



A United Approach to Public Health

Federal • State • Local • National Workshop Denver, CO August 17 - 19, 2010



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MESSAGE FROM THE WORKSHOP CHAIR

On behalf of the Food and Drug Administration (FDA), it's a pleasure to release the report from the 50-state Workshop held on August 17-19, 2010 in Denver, Colorado. The theme of the workshop, "A United Approach to Public Health," captured the spirit of partnership that was evident throughout the event. FDA's regulatory and public health partners worked in a collaborative effort to provide advice and recommendations that will help develop and implement an Integrated Food Safety System.

The first 50-state workshop was held in 1998, and we have been on a long journey that has resulted in a great deal of progress. FDA is committed to building on past work to break down barriers to collaboration and information flow; better leveraging collective resources; and building capacity that helps advance national interest in food safety. The evolution of a national Integrated Food Safety System from an idea to national policy is significant.

In this report you will find a summary of highlights from the workshop including:

- Accomplishments from the Partnership for Food Protection (PFP) Workgroups
- Update from the Integrated Food Safety System Task Groups
- Recommendations from breakout group discussions

In addition, we have included a participant list and the workshop agenda.

Now comes the hard part of developing the next steps. The recommendations from the breakout group discussions will be reviewed by the PFP Coordinating Committee. The committee will identify the top recommendations and assign them to existing workgroups or recommend new ones be created as needed.

In Denver, many people expressed their commitment to developing an Integrated Food Safety System and FDA has offered to support holding future 50-state workshops every two years. The 50-state workshop is a unique forum that brings together regulators and public health professionals from every level of government – from federal, state, local, and territorial agencies - with a wide range of expertise in food, feed, epidemiology, laboratory science, veterinary science, environmental science and public health – and we are committed to working together with our partners to develop a united approach to public health. The success of an Integrated Food Safety System depends on input and assistance from the experts and leaders across the U.S. who will guide the future safety of America's food supply.

Thank you for your hard work that made the 2010 50-state workshop such a success. I look forward to working with you and your colleagues to continue to move closer to our goal of having a national Integrated Food Safety System that achieves our public health goals.

Steven M. Solomon, DVM, MPH
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EXECUTIVE SUMMARY

From August 17-19, 2010, the Food and Drug Administration (FDA) held a 50-State workshop, entitled "A United Approach to Public Health," in Denver, Colorado. The workshop attendees brought diverse perspectives from federal, state, local, and territorial government agencies to ensure a mix of state and local perspectives. Officials from all 50 states, including five U.S. territories, provided expertise in food, feed, epidemiology, laboratory, animal health, and environmental and public health. Several federal agencies, including FDA, the Centers for Disease Control and Prevention (CDC), the U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS), Department of Defense (DOD), Department of Homeland Security (DHS), Environmental Protection Agency (EPA), and Indian Health Service (IHS) were represented.

The workshop highlighted the progress of the Partnership for Food Protection (PFP) workgroups, provided an update on current legislative issues, and offered an opportunity for discussion and input on building an Integrated Food Safety System (IFSS). The majority of participants' time was spent in small group sessions, the intent of which was for participants to engage in strategic-level discussions that will shape the future direction of the Integrated Food Safety System.

The workshop was designed to provide a setting for the state, local, and territorial stakeholders to apply their expertise across multiple public health disciplines with a role in food safety to address the challenges of a growing global food supply. The participants were tasked with identifying and developing a series of action items and recommendations to further the development and implementation of an Integrated Food Safety System. Participants were split into groups to provide advice and recommendations on addressing challenges and conflict, integrating response efforts, conducting joint investigations, improving communication, and measuring outcomes. The breakout session groups prioritized those recommendations. On the third and final day of the conference, representatives from each breakout session presented the top recommendations to the general session. In addition to these breakout groups, participants also examined the current resource crisis and its consequences and the benefits of sharing resources to maintain the public health infrastructure, with the goal of developing unified talking points to take to policy makers at all levels.

