

Countering Misinformation Regarding Proposal ID 2026-318 United in Responding to CWD in Minnesota

Staff of the Minnesota Department of Natural Resources (MNDNR) were solicited for comment on Proposal ID 2026-318, United in Responding to CWD in Minnesota, submitted by the Minnesota Center for Prion Research and Outreach (MNPRO). MNPRO was made aware that the MNDNR commentary was subsequently shared with all citizen commissioners. That action raises serious concerns due to a significant conflict of interest—MNDNR is also competing for millions in LCCMR funding this year, and therefore, is not in a position to provide an unbiased assessment of the MNPRO proposal. MNPRO was provided a glimpse of the commentary made by the MNDNR and was alarmed by the misinformation that was shared. The following bullets contain corrections to the inaccuracies conveyed in the MNDNR commentary.

Why this is critical

MNPRO is now recognized nationally and internationally for its research advances, outreach efforts, and Tribal partnerships related to CWD here in Minnesota and elsewhere. Misinformation risks trust, successful collaborations, and coordination in the fight against CWD at a time when cervid populations are under significant threat.

- **MNDNR suggested a lack of collaboration by MNPRO with MNDNR.**

It is blatantly inaccurate to say MNPRO is not collaborating with MNDNR. MNPRO leadership reached out to a MNDNR collaborator in February to invite the MNDNR to collaborate on this proposal and was told MNDNR would not sign on and risk directly competing against their own proposals (it is unfortunate that the MNDNR is then provided an opportunity to openly criticize a competing proposal while having inaccurate information). MNPRO has consistently said yes to collaborative opportunities with MNDNR and continues to seek ways to work together.

- **Decentralized testing for CWD is counter to program management surveillance.**

Advancing decentralized testing was in the original and ongoing request and vision when the state funded MNPRO. This approach does not replace MNDNR's surveillance efforts but complements them. The COVID-19 pandemic normalized at-home, decentralized testing, while public health agencies were simultaneously collecting their own standardized surveillance data to monitor epidemic dynamics. What we are proposing is NEEDED to further advance validation of MNPRO's new testing technologies with an eye toward adoption by regulatory agencies, including national laboratories.

- **Diagnostic test licensing and validation are solely a for-profit endeavor.**

The diagnostic tests proposed for further validation are currently licensed by Priogen, a company founded by one MNPRO director—not both. However, no funding in the proposed

budget is going to Priogen; all laboratory equipment and supplies for diagnostic testing will be purchased through other vendors. Benefits to Priogen will purely be *indirect* - research validating licensed products. As an aside, there is a general misconception related to the process of test validation for regulatory purposes. Commercial licensing is the fastest and most effective route to enable access to new diagnostic technologies by state, tribal, and federal agencies, many of which are already leveraging the technologies offered by Priogen for non-regulatory testing. This approach mirrors the successful rollout of the CWD ELISA test, now used by USDA, state agencies including MNDNR, and Tribal authorities for surveillance and regulatory purposes. ENRTF *directly* benefits from these licenses through state-directed returns stemming from LCCMR-funded inventions.

- **Tribal partnership plans for CWD surveillance are inefficient.**

We have partnered with Tribal natural resource agencies, leaders and members, listened to how *they* want to run CWD surveillance and outreach, and empowered them to lead those efforts. While MNDNR suggests inefficiency due to MN Veterinary Diagnostic Lab involvement, this structure was formed and requested by our Tribal partners, which includes almost all of the Tribal nations in Minnesota. Cutting this proposal undercuts the sovereignty of Tribes in our state in their management of CWD.

- **Proposal budget and staffing are excessive.**

Our proposal supports 27 full-time employees (FTEs) over three years (approximately 9 FTEs each year), plus 5 graduate students, 2–3 undergraduates, 1 resident, and 1.5 FTEs for Tribal natural resource staff. This multidisciplinary team is essential for delivering on the proposal's extensive activities and goals. MNPRO has an exceptional track record of providing strong returns on investments made by the state.

- **Environmental monitoring and modeling of CWD spread is purely academic.**

Contrary to claims that environmental surveillance and modeling are “purely academic,” MNDNR has previously requested MNPRO's support in this area (e.g., Beltrami County illegal carcass site) and is currently collaborating on environmental CWD modeling and surveillance. Case in point, the proposed CWD modeling in the current proposal was developed based on expressed MNDNR priorities for understanding conditions that contribute to CWD outbreak development.

- **MNPRO Outreach efforts do not take into account partners' concerns.**

Since its inception, MNPRO prioritizes outreach, collaborating with MNDNR, Tribes, and communities such as the Amish and Hmong, incorporating their thoughts and needs into educational materials. Our earliest outreach efforts were as requested by state leaders, including those in the MNDNR, and we continue to respond to those requests. In the past 6 years, nearly 180,000 people were reached with MNPRO-led CWD outreach.

- **The proposal may have plans to fund building/infrastructure.**

Our proposal has no reference to using the funds for building/space/infrastructure.