

The Facts about USDA's Updated HPAI Testing Guidance for Lactating Dairy Cattle

The U.S. Department of Agriculture's Animal and Plant Health Inspection Service is updating testing guidance for lactating dairy cattle to reflect what we now know about the behavior, spread, and detectability of highly pathogenic avian influenza (HPAI) in dairy herds. These changes are grounded in robust surveillance data collected through the National Milk Testing Strategy (NMTS) and are designed to focus efforts on the most sensitive, efficient, and science based tools available.

This update does not reduce surveillance or signal a diminished commitment to addressing HPAI in dairy cattle. Instead, it strengthens national detection capability by relying on statewide silo and bulk tank milk testing—methods that have proven far more sensitive than individual animal pre movement testing. This approach reduces unnecessary burden on producers while maintaining strong safeguards for the national herd.

By aligning requirements with what works best, USDA can continue early detection, support rapid response, and ensure that producers remain fully engaged in surveillance efforts through ongoing monthly testing required to maintain NMTS Unaffected Status.

The following myths and facts address anticipated questions and help clarify these updates to prevent misinformation.

Myths and Facts

MYTH USDA is backing off efforts to address HPAI in dairy.

FACT USDA is not stepping back — we are shifting to the most effective surveillance strategy based on data.

- The original April 2024 Federal Order was issued under an emergency posture with limited information.



- Since late 2024, the NMTS has generated robust, continuous statewide surveillance data.
- This updated guidance allows us to focus resources where they make the biggest difference, while keeping strong protections in place for the national herd.

MYTH USDA is reducing testing.

FACT USDA is not reducing testing — we're using better, more sensitive testing that covers entire States, not just individual cows.

- Pre-movement testing of individual cows is no longer necessary when animals originate in NMTS Unaffected States, because these States undergo ongoing monthly silo or bulk tank milk surveillance across their dairy industry.
- Individual testing was burdensome for producers and laboratories, and far less sensitive for early detection than NMTS.
- States must maintain regular monthly surveillance to keep Unaffected Status — this is what makes removal of cow level movement testing possible.

MYTH USDA is weakening protections — ‘superspreader cows’ will move interstate and spread HPAI again.

FACT This update *does not* increase disease spread risk.

- Lactating dairy cattle cannot move if they show clinical signs, regardless of their State’s status.
- Unaffected States maintain frequent statewide testing, which is specifically designed to catch herd level infection before animals move.
- NMTS testing is more sensitive than interstate movement testing and would detect infections long before an individual cow level test would.

MYTH Without movement testing, USDA won’t know if HPAI returns to dairy cattle.

FACT NMTS is specifically designed to quickly detect reintroduction of HPAI in dairy— even before animals move.

- The strategy requires monthly statewide sampling from either silos or bulk tank milk.
- This sampling approach has already proven its effectiveness in identifying new detections early.
- The goal of NMTS is elimination, and ongoing monthly testing is essential to maintaining rapid detection capability.

MYTH The NMTS isn’t effective enough to rely on.

FACT NMTS has already demonstrated it is more effective than the original Federal Order’s interstate movement testing.

- NMTS successfully identified four new affected States — Arizona, Nebraska, Nevada, and Wisconsin.
- Three of these four would have been missed if USDA had relied solely on interstate movement testing under the April 2024 Federal Order.
- Most States have already reached Unaffected Status due to ongoing participation in NMTS.

MYTH Dropping pre movement testing means USDA is ignoring HPAI in dairy.

FACT On the contrary — this update strengthens our ability to detect and eliminate HPAI.

- States must maintain monthly surveillance to keep Unaffected Status, which is more rigorous than one time pre movement testing.
- APHIS continues to conduct suspect case investigations, genomic sequencing, and on farm work with States.
- Enhanced biosecurity and CDC aligned One Health monitoring continue nationwide.

MYTH This change removes incentives for States to keep testing.

FACT The change actually *reinforces* incentives.

- Allowing interstate movement without individual cow testing is a major incentive for States to remain in NMTS and maintain Unaffected Status.
- This policy shift is consistent with a U.S. Animal Health Association resolution requesting this very change, and it encourages lagging States to enroll fully.

Conclusion

USDA is not reducing surveillance or relaxing its commitment to eliminating HPAI in dairy cattle. The updated guidance aligns our approach with the strongest available science and the extensive statewide data now generated through NMTS. By relying on silo and bulk tank milk testing — methods proven to be more sensitive, comprehensive, and efficient than individual pre movement testing — we maintain early detection capability while reducing unnecessary burden on producers.

This updated approach supports ongoing participation in NMTS, preserves strong national protections, and ensures rapid detection if the virus re-enters dairy herds. It strengthens our ability to safeguard animal health and the stability of the dairy sector.