

**Request for Nonmaterial/Non-substantive change  
Foreign Quarantine Regulations (42 CFR 71)  
(OMB Control No. 0920-0134)  
Expires 03/31/2022**

**Program Contact**

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## **Circumstances of Change Request for OMB 0920-0134**

The Centers for Disease Control and Prevention (CDC), Division of Global Migration and Quarantine (DGMQ) requests a nonmaterial/non-substantive change to the currently approved Information Collection Request: Foreign Quarantine Regulations (42 CFR 71), OMB Control No. 0920-0134, expiration date: 03/31/2022.

Rabies, one of the deadliest zoonotic diseases, accounts for an estimated 59,000 human deaths globally each year<sup>1</sup> -which equates to one human death every 9 minutes. Canine rabies virus variant (CRVV) is responsible for 98% of these deaths.<sup>2</sup> The rabies virus can infect any mammal, and once clinical signs appear, the disease is almost always fatal.<sup>2</sup> In September 2007, at the Inaugural World Rabies Day Symposium, HHS/CDC declared the United States to be free of CRVV. However, this rabies virus variant is still a serious public health threat in the more than 120 countries where CRVV remains enzootic. Preventing the entry of animals infected with CRVV into the United States is a public health priority.

Per CDC's current practice, dogs arriving from high-risk countries<sup>3</sup> without appropriate rabies vaccination certificates are denied entry and returned to the country of origin on the next available flight. CDC however may issue unimmunized dog permits for dogs, for example for dogs that are imported for documented research purposes or veterinary treatment not available in the country of origin. This permit, *Application for a Permit to Import A Dog Inadequately Immunized Against Rabies*, is currently approved under OMB Control number 0920-0134.

During 2020, CDC observed a 52% increase in dogs that were ineligible for entry compared to 2018 and 2019.<sup>4</sup> The increasing demand to vaccinate and quarantine dogs that have been denied entry presents an increased burden to federal, state and local public health agencies already responding to the COVID pandemic. The increased inspections, medical care, and appropriate quarantine of dogs inadequately vaccinated against rabies has financially burdened federal and state public health agencies.

Between May through December 2020, CDC spent more than 3,000 personnel-hours at an estimated cost of \$270,000 to respond to the attempted importation of unvaccinated or inadequately vaccinated dogs from high-risk rabies countries during these eight months. The time spent represented a substantial increase from previous years because of 1) the 52% increase in dogs with inadequate documentation; and 2) the additional time spent identifying interim accommodations for the dogs because of the reduced outbound international flight schedules due to the pandemic. These are resources and personnel-hours diverted from CDC's current paramount objective in mitigating the COVID-19 pandemic and do not include time from other Federal, state, and local public health partners.

To reduce the burden for federal and state health departments during the COVID-19 pandemic but still protect the public health against the reintroduction of canine rabies virus variant (CRVV), the CDC

<sup>1</sup> WHO Technical Report Series 1012, 2018; Page 6.

<sup>2</sup> 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.

<sup>3</sup> CDC's website [Rabies Vaccine Certificate Required When Coming From These High-Risk Countries](#)

<sup>4</sup> Centers for Disease Control and Prevention. Quarantine Activity Reporting System (version 4.9.8.8.2.2A). Dog Importation data, 2018-2020. Accessed: 15 February 2021.

plans to temporary suspend the importation into the United States of dogs from high-risk rabies-zoonotic countries.<sup>5</sup>

This notice creates a narrow set of exceptions for certain categories of dogs imported into the United States from high risk rabies countries with advance written approval from CDC using the *Application for Permission to Import A Dog Inadequately Immunized Against Rabies* form. The requirement for advanced written approval will help ensure that the limited number of dogs imported into the United State from high-risk countries have valid documentation of rabies vaccination upon entry. It will also mitigate the costs placed upon the U.S. government, airlines, and importers associated with reexporting dogs that do not meet CDC entry requirements.

**Request: Update *Application for Permission to Import A Dog Inadequately Immunized Against Rabies form***

To streamline the form and align with the expected temporary suspension, CDC is requesting approval for the following changes after the temporary suspension is effective.

