June 25, 2020

The Honorable Lamar Alexander  
Chairman  
Senate Committee on Health, Education, Labor and Pensions (HELP)  
428 Dirksen Senate Office Building  
Washington, DC 20510

American Association of Veterinary Diagnosticians (AAVLD) Comments on Preparing for the Next Pandemic White Paper

We thank you for the opportunity to submit comments on the White Paper on preparing for the next pandemic on behalf of the American Association of Veterinary Laboratory Diagnosticians (AAVLD), the organization of diagnosticians focused on protecting animal health and public health in the United States. One of the important goals of the organization is addressing One Health issues that transcend boundaries between animal and human infections. This effort is carried out through the National Animal Health Laboratory Network (NAHLN) operated through the United States Department of Agriculture. There are currently 59 laboratories in the NAHLN, which play a direct role in protecting a safe, sustainable and nutritious food supply; and an essential role in
responding to a biological attack affecting animals and or humans. NAHLN laboratories leveraging the state resources routinely address and respond to animal health needs and emergencies. These laboratories utilize the latest diagnostic technologies and have built up tremendous capacity (50,000+ PCR tests and 200,000+ serological assays daily) to serve the most progressive animal health industry in the world.

As the public health response floundered in the wake of COVID-19 pandemic, several NAHLN laboratories stepped up to offer help to public health partners in their states, but in several states the red tape surrounding this was not easy to navigate, and many laboratories had to stand on sidelines due to bureaucratic issues related to Clinical Laboratory Improvement Amendment (CLIA) approval requirements for the NAHLN laboratories. Most NAHLN laboratories are accredited by AAVLD. This accreditation relies on international accreditation standard (ISO17025) and thus have highly-trained, competent personnel, but were ineligible to participate under current CLIA regulations because they do not recognize veterinary degrees and or advanced training in animal health. During the COVID-19 response, NAHLN assets could have been better utilized through the Laboratory Response Network consortium that includes veterinary and human laboratories intended to address the surges, when they happen. These labs could have added much needed capacity for the human testing response. In states like Oklahoma, NAHLN animal laboratory became epicenter for human testing as public health laboratory response was lagging and needed a boost.

As we look to better prepare for future outbreaks, we encourage Congress to enact legislation that allow the administration to leverage resources and capacity wherever it exists, such as bringing USDA NAHLN into HHS’s response. Additionally, lawmakers should consider ways to relax the regulatory barriers encountered during the COVID-19 response, like the veterinary laboratories encountered with CLIA not recognizing veterinary personnel as being qualified to run tests.

Many of the zoonotic human infections arise as they first continue to circulate in animal populations for a period and then are introduced into humans and in rare situations can end up in pandemic. Human behaviors increase the risk of such breaks. It is imperative that we have a strong infrastructure to handle these challenges today and in future. We encourage Congress to keep funding on an ongoing basis resources strengthening for both public and animal health program and surveillance programs for disease in animals, so such
introductions are detected early and before these cross-species barriers and become pandemics. A One Health approach is a necessity to ensure we as nation are prepared. “One Health” programs recognize that the health of people is deeply connected to the health of animals and the environment. The coordinated approach including One Health stakeholder federal agencies to achieve a level of preparedness that will safeguard public health and the food supply against infectious disease outbreaks is extremely important.

The NAHLN and AAVLD laboratories are also responsible for ensuring food security by doing pre-harvest testing for many of important diseases, that can lead to food borne illnesses. We have learned through this pandemic how important food security is for sustenance and for national security.

In closing, we also recommend that the Senate consider the Advancing Emergency Preparedness Through One Health Act of 2019 (S. 1903). This bill would direct HHS and USDA to develop a coordinated One Health framework, working together to ensure that every federal agency, program, and asset is coordinated to ensure a unified response to a pandemic.

Respectfully submitted,

Deepanker Tewari, President, AAVLD

Pat Halbur, Co-Chair, AAVLD Government Relations Committee

Bruce Akey, Co-Chair, AAVLD Government Relations Committee

Contact AAVD President Deepanker Tewari dtewari@pa.gov
AAVLD Executive Director David Zeman dzeman@aaavld.org