



Animal and Plant
Health Inspection
Service

Animal Care
4700 River Road
Riverdale, MD 20737

February 6, 2018

Dear Management of Horse Shows, Exhibitions, Sales, and Auctions (Management), Horse Industry Organizations and Associations (HIOs), Designated Qualified Persons (DQPs), and Owners, Trainers, Exhibitors, Custodians, and Farriers of Horses Engaged in Horse Protection Act (HPA) Covered Activities:

I hope this message finds you well and looking forward to the new horse show season. I would like to provide you with a progress report on our efforts to: Continue building alignment in inspection findings by U.S. Department of Agriculture (USDA) and DQPs licensed by USDA-certified HIOs; mitigate noncompliance with the HPA equipment prohibitions; and strengthen our working relationship with you and HPA enforcement.

Under the HPA, Management is entrusted with ensuring sore horses do not unfairly compete alongside horses that are not sore. USDA and DQPs licensed by HIOs with USDA-certified programs assist Management by detecting sore horses using consistent inspection techniques and notifying management of inspection findings. To support these shared responsibilities, on February 3, 2018, USDA hosted joint training with DQPs and together we reviewed and discussed our [updated inspection guidance](#), participated in hands-on inspection exercises, and discussed performance expectations. When USDA attends a HPA-covered event this year, we intend to observe DQP performance and inspect horses for HPA compliance. USDA will not select a horse for inspection if a DQP has inspected the horse, detected a specific HPA noncompliance, and management disqualifies the horse from participating in the event. USDA will continue to select a sampling of horses that DQPs have identified as “unsatisfactory” without specifically identifying an HPA noncompliance, and to assess the consistency of USDA and DQP inspection findings.

With respect to HIO and DQP performance, in my [last letter](#), I stressed I should not see any differences in the thoroughness of DQP inspections when USDA is or is not present at an event. Despite this, the [FY 2017 HIO Inspection Data](#) reveals that all but one HIO affiliating both padded and flat shod classes detected zero or very few HPA noncompliances when USDA was not present at the event, while detecting HPA noncompliance when USDA was present. Our focus this year is to close this performance gap. To do this, USDA will:

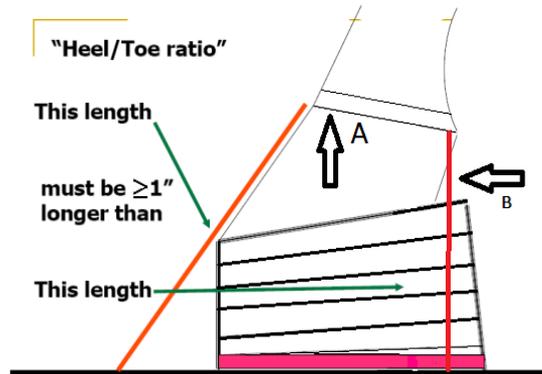
1. Focus its resources on attending events affiliated with HIOs that detected zero or very few HPA noncompliances when inspecting padded and flat shod classes when USDA was not present.
2. Select additional horses for inspection when attending events with DQPs whose performance varies depending on whether or not USDA is present to better understand the true rate of noncompliance at these events and assess future performance.
3. Refer back to the DQP any horse for which USDA detects a HPA noncompliance to provide a platform for continued learning and discussion between USDA and DQPs.

We believe this focus will support thorough and consistent inspections at all HPA-covered events, which, in turn, will bring all of us one step closer to achieving the HPA’s dual purposes of ending soring and promoting fair competition.

