Consumer Complaint Monitoring System (CCMS)

Objectives

Upon completion of this module the trainee will be able to:

1. Describe what the CCMS is and the purpose it serves.

2. Identify what constitutes a consumer complaint.

3. Describe the role of the EIAO when a complaint investigation takes place.

Introduction

All consumers should expect that the products they receive are safe, wholesome and properly labeled. The Agency uses consumer complaints to help identify unsafe meat, poultry, and egg products in commerce that may have to be removed from commerce. The Consumer Complaint Monitoring System (CCMS) is an electronic database used to record, triage, coordinate, and track all consumer complaints reported to the agency. FSIS Directive 5610.1 describes the purpose, activities and maintenance of the CCMS system.

Definitions

A consumer complaint is any complaint reported to FSIS that is initiated by a consumer, or on behalf of a consumer, that is related to an FSIS inspected product. This includes complaints associated with consumption of a meat, poultry or egg product that allege:

- An illness
- An injury
- Foreign object/material
- An allergic reaction
- Under processing of a ready-to-eat (RTE) product
- Misbranding
- Economic adulteration
- Inferior quality

Triage is the classifying of consumer complaints to determine the need for further investigation by FSIS.

Examples of Complaints Not Meeting the Definition

Complaints that are not initiated by consumers or by someone on behalf of a consumer, and complaints that do not involve FSIS regulated products should not be entered into the CCMS. Such complaints should be removed from the CCMS if erroneously entered.

Examples of complaints that should not be entered into the CCMS include:

1. Complaints regarding misconduct, waste, fraud, or abuse reported by a whistleblower. These complaints should be reported to the U.S. Department of Agriculture (USDA), Office of the Inspector General (OIG);

2. Complaints involving possible criminal violations of the Federal Meat Inspection Act (FMIA), Poultry Products Inspection Act (PPIA), or the Egg Products Inspection Act (EPIA). These complaints should be reported to the appropriate Office of Program Evaluation, Enforcement and Review (OPEER), Compliance and Investigations Division (CID), Regional Manager;

3. Complaints reported by an industry competitor. These complaints should be reported to the appropriate FSIS District Manager (DM), except when a criminal violation is alleged. Then the complaint should be reported to the appropriate OPEER, CID Regional Manager;

4. Complaints regarding food supplied through the USDA's Food and Nutrition Service (FNS), nutrition assistance programs (e.g., National School Lunch Program), unless they involve an FSIS-inspected product. These complaints should be reported to the FNS;

5. Complaints concerning retail-prepared products. These complaints should be directed to the appropriate local agency or state agency. However, if the complaint involves outbreaks associated with meat, poultry, or egg products prepared at the retail level, CCMS staff will notify the Foodborne Disease Investigations Branch, HHSD, OPHS, for branch review and determination if further action is needed. Complaints concerning retail-prepared product that may involve violations of the FMIA, PPIA, or the EPIA should be reported to OPEER, CID.

6. Complaints that indicate possible product tampering. These complaints are to be reported to the OPEER, CID Regional Office to determine the need for a criminal investigation and coordination with OIG. These complaints are also to be reported to the Office of Food Defense and Emergency Response (OFDER) so that it is aware of the situation. If criminal conduct is ruled out, OPEER/CID will notify the CCMS staff and the complaint will be entered into the CCMS.

Responsible Offices

The CCMS staff of the OPHS Human Health Sciences Division (HHSD) is responsible for the overall management of the CCMS. After a complaint has been entered into the CCMS and submitted to OPHS/HHSD electronically, the CCMS staff triages the complaint to determine whether FSIS should take any additional action in response to the complaint. If a complaint is investigated, District personnel will manage all aspects of the investigation with the CCMS staff providing technical guidance and scientific direction when needed. The CCMS staff is also responsible for the referral of all complaints that may involve criminal activity or violations of the FMIA, PPIA, or EPIA to the appropriate OPEER, CID Regional Manager.

Other program areas have access to the CCMS and are responsible for entering any consumer complaints that they receive into the CCMS.

- OFDER is responsible in the context of threat detection, for providing additional analysts to assist with analyzing CCMS cases when the country's threat level is raised to red, with specific threats to the agriculture sector. Furthermore, OFDER is responsible, in the context of threat detection,

- OFO: all District Offices (DOs), all Enforcement Investigations and Analysis Officers (EIAOs), and those Public Health Veterinarians (PHVs) that have received EIAO training;

- OPAEO: The Office of Public Affairs, Education and Outreach: Meat and Poultry Hotline (the Hotline);

- OPHS: HHSD;

- OPEER: CID Program Investigators, Supervisors, and Regional Managers;

- OPPED :Office of Policy, Program and Employee Development: Labeling and Consumer Protection Staff (LCPS);

- OIA : The Office of International Affairs; all Regional Import Field Offices, and all Import Surveillance Liaison Officers (ISLOs); and

- Limited access to CCMS information will be given to OPPED, Technical Service Center (TSC); OPAEO, Congressional and Public Affairs Office (CPAO); and OPEER, Evaluation and Enforcement Division (EED); FNS, Food Safety Unit; and AMS, Poultry Programs and Livestock and Seed Programs.

