
 Name of Licensee/Registrant

 Site No.

 Lic/Reg No.

 Site Name

 Date of Inspection

FACILITIES (Permanent & Transport)

	Structure & Construction
	Condition & Site
	Surfaces & Cleaning
	Utilities/Washrooms/Storage
	Drainage & Waste Disposal
	Temperature/Ventilation/Lighting
	Shelter from Elements
	Capacity/Perimeter Fence/Barrier

PRIMARY ENCLOSURE

	General Requirements
	Space & Additional Requirements
	Protection from Predators

ANIMAL HEALTH and HUSBANDRY

	Exercise & Socialization
	Environment Enhancement
	Feeding
	Watering
	Cleaning & Sanitation
	Housekeeping & Pest Control

OTHER

	Identification
	Records & Holding Period
	Handling
	Veterinary Care
	IACUC
	Personnel Qualifications

CANINE CARE CHECKLIST

- _____ Daily observation of all dogs within kennel.
- _____ All dogs requiring veterinary care have been treated.
- _____ Veterinary records have been updated.
- _____ Outdated medications have been disposed of properly.
- _____ Attending veterinarian has made kennel inspection within 12 months.
- _____ All dogs have convenient access to feed and water.
- _____ All feed and water bowls have been cleaned and sanitized within last 2 weeks.
- _____ All bags of feed and bedding are in tightly lidded containers.
- _____ All unopened bags of feed stored off of floor and away from walls.
- _____ All enclosures spot cleaned daily.
- _____ Areas behind and below enclosures have been cleaned as necessary.
- _____ All enclosures have been cleaned and sanitized within last 2 weeks.
- _____ All surfaces in contact with the dogs are impervious to moisture.
- _____ Surfaces within enclosures are free of sharp points and edges.
- _____ Mesh floors of sufficient size to prevent feet from falling through.
- _____ Adequate floor space is provided for all dogs.
- _____ All dogs have a minimum of 6 inches headroom in enclosure.
- _____ Nursing bitches have additional space required for litter.
- _____ All dogs in outside kennels have necessary shelters.
- _____ All outside shelters have wind and rain breaks in place.
- _____ All outside kennels have sufficient shade structures.
- _____ Temperature controlled areas are between 45-85 degrees F.
- _____ All animal areas within kennel are well ventilated.
- _____ Doors, flaps, gates, etc. are in good repair and operate properly.
- _____ All drains are functioning properly.
- _____ Pest control measures are in place as necessary.
- _____ Items not necessary for animal husbandry are not kept within kennel area.
- _____ Animal husbandry items are stored in proper areas within kennel.
- _____ All dogs and weaned puppies have an approved means of identification.
- _____ Records of dogs on hand have been updated and are accurate.

**Standard Operating Procedures for Conducting Tracebacks
from Random Source B Dealers**
(July 31, 2009)

A random source B Dealer (RSBD) is a licensed dealer holding a class B license who buys and sells random source dogs and cats. Random source animals are defined in the Animal Welfare regulations as *“dogs and cats obtained from animal pounds or shelters, auction sales, or from any person who did not breed and raise them on his or her premises.”* These animals are generally sold for research purposes. While the term “random source” applies to both dogs and cats, dogs are the animal primarily involved in this type of activity.

Under the RBIS system, RSBDs are inspected more frequently than other dealers because of the nature of their business. One reason for more frequent inspections is to insure that the dogs and cats at the RSBD’s facility were acquired in accordance with regulations. The legitimacy of the acquisition of these dogs and cats is assured by conducting tracebacks on a sampling of the dogs and cats acquired within the time period since the last inspection. A major purpose of the traceback is to determine if a dog or cat was obtained from a legitimate source. A RSBD who acquires random source dogs and cats from prohibited sources is subject to enforcement action.

Note:

The term “dog” as used throughout this document refers to random source dogs.

However, all situations described for dogs also apply to random source cats, since cats may also be involved in random source sales and acquisitions.

The term “pound” as used in this document refers to any pound or shelter that is owned and operated by a State, county, or city, as well as any legal entity operating as a contract pound or humane shelter under the laws of the State in which it is located. (See section 2.132 (a)(2&3) of the regulations.)

Inspecting a RSBD

Inspection frequency for a RSBD

RBIS requires that all RSBDs be inspected no less than quarterly. In practice, this means that inspections of RSBD facilities must be conducted no more than 90 days apart.

