

After Action Report

Operation Lone Star

FSIS-State Food Defense Partnership Exercise

June 21, 2007

Food Safety and Inspection Service

**Final Report
August 21, 2007**

Background

The U.S. Department of Agriculture (USDA) is actively addressing the need to maintain the safety and defense of the country's food supply. During a crisis, it is critical that the Department be able to efficiently and effectively coordinate with its counterparts at the state and local level, as well as within other federal agencies and the private sector. On June 21, 2007, USDA's Food Safety and Inspection Service (FSIS) conducted Operation Lone Star in Dallas, TX and at FSIS headquarters in Washington, DC. The Operation Lone Star Exercise focused on the roles of federal, state, and local government agencies and the food industry to work together to detect, respond to, and recover from a non-routine emergency incident. Emphasis was placed on a team approach to incident response, coordination, integration of capabilities, problem identification, and resolution through preparation, response, recovery, and multi-agency coordination. The exercise offered FSIS the opportunity to test and validate operating guidelines and directives for responding to a non-routine incident involving the intentional adulteration of food products within an FSIS inspected facility. The ultimate goals were:

- Minimizing suffering, loss of life, and personal injury
- Minimizing damage to property
- Minimizing disaster- or emergency-related service disruption, which would have an adverse impact on the government, the communities, and the businesses and their employees, reputation, and product brand names

This report identifies areas of strength and weakness that were observed during the exercise and offers recommendations for improvement.

Objectives

Operation Lone Star focused on enhancing the coordination and communication between FSIS, other regional Federal agencies, state and local government agencies, and industry stakeholders. The objectives for Operation Lone Star were to clarify roles and responsibilities and improve coordination and communication among:

- FSIS Program Offices and associated field staffs;
- State and local public health and emergency response agencies;
- Primary Federal emergency response organizations;
- Private sector stakeholders in the food industry; and
- Tribal Nations.

Strengths of the Exercise – What Worked Well?

The exercise involved participation by the following stakeholder groups:

- FSIS field and Headquarters personnel from OFO, OPEER, OPHS, OIA, OM, OPPED, OPAEO and OFDER
- Staff from FDA, FBI, USDA Office of Inspector General, Customs and Border Protection (DHS), and Bureau of Indian Affairs' Indian Health Service
- State of Texas State government agencies, including the Department of State Health Services
- Local stakeholders, including Dallas City, Dallas County Health and Human Services, and Parkland Health and Hospital
- Food industry, including Pilgrim's Pride, Cargill, Kraft, Sanderson Farms, Trinity Valley Foods, Quality Sausage Company, Loggins Meat Company, and Don Miguel Foods.

Participants were actively engaged in the exercise. There was open dialogue and networking among stakeholder groups.

Areas for Improvement – What Did Not Work Well in the Exercise?

Exercise Structure

Several participants suggested that representation from regional EPA, state and local government environmental agencies, and consumer groups would have improved the exercise.

Several industry representatives commented that participation by retail and restaurant representatives would have enhanced the exercise.

Several participants commented that the exercise needs a more realistic timeline with regard to how the different elements of the scenario unfold. Other participants suggested that additional information should be provided about the products involved, product distribution, and epidemiological and laboratory data.

Some participants commented that the exercise seemed to slow down in the later phases and suggested revisiting the mix of injects to keep all stakeholders engaged. Other participants suggested that the timing of the inject delivery could have been improved (i.e., too fast in early phases, too slow in later phases).

Some participants suggested that injects be revised to provide more closure on several issues (e.g., criminal); too many issues were left open.

Several participants suggested that less time be allowed for discussion within stakeholder groups and more time be allowed for the debrief periods at the end of each phase.

The recall injects generated considerable discussion. Industry commented that insufficient information was provided to clearly relate the product recalled and the consumer illnesses. The state and local government representatives commented that their role with respect to contacting hotels and restaurants was not clearly defined.

Communication

Several industry representatives requested that a list of government agencies that might be involved in emergency response actions, along with a description of their roles and responsibilities and contact information, be provided.

Several participants suggested that a similar exercise should be conducted specifically for Public Information Officers, or include some mock media play.

Many participants noted that the exercise illustrated the need to improve communication among stakeholder groups.

Close communication loop of patient care → public health investigation → FSIS investigation → criminal investigation.

Coordination

Coordination among FSIS and industry needs to be improved. For example, industry requested participation in FSIS' ICS structure. FSIS headquarters initially advised the District Office that industry could not participate, but upon further discussion, agreed to bring industry into the Agency's ICS in a later phase of the exercise.

Coordination among federal, state, and local agencies involved in response actions also needs to be improved. ICS structures needed to be better established.

Some participants suggested that integration of medical, public health and regulatory concerns need better understanding and/or coordination.

Need to clarify integration/organization of various EOC/JOC/MAC/ICS structures. Who takes the lead, and when, was not clear.

Incident Command System (ICS) Issues

What triggered each stakeholder group to organize into or participate in a multi-agency incident command structure?

- Local – depended on phase; public health impacts caused local ICS in early phases of scenario

- State of Texas – each group reacted to injects rather than using ICS; Texas is a home rule state, therefore, there was never an intuitive trigger
- FSIS – local and state government agency involvement; structure, magnitude and seriousness of event
- Industry – feedback from retail and foodservice and implication of product with illnesses; contract employee tampering

What was the effectiveness of the ICS structure for this exercise?

- Local – Hospitals would have stood up first (threshold low). Did not work with it much (county), but it would have worked well.
- State of Texas – Did not feel there was an effective ICS structure but job got done.
- FSIS – strengthens lines of communication and coordinates response
- Industry – there was confusion about industry’s role in ICS structure

Who was in charge?

- Local – initial Incident Command was at the local level; however, everyone was a stakeholder at each phase
- State of Texas – Not clear which group was in charge at different phases – because of the home rule concept, felt like a support group. Each group did their part, but well.
- FSIS – local government and FBI initially, then FSIS and other agencies
- Industry – industry had most visibility in Phase 1; regulatory agencies took control in later phases and industry felt left out

Were decisions coordinated among stakeholder groups?

- Local – yes; but could always use more efficiency
- State of Texas – yes, but improvement is needed.
- FSIS – yes; e.g., testing, recall, disposal
- Industry – yes; e.g., recall, disposal, law enforcement

Other Observations

Representatives from the State of Texas observed the need for further coordination, since each group operating separately may lead to inefficiencies. However, the compressed timeframe for the exercise scenario does not accurately reflect how groups would form in real time.

State of Texas participants also commented that there was jurisdictional overlap of FSIS, state, and FBI that was not sorted out. As ICS expands, structure should adapt.

Industry did not feel that their capability to rapidly recall products was accurately reflected in the injects or taken into consideration during discussions

Recommendations

Better coordination and communication among all stakeholder groups is needed. In particular, government at all levels needs to work with industry to help industry understand the ICS structure and the role of the private sector in ICS.

More dialogue is needed between state agencies, FSIS and industry about the release of product distribution information.

FSIS needs better communication with industry about press conferences or calls.