Program areas that occasionally receive consumer complaints but do not have direct access to the CCMS, such as the OPAEO/Executive Correspondence and Issues Management Staff, and OPEER /Internal Control Staff, should forward any consumer complaints that they receive to OPHS/HHSD for entry into the system.

Responding to a Consumer Complaint

The first step in responding to a consumer complaint reported to FSIS is to determine whether the complaint meets the definition of a "consumer complaint". The person that initially receives the complaint makes this determination. If the complaint meets the definition of a "consumer complaint," the information provided should be entered into the CCMS. If the complaint does not meet the definition of a "consumer complaint," the information provided by the consumer should not be entered into the CCMS. If another government agency (e.g., a local or State health department or another Federal agency) is responsible for responding to the complaint, the person taking the complaint should refer the consumer to that agency. Also, complaints that involve possible criminal activity or violations of the FMIA, PPIA, or EPIA should be referred to the appropriate OPEER, CID Regional Manager and to OFDER.

If the complaint meets the definition of a “consumer complaint,” the person taking the complaint should enter information about the consumer, the product, and the nature of the complaint into the appropriate CCMS data entry fields. In addition, the person who is entering the complaint into the CCMS should input his or her name, assignment location, and telephone number in the appropriate CCMS data entry fields.

Once the complaint information is documented in the CCMS, the person who received the complaint should submit the complaint to the CCMS staff for triage. This is accomplished by clicking on the “submit” button on the CCMS screen.

All consumer complaints reported to FSIS are to be entered into the CCMS, even if the consumer is only able to provide limited information about the product. Thus, the person receiving the consumer complaint should enter all information received about the complaint that the consumer is able or willing to provide.

When talking with the consumer, the person who receives the complaint should ask the consumer to keep the remaining product and the product packaging in the freezer until he or she receives a letter from FSIS concerning the disposition of the complaint, or is contacted by an FSIS program employee assigned to investigate the complaint.

FSIS will respond to every consumer who registers a complaint with the Agency that is entered into the CCMS.

Possible Outcomes of Triage

The CCMS staff will triage all complaints that are entered into the CCMS. The following is a description of the possible outcomes of a triage.

1. Close the case:

If, after triaging a complaint, the CCMS staff determines that the complaint does not warrant an investigation, the CCMS staff will close the case without any further action by FSIS. The CCMS staff is the only program area with access to the CCMS that is permitted to close a case. When a case is closed without further action by FSIS, the CCMS staff will:

a. Document the reason that additional action on the complaint was not needed in the case notes field of the CCMS;

b. Send a letter to the consumer that informs the consumer of the final disposition of the complaint. A copy of this letter is posted to the case file in CCMS; and,

c. Send a letter to the establishment where the product was produced that contains a summary of the complaint without identifying the consumer’s name. The letter will inform the establishment that FSIS has evaluated the complaint and has decided to take no further action on it. The establishment may determine whether it should unilaterally act to address the problem alleged in the complaint. An electronic copy of this letter is posted in the CCMS case file.

2. Request an investigation:

If, after triaging a complaint, the CCMS staff determines that the complaint should be investigated, it will contact the appropriate District Office and request an investigation. CCMS staff will request an investigation if there is:

1. A laboratory confirmed foodborne illness;
2. An allergic reaction to a previously diagnosed food allergy;
3. Signs that a ready-to-eat product may be under-processed;
4. Unusual signs or symptoms that may represent the deliberate introduction of a chemical, biological, or radiological threat agent into the food supply;
5. Two or more foreign material complaints;
6. Two or more complaints of quality, economic adulteration;
7. Two or more complaints for misbranding.

Role of the EIAO

The Office of Field Operations (OFO) has a role in investigating complaints when triage by the CCMS staff indicates that an investigation is warranted. Under the direction of the District Office, you, as an EIAO, may conduct an investigation of a consumer complaint. You may be requested by the District Office to follow up with consumers, collect evidence (e.g., product, documents, and photographs), submit samples, and enter information gathered from an investigation into the CCMS database as outlined in FSIS Directive 5610.1.