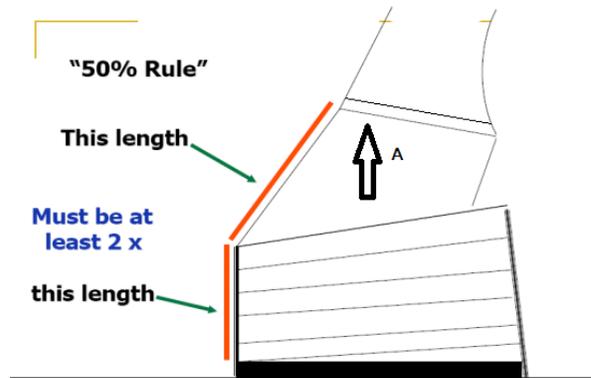
In this regard, we are also working to mitigate HPA noncompliances USDA and HIOs documented during the last show season, including those involving equipment prohibitions in the HPA regulations. To this end, on February 3, USDA and S.H.O.W. HIO partnered to host the first shoeing clinic open to all owners, trainers, exhibitors, and those who support them. This event provided USDA and the industry with the opportunity to review the inspection process in advance of the show season's start, and engage in open dialogue with hands on demonstrations for applying HPA regulations. Please ensure you review the [training slides](#) from the clinic and the highlights below as you prepare for the new season:

- **Scar rule.** USDA and DQPs will continue to apply the inspection focus for assessing compliance with the scar rule. Please note with respect to the anterior and anterior medial and lateral aspects of the front pastern, our focus will be on identifying noncompliances involving tissue that is non-pliable, with hard ridges or nodules with distinct edges even if there is no hair loss in the area. This was a point of confusion last season because hair loss is part of our focus for assessing compliance with the posterior aspect of the front pastern. With respect to the posterior aspect the front pastern, our focus will be on identifying noncompliances involving tissue that has multiple focal areas of hair loss or generalized hair loss and that is non-pliable, with hard ridges or nodules with distinct edges.
- **Coronary (coronet) band.** In accordance with the HPA regulations, USDA and DQPs will assess compliance for metal hoof bands, heel-toe ratio, and the 50 percent rule by measuring from the bottom of coronary band or coronet. USDA and DQPs will identify the bottom of coronary band by applying pressure with a finger to identify the location where the hoof wall ends and pliable tissue begins. USDA and DQPs generally identify the bottom of the coronary band with ease; however, if it is more complicated to locate (because of excessive cornification, for example), USDA and DQPs will confer and agree on the location of the bottom of the coronary band before taking measurements.
- **Heel-toe ratio.** The HPA regulations prohibit a toe length that does not exceed the height of the heel by 1 inch or more. During the shoeing clinic, there was considerable discussion about the meaning of “the most lateral aspect of the rear pastern,” which is the location where USDA and DQPs measure the height of the heel. Following the clinic, we reviewed the Federal Register Notices associated with the promulgation of this rule, and found that in [April 1978](#), USDA explained, in greater detail, the location for taking heel measure: “The heel is measured from the coronet band, at the most lateral part of the rear pastern, at a 90 degree angle to the ground, at the rear of the shoe.” Applying this intent, USDA has updated its diagram for measuring heel-toe ratio, and USDA and DQPs will measure as follows:
 - Toe length: measured from the coronet band (arrow “A” in the diagram below), at the center of the front pastern along the front of the hoof wall, to the ground.
 - Heel height: measured from the coronet band, at the most lateral portion of the rear pastern, at a 90 degree angle to the ground, at the rear of the shoe (arrow “B” in the diagram below). The heel measure excludes normal caulks at the rear of a horseshoe that do not exceed $\frac{3}{4}$ inch in length. That portion of caulk at the rear of a horseshoe in excess of $\frac{3}{4}$ of an inch is added to the height of the heel. **Note:** The exclusion of $\frac{3}{4}$ inch in length only applies to horseshoes with caulks. If a horseshoe does not have a caulk (i.e., a rubber bottom horseshoe), the heel is measured from the

coronet band, at the most lateral portion of the rear pastern, at a 90 degree angle to the ground, at the rear of the shoe.



