

Animal and Plant Health Inspection Service (APHIS) Stakeholder Survey Response Summary

Introduction

On February 27, 2012, APHIS' Administrator and Associate Administrator co-hosted a stakeholder meeting to share information about the Agency's budget, business process improvement efforts, and modernization initiatives, and to provide an opportunity for stakeholders to share their thoughts and perspectives on Agency activities. Nearly 60 stakeholders attended in person and an additional 225 participants joined via the live Webcast.

At the same time we announced the public meeting, the Agency launched a survey seeking feedback from stakeholders on the APHIS services they most value, opportunities for increased collaboration and partnership, and suggestions for improving the way we do business. (The full list of survey questions is included at the end of this document.) The survey was open from February 10 through March 23, and more than 220 stakeholders responded via the Federal Register, by email at partnerships@aphis.usda.gov or anonymously through a link on the APHIS Web site.

Those stakeholders who responded had a lot to say; their comments touched on all of APHIS' program areas, with the majority of comments focusing on the Agency's animal health and animal welfare activities. Given the diverse nature of our stakeholders, some of the comments we received were contradictory, but as our analysts read through the responses, several common themes emerged. The following summary highlights recurring themes and provides a sense of the broad range of topics addressed in the feedback; it does not detail every comment. However, to ensure we make the best use of the feedback stakeholders shared with us, the APHIS Management Team received a presentation with a complete breakdown of comments. We also made the full set of comments available to all employees.

APHIS' Organizational Structure

Stakeholders did not, as a rule, make suggestions about how APHIS should structure its field organization. Instead, they emphasized that should APHIS decide to consolidate or restructure, they hope that the availability and quality of services to States will remain and improve. Some stakeholders provided organizational suggestions for APHIS to consider based on other models they have seen work effectively. For example, one commenter suggested APHIS provide part-time staff to work out of satellite offices in State departments of agriculture to maintain field staff to conduct work in States and to promote collaboration and relationships with State Animal Health Officials (SAHO). Another group suggested APHIS consider regional or sub-regional approaches that cross State lines. They cited the Multi-State Partnership for Security in Agriculture and the Southern Agricultural and Animal Disaster Response Alliance (SAADRA) as examples of regional State-level alliances where States have been able to work together and accomplish things that no one State alone could accomplish. Many stakeholders expressed the importance of having a local contact who knows their needs and is empowered to make decisions. Some specific comments included:

- Maintain at least one Veterinary Services (VS) Area Office in each State. Consolidating several States under one "area" is an inconvenience to citizens and the State Veterinarians' offices. Perhaps consolidate U.S. Department of Agriculture (USDA) personnel including APHIS VS, the Farm Service Agency (FSA), and the Natural Resources Conservation Service (NRCS) in one office to save money), but don't eliminate VS entirely from a State.
- Establish regional offices, each with specific areas of expertise such as import/export, species, diseases, etc.
- Maintain APHIS State level offices headed up by State Plant Health Directors; these offices are critical to maintaining, protecting and preserving U.S. agriculture, as they are constructed to serve both as the responding body to non-native or invasive outbreaks and detections and they oversee both Federal and State quarantine matters to provide for uninterrupted trade.
- Maintain the regional offices and the Center for Plant Health Science and Technology (CPHST).

Partnering and Addressing the Challenge of Limited Resources

To augment limited Federal personnel resources, stakeholders repeatedly pointed to several sources of expertise and assistance they believe APHIS is under using; in particular, stakeholders mentioned potential new roles for accredited veterinarians and registered veterinary technicians. They advocated fully implementing the revised National Veterinary Accreditation Program, and (given that national accreditation is making it easier to catalogue and use their expertise) expanding the National Animal Health Emergency Response Corps (NAHERC) to include other assistive efforts by private veterinary practitioners.

Stakeholders mentioned reaching out to academia (especially graduate students with plant and animal science degrees) to engage them in mutually beneficial projects that would provide hands-on learning opportunities and allow APHIS to benefit from data and talent available through academic institutions. Others mentioned the importance of APHIS' partnering with academia to develop science-based approaches to pest management that could eliminate reliance on pesticides. Stakeholder groups offered to help APHIS hire graduate students as temporary employees to work on risk assessments during high workload periods.

