



CALIFORNIA DEPARTMENT OF
Food and Agriculture

USDA Biosecurity Audit Tool for HPAI: What Poultry Producers Need to Know

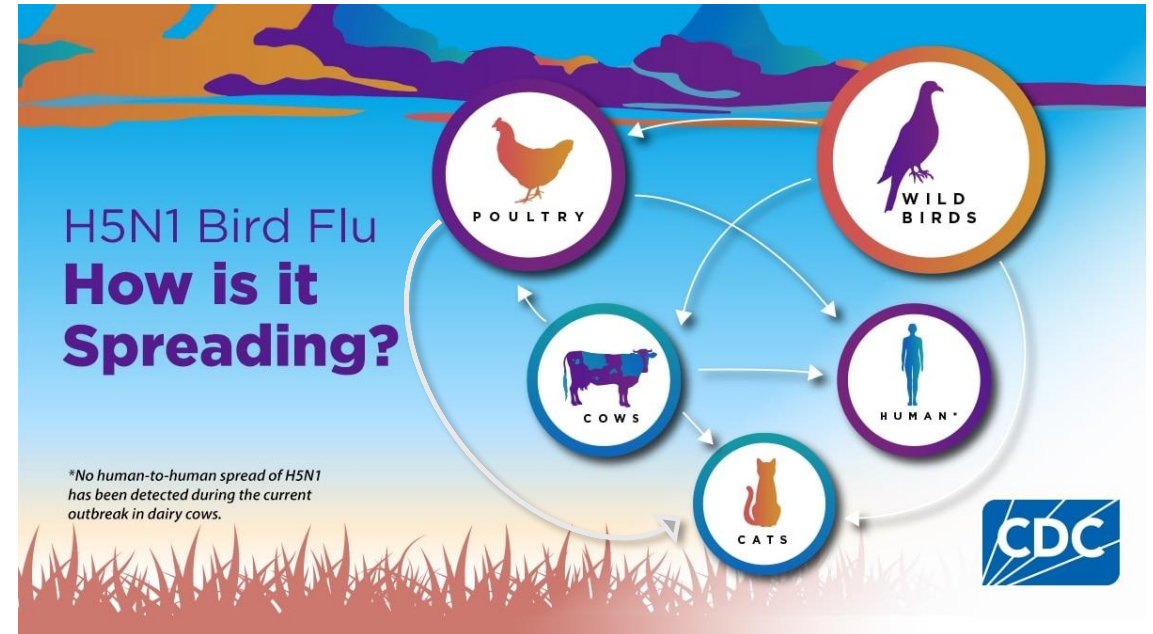
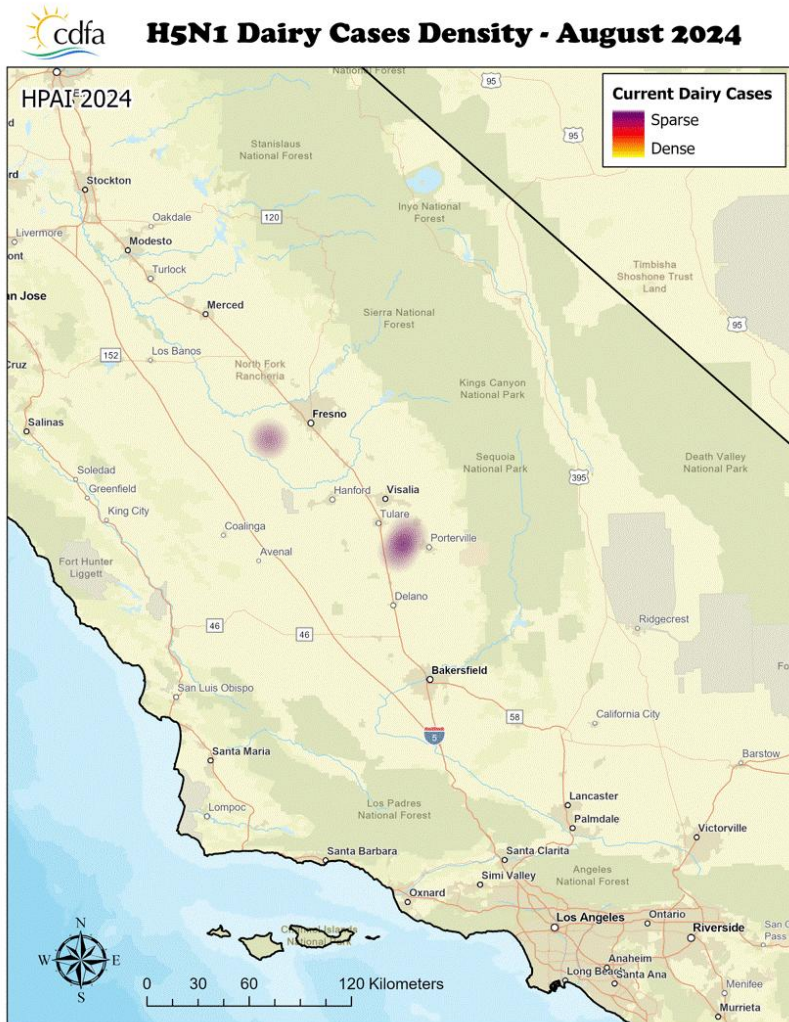
July 2025