Sources for random source dogs

Section 2.132(a) of the regulations limits the acquisition of random source dogs by class B dealers to the following sources:

1. another licensed dealer,
2. state, county, or city owned and operated pounds and shelters,
3. contract pounds or shelters.

Acquiring dogs or cats from sources other than those listed above is noncompliant with regulations and the RSBD may be subject to enforcement action.

If someone, such as a hound breeder, sells dogs that he or she has bred and raised to a RSBD, those dogs are not random source dogs when they are purchased, since they do not meet that definition until the RSBD resells them. The RSBD would be noncompliant with section 2.132(d), however, if he buys 25 or more dogs within a year from an unlicensed breeder, since that breeder would no longer be exempt from the licensing requirement. Section 2.132(d) and Section 2.133 also contain certification requirements that the RSBD must comply with.

Examining RSBD records

During an inspection, the inspector should determine that the acquisition and disposition records for an RSBD contain all the information required by section 2.75(a). Acquisition records should include the physical address of the seller, not just a PO Box. Every dog acquired or sold by the RSBD must be accounted for and all required information on the seller must be included in the records. The RSBD should be cited for noncompliance on the inspection report if any of this information is missing.

If the RSBD has acquired dogs from a **pound**, the dealer must have acquired a signed statement from that pound certifying that the pound has met the holding requirements for that dog as required by section 2.133(a) of the regulations. The RSBD must obtain such a statement for each dog acquired from a pound, though all dogs acquired at any one time may be placed on the same certification statement.

If the records show that an **unlicensed person** has sold 25 or more dogs and/or cats to the RSBD in a year, that person is not exempt from the licensing requirement. The name and address of this unlicensed dealer should be submitted to the Regional Office (RO) by the inspector, and the RO will determine the necessary course of action. If the RSBD acquired one or more dogs from an unlicensed person, but did not acquire the certifications required by section 2.132(d), the RSBD should be cited for this on the inspection report.

Traceback Procedures

Choosing dogs for traceback

Following every inspection of an RSBD facility, the inspector must conduct tracebacks on a sampling of the dogs acquired by the dealer during the time period since the last inspection. In general, dogs should be chosen for traceback on a random basis. However, all dogs whose acquisition appears suspicious should be traced back. Also, the dogs should not all be from the same seller, but dogs sold by different persons should be chosen whenever possible.

The number of tracebacks conducted will depend upon the circumstances.

- If 4 or fewer dogs were acquired in the quarter, tracebacks should be conducted on each of those dogs.
- If between 5 and 100 dogs were acquired in the quarter, tracebacks should be conducted on at least 4 dogs, or 10% of all the dogs acquired during that period, whichever is greater.

- The maximum number of tracebacks to conduct under normal circumstances is 10. So if more than 100 dogs were acquired in the quarter, the inspector would still only conduct 10 tracebacks.

In some instances, the traceback of 100% of the acquired dogs may be required. This will be determined by the RO, and the inspector will receive specific instructions via their supervisor.

Conducting a traceback

FOR YOUR SAFETY

Most of the sellers you will be checking on are not accustomed to visits by APHIS, and some may resent the imposition of the Federal government into any area of their life.

If you believe you cannot safely conduct a traceback, contact your SACS. With your SACS, a determination can be made whether a 2nd inspector should accompany you to the seller's address, or whether you should attempt to conduct the traceback by telephone only. You should not place yourself in an unsafe situation.

If you determine that you should conduct the traceback by telephone, enter a brief statement into the "Comments" section of the traceback form explaining that the traceback was conducted (or attempted) by telephone due to employee safety concerns. If you are unable to contact the seller by telephone, the traceback should be documented as "unsuccessful."

Every attempt must be made to trace the dog to the person who originally sold it. When practical, most tracebacks should be conducted by visiting the seller listed on the RSBD records. Tracebacks can be conducted by telephone, however, under the following circumstances:

- the seller is a licensed dealer,
- the seller is a pound,
- the seller is a person who is known to the inspector, such as a dog breeder that the inspector recognizes from a previous traceback.