Stakeholders called on APHIS to coordinate with other Federal agencies both within USDA and outside the Department. Some specific suggestions included:

- APHIS and the Food Safety and Inspection Service (FSIS) coordinating and collaborating more often as they jointly work with SAHOs and accredited veterinarians on disease detection, surveillance, control, and eradication efforts.
- APHIS partnering with the Agricultural Marketing Service (AMS) to look at the possibility of accessing and augmenting the cadre of qualified and trained USDA auditors who can support efforts such as the National Seed Health System's accreditation efforts.
- APHIS relying more heavily on the Cooperative Extension System to reach underserved populations.
- APHIS sharing inspection resources with the Food and Drug Administration (FDA) to assist in implementing the new Food Safety Modernization Act.

Stakeholders appreciated and recommended continuing APHIS' current efforts with the livestock industry to address continuity of business during a disease outbreak, with a focus on recovery. There were also numerous suggestions advocating that APHIS improve its efficiency by researching and implementing tools and technologies developed and used by private industry.

Animal Care (AC) stakeholders made multiple suggestions that APHIS partner with the American Association of Zoo Veterinarians (AAZV), the International Association for Aquatic Animal Medicine (IAAAM), and the Association of Avian Veterinarians (AAV) on best practices for zoos and aquatic animal welfare. We received repetitive comments indicating that APHIS could make better use of its limited resources by acknowledging that facilities that are accredited or that have a great compliance history may not need to be inspected every year. In particular, respondents asked that the Association for the Assessment and Accreditation of Laboratory Animal Care (AAALAC) or the Association of Zoos and Aquariums (AZA) accreditation be considered as key factors in a facility being considered lower risk in APHIS' risk-based inspection system. Respondents suggested consideration of incentives/rewards for model facilities, such as fewer inspections, negotiated consent orders, or penalty reductions. Another theme was for APHIS to develop partnerships with local and State agencies to enforce laws such as those related to animal cruelty, leaving the Federal program more resources to focus on wild and exotic animals.

Stakeholders offered several ideas for joint education and training initiatives, including a recommendation that APHIS' Veterinary Medical Officers (VMO) partner with Institutional Animal Care and Use Committees (IACUC) and accredited veterinarians to share knowledge and expertise. Another idea was that APHIS should support preceptorships in academia and industry for VMO's. Finally, those providing comments about the horse protection program mentioned several times that partnering with the Humane Society of the United States would reap benefits.

Stakeholders of APHIS' Plant Protection and Quarantine (PPQ) program recommended continued joint outreach with groups like the Nature Conservancy to educate the public about forest pests and the pathways by which they are transported. They advocated for APHIS' support of volunteer "early detection" networks focused on early pest detection in high-risk urban areas and ports, allowing for containment before major ecological/economic damage occurs. Stakeholders acknowledged the importance of increasing the public's awareness about how they can play a role in minimizing damage from plant pests. They recommended expanding successful programs such as the national "Don't Move Firewood" campaign to minimize damage posed by forest pests; and suggested sharing more information with the public about what invasive species cost various sectors of the American society and how APHIS, State partners, and others are coordinating -- and will continue to coordinate -- to address these threats.

Trade and Import/Export Comments

Stakeholders recognize the important role APHIS plays in facilitating safe trade, both imports and exports. They expressed appreciation for APHIS staff members who: conduct risk assessments and train others in risk assessment; negotiate with other countries imposing unfair restrictions; and, offer assistance to stakeholders in export certification requirements. Stakeholders recommended the following for APHIS' consideration:

- Imposing reasonable user fees to help support American exports.
- Increasing the duration of permits for the importation/transportation of untreated, restricted scientific material from one to three years and adjusting the fees so no revenue is lost.
- Providing more timely answers to export-related questions and scheduling timely appointments on return of export-related certificates.
- Continuing to devote adequate resources to prevent the introduction of tuberculosis from Mexico.
- Encouraging an educated approach to import/export that considers the natural balance of the ecosystem and creative measures to control pests and the spread of invasive species, and supporting collaboration with international resources that embrace a similar approach.
- Maintaining APHIS' International Services program (commenters indicated this program is essential to maintain or expand export markets, which contribute significantly to job growth in the United States).
- Continuing to work with the World Organization for Animal Health (OIE) to elevate the United States to a BSE-free status.
- Enhancing the responsiveness and timeliness of the import permit program (for import of diagnostic samples / biological materials) through the National Center for Import and Export.
- Continuing to support Customs and Border Protection (CBP) to ensure adequate agricultural inspectors at inland international ports.
- Funding more in-field import/export trade specialists to facilitate and assist stakeholders with import and export certification, and continuing to support automated systems such as PCIT, PExD, and the National Seed Health System (NSHS).
- Managing certified "clean plant" networks through user fees.

