



United States Department of Agriculture

United States  
Department of  
Agriculture

Marketing and  
Regulatory  
Programs

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20250

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*Kevin Shea 10/7/2022*

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**ALECIA NAUGLE**

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**SUBJECT:** Request for Emergency Approval of a New Information Collection for Conducting a Case-Control Study on Highly Pathogenic Avian Influenza on Turkey Farms 2022

The Animal and Plant Health Inspection Service (APHIS) is submitting to the Office of Management and Budget (OMB) an information collection request for an emergency 6-month approval for a case control survey of highly pathogenic avian influenza (HPAI) infection on turkey farms. The United States is currently experiencing one of the largest and most costly HPAI outbreaks in U.S. history. Over 70% of affected commercial poultry farms to date are turkey farms. The U.S. turkey industry has requested that APHIS begin this study. Turkey producers urgently need information on:

- transmission risk.
- biosecurity best practices
- priority areas for investment in biosecurity measures that mitigate risk.

During this outbreak, there has been unprecedented distribution of virus in wild birds' migration flyways across the United States. The result of which was the ongoing outbreak through the summer. The United States is currently experiencing increases in cases again due to the fall bird migration. In the last week alone, the number of turkey farms affected with HPAI has increased by 20%.

APHIS' main mission is the prevention, control, and eradication of animal diseases to safeguard animal health. Disease detection and prevention is the most effective method for maintaining a healthy animal population and for enhancing the United States' ability

to compete globally in animal and animal product trade. Detection of HPAI on a turkey farm results in loss of all birds. This creates significant economic losses for turkey producers. Vaccination for this pathogen is not feasible. Were the United States to pursue vaccination, it could result in negative international trade impacts for the U.S. turkey industry. Therefore, the best option for APHIS and turkey producers is to identify risk factors and develop mitigation strategies to limit future impacts. APHIS has determined that in this situation, traditional information collection and rulemaking procedures could further cause public harm, are contrary to the public interest, and that there is good cause under 5 U.S.C. 553 to justify an emergency information collection.

Between February and September 2022, APHIS mobilized over 1,300 employees to respond to HPAI. Nearly \$800 million in emergency funding has been authorized to address indemnity, diagnostics, field activities, and other response costs. Despite the significant burden of this pathogen on turkey farms, there is much to be learned about preventive measures. Therefore, to limit additional flocks becoming infected in 2022 and beyond, it is critical for APHIS to conduct surveys to identify the potential sources of new HPAI infections. As the fall season of wild bird migration continues, APHIS has plans to immediately gather data from turkey producers in November 2022 to identify risk factors and mitigate future outbreaks. This information is needed as quickly as January 2023, when the risk of new infections is expected to increase substantially.

APHIS will collect data via phone surveys of both affected (case) and unaffected (control) turkey farms. APHIS will identify potential study participants from affected turkey producers as stored in our Emergency Management Response System (EMRS). Unaffected farms will be selected from the USDA National Agricultural Statistical Service (NASS) list frame, if NASS is able to provide these, or from EMRS, if NASS is not able to provide these.

To develop the prevention and control recommendations that turkey producers need, APHIS needs to identify differences in management practices, environmental conditions, and flock and barn-level factors between affected and unaffected flocks. This information is a critical component to develop desperately needed science-based prevention and control measures to stem further economic losses, protect the turkey industry, and secure our domestic and global food system.

Thank you for your time and consideration.