The Partnership for Food Protection Coordinating Committee is currently looking at the recommendations made by the 50-state breakout groups and are evaluating how best to integrate the suggestions to improve the design and implementation of an Integrated Food Safety System.

DAY ONE - Tuesday, August 17

DEVELOPING AND IMPLEMENTING THE INTEGRATED FOOD SAFETY SYSTEM

FDA provided opening comments and kicked off the 50-State workshop with a presentation on current progress towards developing and implementing an Integrated Food Safety System (IFSS). The presentations described what an IFSS looks like and what federal, state, and local officials need to do to achieve this vision. A vision document exists on the FDA's website that outlines the need to work collaboratively to create an integrated national food safety system. (http://www.fda.gov/downloads/ForFederalStateandLocalOfficials/UCM183650.pdf) FDA has received feedback on and support for the vision paper from many associations. Additional feedback on the vision document is welcome and may be submitted at any time.

Where we are with the IFSS

Dr. Steve Solomon, Deputy Associate Commissioner for Compliance Policy in FDA's Office of Regulatory Affairs (ORA), discussed where we are with the development of an IFSS. The vision for the future is an Integrated Food Safety System that focuses on preventing harm before it happens, which requires: reducing the risk of the problems occurring; responding rapidly when problems do occur; and ensuring optimal use of resources. The report "Enhancing Food Safety: The Role of the Food and Drug Administration" by the Institute of Medicine of the National Research Council was issued on June 8, 2010 and validates that this vision is on target and that our implementation approach is sound.

While the task ahead is oftentimes daunting, we have made some progress. For example, rather then Federal, state and local agencies developing independent work planning assignments, a small number of regional assignments are being developed in collaboration, with the Districts and states working together. In addition, four state partners were invited to participate in a food planning workshop to discuss and evaluate FDA's FY 2011 risk prioritization model. Building on this collaboration in the future, the goal is to have a national, risk-informed integrated work plan to provide comprehensive coverage of the food safety system.

Integrating response activities is a key element for formation of an IFSS. FDA has customized incident command system (ICS) training to incorporate a public health focus that includes emergency response to intentional and unintentional adulteration of food and animal feed. In order to improve emergency response capabilities and coordination, FDA encourages state and local officials to participate in basic and advanced ICS training

Additionally, the FDA is creating sustainable systems to support Rapid Response Teams (RRT) for timely and efficient response to foodborne outbreaks and other food safety incidents. FDA is currently sponsoring 9 cooperative agreements with States for the development of all hazard Rapid Response Teams.

FDA is continuing work to get more states enrolled in the Manufactured Food Regulatory Program Standards (MFRPS) implementation process. The use of national uniform program standards with robust oversight will ensure the comparability of food safety programs at all levels of government.

The FDA is working to implement national uniform training and certification programs based on established curriculum and standards. In 2009, over 2,100 state and local participants attended FDA classroom training, and over 11,500 state/local/tribal officials had access to online training modules through FDA's ORA University. Unfortunately, this approach alone will not come close to addressing the broader training and certification needs of an integrated system. FDA is working cooperatively with the International Food Protection Training Institute (IFPTI) to develop and deliver food regulatory training programs and build on our vision for a national training system. These efforts support the design and implementation efforts that will ensure a robust, thorough, and uniform training and certification system.

Moving forward, the Partnership for Food Protection will be leading the development of the IFSS. The once independent state and local-led PFP workgroups and FDA-led IFSS task groups will be merging together under the PFP. The redesigned PFP workgroups will decide how best to collaborate in the future. In addition, the Coordinating Committee is working to design a proposed long-term governance structure that will oversee and guide the establishment of an IFSS as well as the system once fully functional.

Currently, there is a resource crisis at all levels of government and we need to ensure future funding for the IFSS. A key component to securing funding will be the development of metrics that demonstrate the value of an Integrated Food Safety System to lawmakers and to the public. A successful program will require the ongoing support of, and engagement into, the system from all participants in order for lawmakers and the public to buy into the system.

