



Centers for Disease Control
and Prevention (CDC)
Atlanta GA 30329-4027

February 2, 2023

The Honorable Dean Phillips
U.S. House of Representatives
Washington, DC 20515

Dear Representative Phillips:

Thank you for your letter regarding the temporary suspension of dogs entering the United States from countries at high risk for dog rabies. The Department of Health and Human Services (HHS) and the Centers for Disease Control and Prevention (CDC) announced through the Unified Agenda¹ that we are developing a proposal to amend CDC's regulation for the importation of dogs and cats. Our intent is that this will be published as a Notice of Proposed Rulemaking (NPRM) in the *Federal Register*. The purpose of an NPRM is to obtain and consider public comment on proposed changes before such regulation(s) become final. CDC is currently developing the NPRM and cannot publicly disclose the agency's deliberations before the NPRM is finalized and published in the *Federal Register*. I have provided additional information in response to your questions in an enclosure.

I appreciate your letter and support, and that of Congress overall. If you have further questions, please have your staff contact Jeff Reczek in our CDC Washington Office at (202) 245-0600 or JReczek@cdc.gov.

Sincerely,

Rochelle P. Walensky, MD, MPH
Director, CDC

Cc:

Hon. Cynthia Axne
Hon. André Carson
Hon. Earl L. "Buddy" Carter
Hon. Joaquin Castro
Hon. Steve Cohen
Hon. Madeleine Dean
Hon. Mike Doyle
Hon. Brian K. Fitzpatrick
Hon. Lance Gooden
Hon. Al Lawson
Hon. Nancy Mace

Hon. Nicole Malliotakis
Hon. Joe Neguse
Hon. Tom O'Halleran
Hon. Scott H. Peters
Hon. Guy Reschenthaler
Hon. Maria Elvira Salazar
Hon. Elissa Slotkin
Hon. Darren Soto
Hon. Claudia Tenney
Hon. Dina Titus
Hon. Bonnie Watson Coleman

¹ <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202210&RIN=0920-AA82>

Enclosure

Information from the Centers for Disease Control and Prevention (CDC) Regarding Dog Importation from Countries with a High Risk of Rabies

Historical Background

Implementation of Temporary Suspension

Rabies, one of the deadliest zoonotic diseases, accounts for an estimated 59,000 human deaths globally each year.² Over 98% of those deaths are due to dog-maintained rabies virus variant (DMRVV).³ The last U.S.-acquired human rabies death due to DMRVV was in 1994, after a 14-year-old boy in Texas was scratched by a puppy that had recently been adopted. The United States has been free of DMRVV since 2007 and focuses its regulatory efforts on preventing the reintroduction of this rabies virus variant.

DMRVV is still a serious public health threat in more than 100 countries where it remains enzootic.³ The rabies virus can infect any mammal, and once clinical signs appear, the disease is almost always fatal.⁴ DMRVV also has been highly successful at adapting to new host species, particularly wildlife, that can further transmit the virus; of the seven wildlife variants present in U.S. terrestrial wildlife, four were the result of the DMRVV virus being introduced into native wildlife.⁵ The importation of just one dog infected with DMRVV risks re-introduction of the virus into the United States, which can lead to the loss of human and animal life and substantial costs stemming from public health responses.^{6,7,8} Additionally, the re-establishment of DMRVV in the United States would result in costly efforts over many years to eliminate the virus again. National and state campaigns to eliminate domestic dog-coyote rabies virus variant jointly with gray fox (Texas fox) rabies virus variant in Texas from 1995 through 2003 cost the U.S. Government \$34 million,^{9,10} or \$60 million in 2022 U.S. dollars (USD).

In 2019, the importation of one rabid DMRVV-infected dog cost the federal and affected state governments more than \$400,000 USD for the ensuing public health investigations and rabies post-

² WHO Technical Report Series 1012, 2018; Page 6.

³ Hampson K, Coudeville L, Lembo T, et al.; Global Alliance for Rabies Control Partners for Rabies Prevention. Estimating the global burden of endemic canine rabies. *PLoS Negl Trop Dis* 2015;9:e0003709. <https://doi.org/10.1371/journal.pntd.0003709>.

