

Animal Disease Traceability Public Meetings

Regulatory Working Group Report - Talking Points

May 2010

#	Talking Points
1	Title Page
2	<p>The objective of the working group is to draft the framework of a proposed rule that will:</p> <ul style="list-style-type: none"> • Give States and Tribes the responsibility for their animal disease traceability programs • Direct interstate livestock movement through compliance with performance standards
3	<p>The working group is responsible for providing input on the proposed traceability rule. The group will do this by recommending:</p> <ul style="list-style-type: none"> • Traceability performance standards • Methods of evaluating tracing capability • Consequences for noncompliance • Incentives for compliance
4	<p>Performance standards describe a desired result or outcome, but not the methods for achieving the result or outcome.</p> <p>Performance standards provide a process for having all methods evaluated equally. In concept, it's like evaluating vehicles for miles per gallon (mpg). Regardless of the number of cylinders, fuel, or horsepower, the mpg value uniformly evaluates vehicles to a performance standard.</p> <p>Traceability performance standards provide a uniform method of evaluating tracing capability regardless of the tracing method used — whether States or Tribes use a sophisticated electronic system or a basic paper-based system.</p> <p>The standard should focus on tracing animals and not be disease specific, although the information used in a specific disease situation differs based on the disease itself.</p>
5	<p>A traceability performance standard includes a measureable activity, such as tracing animals to where they were officially identified, plus measurement. An example of a measurement is 95 percent of the time within 7 days.</p>
6	<p>The first principle in establishing any performance standards is determining what is being measured. For animal disease traceability, the working group considered the typical actions taken during a disease traceback event that involve interstate movement.</p> <p>Examples include:</p> <ul style="list-style-type: none"> • Notifying a State or Tribal Nation where a shipment originated • Notifying the State or Tribe where an animal was officially identified
7	<p>The next step is to define a value or timeline for achieving the action, using criteria such as:</p> <ul style="list-style-type: none"> • How long does it take to accomplish? • How many work hours are needed?

8	<p>Another step is determining where we are currently with tracing capability, in other words, establishing a baseline.</p> <p>A good baseline will help establish standard values for each activity that are achievable and meaningful.</p> <p>Together, the actions being measured and the time values establish performance standards.</p>
9	<p>In this performance-based approach, we need to evaluate actual tracing capability and see if it meets the performance standards.</p> <p>This evaluation could involve measuring the tracing performance for actual routine disease investigations and traces of suspect and reactor animals. Test exercises or check tests may be considered using available data randomly selected from test charts, calfhood vaccination records, interstate movement certificates, or other records. Other descriptive requirements may be established, perhaps similar to those used in the current scrapie program.</p> <p>We recognize the evaluation process must be efficiently administered while achieving accurate and reliable results.</p>
10	<p>Many people have asked: What if a State or Tribal Nation does not achieve the performance standards? The compliance parameters must be meaningful, and they will include consequences. They need not be “heavy handed” and may include incentives for compliance. We don’t know yet what those will be, but your input to the traceability working group on this issue is critical as the group develops its recommendations.</p>
11	<p>To date, the traceability working group has had weekly conference calls and one face-to-face meeting. They have discussed the following topics:</p> <ul style="list-style-type: none"> • Key points from the Kansas City Traceability Forum • What do State and Tribal animal health officials need to measure to adequately assess their tracing capability? • What are the current capabilities of States and Tribal Nations? • What performance standards are appropriate?
12	<p>The working group also discussed the following topics:</p> <ul style="list-style-type: none"> • What classes of livestock should be exempt or phased in? • How should States/Tribes be categorized with regard to performance standard compliance? • What should the consequences be for noncompliance? • How should the working group’s progress be communicated to the public?

13	<p>Animal health officials routinely do many things to find an animal affected with a disease that is targeted for surveillance, monitoring, control, or eradication. Tracing activities are not rare events. It is important that we build on what is done successfully today and identify areas that need improvement in the future.</p> <p>The working group has spent much time identifying the activities necessary to support an adequate traceability plan. They are:</p> <ul style="list-style-type: none"> • Tracing an animal to the State or Tribal Nation where it was officially identified • Tracing an animal to the State or Tribal Nation it was shipped from • Tracing an animal to the herd of origin • Finding all herds the animal has been in • Tracing movements into and out of affected herds • Identifying adjacent herds for disease monitoring and surveillance • Notifying the State or Tribal Nation of origin of the animal's movements
14	<p>Some of the activities mentioned are directly aligned with the interstate traceability framework envisioned by Secretary Vilsack:</p> <ul style="list-style-type: none"> • Tracing an animal to the State or Tribal Nation where it was officially identified • Tracing an animal to the State or Tribal Nation it was shipped from • Notifying the State or Tribal Nation of origin <p>These provide an appropriate basis for interstate traceability performance standards.</p>
15	<p>We need to measure existing capabilities for the same or similar performance measures to properly document progress. We have ample real investigations that document that current capabilities are inadequate. We do not have a good baseline, as those individuals currently conducting disease investigations don't typically capture the time required to collect tracing data.</p> <p>APHIS will establish a baseline and evaluate national tracing capability with the help of State and Tribal cooperators. Cooperators will document current tracing capability through their FY 2010 cooperative agreements. In addition, APHIS will evaluate the tracing capability within its disease control programs on a national level.</p> <p>This information will help develop the minimum acceptable criteria.</p>
16	<p>The working group has started to draft some ideas for what should be included in the new section in title 9 of the <i>Code of Federal Regulations</i> (9 CFR). They include the following:</p> <ul style="list-style-type: none"> • Unless specifically exempted by the new CFR section, all livestock moved interstate must be officially identified • All livestock moved interstate must be accompanied by an interstate certificate of veterinary inspection (ICVI) • Livestock not required to be accompanied by an ICVI must be accompanied by a movement permit • Ages and classes of animals to exclude from the regulation will be defined in an "exemption" paragraph <p>All livestock moved interstate must be moved in compliance with all applicable provisions of program disease regulations.</p>

