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Regulatory and Legal Considerations in Wildlife Medicine

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Introduction

In virtually all instances, licensed veterinarians can lawfully admit and treat a wild animal that requires medical attention. Except for a few circumstances discussed below, state or federal wildlife regulations do not prohibit such “Good Samaritan” action by a veterinarian. However, once an animal has been medically treated and stabilized, further steps are governed by myriad state, federal, and local regulations, statutes, and ordinances, depending on species and locale. These regulations may be more or less restrictive depending on the government agency imposing them. A veterinarian should not be deterred by this, but should be well informed in advance of administering medical assistance and understand what other actions are allowed regarding wild animals.

Perspective

The information discussed in this chapter is intended for the veterinarian who is licensed to practice veterinary medicine in the United States, but who does not hold any type of license or permit (hereafter referred to simply as “permit”) that authorizes possession of wildlife species, such as zoological, alternative livestock, animal sanctuary, falconry, or rehabilitation. It is assumed that holders of those permits are already aware of the requirements granted under those permits regarding the medical treatment of wildlife species that are privately owned or otherwise authorized to be in private possession. In this chapter, wildlife is defined as free-ranging wild animals and migratory birds that prior to admission for medical attention were not under private ownership or otherwise authorized to be in private possession.

Lastly, this chapter is not a definitive source of regulatory requirements or legal advice, but serves as a guide

for the types and sources of information a veterinarian should be knowledgeable about if asked to treat any wild animal. Any specific regulation, statute or legislative act discussed or referenced in this chapter is current at the time of publication and is subject to change in the future. It is therefore prudent to stay apprised of any changes that may occur to existing regulations and statutes, and to be alert to newly enacted related regulations or statutes that might affect the rehabilitation of wildlife.

Federal Regulations Pertaining to Wildlife Rehabilitation

The US Fish and Wildlife Service (USFWS) is the federal agency that has responsibility to implement provisions of the Migratory Bird Treaty Act (MBTA), the Bald and Golden Eagle Protection Act (BGEPA) and the Endangered Species Act (ESA) that specifically address authorized activities for these species, including rehabilitation of migratory birds and eagles. Where the BGEPA and ESA are focused on conserving at-risk species, the MBTA protects all migratory birds, regardless of their conservation status. Another federal agency, the National Marine Fisheries Service (NMFS), has promulgated policies, standards, and best practices that govern marine mammal stranding response, rehabilitation, and release.

USFWS – Migratory Birds, Bald Eagles, and Golden Eagles

The federal regulation that addresses criteria for the rehabilitation of migratory birds is 50 CFR §21.31 (Federal Register 2003). The list of migratory birds includes almost all bird species in North America except for invasive species such as European starling (*Sturnus vulgaris*), English sparrow (*Passer domesticus*), Eurasian

collared dove (*Streptopelia decaocto*), rock pigeon (*Columba livia*), and certain game species governed by state regulations, such as quail (Odontophoridae), pheasant (*Phasianus colchicus*), grouse (Tetraonidae), domestic chicken (*Gallus gallus*), and wild turkey (*Meleagris gallopavo*). The list can be found at <https://www.fws.gov/migratorybirds/pdf/policies-and-regulations/MBTAListofBirdsFinalRule.pdf>. However, under §21.12(c), permit exemptions, licensed veterinarians are not required to obtain a federal migratory bird permit to temporarily possess, stabilize, or euthanize sick and injured migratory birds. According to federal regulations, “a veterinarian without a migratory bird rehabilitation permit must transfer any such bird to a federally permitted migratory bird rehabilitator within 24 hours after the bird’s condition is stabilized, unless the bird is euthanized” (50 CFR 21.12(c)). “Stabilize” is not legally defined since each medical case presents differently. The veterinarian and the rehabilitator should work together to determine when a bird’s condition no longer requires direct veterinary care and it can be moved to the rehabilitator’s facility. If a veterinarian is unable to locate a permitted rehabilitator within that time, they must contact the Regional Migratory Bird Permit Office for assistance in locating a permitted migratory bird rehabilitator and/or to obtain authorization to continue to possess the bird.

