



Board of Animal Health's Oversight of Deer and Elk Farms

Update to 2018 Evaluation Report

January 2019

Problems Identified

- **Inventory Expectations Unclear.** State law requires an annual inventory of deer and elk farms but does not specify *how* it be conducted. Deer and elk producers who sell animals to farms in other states must conduct a “physical inventory” by reading their animal’s identification tags every three years. Some other producers, however, have constructed inventories based on previous years’ inventory lists, without reading identification tags.
- **Insufficient Oversight of CWD Testing.** Historically, Board of Animal Health (BAH) staff have not ensured that deer and elk producers submit tissue samples for chronic wasting disease (CWD) testing for all deceased deer and elk, as required by state law. Some producers failed to submit samples.
- **Inconsistent Enforcement.** In some instances, BAH staff failed to enforce deer and elk regulations related to facility fencing and CWD testing, among other things. Field staff had been inconsistent with how they tracked inspection results and violations.
- **Board Lacks Public Member.** The board has five members, none of which represent the general public. BAH is also smaller than similar boards in other states.

Changes Implemented

- **Tag Reading Required.** BAH now requires that all deer and elk producers conduct a physical inventory with tag reading once every three years. BAH has developed a three-year rotating schedule and will assign an inventory year to each producer that does not already conduct regular tag reading. Herds will receive their assigned years in January 2019, and all producers will be required to conduct their first physical inventory by 2021.
- **CWD-Test Tracking Improved.** BAH modified its data entry procedures for tracking CWD testing of farmed deer and elk. It will use the improved data to develop a report on testing compliance. Further, BAH has developed a training and certification program, set to begin in early 2019, for deer and elk producers who want to collect their own CWD-testing samples.
- **Enforcement Standardized.** BAH administrators reported that field staff now issue a “notice of violation” with a compliance timeline for all instances of noncompliance with deer and elk farm regulations. BAH is also working to standardize compliance procedures across all board program areas.

Action Needed

- **Modify Board Composition.** The Legislature should consider expanding the number of BAH board members and adding at least one member of the general public.