November 5, 2026
The Honorable Brooke L. Rollins
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue SW Washington, DC 20250

Dear Secretary Rollins:

The National Association of State Departments of Agriculture (NASDA), representing the commissioners, secretaries and directors of agriculture in all 50 states and four U.S. territories, and the National Assembly of State Animal Health Officials (NASAHO), representing the state animal health officials responsible for protecting livestock health and responding to animal disease threats across the country, write to urge USDA to take additional action to control and ultimately eradicate Highly Pathogenic Avian Influenza (HPAI) in dairy cattle. Given the central role states play in disease surveillance, response and eradication, NASDA and NASAHO believe the continued circulation of H5N1 in dairy herds warrants additional tools and urge USDA to immediately authorize a voluntary national emergency vaccination framework for dairy cattle, beginning with a limited pilot program in willing states, as part of a broader integrated disease control strategy.

The emergence and persistence of HPAI H5N1 in livestock poses an urgent threat to public and animal health, national agricultural stability, international market access, and the economic viability of the dairy and poultry industries across the U.S. Since the initial single spillover event of B3.13 genotype from wild birds into dairy cattle in Texas in 2024, there have been over 1,200 dairy farms with confirmed cases in 20 states nationally. Spillover of the strain from dairies to poultry facilities in proximity is further complicating this issue resulting in depopulation of millions of birds. A persistent multi-state outbreak threatens to disrupt supply chains, undermine consumer confidence and amplify concerns about affordability of dairy, beef, eggs and poultry products at a time when grocery prices are on the rise.

***Economics***
From February 2022 to February 2025, USDA APHIS committed about $1.81 billion for HPAI response activities, plus an additional $1 billion in a new 2025 strategy to curb the outbreak. In addition, $824 million is allocated for APHIS response and producer programs. To date, APHIS has also committed $1.843 billion for indemnity for depopulated birds and eggs, as well as $578 million for depopulation, disposal, and virus elimination activities. Current associated personnel, contractors, state agreements, and field costs are estimated at an additional $466 million. In total, APHIS has committed $2.887 billion. These figures are based on USDA APHIS programmatic data.

Genomic and epidemiological data demonstrate lateral spread between dairy and poultry operations, particularly in areas where infected dairy cattle and commercial poultry are in close proximity. As of July 2025, at least 17 states have experienced commercial poultry losses associated with spillover events linked to dairy operations based on GSAID and GenoFlu data. To date, there have been 115 domestic flocks infected with the B3.13 strain resulting in the loss or depopulation of more than 36 million birds and accounting for 28% of the total detections in poultry with an estimated $360 million for indemnity alone. Some affected dairies have experienced gross revenue losses of up to $700,000. Despite aggressive supportive care to treat sick cows, many never fully achieve pre-infection milk production, are culled from the herd early, die, or experience late-term abortions impacting the beef supply. A total of 807 herds across 20 states are currently enrolled in USDA's HPAI financial support programs for dairy cattle producers. In addition, 989 producer applications have been processed through the Emergency Assistance for Livestock, Honeybees, and Farm-Raised Fish Program (ELAP) with more than $390 million paid to date.

Beyond direct producer losses and federal response costs, continued circulation of HPAI in dairy cattle creates significant uncertainty for domestic and international markets. Trading partners closely monitor emerging animal disease events, and prolonged outbreaks can increase the risk of export disruptions, additional certification requirements, and reduced market confidence in U.S. dairy, beef, poultry, and genetic products. A successful control and eradication strategy is essential not only for animal health and food affordability, but also for maintaining the global competitiveness of U.S. agriculture and preserving access to key export markets.

***Veterinary Countermeasures Strategy***

Proactive surveillance strategies with the National Milk Testing Strategy (NMTS) and premovement testing have been critical in early detection. However, detection is only effective if it is paired with specific and effective control and eradication strategies. Key epidemiological principles in response include: 1) prevent contact between susceptible animals and exposed/infected animals and herds; 2) stop the production of the virus in infected or exposed animals and 3) increase disease resistance of susceptible animals. In poultry, the "stamping-out" strategy has been adopted as an eradication strategy. However, in dairy, current control and eradication efforts rely primarily on surveillance, biosecurity and movement controls, without deployment of a veterinary countermeasure capable of directly reducing disease spread to susceptible animals. While natural infection can generate protective immunity, the duration of the immunity is short lived, leaving herds susceptible for reinfection.

Without a proactive, coordinated eradication strategy, H5N1 risks becoming an endemic disease in U.S. dairy cattle, requiring USDA, State Animal Health Officials and industry to manage the disease for years while continuing to respond to costly spillover events in poultry. There is a clear and immediate need to deploy emergency veterinary countermeasures, including USDA-approved vaccines, as part of an integrated disease control strategy that also incorporates surveillance, biosecurity, movement management, animal identification and traceability.

In 2025, USDA announced a five-pronged strategy to combat highly pathogenic avian influenza (HPAI) and lower egg prices. One of those key priorities included the investment in new-generation vaccines, therapeutics or innovative solutions. NASDA and NASAHO support the Secretary's emphasis on advancing new-generation vaccines and other innovative solutions and urge USDA to approve and deploy effective HPAI vaccines as part of a voluntary national disease control strategy for dairy cattle. Any vaccination strategy should be science-based, risk-informed, and implemented in coordination with federal and state animal health officials to support disease control objectives while minimizing potential trade and market disruptions. A dairy cattle vaccination strategy could be deployed judiciously, prioritizing affected herds, states and other populations based on epidemiological risk. While USDA has stated that it continues to support their rapid development and timely approval, several H5N1 vaccine candidates for dairy cattle are currently undergoing field trials or are awaiting final approval for emergency use.

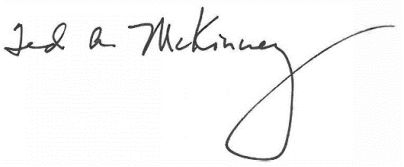
***Recommendation***

States and USDA have a shared mission to protect the health, welfare, and economic viability of animal agriculture. **NASDA and NASAHO urge USDA to immediately approve a voluntary national emergency vaccination framework for dairy cattle, beginning with a pilot program in willing states. Participation should remain voluntary, with vaccination deployed within a state in consultation with and with the concurrence of the State Animal Health Official.** This approach would allow USDA, states and industry to evaluate vaccine effectiveness, surveillance protocols, implementation needs and potential trade impacts while establishing a pathway for broader use if epidemiological conditions warrant. To implement this recommendation, we encourage to stand up a task force, including state animal health officials, to establish clear criteria for state participation, vaccine deployment, post-

vaccination surveillance, animal identification and movement, and the conditions necessary to expand or conclude vaccination activities.

Together, states and USDA can strengthen public and animal health, protect our food supply, reduce disease transmission within and between livestock and poultry operations, preserve domestic and international market confidence, and advance the long-term goal of HPAI eradication in dairy cattle. Continued delay risks further establishment of H5N1 in dairy cattle, additional spillover into poultry, and increasing costs to producers, taxpayers and U.S. agricultural markets.

Sincerely,



Ted McKinney, CEO, National Association of State Departments of Agriculture



Dr. Alex Hamberg, President, National Assembly of State Animal Health Officials

Cc: Undersecretary Dudley Hoskins, Deputy Undersecretary Jeremy Witte, Administrator Kelly Moore, Chief Veterinary Officer Allan Huddleston