Copies of all tracebacks to be conducted must be sent to the RO along with the inspection report on the RSBD. Inspectors should conduct all tracebacks for sellers located in their inspection areas. If a traceback leads to an address outside of the inspector's area, the inspector must send the traceback form indicating an incomplete traceback to the RO. The RO will then forward this information to the appropriate inspector in whose area the seller is located. In those instances where a seller is in another Region, the RO will send the information to that Region, and information on the traceback will be recorded in the RO in order to follow up on the traceback.

When conducting a traceback, the inspector should ask the seller open-ended questions so as not to indicate the answers that are being looked for. For example, the inspector

should ask: “Where did you obtain this dog?” rather than asking: “Did you breed and raise this dog yourself?”

The following information should be obtained from the seller:

- Did the person listed on the records as the seller actually sell the dog or cat?
- If that person verifies being the seller, did he or she breed and raise the dog themselves?
- If the seller says they bred and raised the dog, is there evidence of a kennel on the premises? If not, where did the seller raise the dog?
- Did the seller provide the required certifications to the RSBD?
- If the seller did not breed or raise the dog, where did they get the animal?

If seller is a **private individual**, the above information must be collected and recorded on the traceback form.

If the seller is another **licensed dealer**, the second dealer’s records should be examined to verify the sale to the RSBD. If the second dealer is also a RSBD, a traceback now needs to be conducted for this seller listed on this second RSBD’s records. This information must also be recorded on the traceback form.

If the seller is a **pound**, the inspector must either call or visit the pound and confirm the sale of the dog. The inspector should also confirm that the certification statement provided to the RSBD for that dog is accurate.

If, while conducting a traceback, the inspector is unable to verify the sale of the dog, e.g., the person listed as the seller did not sell the dog, or the address of the seller listed on the records does not exist, this information should be included on the traceback form, and the traceback should be listed as **unsuccessful**.

All tracebacks must be completed within 30 days of the inspection of the RSBD, or for referred tracebacks, within 30 days of the time the traceback request is received. The inspector must notify his or her SACS if all the tracebacks cannot be completed in that time

The traceback form

A separate traceback form must be completed by the inspector for each dog or cat that the inspector chooses to have traced. The form can be filled out either electronically or by hand. If hand-written, **the writing must be legible**. All completed forms must be sent to the RO.

The inspector must assign a **traceback number** to each traceback form, unless otherwise instructed. The traceback number begins with the RSBD’s customer number, which is followed by another number assigned in sequential order. For example, if the RSBD has customer number 9999, the inspector would assign traceback number 9999-1 for the very first traceback, followed by 9999-2, then 9999-3, etc. in sequence for each subsequent traceback.

Note:

When conducting a 100% traceback, the inspector may include on a single traceback form all the dogs sold to the RSBD by one supplier. When doing this, each dog's ID number must be entered, and a sequence of traceback numbers, one for each dog, must be included on the form. For example, if a supplier sold 10 dogs to the RSBD, the traceback numbers on the form would run from 9999-1 to 9999-10. The dog ID numbers would be listed as 4263 – 4272, if sequential. If not sequential, each individual dog number should be entered.

The inspector conducting the traceback must indicate on the traceback form whether the traceback was successful or unsuccessful.

A **successful traceback** can be one of the following:

- the seller has confirmed that he sold the dog and that he has bred and raised the dog on his premises. Some confirmation of the seller having actually bred the dog should also be made, e.g., there is a kennel on the premises.
- the seller is a pound and has confirmed the sale.

An **unsuccessful traceback** can be one of the following:

- the seller listed in the records claims he did not sell dog,
- the dog was not bred and raised by the seller,
- the address listed for the seller does not exist, the seller's name is fictitious, or the seller is not at that address.

The inspector should also indicate in the Comments section how the traceback was conducted, i.e., by phone or visit, and include a brief description of the results of the traceback, e.g., "Mr. Jones told me he did not breed and raise this dog, but got it from a local pound." The RO will typically request an investigation by IES for unsuccessful tracebacks.

Unable to contact the seller: If the inspector is unable to contact the seller and the traceback cannot be completed, the traceback should be listed as unsuccessful, and the inspector should note this in the Comments section on the traceback form and submit it to the RO. The RO will research and check accuracy of the information and consult with the SACS and inspector before determining what course of action to take.