If you are assigned to investigate a complaint, you should:

- Immediately contact the consumer to verify information.
- Visit the consumer to verify that the information provided by the consumer is accurate.
- Collect the relevant information and evidence needed to identify and document the problem. You may be requested to obtain photos or samples.
- Enter investigation findings in the “case note” section of the CCMS screen.
- Collect and submit laboratory samples to an FSIS laboratory, if requested.
- Contact or visit point of purchase (POP) to determine product origin and associated establishment number.
- Meet with plant officials about the matter and verify that the establishment’s Sanitation SOPs, HACCP plan, or other food safety controls are effective.
- Discuss the information with the Deputy District Manager as it may be appropriate to initiate recall proceedings or take a regulatory or enforcement action.

- Contact OPEER and CCMS staff if there are concerns regarding criminal activity and document such in CCMS.

- Immediately contact the OFDER and CCMS staff, concerning product tampering or potential food security threats, complete a Non-Routine Incident Report (FSIS Form 6500-5), and update the CCMS.

- Forward complaints to the appropriate agency (e.g. state or local department of health or agriculture) if it is deemed that the product in question falls outside FSIS jurisdiction.

Other Possible Outcomes of Triage

Some other possible outcomes of triage by the CCMS staff may be to:

3. Inform the appropriate DO of similar complaints about non-identical products:

If, after triaging a complaint, the CCMS staff finds that there is more than one similar complaint about non-identical products produced at a particular establishment, but the complaints do not meet the criteria for an investigation, it will inform the District Office for the establishment that is the subject of the complaints so that the Inspector-in-Charge (IIC) can follow-up with the establishment.

4. Refer the complaint to OPPED/LCPS:

If, after triaging a complaint, the CCMS staff determines that the complaint is about the product's labeling but does not raise health or safety concerns, it will refer the complaint to OPPED/LCPS. LCPS is responsible for further management and documentation of these complaints in the CCMS.

5. Refer the complaint to OIA:

If, after triaging a complaint, the CCMS staff determines that the complaint involves a product produced in a foreign establishment, it will immediately inform the Director of OIA Import-Export Program Staff (IEPS).

6. Refer the complaint to OFDER:

If, after triaging a complaint, the CCMS staff determines that the complaint involves a potential non-routine incident, the CCMS staff will forward the incident information through the Medical Affairs and Surveillance Branch to the Director of HHSD. The HHSD Director then validates the incident and submits the Non-Routine Incident Report to the OPHS AA and the OFDER duty officer for possible EMC activation.

7. Notify OPEER/CID headquarters of possible criminal conduct:

If, after triaging a complaint, the CCMS staff determines that the complaint appears to involve product tampering, food security threats, economic adulteration, misbranding, or other potential criminal conduct, it will inform OPEER. The CCMS staff will also notify OFDER if the complaint appears to involve a food security threat. Note: The CCMS staff

will request OFO to determine whether the complaint appears to involve product tampering, food security threats, economic adulteration, misbranding, or other potential criminal conduct.

8. Notify FNS/Food Safety Unit of complaints involving products distributed through the National School Lunch Program:

If, after triaging a complaint, the CCMS staff determines that the complaint appears to involve a food safety risk to recipients of products through the National School Lunch Program, it will inform FNS/Food Safety Unit and/or AMS/Poultry and Livestock Program headquarters and request their assistance in investigating the complaint.

9. Reopen a case: If necessary, after a case is closed:

The CCMS staff may reopen it and enter additional information. If an OFO program employee determines that a case should be reopened, he or she should contact the DM or designee for his or her District and explain the reason he or she believes that the case should be reopened. If the DM or designee agrees, he or she will contact the CCMS staff and request that they reopen the case. OPEER/CID Regional Managers or OIA Director of Import Inspection Division may also request that the CCMS staff reopen a case.

FSIS Form 1411-2

This form can be used as a worksheet for gathering information to enter into the CCMS.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE **CONSUMER COMPLAINT INFORMATION SHEET**	EPIDEMIOLOGY CASE NUMBER	EMERGENCY PROGRAMS CASE NUMBER	DATE RECEIVED

1. FORM OF INQUIRY	2. SOURCE OF INQUIRY	
☐ Visit ☐ Telephone ☐ Letter ☐ Fax	☐ Consumer ☐ Congressional ☐ Referral *(From Another Agency)*	OTHER *(Specify)*

3. IDENTIFICATION OF INQUIRER

NAME OF INQUIRER *(Last, First, Middle Initial)*	TELEPHONE NUMBER *(Home)*	TELEPHONE NUMBER *(Work)*
ADDRESS *(Street, P.O. Box, etc.)*	CITY/STATE	ZIP CODE

