

Why GAO Did This Study

For decades, the public has been concerned that lost or stolen dogs and cats could be used in research. The U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) is responsible for the licensing and oversight of dealers who provide animals for research. Random source Class B dealers—who generally obtain dogs and cats for research from individuals, pounds, and other dealers—have been the focus of this concern.

GAO was asked to determine (1) the number of random source Class B dealers, (2) the extent to which APHIS conducts inspections of these dealers and verifies their records, and (3) the costs associated with APHIS's oversight of these dealers compared to other types of dealers. GAO reviewed the Animal Welfare Act (AWA); APHIS regulations and guidance; inspection reports; agency data, such as "traceback" data used to verify dogs and cats are not lost or stolen; and interviewed and reviewed documents from agency officials and other stakeholders.

What GAO Recommends

GAO recommends that USDA (1) improve its analysis and use of the traceback information it collects for random source Class B dealers and (2) develop a methodology to collect and track the oversight costs of each class of dealer and others APHIS inspects. USDA agreed with GAO's recommendations and noted specific actions it will take to implement them.

View [GAO-10-945](#) or [key components](#). For more information, contact Lisa Shames at (202) 512-3841 or shamesl@gao.gov.

ANIMAL WELFARE

USDA's Oversight of Dealers of Random Source Dogs and Cats Would Benefit from Additional Management Information and Analysis

What GAO Found

As of July 2010, nine Class B dealers were licensed by APHIS to sell random source dogs and cats for research. This number has not changed significantly since fiscal year 2005 but declined from over 100 dealers in the early 1990s. Random source dealers sold 3,139 animals to research facilities from November 2007 to November 2008—equivalent to about 3 percent of the dogs and cats used in research in fiscal year 2008.

APHIS inspections have found numerous random source Class B dealer violations, such as the condition of animal housing and inadequate veterinary care, but APHIS has not completed all of its fiscal year 2009 tracebacks related to these dealers or analyzed traceback verification data to detect problems with the process. In reviewing all inspection reports for fiscal years 2007 through 2009, GAO found APHIS generally inspected, or attempted to inspect, each of these dealers at least four times a year, as directed. APHIS guidance directs inspectors to examine the condition of a dealer facility, examine the condition of the dogs and cats present, and review dealer records. Overall, 54 of the 156 inspection reports cited at least one dealer violation, and seven of the nine dealers had one or more violations. As of July 2010, several dealers were under further APHIS investigation due to repeated violations. To verify dealer records and help ensure dealers are not obtaining lost or stolen animals, APHIS attempted a total of 326 tracebacks in fiscal year 2009. Though APHIS has conducted tracebacks since fiscal year 1993, it did not compile traceback data until fiscal year 2009. As of June 2010, data showed APHIS successfully traced a dog or cat back to a legitimate source about 71 percent of the time. About 29 percent of tracebacks APHIS conducted during this period were either unsuccessful or had not been completed as of June 2010, as directed by agency guidance. Because APHIS does not analyze traceback data, it cannot systematically detect problems with tracebacks and take all available steps to ensure random source dealers obtain dogs and cats from legitimate sources. For example, without analyzing data, APHIS cannot know whether the same sellers or inspectors were consistently involved in late or incomplete tracebacks.

According to APHIS officials, the agency does not collect cost information specific to its oversight of random source Class B dealers, or to any other class of dealer it inspects. Officials also said the agency does not currently have a mechanism to determine these costs. Federal internal control standards call for agencies to obtain such information for program oversight. For example, APHIS inspectors do not record their time by specific oversight activity or class of dealer. Without a methodology to collect and track costs associated with the oversight of these dealers, and others APHIS inspects, APHIS management cannot identify trends or deficiencies requiring its attention. Furthermore, management cannot develop a business case to change its oversight program, if needed, to more effectively and efficiently use available resources.