

New CDC dog importation requirements: FAQs for veterinarians

Starting August 1, all dogs entering or re-entering the U.S. must meet new requirements to protect the country from reintroduction of dog-mediated rabies virus variant (DMRVV or canine rabies), regardless of the planned duration of stay or the country of origin. In adopting these regulations, the U.S. Centers for Disease Control and Prevention (CDC) aligned U.S. importation requirements for dogs with the importation requirements of other countries free of canine rabies by requiring proof of rabies vaccination and adequate serologic test results (titer) from a CDC-approved laboratory.

The following are answers to questions veterinarians might have about the CDC's final rule.

Q: What are the new importation requirements for dogs?

A: All dogs must meet **all** of the following requirements:

- Be healthy on arrival
- Be at least 6 months old
- Have an International Organization for Standardization (ISO)-compatible microchip (implanted prior to the required rabies vaccination)
- Have a CDC Dog Import Form receipt
- Have government-endorsed documentation of their vaccine and/or travel history (specific requirements depend on where the dog has been in the last 6 months and whether or not it was vaccinated against rabies in the U.S.)

Dogs in certain situations (e.g., foreign-vaccinated dogs coming from rabies high-risk countries) face additional requirements for entry.

Q: How can I determine which specific requirements and additional documents apply for a given dog?

A: The CDC offers resources to aid decision-making and compliance on its website, including relevant forms, checklists, and a DogBot tool to help determine which rules apply based on a dog's situation. Find links to these resources and the final rule at avma.org/AnimalTransport.

Q: Does the CDC's final rule affect the importation of cats, too?

A: The final rule does not change entry requirements for cats. The CDC requires cats to be healthy to enter the U.S., and cats require no rabies documentation.

Q: What will the U.S. customs inspector need to see before a dog is allowed to enter or re-enter the U.S.?

A: Requirements apply at all ports of entry: land, air, and sea. They depend on where the dog was vaccinated against rabies, where it has been in the 6 months before U.S. entry or re-entry, and which forms of documentation the importer has chosen to provide. In general, importers will need to show the following:

- A receipt indicating completion of the CDC Dog Import Form, which will be accessible on the CDC's website beginning July 15. This form is completed by the importer and does not require review or verification by a veterinarian. While the CDC recommends people complete the form ahead of time, it can be completed in less than 5 minutes from any location with cell service. The form submission system generates a receipt within minutes of submission, and the form is free to complete. The port of entry listed on the CDC Dog Import Form receipt must match the port of entry of arrival.
- Official paperwork endorsed by a government veterinarian. There are various ways to meet this requirement, depending on the circumstances.
- The dog. The customs officer will visually confirm that the dog matches the photo and description on the CDC Dog Import Form receipt and also may scan the dog's microchip to confirm that it matches the paperwork.

Although the new requirements don't include pre-travel testing or vaccination against diseases other than rabies, any dog that appears ill either at the port of entry or during evaluation at a CDC-registered animal care facility may be required to undergo additional evaluation by a veterinarian to rule out diseases transmissible to people.

Q: What is the rationale behind the requirement that ALL dogs be at least 6 months old?

A: The CDC describes the multiple considerations that informed this requirement throughout its final rule on dog importation. Briefly, the CDC believes that the 6-month age requirement for all dogs will help protect public health, while improving safety and welfare for young dogs subjected to stressful travel environments in which their health could be compromised. In the context of dogs arriving from countries with a high risk of canine rabies, the age requirement ensures the following:

- Imported dogs are old enough to be vaccinated against rabies.
- The vaccination has time to be effective and confer immunity to the dog.
- Protection against rabies can be verified.
- An appropriate waiting period exists after any rabies titers are measured to ensure the dog doesn't develop signs of rabies.

It is not sufficient that a dog be old enough to be vaccinated; there must be sufficient time for immunity to develop and authorities must be able to verify immunity. Dogs cannot be vaccinated effectively against rabies before 12 weeks of age, and are not considered fully vaccinated until 28 days after vaccination.

The CDC decided to apply the same age requirement to dogs from countries that are low-risk or free of canine rabies because the agency has documented cases of importers moving dogs too young to be vaccinated effectively from countries with a high risk of canine rabies to low-risk countries to avoid rabies vaccination requirements.