⁴ Fooks AR, Banyard AC, Horton DL, Johnson N, McElhinney LM, Jackson AC. Current status of rabies and prospects for elimination. *Lancet* 2014;384:1389–99.

⁵ Velasco-Villa A, Mauldin MR, Shi M, et al. The history of rabies in the Western Hemisphere. *Antiviral Res.* 2017;146:221-232. doi:10.1016/j.antiviral.2017.03.013.

⁶ Smith J, le Gall F, Stephenson S, et al. People, pathogens and our planet. *The Economics of One Health* 2012;2.

⁷ Raybern, C et al. Rabies in a dog imported from Egypt-Kansas, 2019. *MMWR Morb Mort Wkly Rep* 2020; 69 (38): 1374-1377.

⁸ Jeon S, Cleaton J, Meltzer M, et al. Determining the post-elimination level of vaccination needed to prevent re-establishment of dog rabies. *PLoS Neg Trop Dis* 2019; 13 (12): e0007869.

⁹ TJ Sidwa et al. (2005) Evaluation of oral rabies vaccination programs for control of rabies epizootics in coyotes and gray foxes: 1995-2003. *Journal of the American Veterinary Medicine Association*; 227(5):785-92.

¹⁰ R.T. Sterner et al. (2009) Tactics and Economics of Wildlife Oral Rabies Vaccination, Canada and the United States. *Emerging Infectious Diseases*; 15(8), 1176-1184.

exposure prophylaxis (PEP) treatments administered to exposed persons.^{11,12} Additionally, a single rabid dog imported in 2021 led to a 10-state investigation in which 18 people received PEP, and 32 dogs and one cat had to undergo vaccination and quarantines of 45 days to six months.

On June 16, 2021, CDC announced a temporary suspension¹³ of the importation of dogs from high-risk countries¹⁴ to protect the public's health. Due to the unprecedented global response to the coronavirus disease 2019 (COVID-19) pandemic and limited availability of public health resources at the federal, state, and local levels, this action was necessary to protect the public health against the reintroduction of DMRVV into the United States and to ensure the welfare of dogs being imported into the country.

CDC recently extended the temporary suspension through July 31, 2023,¹⁵ due to the continued risk of the reintroduction of DMRVV into the United States. The COVID-19 pandemic has disrupted rabies vaccination campaigns in high-risk countries.^{16,17,18} Constraints on the global veterinary workforce capacity and veterinary supply chain shortages that were exacerbated by the global COVID-19 pandemic have led to delayed or disrupted care and government-sponsored vaccination campaigns for dogs, which increases the likelihood that dogs imported into the United States may pose a public health threat.^{19,20,21,22}

Dogs that do not meet CDC entry requirements are denied entry into the United States. Prior to issuing the temporary suspension, CDC required importers of dogs from high-risk countries to present a valid rabies vaccination certificate (RVC) upon arrival. Historically, approximately 60 to 70% of CDC's dog entry denials (or about 200 cases annually) were based on fraudulent, incomplete, or inaccurate paperwork. However, between January and December 2020 (i.e., during the ongoing COVID-19 pandemic), CDC documented more than 450 instances of incomplete, inadequate, or fraudulent RVCs for dogs arriving from high-risk countries. This number increased during the first six months of 2021, when CDC documented more than 550 instances of incomplete,

¹¹ Raybern C, Zaldivar A, Tubach S, et al. Rabies in a Dog Imported from Egypt — Kansas, 2019. *MMWR Morb Mortal Wkly Rep* 2020;69:1374–1377. DOI: <http://dx.doi.org/10.15585/mmwr.mm6938a5>.

¹² https://www.cdc.gov/rabies/medical_care/index.html

¹³ <https://www.federalregister.gov/documents/2021/06/16/2021-12418/temporary-suspension-of-dogs-entering-the-united-states-from-high-risk-rabies-countries>

¹⁴ A complete list of countries with high risk of DMRVV can be found at: <https://www.cdc.gov/importation/bringing-an-animal-into-the-united-states/high-risk.html>.

