



Idaho State Department of Agriculture
P.O. Box 7249 • Boise, Idaho 83707
P: 208.332.8500 • F: 208.334.2170
www.agri.idaho.gov

BRAD LITTLE, GOVERNOR
CELIA GOULD, DIRECTOR

February 28, 2022

Dr. Stephanie Brault
Ruminant Health Center
Strategy and Policy
USDA APHIS VS
2150 Centre Ave, Building B
Fort Collins, CO 80526

Re: Idaho Brucellosis Program Review

Dear Dr. Brault,

On behalf of the Idaho State Department of Agriculture (ISDA), I would like to thank USDA Veterinary Services, the Ruminant Health Center, as well as the review team for the time and effort that was invested into the review of Idaho's brucellosis program. I would especially like to convey the Department's gratitude for USDA's willingness to conduct the review in-person, which allowed greater interaction with many new ISDA personnel that had not yet experienced this process or had the opportunity to meet our USDA counterparts.

We are appreciative of the positive feedback conveyed in the review team's analysis and will make a concerted effort to implement the recommendations made by the committee. Specifically, Idaho will be requesting regular brand inspection reports from the Idaho Brand Board once their transition to electronic records is complete. This information will assist ISDA in verifying pre-movement testing, as well as serve as a starting point for future outreach and regulatory activities. ISDA will continue to collaborate with Idaho Fish & Game, as we have successfully done for many years, to conduct risk assessments, fund wildlife surveillance activities and implement wildlife and livestock management strategies. ISDA will also provide updated maps and lists of DSA producers, on a biannual basis, to all new and existing livestock markets and slaughter plants known to receive cattle from the DSA. ISDA will also look to check-in with each of them on a regular basis to confirm all test-eligible cattle are being sampled and submitted for testing.

Regarding the discussions mentioned in the review document where changes in raw milk sampling and lab procedures would be implemented, I would respectfully ask for USDA VS to consider the following requests to modify existing protocols and program strategies.

1. The original Idaho Brucellosis Management Plan (IBMP), approved in 2012, required quarterly Brucellosis Ring Test (BRT) sampling on all dairies (grade A, manufacture grade and raw) throughout the entire state. Since 2012, with the assistance of USDA and Idaho Fish & Game, Idaho has diversified and expanded annual brucellosis surveillance to include approximately 20,000 live tests, 400,000 MCI tests, 1,300 wild elk tests, in addition to over 1,000 miscellaneous samples tested on bison, goats and other animals. The expanded surveillance has provided the opportunity to more strategically manage Idaho's domestic cattle herds to mitigate the spread of brucellosis. ISDA believes continuing with the quarterly BRT sampling of all dairies, statewide, is redundant, costly and serves no appreciable value to the ongoing management of the program. ISDA requests that the IBMP be amended to require quarterly BRT sampling from only those dairies located within the borders of the Designated Surveillance Area. Currently, the only dairies that operate within the borders of the DSA are one (1) Grade A dairy and one (1) raw milk dairy.

2. The current lab database used to store animal ID in the form of electronic VS 4-54s (Microsoft Access) was originally set up to receive all forms of identification from cattle MCI test submissions. However, the amount of time currently necessary to enter each ID into the database is labor intensive and conducive to cause repetitive motion injuries during the ID recording and testing process, which is well over two thousand samples per day. To improve the level of efficiency and limit technician fatigue, the Animal Health Lab requests the animal ID recording process be changed for MCI samples to require only electronic IDs (RFIDs) be entered into the MCI lab database. Slaughter facilities are required to submit handwritten VS 4-54 forms or lists of back tag IDs with MCI samples that are submitted along with the samples for testing at the AHL. All submitted paperwork and lab-generated electronic VS 4-54 forms will continue to be filed and stored by the AHL. An exception to this modified protocol would occur if and when a sample returns a non-negative result or when a sample is submitted that has no electronic ID associated with it. When non-negative cases are identified, the nine (9) samples before and the nine (9) samples after the non-negative sample will have all forms of identification recorded. (RFID, NUES, management tag, etc.)

Thank you again for all the time and effort that went into providing Idaho's brucellosis program with this essential review and analysis. As always, Idaho greatly appreciates the collaborative and professional relationship that we have maintained with USDA APHIS VS and we look forward to our continued partnership for years to come.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott R. Leibsle". The signature is fluid and cursive, with a long horizontal stroke at the end.

Scott R. Leibsle DVM, DABVP
State Veterinarian
Administrator – Animal Industries
Idaho State Department of Agriculture