Q: Why do the rabies vaccination requirements apply to dogs from countries that are low-risk or free of canine rabies? Can't those dogs be considered at low risk of being infected?

A: The CDC is aware of individuals and organizations who have tried to circumvent rabies vaccination requirements by shipping puppies born in countries with a high risk of canine rabies into the U.S. through countries free of canine rabies. This is why the age requirement and government-endorsed documentation requirement both apply to dogs traveling from low-risk countries. However, dogs that have only been in low-risk or canine rabies-free countries in the 6 months before travel are not required to be vaccinated against rabies before travel.

Q: Are the new vaccination requirements restricted to rabies? Are any other vaccinations required?

A: The CDC recommends that dog owners consult their veterinarian about which other vaccines may be appropriate for their pet, but rabies is the only vaccine specifically required for importation. This is because the CDC's mandate is to protect human health, and rabies is the most serious vaccine-preventable disease in dogs that is transmissible to people.

Q: Are there any exemptions when it comes to the importation of dogs from countries that share a land border with the U.S., such as by road travelers or from Canadian breeders?

A: No. The CDC originally proposed a limited exemption for dogs younger than 6 months, primarily to reduce the burden on travelers who frequently travel across the U.S. and Canada/Mexico borders and choose to travel with young dogs. However, the agency withdrew this exemption after considering comments received on the final rule. If it were possible for dogs younger than 6 months to enter via land border crossings, U.S. Customs and Border Protection and the CDC believe this could create a significant burden on customs officers at these crossings because more importers would attempt to enter the U.S. in this way. The situation also could potentially lead to dogs from countries with a high risk of canine rabies arriving in the U.S. via land borders to circumvent entry requirements.

Given that the CDC has no registered animal care facilities at land border crossings, this creates a potentially dangerous situation for dogs that must be held pending determination of their admissibility, because neither the CDC nor Customs and Border Protection has safe housing options at land ports of entry. So, ultimately, the CDC removed the exemption to create a uniform standard for all dogs, help ensure U.S. land borders are not overwhelmed with dog importations, and reduce the risk of importers fraudulently claiming that their dog has not been in canine rabies high-risk country.

Q: What does it mean for a dog to have an ISO-compatible microchip?

A: ISO-compatible microchips contain a 15-digit numeric identification code and can be activated at a frequency of 134.2 kHz. Such microchips allow a standard of record keeping that is recommended by the World Organization for Animal Health when pets are transported internationally.

Most standard microchips used in the U.S. are ISO compatible and will serve this purpose. The microchip does not need to be from the U.S. If a dog is already microchipped, you can verify that the chip is ISO compatible by scanning it with a universal microchip scanner (available from most veterinary retailers and some online stores).

Note that many universal scanners used in the U.S. have been unable to detect microchips that begin with the numbers 1 or 8. If a dog's microchip begins with a number other than 9, please ensure the microchip can be detected by a universal scanner. If unsure, the owner can purchase their own scanner that can detect the microchip or have the dog re-microchipped.

Q: What form is required to document rabies vaccination in the U.S.?

A: There are two options, and the appropriate choice will depend on the dog's circumstances and the date:

- The Certification of U.S.-issued Rabies Vaccination form, which must be completed by a U.S. Department of Agriculture (USDA)-accredited veterinarian before the dog leaves the U.S. This form may be completed retroactively.
- Until July 31, 2025 (the end of the CDC's transition period), a USDA-endorsed export health certificate that documents the dog's age (at least 6 months) and microchip number, and does either of the following:
 - o Lists the destination as the canine rabies-free or low-risk country from which the dog is returning (the form will be valid for only 30 days if it does not contain rabies vaccination information)
 - o Documents a valid (unexpired) rabies vaccination administered in the U.S.

Q: Do dogs vaccinated in the U.S. need to be certified as such by a USDA-accredited veterinarian or is there a way for them to authenticate a rabies certificate that was filled out by an unaccredited veterinarian?

A: A USDA-accredited veterinarian must fill out the certification form and enter only vaccines that they administered or that were administered in their clinic, which they can verify using their clinic's existing medical records. To find a USDA-accredited veterinarian near you, use the USDA's search tool: <https://vsapps.aphis.usda.gov/vsps/public/VetSearch.do?method=display>.

