



October 6, 2021

Re: APHIS-2021-0061

The Association of Public Health Laboratories (APHL) appreciates the opportunity to comment on the *Proposed Framework for Advancing Surveillance for SARS-CoV-2 and Other Emerging Zoonotic Diseases*. APHL is a member-service association that works to strengthen laboratory systems serving the public's health in the United States and globally, representing state, local, and territorial governmental public health laboratories in the United States.

We commend APHIS' ongoing work in this pandemic, testing species under your purview and strengthening One Health partnerships with other agencies. Improved collection, analysis, and response to zoonotic disease data, as outlined in the proposed framework, is critical to the public health mission of state, local, territorial and federal governments.

APHL strongly supports the strategies outlined for *Year One Objective: Address Immediate Threat Presented by SARS-CoV-2*. We encourage APHIS to continue to work with CDC, FDA and other agencies and stakeholders to learn from the successes and failures of the pandemic response.

We encourage the thoughtful linkage of surveillance and laboratory systems, a concept outlined in the 2017 workshop summary on, *Prioritizing Zoonotic Diseases for Multisectoral, One Health Collaboration in the United States*<sup>i</sup>. We appreciate the important work of the animal disease diagnostic laboratories, both for animal health and for the role they play in improving public health and look forward to any support USDA can provide towards helping human, animal and environmental health laboratories work together.

The APHL Informatics Messaging Systems platform (AIMS) is a secure, cloud-based platform that accelerates the implementation of health messaging by providing shared services to aid in the visualization, interoperability, security and hosting of electronic data<sup>ii</sup>. AIMS securely transports millions of messages on a monthly basis. Thirteen laboratories send their rabies data through AIMS with more in progress. In the pandemic AIMS was quickly purposed to manage SARS-CoV-2 messaging. While APHIS has made significant progress in laboratory data systems, further foundational investments in electronic messaging capabilities are needed to ensure other, existing and emerging, zoonotic diseases can be tracked in a timely enough manner to be actionable. It is also critical that the ongoing data modernization efforts at FDA and CDC facilitate any needed integration of USDA data.

The pandemic has shown the need to ensure data adequately represents underserved populations. APHL strongly encourages USDA to work with underrepresented communities as emphasized in USDA's FY22 president's budget request, in these discussions. Another USDA FY22 priority, climate change, shifts disease patterns, making improved interoperability, integration and analysis of data within USDA and across agencies, ever more vital.

The pandemic response highlighted laboratory workforce needs, and supplemental relief funds through CDC provided our laboratories with fellowship opportunities as a way of rapidly expanding the workforce. USDA could consider a similar model to place fellows and interns in veterinary, agricultural, and environmental labs to expand the One Health literate laboratory workforce. APHL and CDC along with WHO and OIE, participated in the development of the Global Laboratory Leadership Program, a transdisciplinary approach to laboratory leadership, which may prove a useful tool for USDA<sup>iii</sup>.

As strategic stockpiles are examined, virtual stockpiles, agreements in place for the provision of less shelf stable supplies, should be considered along with procurement of quality shelf and technology stable supplies such as swabs.

We believe that strengthening federal, state, local, and territorial laboratory capability should include the development, validation and implementation of pathogen agnostic methods to detect emerging and zoonotic pathogens. We also recommend any investments in testing and reporting are rapidly scalable for a single pathogen and broadly for new strains and pathogens. Biosafety and biosecurity investments are needed in each of the detection, investigation and control focus areas. This should include sustainable funding for these activities in out years.

*For Year 2+: Objectives: Improve APHIS' ability to prevent, detect, report, and respond to emerging and zoonotic diseases, including SARS-CoV-2, in the United States earlier, APHL supports expanding APHIS authority for pathogens in animals that may threaten human health, even if they do not affect animal health or industry. We hope USDA can work with other federal partners, including CDC and FDA, and receive any new authorities needed, to address these health threats.*

In particular, APHL has been concerned over the stalled progress in reaching HHS Healthy People *Salmonella* targets. *Salmonella* was listed second behind influenza and in front of coronaviruses in the domestic zoonotic disease prioritization framework. To better control *Salmonella* risks and protect consumers' health, APHL recommends a combination of government and industry actions in two vital areas similar to those proposed for SARS-CoV-2 in the framework. The CDC, USDA, Food and Drug Administration (FDA), and regulated food businesses should agree on a common definition for emerging pathogens and diseases, signals of a potential emergence event, and communications and responses triggered by each indicator. Food businesses including poultry operations should proactively alert public health agencies when new serotypes and strains appear, or existing ones increase in results from their testing programs. Federal surveillance systems should collect more data from domestic food animal operations and on imported products that may introduce pathogens, such as contaminated feed ingredients.

We encourage APHIS to mine existing strategies, such as The *NARMS Strategic Plan 2021-2025*<sup>iv</sup> and CDC's *A National Public Health Framework for the Prevention and Control of Vector-Borne Diseases in Humans*<sup>v</sup> to aid efficient and effective implementation of the strategy. Investments and progress made during the pandemic can help vault these strategies forward. For example, USDA should consider working with the CDC's National Wastewater Surveillance System (NWSS)<sup>vi</sup>, stood up during the pandemic, on tracking antimicrobial resistance and other potentially zoonotic pathogens.

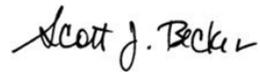
APHIS has done significant preparatory work for Foreign Animal Disease outbreaks, in particular processes for coordinated, multisectoral responses, and groundwork with stakeholders, clearly all described and readily available in FAD PReP resources. We hope APHIS can use this expertise and experience to work with public health partners to similarly outline triggers and response mechanisms for zoonotic pathogens.

APHL encourages the support of local One Health frameworks, through grants or material support, to not only facilitate the response to zoonotic disease, but allow for improved communication and resource sharing to assist continuity of operations and messaging in an emerging or Foreign Animal Disease or public health emergency.

APHL would appreciate further discussion of needed human, laboratory and financial resources to fully realize the goals in the strategy. The resources provided by Congress through the American Rescue Plan indicate an understanding of the need for improved animal surveillance for zoonotic pathogens. However, the pandemic has shown the extent of the underfunding of our public health systems and the significant and sustained resources that it will take to bring us to an acceptable state of readiness. Not fully funding upgrades to APHIS response will allow a dangerous gap in the nation's preparedness for pandemics to remain.

We look forward to seeing the stakeholder communication plan mentioned in the framework, and would be happy to participate in any further discussions. Please contact Kuki Hansen, Manager Regulatory and Public Policy (kuki.hansen@aphl.org) with any questions.

Sincerely,



Scott Becker  
Chief Executive Officer



Denise Toney  
President

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<sup>i</sup> <https://www.cdc.gov/onehealth/what-we-do/zoonotic-disease-prioritization/us-workshops.html>

<sup>ii</sup> [https://www.aphl.org/programs/informatics/pages/aims\\_platform.aspx](https://www.aphl.org/programs/informatics/pages/aims_platform.aspx)

<sup>iii</sup> <https://www.who.int/initiatives/global-laboratory-leadership-programme>

<sup>iv</sup> <https://www.fda.gov/media/79976/download>

<sup>v</sup> <https://www.cdc.gov/ncezid/dvbd/framework.html>

<sup>vi</sup> <https://www.cdc.gov/healthywater/surveillance/wastewater-surveillance/wastewater-surveillance.html>