Challenges to creating the IFSS

Dr. Solomon described five key challenges currently facing the nation's food safety system. The 50-State workshop was the perfect platform to explore solutions to these challenges.

The first challenge is **telling the story** in an effective way to better compete for scarce resources. This means moving away from the traditional approach of counting inspections and 'widgets' and moving towards developing performance and outcome measures that will help us demonstrate the success and impact of an integrated system.

The second challenge is **communication**. Communication at every level continues to be a challenge. Sharing information and the development of information technology solutions need to be addressed. We are making in-roads with the development of new systems, but there is much more to do. Getting the message out to all levels of government and providing opportunities to provide input and feedback are needed. As a start, the PFP Coordinating

Committee hosted a webinar on the IFSS on June 28 that was taped and is posted on FDA internet site.

The third and forth challenges are **working together and handling disagreements.** We know there are and will be challenges based on our different authorities and requirements, but we don't believe these are insurmountable and we want to continue to break down the barriers to successful and seamless integration of activities. In fact, some of our differences can be used to our advantage when we work collaboratively. The key is to be working together to find the solution when foodborne illness exists and the health of the public is at stake.

The fifth challenge, felt by all levels of government, is **funding** and sustainability. Resources are necessary to fulfill our missions and to do what the public expects of us. We will need to find new, creative, and sustainable ways to ensure resources are available for an IFSS.

ACCOMPLISHMENTS OF THE PARTNERSHIP FOR FOOD PROTECTION WORKGROUPS

In August 2008 at the 50-state workshop in St. Louis, federal, state, local, territorial, and tribal officials met to address the challenges of ensuring that the food that Americans enjoy is safe and secure. At the end of that workshop, the participants came up with proposed action items and recommendations.

The recommendations were reviewed and sorted into categories. Twenty state and local members and 11 federal officials comprised the Partnership for Food Protection Coordinating Committee which recommended the formation of four State-led workgroups: Response, Training, Interactive Information Technology, and Risk-Based Work Planning; and the FDA/Center for Veterinary Medicine-led Pet Event Tracking Network (PETNet) project.

In 2009, each workgroup was charged to work on action items from the St. Louis workshop which were endorsed by the Coordinating Committee to implement. The workgroups developed project plans and timelines to complete by August 2010. The following are a summary of the workgroup accomplishments in 2009-2010.

The **Training** workgroup (TWG), led by the City of Plano (TX) Health Department's Brian Collins and the Minnesota Department of Agriculture's Dave Read, worked on projects to assist the Partnership for Food Protection (PFP) in development and implementation of uniform, national standards for training and certification of regulators working in retail, manufactured, raw/unprocessed foods, and feed. This is needed because a competent regulatory workforce doing comparable work at federal, state, local, tribal and territorial levels is critical to successful implementation of a fully integrated national food safety system. The TWG's accomplishments include development of a "Vision Plan for Food Safety Training and Certification for Federal, State, Local, Territorial and Tribal Regulators" which includes a roadmap for curriculum and certification development and delivery; endorsing the International Food Protection Training Institute (IFPTI) as a National Training Institute; collaborating with FDA to initiate a job task analysis for entry level food safety professionals; and compiling the first edition of a course catalog of all food safety training.

The Interactive Information Technology (IIT) workgroup, headed by John Ryan, Hawaii State Department of Agriculture, and Minnesota Department of Agriculture's Carrie Rigdon, proposed a vision of an interoperable food information system that links information, such as laboratory, inspection, and recall data, to support the overall goal of an integrated national food safety system. From 2008-2010, the IIT group worked on three main project groups to meet its goals: Systems Assessment, Data Elements, and Business Needs. The assessment of seven electronic systems used for inspections, recalls, laboratory data, and collaboration showed that most officials do not use the current systems available, and that even though all of these systems were web-based or web accessible, many of the systems that officials use within their agencies were still paper-based. There is a large demand for electronic, on-line systems and these systems could make a substantial impact. However, more work is needed to move towards interoperability of existing and newly-developed systems.