In addition, veterinarians must: (i) notify the local USFWS immediately upon receiving a threatened or endangered migratory bird species, or bald eagle or golden eagle; (ii) euthanize migratory birds whose injuries are as described in §21.31(e)(4)(iii) and §21.31(e)(4)(iv) (Figure 1.1), although the regulation also establishes criteria for exceptions; (iii) dispose of dead migratory birds in accordance with §21.31(e)(4)(vi)(A–D); and (iv) keep records for five years of all migratory birds that die while in care, including those that are euthanized. The records must include the species of bird, type of injury, date of acquisition, date of death, and whether the bird was euthanized or transferred to a rehabilitator. Euthanasia of any eagle should be coordinated with USFWS permission.

Nonreleasable migratory birds may be placed in educational programs or used for foster parenting, research projects, or other permitted activities with persons licensed, permitted or otherwise authorized to possess such birds, with prior approval from the issuing Regional Migratory Bird Permit Office.

Veterinarians may conduct necropsies on certain species but, prior to conducting the necropsy, they should check first with USFWS because some species may need to be sent to regional or federal diagnostic laboratories. If factors such as oil or chemical contamination, electrocution, shooting, or pesticides are suspected, USFWS law enforcement officials must be contacted immediately.

Other situations that may be helpful to know where the “take” of migratory birds is authorized by regulation, and

Federal Regulation Excerpts

Euthanasia

You must euthanize any bird that cannot feed itself, perch upright, or ambulate without inflicting additional injuries to itself where medical and/or rehabilitative care will not reverse such conditions. You must euthanize any bird that is completely blind, and any bird that has sustained injuries that would require amputation of a leg, a foot, or a wing at the elbow or above (humero-ulnar joint) rather than performing such surgery. §21.31(e)(4)(iii)

You must obtain authorization from your issuing Migratory Bird Permit Office before euthanizing endangered and threatened migratory bird species. In rare cases, the Service may designate a disposition other than euthanasia for those birds. If Service personnel are not available, you may euthanize endangered and threatened migratory birds without Service authorization when prompt euthanasia is warranted by humane consideration for the welfare of the bird. §21.31(e)(4)(iv)

Dead birds, parts and feathers

You may donate dead birds and parts thereof, except threatened and endangered species, and bald and golden eagles, to persons authorized by permit (under §21.12) to possess migratory bird specimens or exempted from permit requirements. §21.31(e)(4)(vi)(A)

Rescue by the Public

Any person may remove a migratory bird from the interior of a building or structure under certain conditions (§21.12(d)). Good Samaritan clause—any person who finds a sick, injured, or orphaned migratory bird may, without a permit, take possession of the bird in order to immediately transport it to a permitted rehabilitator. (§21.31)

Education –Specimens /Live Birds Possession

State, federal, and municipal agencies as well as AZA accredited zoos may possess lawfully acquired migratory bird specimens and live birds for educational purposes without a permit. (§21.12(b)) All others must have a Special Purpose Possession permit for education (§21.27)

Figure 1.1 Excerpts from the Code of Federal Regulations §21 pertaining to veterinarians treating native wild animals.

thus exempt from needing a permit, include rescue of birds by the public (“Good Samaritans”) and the use of specimens or live birds for educational purposes by certain public and private institutions (Figure 1.1). “Take” has been broadly defined and may include harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or attempts to do so.

USFWS & NMFS – Threatened and Endangered Species, Including Sea Turtles and Marine Mammals

Aside from rendering immediate medical attention to any federally listed threatened and endangered (T&E) species, sea turtle or marine mammal, it is advisable to

immediately contact the state wildlife agency or USFWS or NMFS for further instructions, especially for endangered species.

In the case of sea turtles, the USFWS has issued *Standard Permit Conditions for the Care and Maintenance of Captive Sea Turtles* (USDI/USFWS 2013) in accordance with §10(a)(1)(A) of the ESA, which includes requirements for rehabilitation. For veterinarians who will rehabilitate sea turtles, these conditions include experience requirements, keeping complete health records on each animal, a USFWS- or state-issued permit for euthanasia, submission of a gross necropsy report on each deceased animal, etc. Euthanasia of any sea turtle requires USFWS approval.