HPAI and Its Impact on Poultry Producers

- Economic & industry impact
 - Significantly more losses seen in most recent outbreak vs past outbreaks
 - \$227 million spent on indemnity to reinfected premises since 2022
- Why create new interim rule for indemnity?
 - Current biosecurity practices have not been adequate to prevent infection/re-infection
 - HPAI in dairy cattle adds extra source of exposure for infection

Total poultry lost in current wave in CA (vs 2023-24 winter outbreak)		
	Current Wave	2023-2024 Winter
Egg layers/Pullets	10.6 million	4 million
Broilers	5 million	1.55 million
Turkeys	641,600	106,000
Ducks	583,500	248,000
Pheasants/Chuckers	45,000	

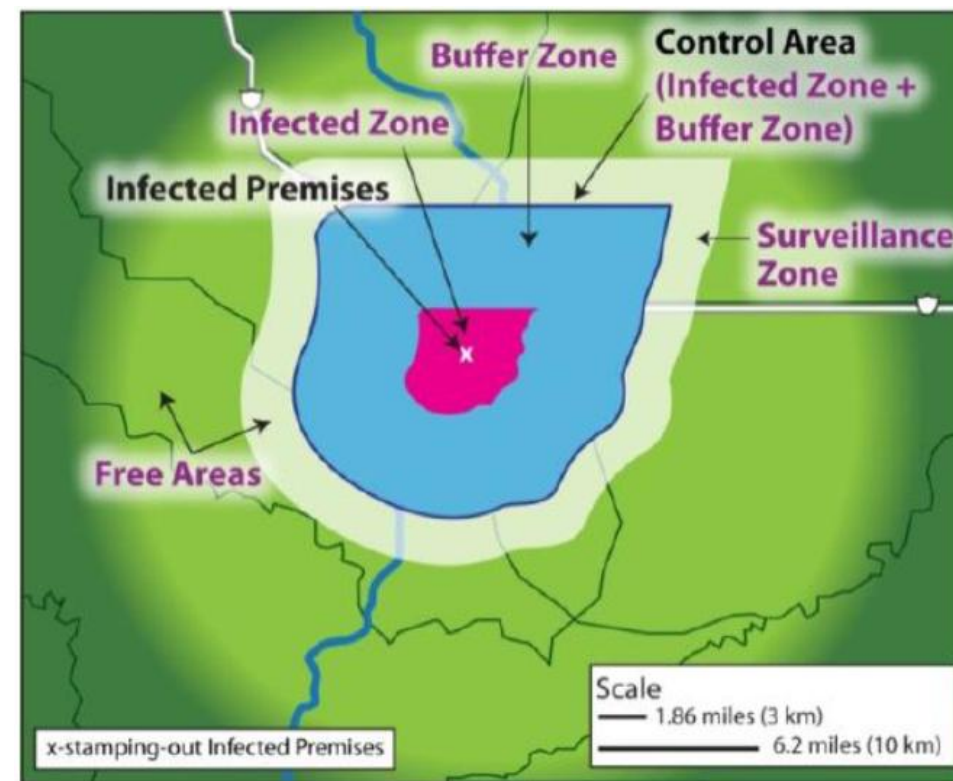
The Dairy Cattle Factor



Source: [H5 Bird Flu: Current Situation | Bird Flu | CDC](#)