¹⁵ <https://www.federalregister.gov/public-inspection/2023-01688/temporary-suspension-of-dogs-entering-the-united-states-from-countries-with-a-high-risk-of-rabies>

¹⁶ Nadal D, Abela-Ridder B, Beeching S, Cleaveland S, Cronin K, Steenson R and Hampson K (2022). The Impact of the First Year of the COVID-19 Pandemic on Canine Rabies Control Efforts: A Mixed-Methods Study of Observations About the Present and Lessons for the Future. *Front Trop Dis* 3:866811. doi: 10.3389/ftd.2022.866811

¹⁷ Kunkel, A., Jeon, S., Joseph, H., Dilius, P., Crowdis, K., Meltzer, M., Wallace, R. (2021). The urgency of resuming disrupted dog rabies vaccination campaigns: a modeling and cost-effectiveness analysis. *Scientific Reports*, 11, 12476. doi:10.1038/s41598-021-92067-5.

¹⁸ Raynor, B., Díaz, E., Shinnick, J., Zegarar, E., Monroy, Y., Mena, C., Castillo-Neyra, R., De la Puente-León, M., Levy, M. (2021). The impact of the COVID-19 pandemic on rabies reemergence in Latin America: The case of Arequipa, Peru. *PLoS Neglected Tropical Diseases*, 15(5), e0009414. doi:10.1371/journal.pntd.0009414.

¹⁹ <https://www.theatlantic.com/health/archive/2022/07/not-enough-veterinarians-animals/661497/>

²⁰ <https://www.agcanada.com/2021/07/is-the-veterinarian-shortage-real-or-regional#:~:text=A%20perceived%20global%20shortage%20of%20veterinarians%20is%20creating,for%20the%20quality%20of%20care%20they%20can%20offer>

²¹ <https://www.thebusinessresearchcompany.com/report/companion-animal-veterinary-vaccines-global-market-report>

²² <https://7news.com.au/lifestyle/pets/aussie-dog-owners-warned-of-national-vaccine-shortage-as-deadly-bacterial-disease-spreads-c-8568550>

inadequate, or fraudulent RVCs for dogs arriving from high-risk countries. The rise in incomplete, inadequate, or fraudulent RVCs represented an increase in the risk of a rabid dog importation while public health resources were needed to fight the COVID-19 pandemic. It also resulted in more dogs being denied entry into the United States and ultimately returned to their country of origin. Because of fewer international flights worldwide, several dogs were denied entry and placed in conditions later found to be unsafe.

Since the temporary suspension went into effect, the number of dogs denied entry and the number of sick and dead dogs arriving in the United States has substantially decreased, despite the increased communicable disease risk due to disruptions to vaccination programs in high-risk countries and veterinary supply chain and staffing shortages worldwide. This constitutes strong evidence that the temporary suspension has been effective at preventing the importation of dogs that present a communicable disease risk that would otherwise require significant U.S. resources to address.

Government Employee Importation

CDC does not have a record of a U.S. government employee on official orders importing a rabid dog into the United States. However, since the temporary suspension went into effect in July 2021, CDC has documented multiple instances of U.S. government employees, including Foreign Service Officers and military service members, attempting to use fraudulent RVCs or fraudulent *CDC Dog Import Permits* to circumvent entry requirements. CDC communicated these concerns to the Department of Defense (DOD), the Department of State (DOS), and the Department of Agriculture (USDA) for investigation and follow-up. USDA investigated the actions of an employee who falsified rabies vaccination records for U.S. government employees. CDC also notifies the DOS Office of Inspector General and the DOD of instances of suspected fraud committed by Foreign Service Officers or military service members.

Additionally, CDC has documented instances of DOS employees submitting serologic titer results that showed their dogs were not adequately vaccinated and protected from rabies. Although not involving fraud, the serologic titer results demonstrated that these dogs were a health risk to their owners and anyone who interacted with them. Given that the vaccine supply in rabies endemic countries can be unreliable or the vaccine can be improperly administered, serologic titer results are an important part of ensuring adequate rabies vaccination.

