

**CDC ENFORCEMENT OPTIONS FOR ACFs<sup>1</sup>**

Severity	Enforcement Option	Nature of Violation	Examples of Violations
	Reminder Letter	<ul style="list-style-type: none"> <li>• Procedural or technical violations that do not create a public health risk or represent a low public health risk; <i>or</i></li> <li>• First time violations or where error may be considered excusable based on lack of knowledge, training, or experience.</li> </ul>	<ul style="list-style-type: none"> <li>• Requesting clearance before uploading all documents in SAFE TraQ.</li> <li>• Failing to document reservations in SAFE TraQ prior to an animal arriving at the airport.</li> <li>• Issuing reservations for dogs based on certain incomplete documents (e.g., missing dates, mismatched microchips).</li> </ul>
	Warning Letter	<ul style="list-style-type: none"> <li>• Procedural or technical violations that do not create a public health risk or represent a low public health risk;<sup>2</sup> <i>or</i></li> <li>• If an ACF has repeated the same error in the recent past or would otherwise be expected to have knowledge or awareness of CDC’s requirements, e.g., based on issuance of previous reminders, memoranda to ACF, or based on training.</li> </ul>	<ul style="list-style-type: none"> <li>• Same as for “Reminder Letter” if ACF has repeated the same error or should know or be aware of CDC’s requirements.</li> </ul>
	Non-Compliance Letter	<ul style="list-style-type: none"> <li>• Violations that represent a public health risk or may create a public health risk if left uncorrected; <i>or</i></li> </ul>	<ul style="list-style-type: none"> <li>• Same as for “Warning Letter” if a repeat violation.</li> </ul>

<sup>1</sup> Please see Division of Global Migration Health (DGMH) Policy Statement: Enforcement options for CDC-registered animal care facilities (ACFs) for further explanation. CDC reserves the right to determine the appropriateness of any enforcement option based on individual circumstances. The examples provided in this chart are informational and intended for illustration purposes only.

<sup>2</sup> CDC, in its discretion, may choose to issue a warning letter for more serious violations potentially affecting public health, instead of a non-compliance letter, if, for instance, CDC believes that some aspect of its regulations or procedures may have been unclear or if the non-compliance predated CDC’s issuance of a memoranda, policy statement, training material, letter to the ACF, etc., clarifying its policies and practices.

		<ul style="list-style-type: none"> <li>• Repeat violations for which reminders or warning letters have been previously issued; <i>or</i></li> <li>• Violations that appear deliberate, intentional, willful, or are otherwise of a serious nature.</li> </ul>	<ul style="list-style-type: none"> <li>• Issuing reservations for dogs based on certain incomplete information of public health concern (e.g., missing vaccination information, inaccurate, or altered rabies vaccination, titer documents, or teeth photos).</li> <li>• Intentional delays in returning or refusal to return dogs denied entry to their country of departure.</li> <li>• Issuing reservations for ineligible dogs (e.g., dogs under 6 months of age, unvaccinated, failing titer (if not planning to quarantine), different microchip numbers across documents).</li> <li>• Transporting dogs without a reservation from an airport to the ACF without written approval from CDC.</li> <li>• Obstructing, interfering, delaying, or refusing to return dogs denied entry to their country of departure.</li> <li>• Violations of quarantine or other standards for animal care (e.g., dogs in quarantine socializing with other dogs or having access to unauthorized personnel)</li> </ul>
	<p>Non-Compliance Letter Requiring a Corrective Action Plan (CAP)</p>	<ul style="list-style-type: none"> <li>• Same as for Non-Compliance Letter.</li> <li>• Based on individual circumstances, a non-compliance letter may require an ACF to submit a CAP for CDC’s approval describing the corrective steps the ACF will take to ensure that further non-compliance does not occur, e.g., staff retraining, reassignment of staff duties, changes to ACF’s SOP, changes to facility layout to ensure proper quarantine.</li> </ul>	<ul style="list-style-type: none"> <li>• Same as for “Compliance Letter”</li> <li>• CDC will consider if previous non-compliance letters have been issued, if previous efforts at remediation have failed, or if non-compliance appears deliberate, intentional, willful, or is otherwise of a serious nature.</li> </ul>

	Temporary Suspension	<ul style="list-style-type: none"> <li>• Violations that represent a significant public health risk, <i>or</i></li> <li>• Violations that appear deliberate, intentional, willful, or are otherwise of a serious nature; <i>or</i></li> <li>• If the ACF has failed to submit a CAP on a timely basis, failed to adhere to a previously approved CAP, or if the CDC and the ACF have failed to agree on the terms of a CAP, or</li> </ul> <p>The duration of a temporary suspension will be determined based on individual circumstances, e.g., used by CDC as an interim step pending a notice of revocation or until corrective action has been implemented.</p>	<ul style="list-style-type: none"> <li>• Same as for “CAP” if ACF has failed to submit a CAP on a timely basis, failed to adhere to an approved CAP, or if CDC and the ACF have failed to agree to the terms of a CAP.</li> <li>• Same as for “CAP” if non-compliance appears deliberate, intentional, willful, or is otherwise of a serious nature.</li> <li>• Violations that represent a significant public health risk (e.g., failing to report illness or ectoparasites in animals to CDC, alteration of veterinary documents, making false entries in SAFE TraQ, releasing animals without CDC approval).</li> </ul>
	Revocation	<ul style="list-style-type: none"> <li>• Same as for “Temporary Suspension.”</li> <li>• Revocation may be especially appropriate based on a past failure to adhere to CAPs, based on conduct occurring while a temporary suspension is in effect, or if non-compliance appears deliberate, intentional, willful, or is otherwise of a serious nature.</li> </ul>	<ul style="list-style-type: none"> <li>• Same as for temporary suspension</li> </ul>