NMFS – Marine Mammals (Cetaceans and Pinnipeds)

The NMFS has issued *Policies and Best Practices, Marine Mammal Stranding Response, Rehabilitation and Release, Standards for Rehabilitation Facilities* (NOAA, NMFS 2009) in accordance with Title IV §402(a) of the Marine Mammal Protection Act that includes requirements for rehabilitation of marine mammals. Portions of this document are based on the US Department of Agriculture Animal and Plant Health Inspection Service Animal Welfare Act. To qualify as an attending veterinarian for a marine mammal rehabilitation facility, extensive training and experience are required. For the occasional case presented at a veterinary clinic, it is advisable to contact a local stranding network, facility or veterinarian who is permitted to provide rehabilitative care for consultation on diagnosis, treatment, and medical clearance for release or transport.

State Wildlife Regulations Pertaining to Wildlife Rehabilitation

Every state has its own set of regulations that govern the wildlife native to that state, but all contain a general provision that prohibits the temporary or permanent possession of almost all species of native wild animals (Musgrave and Stein 1993). Exceptions to this rule include activities such as scientific research, bird banding, translocation, animal control, falconry egg harvest, rehabilitation, and, in some states, educational animals that recover from rehabilitation but are deemed nonreleasable. These few exceptions usually require issuance of a permit, which may also include one or more state or federal permits, as discussed later.

Where most veterinarians become involved in the temporary possession of a wild animal is in participating in wildlife rehabilitation, broadly defined as providing assistance to a wild animal that is injured, diseased or

distressed, for the purpose of release back to its wild habitat. Most often, this involvement occurs as a direct contact with a rescuer from the public or in assisting a local permitted wildlife rehabilitator.

As mentioned earlier, most state wildlife rehabilitation regulations are silent on any prohibition of a veterinarian rendering immediate, emergency medical assistance to a wild animal in need (Casey and Casey 1994, 1995, 2000, 2005). Thus, it is generally accepted as being allowed. Most states have a clear requirement that the animal, once stabilized and not requiring continuing veterinary care, be transferred to a local permitted rehabilitator as soon as possible for further rehabilitation and release. If such transfer is not possible, either due to a lack of a local rehabilitator authorized for that species or if the rehabilitator's facility is at capacity, the veterinarian should contact the local state wildlife officer or state wildlife agency for guidance and authorization on any next steps, including further care and disposition for that animal.

If a veterinarian finds that wildlife is being delivered by the public on some frequent basis, especially in more urban areas and generally seasonally, and circumstances are such that frequently the local rehabilitator is unable to accept more cases, the veterinarian may consider obtaining a state wildlife rehabilitation permit. The requirements and application forms for a state-issued wildlife rehabilitation permit are available through the state wildlife agency, with many available on the agency's website.

Lastly, many states require that the veterinarian notify the state agency if the animal is a species listed as having some level of protected status, such as a state-sensitive or state T&E species, or a federally listed T&E species.

Another circumstance where veterinarians provide medical assistance on a more regular basis is through a working relationship with a local rehabilitator. States that issue wildlife rehabilitation permits require that the rehabilitator have a veterinarian of record who has agreed to provide medical assistance to wild animals undergoing rehabilitation. Rehabilitation permits do not authorize the practice of veterinary medicine, so a consulting veterinarian is a critical requirement in any successful rehabilitation process.

This partnership may take the form of an informal arrangement between the veterinarian and rehabilitator, or it may be more formal, such as using a written agreement. If a veterinarian agrees to be the veterinarian of record for the rehabilitator, some form of agreement should be clearly discussed and understood, whether formal or informal, written or oral, that articulates the roles, responsibilities, and expectations of both parties. While some states require the rehabilitator to list the name of the consulting veterinarian on the rehabilitation permit, other states require the veterinarian to complete

and sign a form specifying and agreeing to the type of services that will be provided for wildlife.

Such discussions of services should clarify if the veterinarian will provide professional services and out-of-pocket costs free of charge, or what portion, if any, are expected to be paid or reimbursed by the rehabilitator, most of whom are volunteers. They also should clarify what initial and continuing medical treatment procedures or supportive care the rehabilitator is authorized to perform under the training and supervision of the veterinarian, such as basic first aid, routine wound management, fluid therapy, and administering prescribed medications. Further details on the communication between the wildlife rehabilitator and the veterinarian can be found in Chapter 8.