Policy Background

When developing the temporary suspension published in July 2021, CDC conducted an analysis of the economic impact. One important challenge to conducting a thorough analysis by country or type of importer is that no federal agency collects comprehensive dog import data. Because of this lack of data, it is challenging to estimate both the number of dogs imported from each country on a year-to-year basis and the distribution of dogs imported by different categories of importers. Thus, it is not possible to subdivide risk by category of importer (e.g., the relative risk among dogs imported by U.S. government employees compared to other types of importers).

The international public health community has recognized that RVCs alone are not sufficient to ensure adequate protection against rabies since the vaccine supply can be unreliable in rabies

endemic countries.^{23,24} CDC evaluated other DMRVV-free countries' policies to inform dog importation requirements. Many DMRVV-free countries, including Australia, New Zealand, Canada, the United Kingdom, and European Union (EU) member states, require multi-step verification of rabies vaccination status for dogs imported from high-risk countries (when direct importation is allowed), including proof of adequate titers via a rabies serologic test. Rabies serologic titers are also mandatory for *transiting* dogs and cats through the EU. Australia and New Zealand do not allow dogs to be imported directly from high-risk countries without spending six months in a rabies-free country prior to importation, and Canada does not allow commercial dog importation from high-risk countries.²⁵ CDC considered these policies when developing the temporary suspension and incorporated recommendations from global health and animal health experts, such as the World Health Organization and the World Organisation for Animal Health.

When conducting the economic impact analysis, CDC estimated the costs, on average, for a veterinarian to draw blood samples for the titer test and for laboratories to test those samples. CDC further estimated the cost to ship blood samples to laboratories, which will vary considerably across countries since some individuals can access laboratories within their countries and some need to ship samples internationally. CDC did not attempt to estimate costs across all countries and tried only to use available data to determine an average cost for all foreign-vaccinated dogs imported from high-risk countries.

Because any importer can claim a dog is their personal pet, and CDC has no way of verifying whether an importation is for personal or commercial purposes, CDC does not make risk decisions based on the status of the person importing the dog. Instead, CDC determines risk based on the country of origin, vaccination status of the animal, quality of rabies vaccine administered (U.S.-licensed vs non-U.S.), serologic titer results, and the number of dogs the importer is seeking to import. An individual's employment status does not factor into the risk assessment for the dog. CDC, U.S. Customs and Border Protection, and USDA have documented numerous instances of organizations posing as individual pet owners through the use of "flight parents" (persons recruited and typically compensated to accompany a dog during transport), including DOS and DOD staff, to import dogs for resale or rescue.

When CDC modified and extended the temporary suspension on June 10, 2022,²⁶ we expanded dog importation eligibility to all importers, with multiple pathways for those with two or fewer pet dogs and those with more than two dogs. CDC evaluated data during the temporary suspension between July 14, 2021, and December 31, 2021, and found that 97% of personal pet importers had two or fewer dogs. Since commercial importations are higher risk than personal pet dog importations, and because CDC has no way of verifying the status of a person importing the dog or the purpose of an importation, CDC used the number of dogs to differentiate risk between categories of importers. Therefore, importers of three or more dogs must make reservations with a CDC-approved animal care facility where their dogs will be examined and revaccinated by a U.S. veterinarian, and quarantined, if necessary, upon arrival. Requiring these dogs to be revaccinated upon arrival ensures

²³ World Organisation for Animal Health. Terrestrial Code Online Access - WOAHA - World Organisation for Animal Health, Chapter 2.1.17 and 8.14. <https://www.woah.org/en/what-we-do/standards/codes-and-manuals/terrestrial-code-online-access>.

²⁴ World Health Organization. Expert Consultation on Rabies, Third Report. Geneva, Switzerland. 2018.

²⁵ <https://inspection.canada.ca/animal-health/terrestrial-animals/diseases/reportable/rabies/countries-at-high-risk-for-dog-rabies/eng/1656375417730/1656375418777>

²⁶ <https://www.federalregister.gov/documents/2022/06/01/2022-11752/notice-of-extension-and-modification-of-temporary-suspension-of-dogs-entering-the-united-states-from>

that they receive a high-quality, effective USDA-licensed rabies vaccine. It also allows for higher-risk dogs to be examined by a veterinarian, not only for signs of DMRVV, but for other zoonotic diseases as well.