When a traceback is unsuccessful, the RSBD's inspector may need to write an additional inspection report on the RSBD, citing the RSBD for noncompliance with section 2.132(d) for acquiring the dog or cat from an unlicensed and nonexempt source, and/or citing Section 2.133 for failure to provide the recipient(s) with the appropriate certification. The inspector should contact their SACS to determine if another inspection report with the citation should be written.

Non-Domestic Cat Safety Tips for Inspectors

When inspecting wild or exotic cats (i.e., tigers, lions, cougars, bobcats etc), it is important that inspectors be acutely aware of their surroundings. If you are unfamiliar with a licensee, do not trust they know what they are doing, and do not take unnecessary risks related to the licensee's ability to handle the cats. Any licensee who thinks it is appropriate to enter a big cat enclosure without a trained back-up person present may create a situation that is clearly inappropriate for an inspector to participate.

Observe the animals

Cats are sensitive animals and may become agitated at the presence of strangers. Cats of all species will flatten their ears when angry or agitated. Try to recognize this behavior and step away from the enclosure before the cat becomes more agitated and either vocalizes or hits the enclosure fence. Talking to the animals when they are agitated rarely soothes them as you are a stranger in their environment. If a big cat approaches the fence and lifts its tail, step back and to one side quickly as it is likely to spray urine in your direction.

Be Observant When Approaching the Enclosure

A basic rule is to stay a minimum of 3.5 feet away from all big cat enclosures and gates unless you are certain there is no way a cat can reach any part of its body through the enclosure fence. That includes that small space under a cyclone fence or gate!

Prior to moving closer to the primary enclosure for your inspection, look at the material used to construct the enclosure. If it is livestock panel, with any open spaces 3" by 3" or larger, or any "piano wire" enclosures, STAND AT LEAST 3.5 FEET AWAY (See Fig 1). Many enclosures, especially night quarters or gates to enclosures, have a small space between the bottom of the enclosure and the ground (See Fig. 2). Cats have been known to reach under gates or enclosure fences and attack unsuspecting persons who are standing too close. A large lion or tiger may be able to extend a limb out a distance of 2.5 feet from their enclosure. If the fence yielded, this distance could be greater.

Exceptional zoos will have a protocol and an obvious "safety line" painted on the floor in the halls running adjacent to the big cat enclosures. If entering a narrow hallway between two cages, ensure you know the whereabouts of the cats, and be careful not to back up against one enclosure with a cat present if you are startled by another cat across the hallway. Most zoos are designed so there are no spaces large enough for a cat to reach through, but this is not always the case. Try to maintain your distance from all enclosures when in tight quarters, and if the situation seems dangerous in any way, ask the keepers to shift the cats to enclosures away from the hallway so you may complete your inspection.

Common Sense

- Never turn your back on or take your attention from the cats.
- Do not be distracted by a conversation with the licensee while you are inspecting potentially dangerous animals.
- Never reach out or try to pet or feed the animals, no matter how friendly they may seem or what the licensee does.

- Do not agree to help a licensee handle a big cat in any way, and if the licensee chooses to enter a big cat enclosure without any trained back-up person present, politely decline to participate as their only back-up. Inspectors should never be in a position to have to back up a licensee if an attack were to occur.

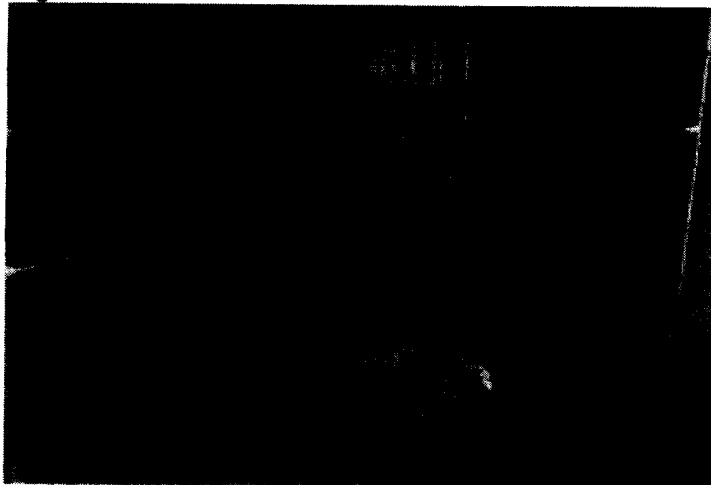
If however, an attack occurs in your presence, and you are the ONLY other person present consider in advance what your actions might be.