Most medical procedures should be performed by the veterinarian and not delegated to the rehabilitator. These would include surgeries, radiography/imaging, stabilization of fractures, and administration of controlled substances such as strong analgesics or euthanasia agents. Correspondingly, the trained and experienced rehabilitator, because of permit requirements, is likely to better understand the captive care and husbandry requirements of a specific species, including diets, enclosure requirements, and pre-release conditioning and considerations. Even when working frequently with a rehabilitator who seems to know and understand all the rules and regulations that may apply, it is good practice for the veterinarian to obtain a copy of regulations to personally understand the rules and arrive at independent interpretations. It is also important to obtain copies of the rehabilitator's state and federal permits.

A few other provisions that often appear in state wildlife rehabilitation regulations that are sound practices for veterinarians to follow include separation of wildlife from domestic animals, prohibition from public display, including social media, and release restrictions. Any wild animal admitted for treatment should be confined and housed separate from all other domestic species in the clinic. This reduces captivity stress on juvenile and adult animals, provides for quarantine against possible transmission of pathogens and parasites, and helps prevent habituation of young animals. Any form of public display of the animal should be prevented, including from curious clinic staff not involved in direct treatment, members of the public, and the media.

The regulations of some states have strict requirements as to when and where animals can be released. Rehabilitators are responsible for preparing and assessing the wild animals for release, and conducting the release. On rare occasions, a brief period of quiet recuperation may be sufficient for the animal to recover and be ready for immediate release. In these cases, the veterinarian

may want to consult with a rehabilitator to confirm the appropriateness of the release.

Some states require that the animal be released as close as possible to or within a specified distance from the point of original capture. Other states may require the release location to be chosen in consultation with a wildlife officer, especially involving any state or federal T&E species. States may also outright prohibit the release back to the wild of certain animals, such as those considered to be invasive or nonnative.

Some states may have departments (other than the wildlife agency) that have some level of involvement, jurisdiction, or oversight involving the state's wildlife. For example, some state health departments have reporting requirements for any type of wild animal bites (e.g., rabies vectors) or known or suspected exposure to a zoonotic disease. If involving a rescuer from the public, this notification requirement is most likely the responsibility of the rescuer, if they know to do so. There may be a requirement or strong expectation from the state that the veterinarian who has knowledge of any such occurrence also should report the incident, including the names of any members of the public known to have been exposed.

Additionally, some states have active commercial alternative livestock operations, often governed by a department of agriculture. They may involve wildlife species such as deer and elk, and may have reporting requirements for any of those species that may arrive for rehabilitation, especially if unusual circumstances are suspected or if the state is concerned about the spread and transfer of communicable diseases such as chronic wasting disease.

Local Municipal and County Considerations

Some state wildlife rehabilitation regulations require that rehabilitation must not be in conflict or violation with any local rule or ordinance. While this requirement applies directly to the facility of the rehabilitator, it may create restrictions or a prohibition for wild animals to be housed, even temporarily, within a veterinary facility. Planning and zoning codes and ordinances of some counties and municipalities may prohibit any wild animal species or any species they define as "dangerous" (e.g., venomous snakes) from being kept onsite. Others may allow certain species of wildlife that are not defined as "dangerous" but only if certain conditions are satisfied (e.g., possession of a current state wildlife rehabilitation permit). These restrictions at the local level, if they exist, most likely pose a very low risk to a veterinary clinic for

the infrequent squirrel, rabbit or songbird that may be admitted. However, they could pose more significant risks if the veterinarian is admitting wildlife on a more regular basis, or admitting larger carnivore species or those species considered to be disease vectors, especially if any adverse incident should occur involving the public or clinic staff.

Surveillance Reporting

Some public health or wildlife agencies have reporting and surveillance requirements for cases of various diseases observed or suspected. Those of public health importance may include rabies, plague, tularemia, or hantavirus and state wildlife agencies may request information on cases of parvovirus, white-nose syndrome, West Nile virus, highly pathogenic influenza virus, Newcastle's disease virus, etc. Those agencies should be contacted in advance for their reporting and surveillance requirements and that information should be maintained in a readily accessible location. It is almost better to err on the side of more frequent communication, particularly with pathogens that affect public health.

Carcass Disposal and Submission

There are few specific instructions in state-level rehabilitation regulations regarding carcass or animal parts disposal. As a result, it may be reasonable to assume that any form of carcass disposal conforming to local ordinances used on a regular basis by the veterinarian is likely acceptable. A few states do have specific requirements (e.g., incinerate) if poisoning is suspected or euthanasia has involved chemical agents. At times, when the veterinarian is reasonably sure that harmful chemicals, pathogens, disease agents, or drug residues are not present, a carcass may be used as feedstock for wildlife being rehabilitated.

