

AVMA CVTEA Q&A

Standard 4e (Rabies)

Appendix A-Rabies Supplement-Comprehensive Mitigation Plan

Question Category: Compliance

Question	Response
1. When is compliance with the changes to Standard 4e regarding rabies immunizations required?	<p>The revised Standard was implemented in January 2022, compliance is expected at the time of implementation.</p> <p>The Committee will be assessing compliance at each program's report to the CVTEA (site visit, progress report, interim report).</p>
2. What about students already in the program that are half, or more than half-way, through the program. Are they required to be vaccinated?	<p>The CVTEA requires either proof of vaccination or the implementation of a comprehensive rabies prevention protocol for protection of all students.</p>
3. Is there a specific rabies vaccine or mode of administration that is required?	<p>The CVTEA defers the appropriateness of the rabies immunization administration method to a student's medical provider. The Committee follows CDC guidelines for rabies prophylaxis.</p>
4. What happens if a program does not come into compliance with the standard? What happens if we are not in complete compliance for three years? I know we need to report what progress we have made in any required reports, but what does it mean for us, if we not in full compliance for three years?	<p>Programs not in compliance may be placed on Probationary accreditation, an accreditation status that may be assigned to a program that has specific deficiencies in one or more Standards. The deficiencies are of such a nature that they can be corrected in a reasonable length of time, not to exceed two years. If at the end of the two-year time period, the program can provide reasons acceptable to the CVTEA for its inability to comply with the Standards, the CVTEA may by majority vote extend Probationary Accreditation for good cause for a further period not to exceed one year. If the reasons for non-compliance do not have merit, the CVTEA must take immediate action to place the program on Involuntary Terminal Accreditation.</p>
5. What evidence is needed for proof of rabies vaccinations? Is a rabies titer acceptable?	<p>The program can decide how to validate vaccination: shots or titer. Refer to CDC guidelines: Pre-exposure Prophylaxis.</p> <p>It is the purview of each program to determine what documentation is necessary for verifying appropriate rabies immunization status. The CVTEA encourages programs to follow CDC guidelines.</p>

<p>6. What are the vaccination requirements for rabbits, rats, and mice?</p>	<p>There are no USDA approved rabies vaccinations for rabbits or rodents. Per the CDC, small rodents (like squirrels, hamsters, guinea pigs, gerbils, chipmunks, rats, and mice) and lagomorphs (including rabbits and hares) are almost never found to be infected with rabies and have not been known to transmit rabies to humans. From 1990 through 1996, in areas of the country where raccoon rabies was enzootic, woodchucks (groundhogs) accounted for 93% of the 371 cases of rabies among rodents reported to CDC.</p> <p>Programs are not expected to administer rabies vaccination to rabbits or rodents.</p>
<p>7. What is the vaccination requirement for goats?</p>	<p>The administration of a USDA approved vaccine for sheep is considered to be an acceptable use of off-label veterinary practice in goats.</p>

Question Category: Waivers and Exceptions

Question	Response
<p>8. What is the CVTEA's stance on allowing for vaccine refusal, pregnancy, medical, cost, or religious exemptions for the rabies vaccination requirement?</p> <p>Under the ADA, is an institution required to offer vaccine exemptions to students in certain circumstances?</p>	<p>Under the American with Disabilities Act (ADA), any program must comply with requirements to provide accommodations for disabilities and be non-discriminatory. CVTEA expects the Institution to demonstrate its process and criteria for reviewing and approving exceptions and providing reasonable accommodations that still protect the student. The CVTEA recommends that programs consult with their legal counsel on this subject.</p> <p>CVTEA recognizes that exemptions may be needed; however, the program must ensure that every student is educated on the risk of rabies. Exceptions should be granted for extenuating circumstances and not based on financial reasons. The program is responsible for determining eligibility for waivers.</p> <p>If waivers or exemptions are allowed, the program must implement a comprehensive rabies mitigation protocol as described in Appendix A, Statement on Safety to appropriately protect unvaccinated students.</p> <p>Models or simulations are not accepted as substitutions for completion of skills on live animals.</p>
<p>9. What about states such as Hawaii that is a rabies-free state?</p>	<p>All programs must demonstrate that students are educated on the risk of rabies, as moving to work in other states is a possibility. The program must implement a comprehensive rabies mitigation protocol as described in Appendix A, Statement on Safety to appropriately protect unvaccinated students.</p>