CDC did evaluate the cost of examination, revaccination, and quarantine at a CDC-approved animal care facility. Each facility sets its own prices. CDC will continue to work to increase the number of CDC-approved animal care facilities during the temporary suspension, some of which may have lower prices than currently approved facilities. We also expect that as we approve more facilities, costs may come down based on increased competition.

The U.S. market for dogs has been increasing, leading to an increase in supply from the global market. As the global market for dogs expands, the risk of dogs importing zoonotic diseases grows. Addressing zoonotic disease risk prior to arrival is challenging; however, ensuring the existence of safe quarantine facilities with onsite veterinary staff who can provide care to imported dogs helps to safeguard not only human health, but the health of other pets, livestock, and wildlife in the United States.

Alternate Programs for U.S. Military Service Members and Civil Servants on Official Travel

CDC has worked closely with other federal agencies to develop streamlined procedures for U.S. government employees, service members, and family members to import personal pets or military working dogs, particularly in circumstances when there is an authorized or ordered departure. CDC identified liaisons within CDC and DOS to triage urgent requests for DOS employees, expedite permits, share communications on dog importation, and address any issues that DOS employees experience. Establishing this connection has allowed CDC to expedite more than 1,000 *CDC Dog Import Permits* for DOS employees requesting authorized or ordered departure in more than seven countries since the temporary suspension was enacted on July 14, 2021. CDC has issued *CDC Dog Import Permits* in less than 36 hours for more than 99% of emergency DOS or DOD requests received. CDC is not aware of any civil servant or service member who was unable to evacuate their pet dog during an authorized or ordered departure. U.S. government veterinarians on official orders also vaccinate government-owned dogs with a USDA-licensed vaccine; therefore, government owned dogs are considered U.S.-vaccinated for purposes of entry into the United States. CDC will continue to work closely with, and consider feedback from, our federal agency partners as we work to amend the dog and cat regulation.

CDC estimates that around 4% of all dog importations are impacted by the requirements of CDC's temporary suspension. Importations from rabies-free or low-risk rabies countries, as well as dogs from high-risk countries with U.S.-issued RVCs, do not require a *CDC Dog Import Permit* or post-arrival examination, revaccination, or quarantine at a CDC-approved animal care facility. CDC recognizes that pets play an important role in people's lives, which is why CDC evaluated the latest scientific data to modify its requirements for dog importation since the temporary suspension initially went into effect in July 2021.

Within the first five months of issuing the temporary suspension, CDC began using enforcement discretion to ease the burden on importers and expand eligibility and options for dog importation. CDC began allowing dogs six months of age or older that were microchipped and accompanied by a valid, U.S.-issued RVC to re-enter the United States without a *CDC Dog Import Permit*. CDC also

expanded the number of approved rabies serologic test laboratories²⁷ from five to 60 and reduced the timeframe between when a sample is collected and when a dog is eligible to enter the United States from 90 days to 45 days.

Additionally, CDC allowed imported dogs to enter through any of the 18 CDC-staffed U.S. ports of entry (POE)²⁸ during the remainder of the temporary suspension period, as opposed to only one POE with an animal care facility at the time the July 2021 *Federal Register* notice²⁹ announcing the temporary suspension was published.

From July 14, 2021, to June 9, 2022, CDC issued *CDC Dog Import Permits* for people permanently relocating to the United States; importers of government-owned working dogs; owners of service animals; and importers of dogs for research, science, exhibition, or bona fide law enforcement purposes.

On June 10, 2022, CDC expanded dog importation eligibility to all importers and offered an additional pathway for importers of foreign-vaccinated dogs to bring their dogs into the United States. This pathway also provides an option for importers who do not have serologic titer results for their dogs.

²⁷ List of CDC-approved labs can be found at www.cdc.gov/importation/bringing-an-animal-into-the-United-States/approved-labs.html.

²⁸ Ports of entry available at: www.cdc.gov/quarantine/quarantinestationcontactlistfull.html.

²⁹ <https://www.federalregister.gov/documents/2021/06/16/2021-12418/temporary-suspension-of-dogs-entering-the-united-states-from-high-risk-rabies-countries>