



July 27, 2006

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Docket No. APHIS-2006-0093
Regulatory Analysis and Development
PPD, APHIS
Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

Dear Sir or Madam:

The American Veterinary Medical Association, on behalf of its more than 74,000 members, supports the amendments to the regulations regarding the National Veterinary Accreditation Program.

At its recent annual meeting, the AVMA House of Delegates passed a resolution stating, “RESOLVED, that the American Veterinary Medical Association urges the USDA-APHIS to implement ongoing training programs for accredited veterinarians in the United States.” The statement about the resolution recognizes that a one-time APHIS accreditation has worked in the past but is not appropriate in today’s fast-paced global environment, that veterinarians need to have a knowledge base to meet the challenges associated with disease prevention and emergency/disaster preparedness, that modernization of accreditation training will help safeguard public health while improving the health and quality of animals, and that continued accreditation will provide veterinarians with the ability to enhance their knowledge base and remain current on emerging health issues. The APHIS proposed rule meets the intent of the approved AVMA resolution and therefore the AVMA supports the proposed rule.

However, we request that the final rule specify its application to aquatic animals. The proposed rule is unclear regarding farmed and companion aquatic animals. We believe that the NVAP should assign veterinarians serving companion aquatic animals to Category I accreditation and veterinarians serving farmed aquatic animals to Category II accreditation. And the regulations should refer to “terrestrial, avian, and aquatic companion animals” and “livestock, poultry, and farmed aquatic animals” as appropriate. We recognize that careful consideration is necessary to accurately accommodate this request and consequently recognize that this request may need to be implemented in phases.

Further, we request that consideration be given to streamlining the process for veterinarians to obtain accreditation in a new state when veterinarians are responding to a declared emergency or disaster and the veterinarians are licensed or otherwise legally able to practice veterinary medicine in the affected state.

We appreciate the opportunity to comment on this proposed rule.

Sincerely,

Bruce W. Little, DVM
Executive Vice President

BWL/AALC/CPHRVM/ASAC/LPV