



1400 Independence Avenue, SW.
Room 2968-S, STOP 0225
Washington, DC 20250-0225

March 20, 2020

To: Dairy Payment Testing Laboratories
Subject: Payment Testing During COVID-19 Pandemic

My colleagues and I with the USDA AMS Dairy Program recognize the COVID-19 pandemic has resulted in changes to normal daily commerce. Local, State, and National emergency declarations have been issued in response to outbreaks, resulting in many questions within the dairy industry. We want you to know we are aware of the challenges related to milk testing requirements under Federal Milk Marketing Orders and are committed to working with our industry partners during this time.

The following information provides guidance regarding what changes may be necessary to ensure the proper payment to dairy producers during this national emergency. Potential changes include instrument calibration protocol, payment sample testing, and shipping and transportation limitations. These suggestions can be implemented, based on the level of restrictions in your state or local region, with a goal of maintaining the best possible payment test results for use in inter and/or intrastate commerce of milk:

- A. National Market Administrator (MA) control sets should be conserved during this time (using half sets rather than entire sets) while trying to extend their useful life for as long as 4 weeks. To expand the useful life, samples can be stored in ice water inside a refrigerator to keep them as cold as possible.
- B. If National MA control sets are unavailable or not in ample supply, alternative sources may be utilized to obtain control samples (e.g., ELS, Eurofins DQCI, AgSource Laboratories, or alternative control mechanisms).
- C. If control samples become unavailable, instruments should be maintained on current calibrations unless physical repairs are made to the instrument. In this situation, control samples should be used to assure the repaired instrument is operating properly.
- D. Should industry laboratories move to limited operations or closures then the following actions are suggested:
 - i. Alternative sample drop-off locations or processes could be used.
 - ii. Backup arrangements should be made with alternative Market Administrator approved testing laboratories still operating.
 - iii. Reduce testing (e.g., some minimum number of samples tested throughout the month rather than every load.)
 - iv. Using previous month's test average or the previous 7 to 15 days test average to establish payment test values during a month without available tests to establish payment test per individual loads.

v. Other alternative measures as discussed with the Market Administrator.

Though it is impossible to plan for every contingency, this guidance is designed to assist you with different situations arising from COVID-19. If you have questions or concerns, please contact your MA lab staff. All MA offices are operating and can be contacted via email or phone to discuss any testing related issues or any other areas of concern.

Thank you for your cooperation and working together to ensure the dairy industry continues to operate as efficiently as possible during this time.

Sincerely,

Dana H. Coale

Dana H. Coale
Deputy Administrator
Dairy Programs