



## NATIONAL ASSEMBLY of STATE ANIMAL HEALTH OFFICIALS

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### Comments on Notice of Request for Approval of an Information Collection; SARS-CoV-2 Testing in Animals Reporting Activities

Docket No. APHIS-2020-0109      Comments due 3/5/2021

*"To better meet its reporting requirements about emerging diseases to the OIE, APHIS is interested in collecting information as to the detection of severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) in animals. To accomplish this, APHIS will distribute a request for information to U.S. laboratories engaged in the testing of animals for SARS-CoV-2, develop a questionnaire in NAHRS, and request that State animal health officials and U.S. laboratories provide SARS-CoV-2 animal testing data on a monthly basis. We are asking the Office of Management and Budget (OMB) to approve our use of these information collection activities, as described, for 3 years."*

The National Assembly of State Animal Health Officials (the Assembly) supports the proposal to collect information about the detection of SARS-CoV-2 in animals once per month, with the following comments:

The Assembly suggests that information should be collected on cases that either a) require consultation for SARS-CoV-2 testing, or b) that are submitted to a laboratory for testing, regardless of lab results. The Assembly suggests that all U.S. laboratories, including commercial (private) laboratories be asked to submit SARS-CoV-2 animal testing data.

The National Animal Health Reporting System (NAHRS) could be utilized for SARS-CoV-2 data collection if a detailed questionnaire is employed. If a binary yes/no option continues to be employed in NAHRS, more discussion is needed surrounding the criteria for reporting a case of SARS-CoV-2 in animals. We are in support of developing a questionnaire in NAHRS for the purpose of gathering information that is needed to report test-positive animals to the OIE.

The use of NAHRS to report information on animals that are tested for SARS-CoV-2 will likely be more efficient and user-friendly than the current Excel spreadsheet system; however, it is important to note that State Public Health Veterinarians and other individuals who are responsible for reporting at the State level may **not** have access to NAHRS.



The Assembly strongly encourages USDA and CDC to cooperate on information gathering so that multiple or duplicative entries of data by State officials are avoided. We would like to urge USDA to consider whether the use of existing systems such as CDC's *HHSProtect* database, could fulfill OIE reporting requirements.

Finally, we suggest that SARS-CoV-2 be added to the current list of USDA/APHIS nationally reportable animal diseases.

Thank you for your consideration.

Dr Annette Jones  
President

*The National Assembly of State Animal Health Officials (NASAHO, or the National Assembly) is an organization comprised of the state and territorial animal health officials of the United States. Our mission is to work collectively to safeguard animal and public health as well as the food supply. We accomplish this by working with federal, state, and industry partners to develop science-based policies to address issues that affect public and animal health, public safety, and commerce. We strive to use the best available science to formulate our positions and to reach consensus among all members whenever possible.*