- 50 percent rule.** The HPA regulations prohibit artificial extension of the toe length that exceeds 50 percent of the natural hoof length. The artificial extension shall be measured from the distal portion of the hoof wall at the tip of the toe at a 90 degree angle to the proximal (foot/h hoof) surface of the shoe. In accordance with the diagram below, USDA and DQPs will measure artificial toe extensions, as follows:
 - Natural hoof length: measured from the coronet band (arrow "A" in the diagram below), at the center of the front pastern along the front of the hoof wall, to the distal portion of the hoof wall at the tip of the toe.
 - Artificial extension: measured from the distal portion of the hoof wall at the tip of the toe at a 90 degree angle to the proximal (foot/h hoof) surface of the shoe.



- Metal hoof bands.** The HPA regulations prohibit the placement of metal hoof bands less than $\frac{1}{2}$ inch below the coronet band, and use of bands that can be easily and quickly loosened or tightened by hand (by using a wing-nut, for example). Metal hoof bands must be properly placed and tightened before presenting a horse for inspection and cannot be adjusted for compliance during the inspection process. If, after completing the inspection process, a metal hoof band becomes loose or otherwise requires adjustment, the custodian must return to horse to the inspection area and ask USDA or the DQP for approval to adjust the band in the inspection area. Following any adjustment to the band, USDA and the DQPs may re-inspect the horse.
- Object or material inserted between the pad and the hoof.** The HPA regulations prohibit the insertion of any object or material between the pad and the hoof other than acceptable hoof packing, which includes pine tar, oakum, live

rubber, sponge rubber, silicone, commercial hoof packing or other substances used to maintain adequate frog pressure or sole consistency. The HPA also prohibits the use of pads that are not made of leather, plastic, or a similar pliant material. When developing the HPA equipment prohibitions in [July 1988](#) and [February 1989](#), USDA explained that shoeing practices that do not conform to equipment prohibitions constitute HPA noncompliances (including, for example, the insertion of a metal horseshoe between the pad and the hoof). With that said, corrective horse shoeing practices done for therapeutic treatment under the supervision of a veterinarian may be allowed. If a horse is presented for inspection with corrective shoeing that is done for therapeutic treatment, USDA and/or the DQP may ask the custodian for the name of the veterinarian supervising the treatment of the horse.

- **Tack changes.** Beginning this show season, USDA will allow custodians of flat shod horses to present the horse for USDA or DQP inspection with tack, provided the stirrups on both western and English saddles are positioned to avoid interfering with the USDA or DQP inspection. This means that prior to inspection, exhibitors and custodians must have English stirrups pulled up tight with leathers tucked, and Western stirrups tied up over the saddle. If USDA or a DQP has concerns or suspicions regarding the tack on a flat shod horse, they may request that the custodian remove the tack for inspection.

My most sincere thanks to: The Celebration for providing space for both the joint training for USDA and DQPs and shoeing clinic; the Walking Horse Trainers Association for providing horses for hands on exercises at both events; S.H.O.W. HIO for its collaboration on both events; the National Walking Horse Association (NWHHA) and Dr. Jim Baum for their contributions to the joint training; the HIOs and DQPs who participated in the joint training; the exhibitors, trainers, owners, farriers, and veterinarians who attended the shoeing clinic; and my HPA team at USDA who worked diligently to support these learning opportunities and my vision for ending soring and promoting fair competition.

In my [last letter to you](#), I set forth my belief that to achieve the dual purposes of the HPA: horse owners, exhibitors, trainers, and custodians must present sound horses for inspection; USDA and HIOs must work together to enforce the HPA through consistent compliance inspections; Management must disqualify sore horses from participating in HPA-covered events; and, as Deputy Administrator, I must create an environment that promotes success in each of these areas. I am incredibly humbled to see progress in each of these areas and hope this update has been helpful and informative for you. If you have ideas on how we can improve our communication with you (including this letter), please let me know (Bernadette.R.Juarez@aphis.usda.gov). We look forward to continuing to work with you toward achieving our common goals and a solid season of horse shows, exhibitions, sales, and auctions.

Very truly,

Bernadette Juarez
Deputy Administrator
Animal Care