At the federal level, there are certain species for which carcasses and parts are required to be submitted to federal facilities. Carcasses and feathers of bald eagles and golden eagles must be submitted to the National Eagle Repository located in Commerce City, Colorado. Certain marine mammals and sea turtles may need to be submitted to the offices of the NMFS. To assist in the legal acquisition of federally regulated migratory bird feathers, two programs, listed at the end of this chapter, have been established for the distribution of noneagle feathers and carcasses for tribal religious, medical, and ceremonial purposes.

Lastly, it is always good practice to contact the state or local USFWS office to inquire if there are requirements to submit species that are either state or federally listed as T&E.

Law Enforcement

On rare occasions, a veterinarian may be asked to assist in a law enforcement action, at a local, state, or federal level. Examples of this include unlawful take and possession of wildlife, intentional injury to wildlife not covered by legal hunting regulations, unlawful transport or sale of wildlife, and if the nature of the wildlife injury is related to gunshot, poisoning, electrocution, or oil or chemical exposure. The veterinarian's involvement may include a medical assessment of any confiscated wild animals, providing medical assistance or euthanasia, and temporary possession pending transfer to a rehabilitator or other final destination. There are often evidentiary and chain of custody procedures that require strict adherence (Byrd and Sutton 2012). Complete medical records, radiographs, photographs, and other types of evidence, including gunshot or other objects removed from the affected wildlife species, may be required in a form that is later admissible and defensible in a deposition or court of law. The various law enforcement officers involved in any legal action should provide specific and clear guidance to the veterinarian as to any evidentiary requirements and procedures to be followed.

USFWS regional law enforcement offices can be found at <https://www.fws.gov/le/regional-law-enforcement-offices.html>. A list of state and territorial fish and wildlife offices can be found at www.fws.gov/offices/statelinks.html.

Legal Liability Exposure

Situations that involve physical contact between a human and a wild animal can end badly. A study of rescuers revealed that because of the very strong emotional response that humans demonstrate for animals experiencing pain and suffering, especially young animals, rescues were regularly attempted despite risk of serious injury or disease exposure to the rescuer (Siemer and Brown 1992). When a well-meaning member of the public who is untrained in wild animal capture, restraint, and transport attempts rescue of a wild animal that appears to need help, a plethora of adverse outcomes are very possible, including death or further injury to the wild animal or rescuer.

In the case where clinic staff have advised or coached a rescuer over the phone on capture, restraint or transport, the veterinarian's potential liability exposure begins even before the animal arrives at the clinic. As such, some clinics have chosen to provide no guidance and simply state that the animal will be seen if brought to the clinic. Other clinics simply refer the rescuer to a local experienced rehabilitator or animal control agency to determine if rescue is needed, and if so, to provide for safe methods of capture and transport. This option generally gives the rescuer a more informed source of guidance and instruction, transfers liability away from the clinic, and may result in the rehabilitator offering to perform the tasks for the rescuer in difficult situations. If the veterinarian should decide to provide this type of advice over the phone, very specific training should be given to those clinic staff assigned to speak with rescuers, such as advising the rescuer that particular situations may be unsafe and could result in personal injury and in these cases a rescue should not be attempted.

Once the animal arrives at the clinic, other potential liability exposures are created with clients and clinic staff. To minimize risks to clients, many clinics receive rescued wildlife through an alternative entrance, thus preventing contact with clients or their companion animals. A more real and pronounced set of risks of injury involve clinic staff that assist in the medical treatment of injured or diseased wild animals. Only staff who understand the differences between the behaviors of domestic and wild animals, are trained in safe restraint of wild animals, and in some cases have preexposure rabies vaccinations, should be involved in assisting the veterinarian in any examination, diagnostic or medical procedures.

A thoughtful approach to risk management for the veterinarian and the clinic can mitigate the effects of most of these risks in reducing the likelihood of creating a cause for legal action. Components of a sound defense might include proof that documented policies, procedures, and training were followed to insure the safety of all parties.