Question Category: Comprehensive Mitigation Plan

Question	Response
<p>10. If vaccinations are required, is the rabies mitigation plan still required since all students would be vaccinated prior to animal exposure?</p>	<p>No mitigation plan is needed if all students are vaccinated.</p> <p>If the program grants exemptions, the Committee expects a comprehensive risk mitigation plan for the unvaccinated student(s).</p>
<p>11. If a program does not require student immunizations, are programs allowed to have a separate form with the rabies vaccination information/notification and hold form with the rabies vaccination/notification and hold period post rabies vaccination instead of listed on the MOU?</p>	<p>The mitigation plan requires two MOUs, 1) an MOU that reference animal resources and 2) an MOU that reference externship sites</p> <p>The Committee expects the program to document that all of the animals are vaccinated, with appropriate seroconversion times, prior to the students handling the animals. Parts 1 & 2 of the Comprehensive mitigation plan outlines the Committee’s expectation (in the medical record).</p> <p>The Committee expects the key aspects of the program’s policy to be reflected in the MOUs.</p> <p>The MOUs may refer to subsidiary documents. For example, the MOU may make reference the program’s rabies policy without having to repeat the policy in the wording of the MOU. However, if MOUs refer to subsidiary documents, the program must show that those documents were provided and reviewed as part of the signing of the MOU.</p> <p>If there is a change in a referenced subsidiary document, and the referenced document is changed, the program must record that the updated policy is provided to, and acknowledged by, the signatories of the MOUs.</p>
<p>12. Is documentation needed for every animal the unvaccinated student is in contact with, including if at a private practice or externship site, or just for animals who have bitten the student?</p>	<p>Unvaccinated students must not have contact with animals who have not been vaccinated for rabies and completed the required seroconversion period.</p> <p>Rabies vaccination status of animals must be known and recorded for every animal with which an unvaccinated student is handling.</p>
<p>13. With regard to the “Communication to external parties”, is the college legally able to disclose that a student has been vaccinated for rabies or would that be a HIPPA violation?</p>	<p>The Committee expects the program’s rabies policy will be communicated and referenced in the MOUs with external parties. The program should consult with the institution’s legal Counsel and the accommodations office regarding communications pertaining to individual students.</p>
<p>14. What PPE is the AVMA requiring for students working with live animals with regard to this Standard?</p>	<p>The Committee requires PPE as appropriate for the activity.</p>

<p>15. Are unvaccinated students required to submit all patient medical records showing vaccination history for all animals used throughout the course of the entire program?</p> <p>Does the responsibility to verify that each patient is rabies vaccinated before handling fall on the student or the program? What system should be used to track externship site accountability with regards to this mandate?</p>	<p>Programs are responsible in demonstrating how it is ensuring an unvaccinated student is only handling animals with documented rabies vaccinations. Documentation of compliance may be required.</p> <p>A program may develop a tracking system of its choosing.</p>
<p>16. How do programs appropriately implement a comprehensive mitigation plan for unvaccinated students, whereby the program does not have any control over what animals the students come into contact with. Would distance programs need to do a risk assessment for all of the US and the foreign countries where some students live?</p>	<p>All programs are expected to have oversight of their unvaccinated students and the animals they come into contact with.</p> <p>If students are unvaccinated, the program is expected to complete a risk assessment for each unvaccinated student locality as part of the comprehensive mitigation plan.</p>