- Call 911 on your cell phone
- Distract the animal from the victim by making noise, screaming, squirting a hose at the cat, fire off a CO2 fire extinguisher (if handy), poke the animal with a broom handle or the like through the fence, hit the fence with anything handy (This is assuming you are the only other person present. Otherwise let the management team handle the situation)
- Do not put yourself in harm's way. Do not enter the enclosure to help the victim unless the cat can be lured into a secure lock-off.

Figure 1



Figure 2



DIRECT NCI GUIDANCE

Examples of NCIs that are normally *Direct*

Lack of veterinary care for a serious condition:

- serious illness or injury
- emaciated or debilitated animals with no care provided
- generalized dermatitis or severe otitis externa with no care provided
- large, infected acral lick granuloma with no care provided
- severe infestation with ticks, fleas or other parasites

Inadequate enclosure space

- animal can't make normal postural adjustments – can't hold its head up
- animal cannot lie in full recumbancy

Lack of shade or shelter in extreme conditions for all species; or lack of shade or shelter in uncertain conditions for less hardy species

Food that is clearly spoiled or contaminated

Structural violation

- sharp wire, nail, or other object that is likely to cause an injury and that the animal will come into contact with (eg., floor, near a food bowl)
- immediate risk of a dangerous animal escaping from a primary enclosure

Matted dog with significant underlying lesions and/or other health impacts caused by the mats

Feet falling through flooring to a degree that it is impacting the animal's ability to walk and/or function normally

Lack of drinkable water (no water or extremely contaminated water) with impacts to the animals

Cleaning or drainage – excessive accumulation of feces, urine, mud, water and/or other debris that the animal cannot get away from or avoid lying in or heavily soiled animals

Handling animals in a manner that clearly causes pain or distress such as the use of electric shock or starvation to train animals, and the use of a power hose to make animals shift

Lack of ventilation to the point where there are noxious fumes (e.g., your eyes burn) at the level of the animal's eyes and nose

Incompatible animals housed in the same enclosure - indications of serious physical consequences

Examples of NCIs that are normally not *Direct*

Lack of veterinary care for a minor condition

- cherry eye
- mild or localized dermatitis
- mild otitis externa
- small lick granuloma
- accumulation of tarter on teeth with no related impact on the animal
- some fleas, ticks, or other parasites present

Minor space deficiency with no apparent impact on the animal.

Lack of shade or shelter in minor or uncertain conditions for animals that do not normally seek shelter in those conditions (ie, bison)

Pest control problem but no spoilage or contamination

Structural violation

- sharp wires, nails, or other objects are in areas that the animal will not likely come into contact with (ie., ceiling)
- fencing deficiency with no immediate risk of escape

Matted dog with no lesions or only minor lesions, and no other health impacts

Feet can fall through the floor, but there is no significant threat of injury to the animal and no visible impact on the animal's ability to function

Lack of drinkable water, but the animal appears normal and does not drink voraciously when offered fresh water