Laboratory/Veterinary Diagnostics and Biologics

Stakeholder comments about APHIS' National Veterinary Services Laboratories and Center for Veterinary Biologics included a request from the farmed cervid industry for vector controls and vaccines for epizootic hemorrhagic disease, and a request that APHIS work with vaccine firms to focus more resources on biometrics to ensure more expeditious approval of vaccines. There were also requests that any new "fee-for-service" policies be vetted with stakeholders before implementation.

Stakeholders also thought that State and private diagnostic labs contain a wealth of information and that APHIS could play a role in helping to ensure that data from these labs is collected, warehoused, and made more openly available to help determine disease trends and patterns of occurrence.

Balanced Approaches; Preservation of Natural Resources

While there were significantly fewer comments about APHIS' Biotechnology Regulatory Services (BRS) program and APHIS' Wildlife Services (WS) program, in both cases stakeholders expressed an appreciation for the agency's knowledge and research into current scientific and technical advances. However, stakeholders also advocated that tools be socially acceptable and that public values should weigh into program delivery decisions.

Those stakeholders who mentioned APHIS' regulation of genetically engineered (GE) crops thought that the services were important to ensure protection of natural resources, and in particular cited appreciation for APHIS' work in:

- Conducting science-based assessments and approving new GE seed products.
- Issuing permits for production of new GE products under controlled conditions.
- Providing international leadership on issues such as adventitious presence and low-level presence, and contributing toward the general acceptance of biotechnology by other countries.
- Conducting training and outreach to other countries to encourage them to establish regulations based on the U.S. model.

Several stakeholders expressed support for WS' National Wildlife Research Center's development of non-lethal methods, and other efforts of the program that work to assure both livestock and wildlife health where there are common or conflicting health/disease issues. However, there were a significant number of stakeholders who signed a petition opposing any further plans WS may have to carry out "unscientific wolf culls." There was appreciation from stakeholders for WS' programs focused on wildlife disease management and surveillance, especially their rabies management program and their bird control efforts, which help protect fisheries, farms, and airports.

Stakeholder Requests for Clarification of Policies and Procedures

Some stakeholders responded to APHIS' request for examples by suggesting specific topics for APHIS to clarify through training, guidance, and other opportunities. They included:

- Clarify what needs to be done for laboratory animal shipments and for sample shipments (especially for glass slides and other samples from FDA-required toxicity studies) that are created in Canada or Europe or even shipped from one State to another.
- Establish the chain of command for a joint Federal/State veterinarian response to a foreign animal disease (FAD) outbreak.
- Provide training for State, Federal, university and private veterinarians in FAD diagnosis and response. This is essential to enable capacity for the investigation of and response to FADs.
- Develop policies to administer indemnity funds that are practical, reasonable, fair, equitable, and "vetted" through the States and stakeholders.
- Provide training to States and USDA inspectors on mutual quarantine regulations. Clarify animal welfare policies; in particular, Category E (one of the four USDA pain/distress categories to which research animals are assigned), which is too broad and not evidence-based; terms in field study regulation are left up to each research institute to interpret (e.g. "invasive" and "harm").
- Shipping policies on the APHIS Web site and in international regulations are unclear as to who signs papers and forms when shipping live and dead animals, tissues, cells, byproducts.

APHIS' Disease Monitoring, Testing, and Surveillance

Stakeholders support APHIS' surveillance and testing activities, and they provided the following recommendations to ensure that surveillance programs are coordinated, target the highest risks, and that testing is adequately funded and supported through current technologies.

- Approve the StatPac and Dual Path Platform as tests for the cervid TB program.