Question Category: Human Immunization and Monitoring

Question	Response
<p>17. How often will vaccinated program faculty and staff be required to complete titer testing?</p>	<p>As noted above, the change to accreditation standard 4e and Appendix A-Rabies supplement applies to students and not program faculty, farm staff, externship personnel, etc.</p> <p>CVTEA recommends that programs follow CDC guidelines. CDC website (updated May 2022) recommend a 1 time titer 1-3 years after 2 dose series or 1 time booster in that same timeframe. Check website for current recommendations:</p> <p>https://www.cdc.gov/rabies/prevention/pre-exposure_vaccinations.html</p>
<p>18. When is a person who has been vaccinated for rabies considered fully immunized and able to handle animals?</p>	<p>CVTEA recommends that programs follow CDC guidelines. CDC website states 2-4 weeks after the series is completed. Check CDC website for current recommendations:</p> <p>https://www.cdc.gov/mmwr/volumes/71/wr/mm7118a2.htm</p> <p>Per the CDC information on Rabies Serology, in previous studies all healthy persons tested 2-4 weeks after completion of pre-exposure and postexposure rabies virus prophylaxis, in accordance with the United States Advisory Committee on</p>

	Immunization Practices (ACIP) guidelines, demonstrated a significant antibody response to rabies virus. However, the CVTEA recommends that the program consult with human health professionals to determine when newly vaccinated students would be deemed as protected by the human rabies vaccine.
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Question Category: Hold/wait Periods for Animals

Question	Response
19. How is a hold period defined?	A hold period is defined as a period of time post exposure of an animal to rabies regardless of vaccination status.
20. What about juvenile animals that are not rabies vaccination eligible at the farm?	According to the AABP, cattle are not commonly vaccinated. The Committee is not able to address the rabies seroconversion for production animal and large animal species. Unvaccinated students must not handle unvaccinated farm animals. A vaccinated farm animal can be used by an unvaccinated student.
21. For the Hold/seroconversion period post rabies vaccination (per CDC-28 days). Does this refer to any animal receiving a rabies vaccination or is this related to post-exposure vaccination?	1 st rabies vaccine 28-day seroconversion. Animals that have received 2 nd vaccine are considered to have sufficient protection.
22. For the documentation of seroconversion period including location and handling procedures during the hold – If this is for an owned animal that received a vaccine elsewhere, does the owner need to report the location the animal was held and how they were handled?	As long as the students are not exposed during the 28-day period it would not require documentation.
23. With submission of a vaccination record, the program may not know if this is the animal's first time to receive the rabies vaccine in order to apply the 28-day or 45-day hold period. What about an animal that is getting a 1-3yr rabies booster, are programs required to wait 28 days past the booster or is it okay to utilize that animal since it is not the initial vaccine, assuming the animal has kept up to date with boosters?	The date of protection would be determined by the dating on the rabies certificate or medical record. Rabies status should be based on rabies documentation which indicates the expiration of the rabies vaccination and verifies that the vaccination is a booster, not the initial vaccination.

<p>24. The rabies mitigation plan calls for animals to be held for 28 days post vaccine for seroconversion, but the rabies observation period is 10 days. Would it be more efficient and just as safe to maintain a 10-day hold period for these animals vs. 28 days?</p>	<p>The 28-day hold is for seroconversion post vaccination. The 10-day hold is for an animal bite regardless of vaccination status.</p>
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Question Category: Other issues/Topics

Question	Response
<p>25. What is the legal ramification, if any, to the college if a student has an adverse reaction to a mandated vaccine?</p>	<p>Programs must consult their legal counsel for advice.</p>
<p>26. Can programs still require observation hours/work experience as a condition for acceptance into the program since applicants could potentially be exposed in a veterinary setting?</p>	<p>Observations may be continued as applicants are not yet admitted into the program. Thus, CVTEA Standards would not apply to these individuals.</p>
<p>27. The CVTEA provides the following as guidelines regarding seroconversion and hold periods:</p>	<ul style="list-style-type: none"> • 28-day hold/wait for the full titer post vaccination for 4-month old puppies and kittens and adults. • Vaccinated animal with known exposure to a rabid animal should have received a booster and be held by owner for 45 days (<i>Rabies Compendium</i>) • No vaccination history and known exposure: either euthanized or vaccinated and quarantined for 4 months by owner with no other human exposure. (<i>Rabies Compendium</i>)
<p>28. How will programs be required to document compliance with the Standard?</p>	<ul style="list-style-type: none"> • CVTEA will ask programs to submit updated rabies vaccination and mitigation policies no later than September 15, 2023 via a specific Instrument in the CVTEA Accreditation Portal by Armature. If a concern is identified, an response letter will be sent to the program.