

AVMA



American Veterinary Medical Association

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June 10, 2008

Secretary Michael Chertoff
U.S. Department of Homeland Security
Washington, D.C. 20528

Dear Secretary Chertoff:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, AVMA is the recognized national voice for the veterinary profession. The association's more than 76,000 members comprise approximately 85% of U.S. veterinarians.

The AVMA commends the Department of Homeland Security (DHS) and the Federal Emergency Management Agency (FEMA) for their efforts on the National Response Framework (NRF) and their dedication to working towards a comprehensive approach to emergency preparedness and response. The AVMA asserts that while much emergency preparedness planning has been accomplished, significant gaps remain.

Specifically, the AVMA has two major concerns, which it asserts should be addressed by the DHS and FEMA.

As stated in its letter to the DHS in September of 2007 (attached), the inclusion of one stand-alone document addressing animal emergency support functions in the NRF would *significantly* enhance effective coordination. However, the inclusion of such a stand-alone document has not been accepted by the drafters of the NRF at this time. Specifically, the AVMA recommends development of a service and companion animal Special Annex within the National Response Framework to address coordination of service and companion animal issues during emergency response operations. A Special Annex would serve as an institutionalized "job aid" to assure that "lessons learned" before and since Hurricanes Katrina and Rita Response do not have to be learned anew with each subsequent disaster response and each new group of responders. Such an Annex to the NRF would also clarify technical support roles for federal subject matter experts and their non-governmental organization (NGO) partners who work with requests for assistance from affected States.

Secondly, additional steps must be taken within DHS to fully implement the PETS Act and to provide the leadership on companion animal emergency response, including:

- Development of a dedicated implementation team;
- End-to-end program and policy coordination –preparedness and planning; field exercises to clarify tasks and roles of responders; all phases of emergency operations (evacuation, sheltering, triage and emergency veterinary care, field rescue, pet-owner reunification activities; and support of service animals and their owners during evacuation operations and in settings where pets are prohibited); and recovery;
- Provision of an adequate FEMA budget over a period of several years to support program roll-out and implementation;

- Authority and preparedness funding to create and approve PE' TS Act programs and training materials; and to provide support for operational resources for states to utilize;
- Subject matter experts and technical teams to assist in the field during emergency responses to accomplish rapid needs assessment, situational awareness and reporting, transport, animal ID and tracking, SAR, veterinary triage, emergency care, credentialing, sheltering, and post-incident evaluation in keeping with PE' TS Act and DAP 9523.19 policy guidance; and
- Effective integration through multi-agency and multi-sector outreach and coordination.

The development of a succinct and concise stand-alone document addressing animal emergency support functions in the NRF will add the necessary clarity for an optimal emergency response. The provision of tools to fully implement the PE' TS Act will add significantly to an effective an integrated response. Thank you for the opportunity to share our recommendations. The AVMA applauds DHS for further strengthening our nation's emergency preparedness system, and we look forward to continued collaboration with DHS.

Should you have any questions or concerns, please feel free to contact Dr. Heather Case (hcase@avma.org or 800-248-2862 ext. 6632).

Respectfully,



W. Ron DeHaven, DVM, MBA
CEO
American Veterinary Medical Association

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September 13, 2007

Federal Emergency Management Agency
National Incident Management System
National Integration Center

Re: National Response Framework

Dear Madam/Sir:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, AVMA is the recognized national voice for the veterinary profession. The association's more than 75,000 members comprise approximately 86% of U.S. veterinarians.

The AVMA commends FEMA for its efforts on the National Response Framework and its dedication to working towards a comprehensive approach to emergency preparedness and response.

The veterinary profession is committed to the promotion of preparedness for disasters and emergencies. The AVMA developed our Veterinary Medical Assistance Teams (VMAT) with the American Veterinary Medical Foundation and the National Medical Disaster System. We are proud of our federal veterinary response teams and the excellence they have illustrated providing emergency veterinary care for animals in need during times of national emergencies, including the aftermath of the September 11, 2001 attacks and the after effects of the Hurricane Katrina disaster in Louisiana and Mississippi. These response teams exemplify valor and excellence during times of emergencies, and they perform valuable public health functions. In addition, the AVMA fully supports the efforts of the AVMF to fund programs to promote emergency preparedness and to provide relief to members after disasters strike.

The AVMA contends that while the National Response Framework exemplifies an ever stronger emergency preparedness system for the United States, it is not comprehensive. Specifically, the AVMA asserts that the FEMA National Integration Center should ensure the development of an Animal Annex within the National Response Framework to address all species-all hazards issues. Currently, questions exist regarding the federal agency that would lead on disaster issues associated with companion animals. A clear, comprehensive plan must be implemented to address animal issues in emergencies, as such issues truly affect the public health.

We compliment FEMA for its efforts in striving to develop an excellent National Response Framework, but all-species/all-hazards preparedness plans must be in place for the NRF to be fully comprehensive for the United States to be prepared for disasters and emergencies.

Please feel free to contact Dr. Lynne A. White (800-248-2862 ext. 6784 or lwhite@avma.org) should you need any additional information or explanation of AVMA's comments.

Respectfully,

Lyle Vogel, DVM, MPH
Interim Assistant Executive Vice President
American Veterinary Medical Association