

The Elephant Sanctuary in Tennessee

Response to USDA Inspection Report

2/21/13

The Elephant Sanctuary in Tennessee respects and supports the USDA's enforcement of the Animal Welfare Act and applauds its objective to ensure the best quality of life for all animals living in captivity. We submit the following response for clarifications and to ensure all concerns cited in the inspection report dated 1/31/13 are addressed and that The Sanctuary meets the highest standard of care for our elephants.

I. USDA concerns regarding The Animal Welfare Act section 2.40(a)(2):

Each dealer and exhibitor shall assure that the attending veterinarian has appropriate authority to ensure the provision of adequate veterinary care and to oversee the adequacy of other aspects of animal care and use.

- The Elephant Sanctuary Board respects and fully recognizes and supports the authority of the Attending Veterinarian, Dr. Susan Mikota, and the Consulting Veterinarian, Dr. Steven Scott, in medical decisions and procedures to ensure the highest quality care of our elephants.
- The Sanctuary provides care for 14 elephants, most of whom have a history of emotional and/or physical trauma and some with aggressive behaviors.
- The Sanctuary transitioned to Protected Contact management in 2011.
- The Sanctuary recognizes the challenges of Protected Contact/operant conditioning management of elephants in a natural habitat setting of hundreds of acres.
- In October, 2012, Sanctuary Directors of Husbandry and Veterinary Services along with Board and Care Staff began work on a model of care focusing on the "whole elephant". This model is based on healthcare models used at many university hospitals to build a knowledgeable care team to meet the patient's needs and ensure best care.
- Using this model, Veterinary Care Staff and Caregiver Staff are meeting weekly to share information on behaviors and health of all elephants in our care. Each elephant's treatment and training plan is presented and questions are asked in an effort to problem-solve training behaviors needed and to identify any challenges to health and well-being.
- This model recognizes the knowledge and authority of Veterinary Care in all health decisions and is in place to facilitate clear lines of communication and understanding in an integrated approach for our elephants' well being.
- During the USDA inspection dated 1/31/13, The Sanctuary's Attending Veterinarian, Dr. Mikota, was in Nepal for a scheduled elephant tuberculosis research project. The Sanctuary recognizes that, had Dr. Mikota been present during the inspection some of the miscommunications and issues of concern noted by the USDA would have been clarified.

The Sanctuary's clarification to USDA cited examples:

Treatment sheet records for Elephant MQ show that over the last month daily nail treatment prescribed by the attending veterinarian was only completed on nine days. (USDA 1/31/13 Inspection Report)

- According to the Clinical Notes, the treatment referenced by the Inspection Report was “hose with warm water daily and spray crack with vetericycyn.”
- Attending Veterinarian, Dr. Mikota, acknowledged in the clinical notes on 12/24/12 that MQ “acted aggressive several times while we were examining her nails. I cautioned CG to be careful and not take any chances when working with her.”
- According to the Caregiver, the Attending Veterinarian verbally approved skipping the procedure on days when the elephant was in the habitat.
- **Action:** Care Staff is instructed to document all verbal communication from the Veterinary Care Staff on a log showing all daily treatments. Any changes to treatments based on Veterinary Care Staff's verbal directions are to be initialed by Veterinary Staff.

Health records 12/16/12 for elephant FQ state that foot treatments were not being completed in the manner directed by the Veterinarian as the Caregiver believed “it is too much time to wait.” (USDA 1/31/13 Inspection Report)

- FQ has a long history of severe foot problems involving all 4 of her feet and requires daily treatments overseen in person by Veterinary Care Staff.
- 12/16/12 Treatment required “waiting the 3 minutes post scrub and 2 minutes post betadine.”
- Veterinary Staff clinical notes dated 12/16/12 read, “Lead feels this is too much time to wait, but said she would do tx as prescribed.”
- Treatment was performed as prescribed by the Caregiver with the oversight of the Veterinary Tech.
- **Action:** Care staff is instructed to follow all treatments as prescribed. Treatment sheets are reviewed daily by Lead Caregiver in each barn and the Veterinary Care Staff.

Daily treatment sheet records for footcare for the elephant DQ state that the Caregiver performed procedures in excess of those authorized by the Veterinarians; the procedure performed is one that according to the facilities written program of veterinary care/footcare should only be completed by or under the supervision of the Veterinarian. (USDA 1/31/13 Inspection Report)

- At the time of the USDA visit the footcare program referenced above had not been approved or implemented at The Sanctuary. It was a draft proposal that was to be presented to the Senior Management Team, as per The Sanctuary protocol, when Dr. Mikota returned from Nepal.