Key Definitions

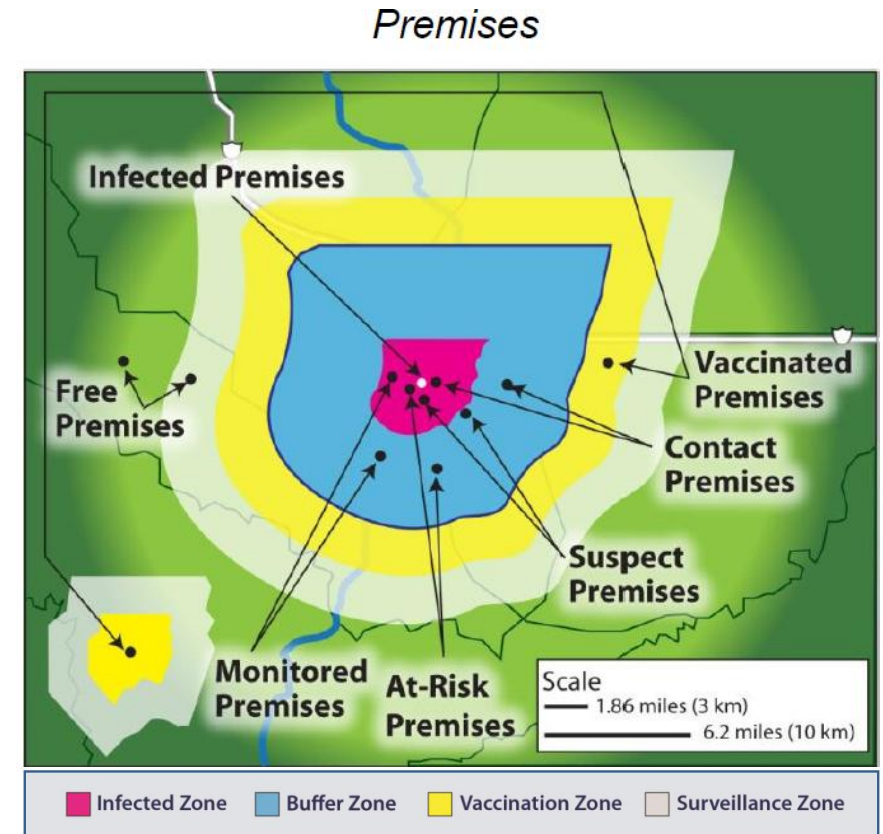
- **Control Area:** Region surrounding an infected premises
 - Contains **Infected zone** and **Buffer zone**
- **Infected Zone:** Immediate area around an infected farm
- **Buffer Zone:** Surrounds the infected zone, includes at-risk premises
- **Biosecurity Audit:** Assessment to verify compliance with **USDA biosecurity requirements**



Source: HIGHLY PATHOGENIC AVIAN
INFLUENZA RESPONSE PLAN, THE RED BOOK
(May 2017)

What is a Buffer Zone Premises?

1. Within 10 km distance of an infected premises
 2. Under quarantine
 3. Surveillance testing
 4. Must request permits for movement of birds
- **Note:** depending on your proximity to nearby infected premises, it is possible to be in multiple buffer zones.



Source: HIGHLY PATHOGENIC AVIAN
INFLUENZA RESPONSE PLAN, THE RED BOOK
(May 2017)

Overview of the Interim Rule on HPAI Indemnity

Key Rule Changes (Effective December 31, 2024)

- **Indemnity payments are now conditional upon successfully passing a biosecurity audit**
- Premises affected:
 - **Buffer zone premises:** must pass virtual audit **before** moving poultry onto premises to be eligible for indemnity
 - **Previously infected premises:** must pass in-person audit **before** restocking to be eligible for indemnity
- Goals: incentivize stronger biosecurity measures, reduce repeat infections, limit disease spread, lower government indemnity costs



Biosecurity Audit Requirements

Who must comply?