Description of the changes

- Change #1: Change name of form from *Application for Permission to Import a Dog Inadequately Immunized Against Rabies* to *Application for Special Exemption for a Permitted Dog Import*  
Justification: To clarify that the form can be used for permits for dogs both inadequately immunized, as well as properly immunized dogs suspended under the temporary suspension, or any other future needs for permits for dogs.
- Change #2: Remove Directions for Fax and Mail  
Justification: CDC’s dog importation permit application process is now 100% electronic.
- Change #3: Remove “Driver’s License” and add “Passport Country” in in Box 10 and 21  
Justification: CDC requires a passport, and no longer needs driver’s licenses since they are no longer sufficient for international travel.
- Change #4: Remove “Passport Country” and “U.S. Driver’s License # Issued By:” and “State” from Box 11 and 22  
Justification: Moved “Passport Country” to Box 10, CDC no longer needs state where driver’s license was issued since driver’s licenses are no longer sufficient for international travel.
- Change #5: Add “USCIS” in Box 11 and 22  
Justification: U.S. legal permanent residents do not have US passports. A USCIS # indicates the person is a permanent resident of the United States.
- Change #6: Add “Visa #” in Box 11 and 22  
Justification: CDC will work with CBP to confirm visa numbers for immigrant and non-immigrant visa holders to help confirm purpose and length of stay in the United States

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<sup>5</sup> A complete list of high-risk rabies countries can be found at: <https://www.cdc.gov/importation/bringing-an-animal-into-the-united-states/rabies-vaccine.html>.

- Change #7: Remove “attach photo” and “email a color photograph of the dog...and contact information” in Box 28  
 Justification: Photo no longer required. Teeth photo that is mentioned later on form will suffice.
- Change #8: Remove “If applicable” in Box 29 and “Tattoo # (if applicable)” in Box 30  
 Justification: Microchips are now the main form of dog ID
- Change #9: Add “Date of Serology (attach copy)” in Box 31  
 Justification: Dogs who do not have US Rabies Vaccinations are required to show rabies immunity through a serological (blood) test known as a titer.
- Change #10: Remove “Intended Final Destination” boxes 34-38 in Section D  
 Justification: Section 1 address is now address where dog will be located
- Change #11: Remove “Resale”, “Rescue/Adoption” and “Veterinary Care” from Section F, Box 42  
 Justification: These purposes will not be applicable during the temporary suspension of dogs from high risk countries
- Change #12: Remove “Dog too young to be vaccinated (i.e. younger than 12 week old)” in Box 43  
 “Less than 28 days after initial rabies vaccination”  
 “Current rabies vaccine certificate expired”  
 Justification: CDC no longer approves dogs to come in under these circumstances
- Change #13: Remove “restriction” and “approval” in Box 43  
 Justification: To simplify option
- Change #14: Add Section New Section G to include
  - Proof of Relocation or Service Dog (e.g. Permit Change of Station orders, employment verification letter, university acceptance letter, etc.)
  - Rabies Vaccination Certificate
  - Official Serology Results
  - Photos of dog’s teeth
 Justification: Reminder to attach supporting documents

### Burden

CDC estimates approximately 60,696 dogs are imported from high-risk countries on average each year. CDC assumes that the temporary suspension may reduce the number of dogs attempting importation from high-risk countries, but is using the upper bound estimate for the number of respondents.

CDC did a weighted average of 1 hour time burden per respondent to respond to this information collection. This weighted average estimates include time to gather necessary documents and fill out the form, but also time it takes for some dog owners/importers to get a titer or get their dog microchipped.

This results in an annual burden estimate of 60,696 hours each year.

Respondent	Form	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Dog Owner/Importer	42 CFR 71.51(c)(2), (d) Application For a Permit To Import A Dog Unimmunized Against Rabies (Attachment G)	60,696	1	1	60,696
<b>Total</b>					<b>60,696</b>

Costs

The time costs for owner/importer time were estimated at \$47.10 per hour based on the average U.S. wage rate and a Department of Transportation estimate specific to international travelers. This results in a total of approximately \$2,858,782 to owner/importers to fill out this form.

Additionally, CDC’s estimated cost to the federal government to adjudicate (CDC), review and take training for review (U.S. Customs and Border Protection) is approximately \$1,040,640.

Privacy

The applicable System of Records Notice (SORN) is 09-20-0171, Quarantine- and Traveler-Related Activities, Including Records for Contact Tracing Investigation and Notification under 42 CFR Parts 70 and 71. CDC uses this notice for both people subject to the terms of the quarantine regulations, and includes importers complying with quarantine regulations in this population. The current verbiage does not explicitly include importers; however, CDC treats the PII of importers with the same security and privacy protection as if it did. CDC is currently awaiting clearance of an update to this SORN that explicitly includes importers as a category of individuals. No other system of records is being created as part of this request. A Privacy Impact Assessment of this system is attached (Attachment B).

Personal identifiers (name, address, telephone number, cell number, Passport or USCIS number, etc.) will be collected and maintained under the Privacy Act system of records listed above from importers who are attempting to import certain animals and cargo into the United States and for individuals for whom an illness report is required according to 42 CFR 71.

Attachments

Attachment A: *Current-Application for a Permit to Import A Dog Inadequately Immunized Against Rabies* — Changes Highlighted

*Attachment B: Updated Form- Application for Permission to Import a Dog Inadequately Immunized Against Rabies*