Note that both the CDC and USDA recommend that veterinarians get accredited. The process is free and can be done online. For clinics with no accredited veterinarians, the agencies recommend that at least one veterinarian in the clinic become accredited so that they can complete this form for clients.

Q: Does a dog need to be revaccinated against rabies if the microchip was implanted after the qualifying rabies vaccine was given?

A: Yes. Microchips must be implanted prior to any required vaccines, tests, or treatments for the international movement of animals, and the microchip number must be documented on all veterinary records. This is the only way to verify that the rabies vaccination certificate for the dog matches the dog presented for importation. Veterinary records that do not contain microchip information cannot be verified and are highly susceptible to falsification. Consequently, rabies vaccines received prior to microchip implantation are considered invalid for importation.

Q: What about dogs owned by people like military personnel, who may not be given adequate time or information concerning a relocation to meet the CDC's microchip and vaccination requirements?

A: A dog's initial (very first) rabies vaccine must be administered at least 28 days before travel. Booster vaccines are valid immediately. Dogs that received their rabies vaccine before an ISO-compatible microchip was implanted will need to be microchipped, and then receive another rabies vaccine. Microchipping and vaccination can be done on the same day, but owners will still need to wait 28 days before traveling with their dogs. The CDC recommends that dogs be scanned with a universal microchip scanner before an owner is told to re-chip and revaccinate their dog, as most dogs with microchips already have ISO-compatible microchips.

The CDC has been working closely with the U.S. Department of Defense regarding the movement of military service members' pets, and will continue to do so. Military service members are advised to contact their chain of command or base veterinarian for additional information, as the Department of Defense will be sending out specific information for pets of military service members.

Q: Is it safe for a dog to receive another rabies vaccine within a short period after a previous vaccine, in order to meet the new requirements?

A: The rabies vaccine has proven to be safe and effective for most pets, and receiving an additional rabies vaccine within a short period is generally considered low risk for most dogs. The risk may increase for dogs with any underlying health issues, dogs receiving immunosuppressive treatment, and the rare dog with a history of allergic vaccine reactions.

Q: Is the Certification of U.S.-issued Rabies Vaccination form the same as the CDC Rabies Vaccination and Microchip Record form? Or the Certification of Dogs Arriving from a DMRVV*-free or Low-risk Country form?

A: No. The forms required by the CDC are available on their website. USDA-accredited veterinarians can access the Certification of U.S.-issued Rabies Vaccination form and its instructions in the USDA's Veterinary Export Health Certification System (VEHCS). This form is not the same as the CDC Rabies Vaccination and Microchip Record form, which will no longer be accepted for entry after August 1, 2024. The completed Certification of U.S.-issued Rabies Vaccination form is valid for multiple entries into the United States as long as the U.S.-issued rabies vaccine documented on the form is valid (not expired).

For dogs that receive their rabies vaccines and veterinary care in Canada or Mexico, Canadian and Mexican veterinarians can complete the Certification of Dogs Arriving from a DMRVV*-free or Low-risk Country form, which is also valid for multiple entries as long as the rabies vaccination is valid (not expired).

Q: For how long are the Certification of U.S.-issued Rabies Vaccination form and USDA-endorsed export health certificate valid?

A: Both forms are valid for as long as the U.S.-issued rabies vaccine documented on the form is valid (not expired). This means the forms are valid for re-entry into the U.S. for either 1 or 3 years. The CDC recommends that the Certification of U.S.-issued Rabies Vaccination form be issued by a USDA-accredited veterinarian within 30 days before travel from the U.S. and submitted to the VEHCS for USDA endorsement. Once the form is endorsed, it will be valid for the duration of the rabies vaccine.

Q: Does the USDA also regulate importation of dogs? How do the two agencies interact on this?

A: The USDA's regulation of dogs currently is limited to enforcement of the Animal Welfare Act, which includes provisions for humane transport of animals. The Animal Welfare Act also requires permits for dogs that are imported for adoption or resale as well as provisions to prevent the introduction of high-impact animal pathogens, such as African swine fever or screwworm.

The CDC has worked closely with the USDA to incorporate use of the VEHCS, which USDA-accredited veterinarians use for completion of export health certificates, as part of the new requirements. The agencies will continue to collaborate to send updates to USDA-accredited veterinarians about those requirements.