- **All commercial poultry producers in control areas**
- Indemnity eligibility dependent on **successfully passing an audit before:**
 - **Moving** poultry into a buffer zone
 - **Restocking** a previously infected premises

Who is exempt?

- < 75,000 commercial egg-laying hens
- < 25,000 egg-type game birds/waterfowl
- < 100,000 broilers raised annually
- < 30,000 meat turkeys raised annually
- < 5,000 breeder birds raised annually

National Poultry Improvement Plan (NPIP)

- Producers must be part of the [National Poultry Improvement Plan \(NPIP\)](#) and have annual NPIP audits to qualify for BCAP.
- Many BCAP Audit Tool criteria are NPIP Program Standards Biosecurity Principles:
 - State-approved written biosecurity plan that meets the 14 NPIP Biosecurity Principles
 - Sourcing birds &/or eggs from currently certified NPIP flocks
 - Biosecurity signs at PBA and LOS
 - Rodent/pest control program
 - Proper feed storage
 - Mortality disposal + addressing elevated levels



***NOTE: The entirety of the supply chain must meet NPIP standards for the audited premises to be an NPIP premises.**

Frequency of Audits

For qualifying operations, an audit must be conducted:

- Every 6 months for previously infected sites until California is declared HPAI-free
- Note: Pre-movement BCAP audit will be waived if an audit has been conducted **within the past 6 months.**

Scheduling the Biosecurity Audit



Poultry farm owner
or representative
contacts:

- Assigned Case Manager
- Area Veterinarian-In-Charge
- State Animal Health Official,
or
- Email: sfspermits@cdfa.ca.gov

Audit type: virtual
or in-person?

- Buffer Zone Placement:
virtual
- Restocking previously
infected premises: in-person
(mandatory)

- USDA APHIS Area Veterinarian-In-Charge (AVIC)
 - Dr. Paul Sciglibaglio:
 - paul.sciglibaglio@usda.gov
 - 505-313-8050
- USDA APHIS Assistant AVIC
 - Dr. Adam Smith:
 - adam.smith@usda.gov
 - 559-368-6977
- CDFA State Animal Health Officials
 - [CDFA - AHFSS - Offices By Location](#)
 - (Under “Animal Health” Field Offices drop-down menu)

Biosecurity Audit Contacts



What Does a BCAP Audit Cover?

Verification of Written Biosecurity Plan and its Implementation

- **Biosecurity Plan Review**
 - Does the farm have a written biosecurity plan?
 - Is it updated and implemented correctly?
- **Visual Verification:**
 - Perimeter security: Fencing, signage, restricted access, visitor log
 - Line-of-Separation (LOS) procedures: Entry/exit biosecurity, PPE use
 - Rodent & wildlife control: Prevention strategies, bait stations, inspections
- **Documentation & Training Compliance**
 - Employee biosecurity training records
 - Cleaning/disinfection logs
 - Movement tracking (vehicles, equipment, people)