The American Veterinary Medical Association (AVMA) suggests that a clinic should have a stated wildlife policy that stipulates whether or not the clinic will accept various wild animal species for treatment. If the clinic does accept wildlife, then clear roles and responsibilities of all staff should be documented and communicated, as well as a list of contacts for referrals and regulatory agencies that may need to be notified (Figure 1.2). The veterinarian should verify that a professional liability insurance policy provides coverage for wildlife treatment, handling, and confinement. If the policy does cover wildlife and classifies them as "small animals" (as opposed to equine or food animal categories), the policy needs to be reviewed to understand if

| Contact Information Checklist | |
|---|---------|
| Governing Authorities: | |
| State Wildlife Agency | # _____ |
| Local Wildlife Officer | # _____ |
| Local USFWS Agent | # _____ |
| Local Animal Control | # _____ |
| State Veterinarian | # _____ |
| USDA APHIS Area Vet. | # _____ |
| Local Public Health Dept. | # _____ |
| Regional CDC office | # _____ |
| Local Wildlife Rehabilitators: | |
| Name _____ | # _____ |
| Name _____ | # _____ |
| Name _____ | # _____ |
| Wildlife Referrals to other Veterinary Clinics: | |
| Clinic _____ | # _____ |
| Clinic _____ | # _____ |
| Clinic _____ | # _____ |
| (Adapted from "Managing Wildlife Emergencies" prepared by the AVMA – www.avma.org/wildlife) | |

Figure 1.2 Sample format for a list of helpful contact numbers for veterinarians treating native wildlife. US Fish and Wildlife Service (USFWS) regional law enforcement offices can be found at <https://www.fws.gov/le/regional-law-enforcement-offices.html> and a list of state and territorial fish and wildlife offices can be found at www.fws.gov/offices/statelinks.html.

certain species or groups of species may be excluded from coverage, such as carnivores, ungulates, raptors, venomous snakes or rabies vector species.

Summary

The successful practice of wildlife rehabilitation has been made possible by the generous support of time, effort, and expertise of countless veterinarians over many decades. This chapter could be interpreted as all the reasons, regulatory hurdles, and legal risks why a veterinarian might hesitate to become involved and volunteer their services, and some will choose to not work with wildlife. However, experience has shown that far more veterinarians will willingly involve themselves, but hopefully do so equipped with knowledge of the rules, regulations, and laws that govern the activity. Just as it is prudent to understand the licensing requirements, laws, and skills needed to operate, for example, a mobile veterinary practice, the same holds true for working with wild animals. Every locale is different, so the veterinarian will need to become familiar with the general set of rules that apply federally, and in their state and local area.

This chapter is a brief discussion to alert the veterinarian to the major considerations to be aware of, and ends with a listing of several helpful resources to further that knowledge. One or more local wildlife rehabilitators also may serve as an excellent source for this information, as they are usually required to fully understand the state and federal regulations that govern wildlife rehabilitation as a primary condition of obtaining and maintaining their permit. Lastly, when in doubt, contact the appropriate governing agency or seek legal counsel.

Resources

- 1) State wildlife agencies in all 50 states, often within the Department of Natural Resources
- 2) USFWS offices in all 50 states (www.fws.gov/offices)
- 3) USFWS Regional Migratory Bird Permit Offices (eight regional offices) (<https://www.fws.gov/birds/policies-and-regulations/permits/regional-permit-contacts.php>)

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- 4) State and local health departments in all 50 states
 - 5) List of licensed/permitted wildlife rehabilitators – usually available from the state wildlife agency
 - 6) USDA Wildlife Services 1-866-487-3297 (www.aphis.usda.gov/aphis/ourfocus/wildlifedamage/SA_Program_Overview)
 - 7) AVMA website – *Managing Wildlife Emergencies* (www.avma.org/KB/Resources/Reference/wildlife/Pages/default.aspx)
 - 8) USFWS National Eagle Repository (www.fws.gov/eaglerepository)
 - 9) Sia Essential Species Repository (for noneagle feathers), Comanche Nation, OK (www.comancheeagle.org)
 - 10) Liberty Non-Eagle Repository (for noneagle feathers), AZ (<http://libertywildlife.org/conservation/non-eagle-feather-repository/>)
 - 11) Sea Turtle Stranding and Salvage Network (www.seaturtle.org)
 - 12) USFWS National Sea Turtle Coordinator, Jacksonville, FL (<https://www.fws.gov/northflorida/SeaTurtles/seaturtle-info.htm>)
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