- Continue to implement APHIS' animal disease traceability program as an essential contributor to the ability of the United States to contain, control and recover from an FAD.
- Implement a comprehensive surveillance program that provides data on multiple diseases and links to the animal traceability system, providing assurance to APHIS' trading partners.
- Provide scientifically sound risk assessments to support decisions.
- Conduct adequate BSE testing to ensure the prevention of risks to human health.
- Maintain funding and support for disease testing and treatment programs.
- Support surveillance programs of the National Animal Health Laboratory Network (NAHLN).

Suggestions Pertaining To APHIS' Enforcement of the Animal Welfare Act (AWA)

Stakeholders familiar with APHIS' Animal Care program primarily focused their comments on the program's inspection and enforcement policies. Most were in favor of ensuring strong enforcement by the agency, either through APHIS-led inspections or coordination with other oversight and certification bodies that focus on animal welfare, particularly in laboratories. Several stakeholders expressed disappointment in the "age of enforcement" rhetoric of the last few years, which they believe illustrates a lack of trust on the part of APHIS. Others indicated there is a "lack of consistency" in the way VMO's interpret the AWA and/or enforce the regulations. Specific recommendations for improving the effectiveness of inspections included:

- Making sure inspections are unannounced.
- Continuing to inspect all facilities once a year.
- Inspecting other government agencies that conduct research with animals.
- Providing more feedback on how noncompliant items are corrected.
- Ensuring that inspectors are experts in species-specific habitats/needs; consider having the initial inspection of a facility focus in detail on a particular species and then focus subsequent inspections of the facility on different species; simplify species-specific fees.
- Harmonizing policies among APHIS, the Office of Laboratory Animal Welfare (OLAW) and the National Institutes of Health (NIH).
- Focusing less on registered research institutions, and focusing more on the vendors who supply dogs and cats to research.
- Devoting more attention to zoos, exhibitors, and transportation of animals (an area that one stakeholder claimed was not being dealt with adequately by State and local governments).

Suggestions Pertaining to APHIS' Enforcement of the Horse Protection Act (HPA)

Much like the comments we received related to the AWA, those stakeholders who focused on APHIS' enforcement of the HPA reflected a wide range of viewpoints depending on their primary interests and livelihoods. For instance:

- Members of the walking horse industry indicated that APHIS should promote their industry, not penalize it, because of the thousands of jobs they support, as well as the significant funding they provide to charities.
- Other stakeholders (including some horse owners) want more of an APHIS inspection presence at walking horse shows, because they are extremely concerned by reports that indicate soring (use of illegal substances on horses) is still occurring, and want APHIS to pursue charges and penalties against violators of the HPA.

- Some recommended APHIS expand its reach to look at practices in other shows to stop soring in Racking, Mountain, Peruvian, Paso Fino, Missouri Fox-trotting, and American Saddle bred horses.
- Stakeholders requested that APHIS provide clearer guidelines to the horse industry on expectations and provide avenues where stakeholders can get clarification when there is misunderstanding, misinterpretation, or misuse of the guidelines.
- Several supported the recommendations in the Office of Inspector General's 2010 audit report (33601-2-KC) on APHIS' Administration of the Horse Protection Program and the Slaughter Horse Transport Program.
- Finally, while not specific to the HPA, stakeholders were clearly concerned about who, at any level of government, is addressing the management of wild horses, neglected and starving horses, and horses transported to Mexico for slaughter.

APHIS' Use of Electronic Technology

Stakeholders submitted many recommendations that APHIS facilitate greater ease of use of electronic technology and enhance the Web site. For example:

- Determine what IT systems are working for States now.
- Support the information technology infrastructure of the National Animal Health Laboratory Network (NAHLN). (Currently only one disease entity can be messaged; there needs to be improvement in lab-to-lab communication, creation of a viable data repository and a single reporting system for all reportable diseases).
- Improve reliability of the E-permits system (e.g. stalling issues, online renewal of permits still requiring manual assignments, etc.).
- Recognize private industry information technology solutions for animal health applications for domestic and international animal and other product movements.
- Build and implement greater use of electronic methods for Certificates of Veterinary Inspection (CVIs), capturing animal identification data and electronic reporting forms.
- Test information technology systems thoroughly before launching to States and the public and ensure involvement of local stakeholders in the decision-making process to ease transition to new systems and to foster acceptance and use.
- Make the APHIS Web site more user-friendly, comprehensive, and up-to-date.
- Provide easily accessible plant and animal health regulatory information and devise ways for stakeholders to report issues or get questions answered.
- Make it easier for people with pets and people with livestock questions to find information they need. Provide a Web site that is easily accessible to accredited veterinarians in each State and ensure it has emergency response and disease outbreak information and protocols, links to the APHIS Web site on pertinent topics, and contact information. Make it easier to find forms, contacts, FAQ's, on the Web site.
- Host Webinars.
- Update the AC Web site and make it more user-friendly by posting current information on the status of cases, posting penalty calculation worksheets, potentially developing online reporting systems for facilities, and providing a PDF of the complete AWA regulations, rather than just individual chapters.