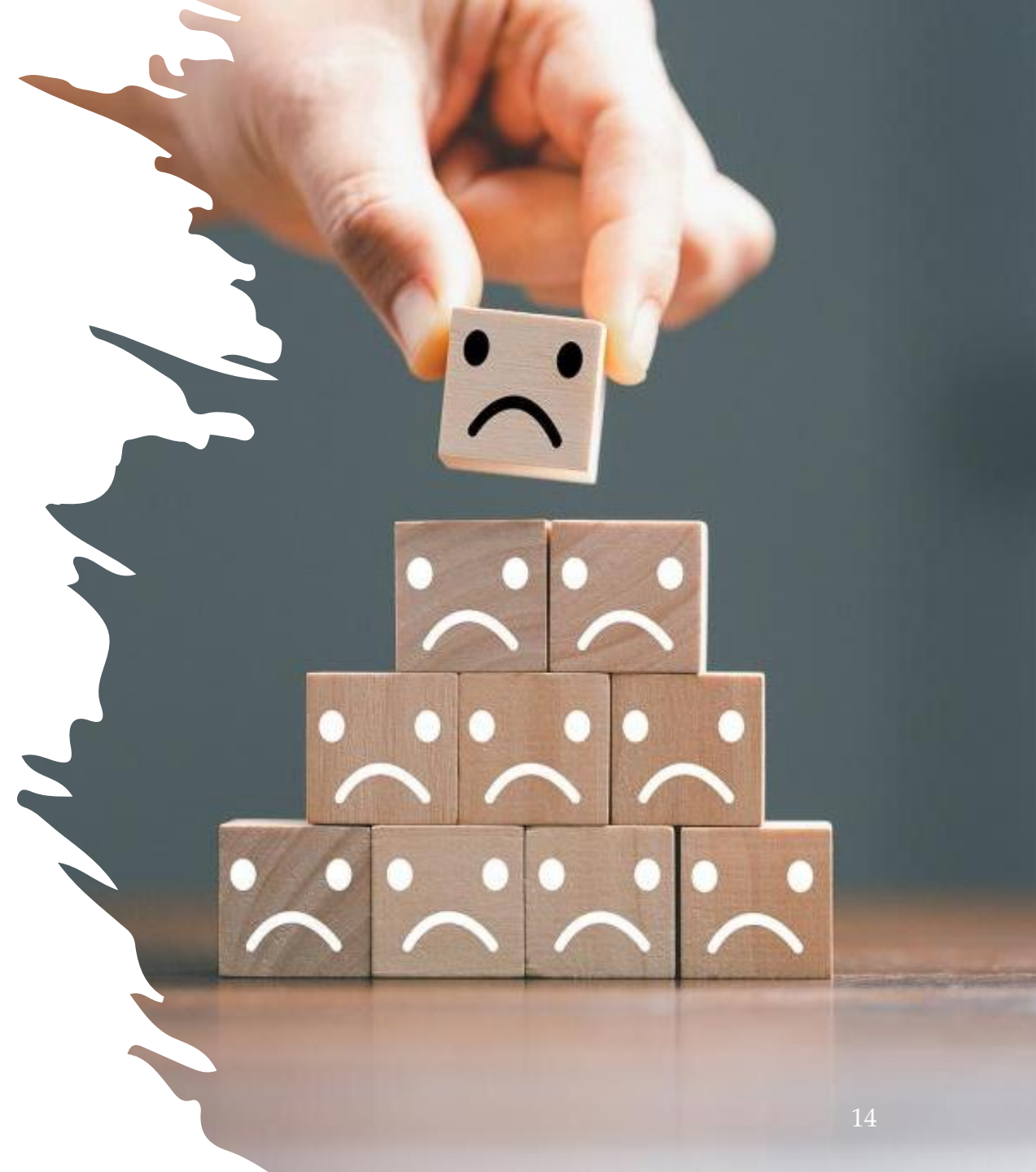
Company Documents

The company's poultry biosecurity plan, policies, and procedures must be submitted to the auditor for review prior to scheduling the actual audit.

What Happens If You Fail the Audit?

Outcomes & next steps:

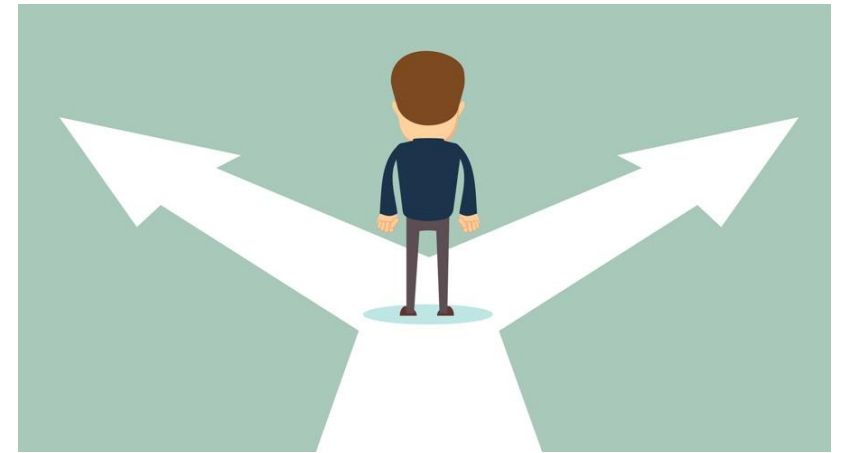
- Deficiencies identified → Producer must correct them
- Re-audit required to assess remediations
- Reconsideration Process:
 - Producer **must** appeal the decision to the auditor in writing
 - A panel review is available if reconsideration fails
- Failure to pass = **No indemnity payments for any future flocks until an audit is successfully passed!**
 - No compensation for birds lost to depopulation



