Response Workgroup Updates
July 23, 2010
Co-Chair: Ben Miller, Minnesota Department of Agriculture
Co-chair: Kathleen Hanley, Washoe County Health Department

Two-Sentence Summary of Group Activities:

"*The Response Workgroup will focus on defining best practices and procedures from state and local health and food safety agencies by focusing on topics related to food recall effectiveness checks, traceback investigations, environmental investigation SOPs, details to the FDA EOC, and the use and implementation of the Incident Command System. The group has established sub-workgroups to focus their efforts on each of these issues and will present their findings at the August 2010 meeting."*

Summary of Successes:

The Response Workgroup initially met in May 2009 to form and discuss how to translate the directives of the Coordinating Committee into actionable items that could be accomplished in the roughly 14 months prior to the next 50 state meeting occurring in August of 2010. To that end, the following projects were identified and attempted:

State and local details to FDA/EOC, recommendations on how to increase collaboration
Subgroup Lead: Ellen Morrison (FDA).
Action Items:

- Create a "Detail" (2-3 weeks) opportunity for state and local partners to come to the FDA EOC and contribute during an outbreak or emergency response.

Deliverables:

- Create a mechanism by which interested and commissioned individuals could volunteer and staff the EOC. Expenses would be paid by the FDA.

Outcome:

- Ellen and Pete worked collectively to create an application form and address some of the challenges surrounding commissioning of state and local officials.
- To date, no one has applied for this "detail". This may be due to the time commitment involved and competing work priorities for state and local staff.

Future Actions:

- Further advertise and recruit for this opportunity. Participation is highly consistent with the "Integrated Food Safety" approach in FDA and would allow for both federal, state, and local staff to better learn what each does in an outbreak or emergency operations setting.

Recall effectiveness checks within 6 pilot states
Subgroup Lead: Brett Weed (North Carolina).

Action Items:

- Investigate the use of FoodShield or the Web-based tracking system used in North Carolina to track field-based recall effectiveness checks during localized or widespread recall events.

Deliverables:

- Test the functionality and ease of use of each system in a real-world effectiveness check scenario.

Outcome:

- This subgroup experienced significant turnover in leadership since the inception of the subgroup (Joe Reardon and Wendy Campbell were both leads at one time).
- FoodShield was piloted separate from the work of this subgroup and the findings of that pilot were never incorporated into the work of the subgroup.
- The North Carolina system was demonstrated and several states entered data into this system during recall events. The performance of this system wasn't specifically measured as a part of this subgroup, although feedback is positive from North Carolina.

Future Actions:

- The redesign of eSAF should provide a good opportunity for FDA to seek input from the states as to specific and desired functionality of a web-based recall effectiveness check system that could be used by the states.
- Future collaboration with the "IT Workgroup" or a similar entity could help with requirement gathering to create a truly useful data tracking system.

Sprout environmental method document

Subgroup Lead: Pat Kennelly (CA)

Action Items:

- Draft an environmental investigation and sampling guidance document that could be used to investigate and inspect sprout growing facilities nationally.

Deliverables:

- A collaboratively created draft guidance document

Outcome:

- This subgroup also experience a change in leadership during the project (Jeff Farrar left for FDA) and Pat Kennelly assumed leadership of the project.
- This subgroup worked closely with the RRT Teams in CA, MI, and MN to write and draft this guidance document. Significant credit should go to the RRT members in these states for working diligently to complete this document.
- This document was reviewed by FDA and formed the basis for DFI Bulletin 37 which provides new and updated guidance on inspection of sprout-growing operations.

Future Actions:

- None specific to this subgroup.

Collecting existing ICS documents, lessons learned, best practices – Scott Holmes

Subgroup Lead: Scott Holmes (Lincoln County, NE).

Action Items:

- Assess current practices concerning the use of ICS in outbreak and food safety related emergencies from the state and local level.

Deliverables:

- A presentation at the August 2010 meeting on some of the "current practices" identified by this subgroup.

Outcome:

- Scott Holmes with the help of Tressa Madden (OK) will be presenting this subgroup's findings at the 50 state meeting in August 2010.

Future Actions:

- These current practices may serve as the basis for further training or collaborative exercises between FDA and the state and local agencies.
- They may also help "standardize" response protocols and position descriptions within the ICS framework that are common to foodborne outbreak response activities.

The use of 3rd Parties to Conduct Recall Effectiveness Checks

Subgroup Lead: Pat Kennelly (CA).

Action Items:

- Draft a Request for Application (RFA) that would allow a 3rd party service provider to conduct recall effectiveness at the request of the regulatory agency and measure the cost effectiveness of these visits versus regulatory staff and "opportunity costs" associated with these inspection activities.

Deliverables:

- A 3-month pilot project using a 3rd party.
- Time and cost tracking data provided in addition to the recall effectiveness check data

Outcome:

- CA successfully drafted and implanted a RFA with a 3rd party to conduct 1500 recall effectiveness checks.
- Due to implementation deadlines, CA asked MN and WA states to also participate in this pilot. Their participation may also provide better cost comparison and geographic variability data for the pilot.
- The pilot will be completed by September 30, 2010.

Future Actions:

- Analyze the data from the pilot and determine if and when the use of 3rd parties for recall effectiveness checks is appropriate.

Product tracing to support epidemiological investigations

Subgroup Lead: Kirk Smith (MN)

Action Items:

- Draft a "whitepaper" on the appropriate use and implementation of traceback investigations during foodborne outbreaks where the epidemiological investigation fails to clearly identify a source.

Deliverables:

- A draft of the whitepaper prior to the 50-state meeting August 2010.

Outcome:

- Kirk Smith with the help of Ben Miller drafted the whitepaper and circulated it for comments in the Spring of 2010.
- Comments from other members of the subgroup, SMEs, and FDA were incorporated into the final draft.
- The final draft may be discussed at the 50 state meeting.

Future Actions:

- The whitepaper should be disseminated for use to federal, state and local entities. It should be posted to the document library on CIFOR's website once a final draft is agreed upon.
- Sections from this whitepaper could be incorporated into the next draft of the CIFOR manual.
- Agreement on the final draft will come after the 50 state meeting.

Concluding thoughts from the Chair:

I would like to thank everyone who participated on the Response Workgroup as part of the Partnership for Food Protection. The workgroup represented a broad and diverse group of talents from the federal, state, and local level and while not everyone may have had an opportunity to contribute to their full desire or potential I believe that we accomplished a significant amount in the 14 months we were together.

The Response Workgroup divided its work into very specific tasks with the goal of completing these in the limited time provided. While we were largely successful, many broader, long-term issues were identified during the process. I would like to see these issues, which center on communication, collaboration and information sharing addressed in the future work of the Response group as the PFP groups merge with their FDA counterparts.

Thank you again for all of your hard work and valuable contributions and I look forward to working with many of you on these issues in the future.

Sincerely,

Benjamin Miller
Operations and Response Section Manager
Dairy and Food Inspection Division
Minnesota Department of Agriculture