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United States
Department of
Agriculture

Animal and Plant
Health Inspection
Service

Cooperative State
Research, Education,
and Extension
Service

Washington, DC
20250

Dr. Sharon Hietala
Secretary-Treasurer
American Association of Veterinary Laboratory Diagnosticians, Inc.
PO Box 1770
Davis, CA 95617-1770

Dear Dr. Hietala,

In reference to your May 11, 2009 letter, APHIS supports the United States Animal Health Association/American Association of Veterinary Laboratory Diagnosticians (USAHA/AAVLD) National Animal Health Laboratory Network (NAHLN) Committee position that "there is a vital need for well-equipped, staffed and experienced AAVLD-accredited veterinary analytical toxicology laboratories coordinated within an organized chain of responsibility for surveillance and national response to a toxicology and/or food contamination issue." Our review of the AAVLD Toxicology Working Group's White Paper indicates the need for an ongoing relationship with multiple NAHLN laboratories with financial support of potentially millions of dollars per year.

Unfortunately, APHIS lacks the funding to support these efforts. Also, it is difficult to determine whether budget priorities would allow the expenditure of funds projected in the White Paper during the next few budget cycles. It may be of benefit to partner with existing laboratory networks with toxicology capabilities and assess critical gaps so that needs could be prioritized. One potential goal of funding could be the development and maintenance of a database that would provide critical information during a response to a toxicology and or food contamination issue. Such a database could include equipment, methods, subject matter experts, and testing capabilities and capacities.

The May 11, 2009, letter also contained a recommendation that USDA and the NAHLN authorize toxicological analysis in authorized NAHLN laboratories of samples collected in Federal disease investigations. The letter recommended that the cost of analysis be reimbursed to the NAHLN laboratories using Cooperative State Research, Education, and Extension Service cooperative agreements or APHIS blanket purchase agreements. Historically, few foreign animal disease (FAD) investigations have involved diagnostic rule-outs of a toxicological nature, and it is not clear what level of costs might be incurred in toxicological analysis. There are also considerations of which agencies (Food and Drug Administration, Food Safety and Inspection Service, Environmental Protection Agency, etc.) might be responsible for individual incidents potentially involving toxicological analysis.

While USDA is tentatively able to support the concept of authorization of payment for toxicological analysis through cooperative agreements or blanket purchase agreements, the issue of numbers of samples, costs of analysis, and agency responsibility would need to be considered before financial resources could be allocated. Should need be determined and resources be available, a possible model for communication and decision



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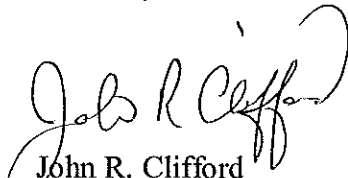
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making would be the one recently developed for submission to NAHLN laboratories of duplicate samples for disease detection from FAD investigations.

Sincerely,


John R. Clifford
Deputy Administrator
Veterinary Services


Meryl Broussard
Deputy Administrator
Plant and Animal Systems

cc:
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