Audit Reconsideration Contacts

Send reconsideration requests within 14 calendar days to:

- APHIS.HPAI.BCAP.audits@usda.gov,
or
- Biosecurity Audit Reconsideration
 - 920 Main Campus Drive, Raleigh,
NC 27606



Challenges & Concerns for Producers

Time & Labor Demands:

- Document review and remediations may take several weeks
- Visual verification portion may take ~2 days (longer if re-audits are needed)
- 72-hour downtime required between in-person audits

Personnel Constraints:

- Only USDA-trained auditors may conduct audits
- Only certified USDA veterinarians can review and approve audits
- *Due to limited USDA personnel who can review and approve audits, we strongly recommend planning at least 3-4 weeks in advance



Commonly Identified Deficiencies

- Biosecurity plans & supporting documentation are:
 - insufficiently developed to pass the requirements of the BCAP audit tool;
 - lacking procedures and detailed information.
- Premises' map(s) not showing biosecurity measures (e.g., PBA, LOS, PPE stations, access points, etc.)

Part 2: LOS/PBA Procedures

	Yes	No
3. Biosecurity signs warning unauthorized visitors not to enter the farm or any of its buildings (e.g., No Admittance—Biosecurity Zone) are required to be posted at all entrances to the PBA and LOS.	<input type="radio"/>	<input type="radio"/>
4. Access points/entryways to the LOS (poultry barns/housing, complexes and egg processing areas) are restricted or monitored during nonbusiness hours (i.e. includes hours outside normal production and flock monitoring at the facility).	<input type="radio"/>	<input type="radio"/>
5. LOS is physically marked and described in written biosecurity plan	<input type="radio"/>	<input type="radio"/>
Note: Includes any physical barriers, markers or signage to indicate LOS entryways (barn door, tape/ lines, benches, PPE storage containers, footpans, biosecurity signage, etc.)		
6. Written complex policy requires that farm workers do not own non-company birds – including any gallinaceous bird species, waterfowl, or gamebird species or exotic birds with outdoor access. The policy must include that when birds are present on the farm, all persons crossing the Line of Separation (LOS) who have had contact with non-company birds, must adhere to a minimum 48-hour downtime prior to entry to the Line of Separation (LOS).	<input type="radio"/>	<input type="radio"/>
7. Written complex policy must have biosecurity requirements for farm workers and farm service personnel who have visited another live production poultry premises, slaughter facility, or egg processing facility, which at a minimum must include cleaning and/or disinfection of vehicle tires, logging of visit, and footwear biosecurity mitigations before crossing the farm PBA and donning of personal protective equipment (PPE) before crossing any LOS on-site	<input type="radio"/>	<input type="radio"/>
8. The following farm service personnel are not permitted to cross or enter the LOS of live poultry production areas where they are not actively working or egg processing areas: <ul style="list-style-type: none"> • Non-company employed live haul catch crews and contracted or company employed drivers that make multiple stops at more than one individual farm in any given day. 	<input type="radio"/>	<input type="radio"/>

Compliance Strategies for Producers

- Prepare early!
 - Use the USDA Audit Tool (QR Code) to identify deficiencies and ensure your written documentation meets the exact requirements of all criteria before your official audit
 - Consider signing up for a voluntary USDA Biosecurity Assessment
- Organize and maintain accurate records:
 - Keep detailed logs of cleaning, training, and movement controls
 - Update biosecurity plans regularly
- Train personnel:
 - Ensure all employees understand and follow biosecurity protocols
 - Conduct routine mock audits



Scheduling Your Restock

- We recommend **NOT** scheduling a restock until your BCAP audit is successfully passed.
- Again, restocking prior to successfully passing a BCAP audit will affect indemnity eligibility for the life of the flock.