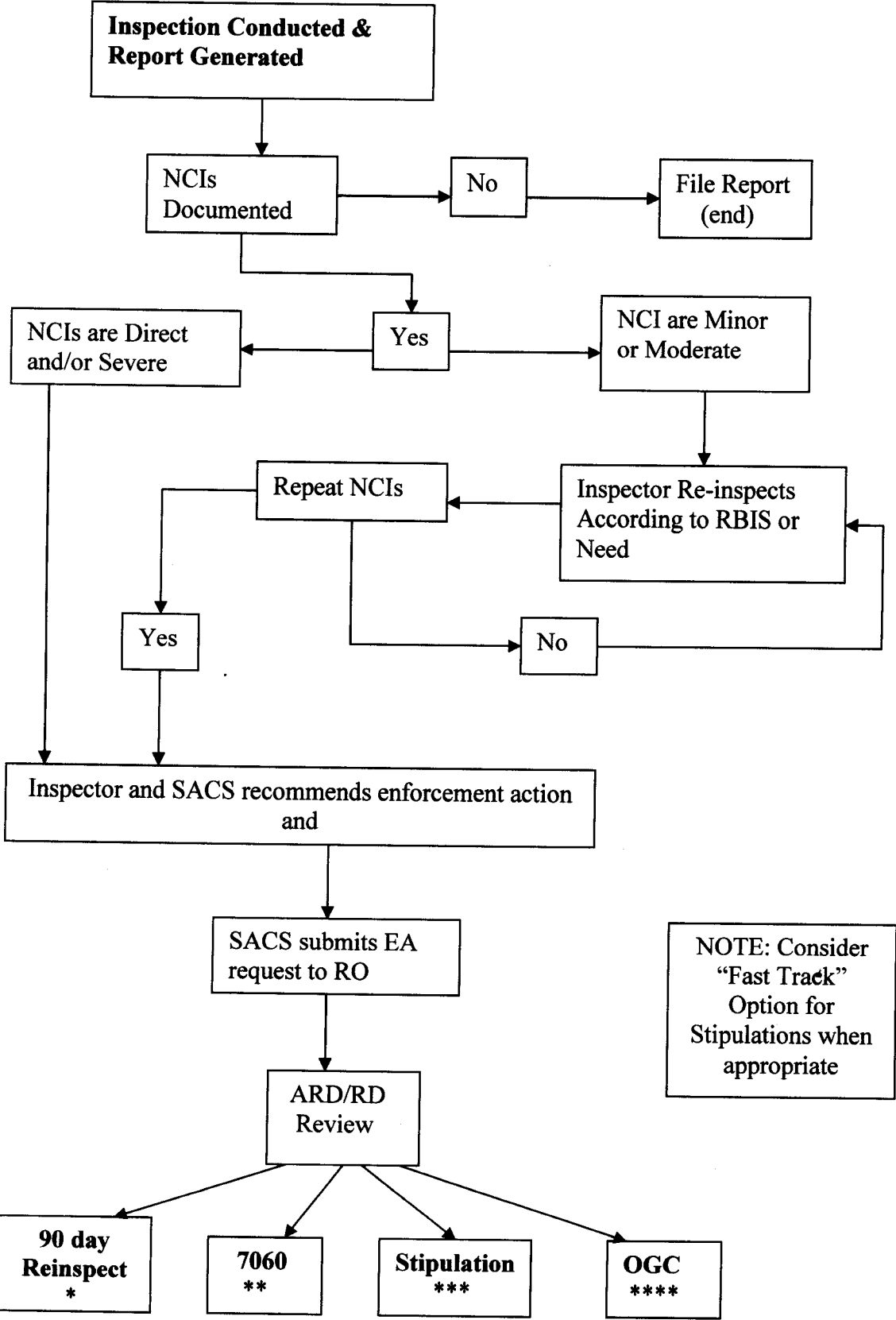
Cleaning or drainage –accumulation of feces, urine, mud, water, and/or other debris but the animal can avoid the areas of accumulation while still having adequate freedom of movement

Handling violations with no apparent (serious) negative impacts to the animal

Lack of adequate ventilation without noxious fumes at the level of the animal's eyes and nose

Animals housed together that occasionally fight but without serious physical or psychological consequences

**Animal Care
Enforcement Actions (EA) Guidance for Inspection Reports**



*** 90 Day Re-inspection**

- Making clear progress toward compliance
- Minor NCIs
- Few # of repeats
- No sign of animals, animal health, or animal welfare being in jeopardy
- No EAs in last 3 years
- Expect compliance
- Note: if compliance not attained in 90 days, proceed to other enforcement steps

**** 7060**

- **May or not be associated with an IES investigation**
- Still out of compliance after 90 day re-inspection and/or
- Multiple repeat NCIs or
- One or more moderate repeat NCI or
- Can be a Direct NCI if no obvious effects on animal health or welfare
- Incomplete documentation of serious NCI
- Slow progress toward compliance
- No EAs (except 90 day re-inspection) in last 3 years

***** Stipulation**

- **Must have IES investigation**
- Multiple minor repeat NCIs
- Moderate to serious NCIs
- Repeat direct NCIs
- Lack of progress toward compliance
- Usually have previous EA(s)
- Animal health and/or welfare may have been impacted

****** OGC Prosecution**

- **Must have IES investigation**
- Serious NCIs
- Repeat direct NCIs
- Multiple repeat NCIs
- No progress toward compliance
- Usually have previous EA(s)
- Animal health and/or welfare may have been impacted

Note: this is the only method by which we can get a suspension or revocation