17	<p>The working group recognized that the CFR already contains identification exemptions for certain ages and classes of livestock. They further recognized the importance of differentiating between the need for official identification and the need for recording the identification on an ICVI.</p>
18	<p>Currently, 9 CFR 71.18 exempts cattle of any age being moved interstate during the course of normal ranching operations without change of ownership to another premises owned, leased, or rented by the same individual. These are sometimes referred to “commuter herds.”</p> <p>Swine moving within a recognized production system are exempt from identification requirements as well under 9 CFR 71.19.</p> <p>Some classes of livestock are currently exempt.</p> <p>We need input at this time to address the needs of industry while moving forward with improving interstate traceability.</p>
19	<p>States and Tribal Nations that have implemented traceability plans for any species of livestock that are consistent with standards referenced in the CFR and in APHIS’ Traceability Performance Standards Document will be considered to have status for traceability for that species.</p> <p>The traceability working group currently recommends that all livestock moved interstate will be from a State or Tribal Nation that is consistent for traceability or must meet additional requirements. These additional requirements have not yet been defined. The “name” of the status designation is yet to be determined.</p> <p>There will be a separate status for each species. Listings of States and Tribe status, according to species, will be posted on the Internet.</p>
20	<p>As mentioned earlier in this presentation, interstate traceability performance standards must be directly related to animals that move interstate and not to intrastate tracing.</p> <p>The performance standards recommended by the working group are listed on the next few slides.</p> <p>State and Tribal Nations will need to document a sufficient number of tracing activities to demonstrate that their tracing capability is consistent with the standards. The working group refers to the animals used to document tracing capability as “reference animals.” Their identities can be obtained from a variety of sources, such as ICVIs, movement or entry permits, test charts, or slaughter sample collection forms.</p> <p>The working group uses the term “traceability unit” to refer to the geographical location of consideration a State or Tribe determines is needed to support its traceability plan. Depending on the nature of the disease and the needs of the State, Tribal Nation, or region, the size of the unit may vary. The traceability unit may be a region, a State or Tribal Nation, a county, a livestock operation, or a site within an operation. It is up to the State or Tribe to determine.</p> <p>The first performance standard measures how long it will take the receiving State or Tribe to notify the State or Tribe in which the animals were officially identified, if the animals are required to be officially identified. Since this is already a relatively simple process, the working group recommends that it should be accomplished 95 percent of the time within 1 business day.</p>

21	<p>The second performance standard measures the ability of a State or Tribe in which animals are officially identified to determine the traceability unit in which reference animals were identified.</p> <p>The working group recommends that this process be phased in to provide achievable standards in the short term and higher standards as the long-range goal.</p> <p>Currently, the records of tags applied are on paper-based systems that may take more time to research than electronic databases. The recommendations are that in phase 1, the activity should be able to be accomplished 75 percent of the time within 5 business days.</p> <p>As official identification records become easier to search, the time required to find the origin of an identification device will decrease. In phase 2, the activity should be able to be accomplished 95 percent of the time within 2 business days.</p>
22	<p>The third performance standard measures the States' and Tribal Nations' ability to notify the State or Tribal Nation from which the reference animals were shipped.</p> <p>The working group also recommended that this standard be phased in.</p> <p>In phase 1, the activity should be accomplished 95 percent of the time within 7 business days.</p> <p>In phase 2, the activity should be accomplished 95 percent of the time within 3 business days</p>
23	<p>The fourth performance standard measures the ability of States and Tribal Nations to identify the traceability unit from which the reference animals were shipped</p> <p>The working group also recommended that this standard be phased in just as for performance standard #2.</p> <p>In phase 1, the activity should be accomplished 75 percent of the time within 5 business days.</p> <p>In phase 2, the activity should be accomplished 95 percent of the time within 2 business days.</p>

24	<p>Consider the interstate movement scenario where an animal officially identified in Iowa is shipped to Nebraska, then to Kansas, and subsequently from Kansas to Missouri. At some time, Missouri identifies the animal as a reference animal for performance standards measurement purposes.</p> <p>Even though there are many movements in this scenario, the performance standards activities only apply to the “book-ends”, i.e., where the animal was identified and where it entered interstate movement immediately prior to entry into the State or Tribe.</p> <p>In this case, Missouri would be expected to:</p> <ul style="list-style-type: none"> • Conduct Performance Activity # 1: Notify Iowa, the State in which the animal was officially identified • Conduct Performance Activity # 3: Notify Kansas, the State from which Missouri received the animal <p>Iowa would be expected to:</p> <ul style="list-style-type: none"> • Conduct Performance Activity #2: Identify the traceability unit in which the animal was identified <p>Kansas would be expected to:</p> <ul style="list-style-type: none"> • Conduct Performance Activity #4: Identify the traceability unit from which the animal was shipped when it moved to Missouri. <p>In an actual animal disease event, the epidemiological investigation would trace the animal to and from all States, with the State animal health official conducting the movements within the state. In this case, the movement of the animal to and from Nebraska would be evaluated. As progress is achieved through phases of the traceability framework, additional performance standards such capability will be considered.</p>
25	<p>If we are to have a regulation requiring animal identification for interstate movement, we will need to develop a method of determining compliance.</p> <p>In addition, as previously noted, the traceability regulation will have to include consequences.</p> <p>These issues are still under discussion within the working group, and no recommendations have been proposed.</p> <p>We are looking for input at these public meetings.</p>
26	<p>We look forward to your feedback on our current thinking on the traceability regulations. Thank you.</p>