Ongoing Stakeholder Communication and Engagement

Stakeholders shared their preferences concerning how they want APHIS to communicate with them. In general, they asked for: transparency; more frequent communications; specific Agency contacts and liaisons knowledgeable about their issues and concerns; listservs to allow them to subscribe to get regular updated information on topics of their choice; regular notifications to regulated entities regarding pertinent changes or updates; Web chats; conference calls; bulletins; and easily retrieved information from Web sites.

Some specific recommendations included:

- Frequent communication regarding concerns of importing countries to allow industry to identify or develop alternative methods or mitigations if necessary.
- Coordinating priorities and messages with producers/their leadership/their organizations.

Respondents also suggested priorities for APHIS' communication to the public, recommending that APHIS continue to educate the public about the highest risk threats, what APHIS is doing to mitigate those threats, and the role stakeholders can play to help achieve the Agency's mission. They appreciated APHIS' embracing new social media tools, but suggested that stakeholders should have continued opportunities to identify their preferred ways to receive information from APHIS, as well as what information they would like to receive.

One organization suggested that APHIS seek to better understand the values of stakeholders. Others asked for all Agency employees who interact with them to epitomize the values of trust and respect, as well as taking every opportunity to facilitate compliance through education, training, and guidance reflecting an awareness of the culture and communities served. Several stakeholders suggested providing more opportunities for increased involvement of minorities in APHIS programs.

The commenters clearly recognized APHIS has a broad and diverse stakeholder base. As one respondent said, "APHIS does not just 'safeguard American agriculture,' it safeguards America's food system, rural communities, environment (both natural and built) and economy. The stakeholder community has broadened from the traditional 'producers and their organizations' to including food and fiber processors, distributors, retailers, including food service, and consumer organizations representing all Americans who eat food and benefit from APHIS' services." Several groups also requested that APHIS provide more support to their growing and economically important industries, including the equine industry, the aquaculture industry, farmed cervid operators, and seed exporters.

In addition to receiving communication from APHIS, stakeholders indicated that they would like to be involved in developing programs and discussing issues earlier in the process. One stated, "Buy-in does not occur when APHIS brings products/ideas to the table where decisions have already been made; buy-in occurs through open and honest dialogue with stakeholders from the beginning about the issues and how best to address them."

Appendix:

APHIS Stakeholder Web Survey Questionnaire:

1. As we take stock of our current programs and services and consider where, if necessary, there should be strategic cuts or across-the-board reductions, we are interested in hearing from stakeholders about those APHIS activities you most value and where and how you think the Agency might make responsible changes.

In your opinion, what are the three to five most essential services APHIS provides and why?

Please share any feedback regarding how you feel we can best structure or provide these services.

When you or your members seek APHIS' assistance, do you primarily rely on our local field offices, State offices, regional offices, research centers and field stations, or headquarters for support? Why?

As we continue to look at ways to improve our processes and enhance customer service, what recommendations do you have for specific efforts we could undertake in 2012?

2. Given limited resources, APHIS is seeking new ways to enhance existing partnerships and build new ones.

How might we strengthen current partnerships or collaborate in new ways to accomplish critical mission activities?

Do you see opportunities for APHIS, State governments, tribes, industry and academia to redefine traditional roles to find efficiencies or improvements in the way we collectively safeguard American agriculture? As best you can, please be specific or provide examples.

3. Please provide any additional comments or feedback you would like to share with APHIS' leadership, especially as it relates to how you like to see APHIS management communicate with you at the local, regional, and national level. Please be specific.