4. SUBJECT OF INQUIRY

☐ Product Safety ☐ Ingredients ☐ Product Appearance ☐ Illness ☐ Injury	Other *(Specify)*

5. IDENTIFICATION OF PRODUCT

A. BRAND NAME	B. PRODUCT NAME
C. SIZE AND PACKAGE TYPE	D. CAN/PACKAGE CODES
E. NAME AND LOCATION OF STORE WHERE PURCHASED	F. DOES COMPLAINANT EXPECT ADDITIONAL INFORMATION ☐ Yes ☐ No ☐ FOIA

G. SELL/USE BY DATE	H. DATE PURCHASED	I. PRODUCT USED ☐ Yes ☐ No	J. DATE USED
K. MANUFACTURER *(Name and Address)*		L. ESTABLISHMENT NUMBER	M. AMOUNT REMAINING

6. INJURY OR ILLNESS RESULTED *(If "YES" complete Items a through h)* ☐ Yes ☐ No

A. TYPE INJURY	G. TYPE SYMPTOMS	H. ONSET *(Time in hours and minutes)*
	☐ Vomiting	
B. ATTENDING HEALTH PROFESSIONAL ☐ Yes ☐ No	☐ Nausea	
C. HOSPITALIZATION REQUIRED ☐ Yes ☐ No	☐ Diarrhea	
D. DOCTOR	☐ Dizziness	
E. HOSPITAL	☐ Headache	
F. CITY	☐ Other *(Specify)*	

7. NATURE OF COMPLAINT AND REMARKS

8. COMPLIANCE ACTION TAKEN

☐ Investigation ☐ Telephone Call	Other *(Specify)*	REFERRED TO	INSPECTION OPERATIONS CONTACTED OFFICE AND PERSON CONTACTED

9. SAMPLING INFORMATION

NUMBER OF SAMPLES	LABORATORY	TYPE OF ANALYSIS REQUESTED	
ASSIGNMENT CODE	COMPLETED BY	BADGE NO.	DATE COMPLETED
	PROGRAM	LOCATION *(City)*	

FSIS Form 1411-2 (7/93)

FSIS Form 10,300-1

This form should be completed when receiving a sample from a private citizen.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE **RECEIPT OF SAMPLE OF MEAT OR POULTRY PRODUCT FROM PRIVATE CITIZEN**		ESTABLISHMENT NO.	DATE OF COLLECTION	DATE USED BY CONSUMER
KIND OF PRODUCT	PRODUCT SIZE	BRAND NAME		DATE PURCHASE
HOW STORED AFTER PURCHASED	LOT CODE	FOREIGN OBJECT SUBMITTED *(Check one)* ☐ NO ☐ YES *(describe)*		
MANNER IN WHICH THE PRODUCT MARKETED *(Check one)* ☐ CANNED ☐ FROZEN ☐ OTHER *(specify)* ☐ REFRIGERATED ☐ DEHYDRATED ☐ CRYOVACED ☐ IRRADIATED		WHERE PURCHASED *(Name and Address of Store or Business)*		
NATURE OF COMPLAINT *(Use reverse if necessary)*				

The U.S. Department of Agriculture accepts this sample with thanks. It will be used to increase the effectiveness of the Meat and Poultry Inspection Operations. Results of any laboratory analyses that may be performed will become part of an investigatory file, and will be handled in accordance with provisions of the Freedom of Information Act, 5 U.S.C. 552(b) (4).

NAME OF COMPLAINANT *(Please print)*	ADDRESS *(Street and number)*	
(City, State and Zip Code)		PHONE *(include Area Code)*
NAME *(FSIS Employee receiving sample)*	SIGNATURE *(FSIS Employee receiving sample)*	DUTY STATION / PHONE

FSIS FORM 10,300-1 (8/91) REPLACES MP FORM 25 (3/85), WHICH MAY BE USED UNTIL EXHAUSTED. Designed on PerFORM Pro Software

Workshop

1. Describe what the CCMS is and the purpose it serves.

2. Circle the letter of each of the following that would constitute a consumer complaint?

a. A consumer calls the Meat and Poultry hotline to report finding a piece of metal in smoked sausage.

b. A consumer calls the local health department to report finding a piece of plastic in a package of ground beef prepared at a local retail market.

c. A consumer calls the local health department to report an allergic reaction after eating a hot dog.

d. Director of Quality Assurance at a federally inspected plant calls the District Office to report finding foreign material in some chubs of ground beef from another establishment.

e. A consumer calls the Meat and Poultry hotline to report finding some fully cooked chicken breast fillets that appear raw on the inside.

3. Describe the role of the EIAO when a consumer complaint investigation takes place.