August EXAMPLE 2025					
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SAT/SUN
				1	2/3
4	5 BCAP audit successfully passed	6 Begin to schedule restock	7	8	9/10
11	12	13	14	15	16/17
18	19	20	21	22	23/24
25	26	27	28	29	30/31

Biosecurity Templates

- The California Secure Food Supply (SFS) Program's website contains various biosecurity plan templates:
 - <https://bit.ly/CDFASFS>
- **Examples:**
 - [California Broiler Farm Premises Enhanced Biosecurity Plan Template](#)
 - [Comprehensive Poultry Farm Biosecurity Plan Template](#)
 - [California Hatchery Premises Enhanced Biosecurity Plan Template](#)



Biosecurity Incentives-Focused Assessment (BIFA)

- Purpose:
 - Bolster structural and operational biosecurity plans and practices in **non-infected** premises
- Assessment covers:
 - Biosecurity documentation
 - Maintenance of Perimeter Buffer Area/Line of Separation
- Outcomes:
 - Summary report + actionable recommendations
 - **USDA may share up to 75% of costs to correct high-risk gaps**
- Voluntary but strongly encouraged

Note: a BIFA may count as a virtual buffer zone BCAP if the premises ends up in a buffer zone within six (6) months after successful completion of the BIFA.

Wildlife Biosecurity Assessment (WBA)

- Purpose:
 - Identify and mitigate wildlife-related risks for HPAI transmission in non-infected premises
- Assessment covers:
 - Wildlife attractants (e.g., feed spills, standing water)
 - Farm perimeter integrity (fencing, netting, barriers)
 - Deterrents and control measures
- Outcomes:
 - Risk mitigation recommendations
 - USDA may share up to 75% of costs to fix highest-risk issues
- Voluntary but strongly encouraged



Requesting a BIFA and/or WBA

Email

poultry.biosecurity@usda.gov
or call 844-820-2234 to request
either assessment.



<https://bit.ly/4lzrsSq>

Key Takeaways

- ❖ Biosecurity audits are now required *before* placement of birds to be eligible for indemnity payments.
- ❖ Failure to pass an audit = no indemnity if infected post-placement
- ❖ A reconsideration process is available for producers who disagree with an initial audit's determination.
- ❖ Compliance minimizes delays and ensures continued operations.
- ❖ Enhanced biosecurity practices protect individual farms, workers, and the entire industry.
- ❖ Two free, voluntary biosecurity assessments (BIFA, WBA) are available for non-infected premises that want to bolster their biosecurity.
- ❖ Stay informed! Review updates to audit standards & requirements.



Links & Resources

- USDA APHIS HPAI Indemnity Update:
bit.ly/HPAIindemnityAnnouncement2025
- Federal Register: Payment of Indemnity and Compensation for HPAI:
bit.ly/HPAIindemnity2025
- Note: bitlinks are case sensitive



Links & Resources

- HPAI Biosecurity Audit Tool:
bit.ly/HPAIBiosecurityAuditTool
- Secure Food Supply:
<https://bit.ly/CDFASFS>
- Note: bitlinks are case sensitive



Additional Links

***Note: This is an interim rule, meaning it is effective immediately (December 31, 2024). The Interim Rule Public Review and Comment Period was reopened on April 14, 2025.**

Federal Register: Payment of Indemnity and Compensation for Highly Pathogenic Avian Influenza; Reopening of Comment Period
<https://bit.ly/HPAIindemnityCommentPeriodReopening>

Federal Register: Payment of Indemnity and Compensation for HPAI
bit.ly/HPAIindemnity2025



Questions?? Contact Us



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inquiries about this
presentation to
sfspermits@cdfa.ca.gov