- **Action:** Active Environments is providing consultation and training in footcare. A Footcare Training Workshop is to be scheduled to accommodate the availability of the Attending Veterinarian in order to co-lead training and to provide clarifications as needed.

Additional health records and conversation with Vet care providers established that elephant Caregivers have demanded when and which medical tests are to be completed. (USDA 1/31/13 Inspection Report)

- **Action:** The Sanctuary model of care supports an environment of collaboration and open forum for questions and information sharing. The model does not support individuals making demands or impeding Veterinary Staff's ability to conduct necessary diagnostics or monitor progress of treatments. This has been communicated to all Care Staff.

II. The Elephant Sanctuary response to USDA concerns regarding Section 3.132 of the Animal Welfare Act:

Employees: A sufficient number of adequately trained employees shall be utilized to maintain the professionally acceptable level of husbandry practices set forth in this subpart. Such practices shall be under the supervisor who has a background in animal care.

- Upon the abrupt departure of The Sanctuary's Director of Elephant Husbandry in early December, 2012, The Sanctuary immediately contracted Active Environments, a leading consulting firm in Protected Contact elephant training programs, to do a formal assessment of the status of The Sanctuary's elephant husbandry program including training and footcare programs.
- **Action:** Active Environments is under contract and has established an interim team of elephant care and training experts to provide ongoing supervision of husbandry and training activities at The Sanctuary while Caregiver recruitment and the search for a Director of Elephant Husbandry is underway.

The Sanctuary's clarification to USDA cited examples:

Inspectors were informed by Caregiver that elephant DA required an ultrasound exam for diagnosis but that the ultrasound could not be performed until March as training of the elephant was still in progress (confirmed in health record). (USDA 1/31/13 Inspection Report)

- Caregiver and Veterinary Care team, and veterinary records, confirm that DA had extensive rectal treatments during the prior year for severe bouts of colic.
- On January 15, 2013, Elephant Care Staff and the Attending Veterinarian consulted with Veterinary Staff from the University of Tennessee College of Veterinary Medicine. A recommendation was made for a diagnostic abdominal ultrasound examination. It was agreed the procedure would be scheduled to accommodate the availability of equipment, technical staff, The Sanctuary Veterinary Staff and facility changes that were necessary for the safety of both the elephant and the Care Staff.

- Further training was added to enhance DA's cooperation and ensure a less stressful and safer procedure for the elephant.
- **Action:** A training plan is in place and is a staff priority. The facility changes have been made. It is anticipated that the ultrasound procedure will occur in the near future.

Another elephant FQ was noted to having foot problems that were severe enough to need radiographs for an accurate diagnosis and treatment plan; records and staff interactions established that the staff are currently not trained in the basic husbandry/training procedures necessary to allow the veterinary staff to complete the radiographs. (USDA 1/31/13 Inspection Report)

- As stated previously, FQ arrived at The Sanctuary in 2006 having had a very long history of chronic and severe foot problems.
- FQ's front feet have been under the direct care of the Veterinary Staff for routine care and treatments.
- FQ is trained to present her feet for ongoing footcare. However, training her to present her feet for radiographs is more challenging due to her limited joint mobility.
- Facilities support was needed to develop specialized equipment to accommodate her limited mobility and the positioning of the radiograph equipment.
- Veterinary Staff was asked to advise on acceptable foot positioning given FQ's mobility limitations.
- **Action:** A problem solving meeting was held for all Veterinary Care and Caregiver Staff, and Facilities Staff, which was observed during the USDA inspection. A plan is in place for special accommodations to be made by Facilities. Additional training of FQ is underway.

Due to lack of sufficient number of trained employees, several elephants are not yet trained in procedures necessary for completion of routine husbandry tasks such as routine foot care, entering chute or allowing blood collection. (USDA 1/31/13 Inspection Report)

- With the departure of our Director of Elephant Husbandry in early December, 2012, Active Environments was called in to assess and recommend training implementation.
- Active Environments has been engaged to supervise and lead our training in a Positive Reinforcement, Protected Contact management system.
- This training is ongoing and involves all Elephant Care Staff
- **Action:** A training program is in place. Active Environments is providing and managing the development of training. The Sanctuary is actively recruiting additional Caregiver Staff and an experienced candidate for Director of Elephant Husbandry.