The IIT Data Elements group focused its efforts on the development of a web-based form for recall audit checks and conducted a comparison of currently used Good Manufacturing Practices (GMP) state inspection forms to identify elements commonly used among states. The recall audit check form has now been submitted to FDA and forwarded to their contractors completing the groups' role in this project. FDA and their contractors are in the process of developing this web-based form, and its integration into eSAF (electronic State Access to FACTS) is planned. The limited number of GMP inspection forms reviewed for data elements was not representative enough to draw firm conclusions, but initial findings found the most uniformity in management and personnel, sanitation operations, and sanitary facilities and controls; and the most inconsistency was in the area of processes and controls. The group recommended an expanded review of additional state and local GMP food inspection forms, conducting similar reviews of other inspection forms, and developing universal model GMP inspection forms.

The objective of IIT Business Needs group was to identify and document business IT needs for an Integrated Food Safety System. The group designed and conducted an on-line survey that focused on inspections-related business needs. Several desired information types were identified, including foodborne illness information, photos, and corrective actions. The group recommended continuing efforts to identify IT business needs/obstacles for several areas of the food safety system and to clarify discrepancies in data needs and sharing between local, state, federal agencies. The group concluded that the respondents want integrated systems and information but there are many obstacles. Technology can help overcome these obstacles when implementing an IFSS, but there needs to be standardized elements across agencies for inclusion in an integrated system.

Oregon's and Tennessee's Department of Agricultures Vance Bybee and Dan Danielson have been leading the **Risk-Based Work Planning** work group. The group was charged to conduct a pilot workplanning project and they agreed that the most efficient approach would be to segment the pilot into phases. For Phase One, they would "ascertain systems, tools, and customs currently employed in federal, state, and local food safety systems identifying how and to what extent data in those systems is documented, utilized, and communicated." To do this, they would first, capture a representation of the current food regulatory system and establish this "snapshot" as a baseline from which future evaluations can measure the effects of upcoming pilot projects; and second, recommend methods and tools to utilize in the development of future projects addressing an Integrated Food Safety System.

The workgroup selected peanuts as the subject for the Phase One pilot project. This was important because the workgroup wanted to identify current practices in all areas of the food and feed industries. Information gathered needed to be transferable to the farm-to-fork continuum of any food or feed product. The workgroup limited the project to FDA's Southeast Region, where the product passes through all 10 identified points in the farm-to-fork continuum. The workgroup used an initial survey to solicit information from the five cooperator states, asking them to identify the laws, regulations, and tools they used for any food safety

inspections and sampling assignments conducted within the states. Each state was asked to provide three sample and inspection reports for ten identified points across the farm-to-fork continuum.

The five cooperator states were instructed to use current tools and established practices, and to provide only information for the points in the continuum where they customarily conduct sampling assignments or inspections. To complete Phase One, the workgroup's Communications Team conducted exit interviews to determine the strengths and weakness of the pilot process from the cooperators' perspectives

The Risk-Based Work Planning workgroup found that inspection and sampling tools varied widely, terminology and definitions were inconsistent, communication was frequently unidirectional, and the scope and level of training varied between partners. They recommended a greater emphasis on communication, coordination, and compatibility among food safety regulators.

The **Response** workgroup, headed by Ben Miller from Minnesota's Department of Agriculture and Kathleen Hanley from the Washoe County (NV) Health District, focused on defining best practices and procedures from state and local health and food safety agencies and selected topics related to food recall effectiveness checks, traceback investigations, environmental investigation SOPs, details to the FDA's Emergency Operations Center (EOC), and the use and implementation of the Incident Command System. The group established sub-workgroups to focus their efforts on each of these issues with the goal of completing these tasks in the time provided.

A major accomplishment was drafting an environmental investigation and sampling guidance document that could be used to investigate and inspect sprout growing facilities nationally. This document was reviewed by FDA and formed the basis for FDA's Division of Field Investigations (DFI) Bulletin 37 which provides new and updated guidance on inspection of sprout-growing operations.

The Web-based tracking system used in North Carolina was tested to track field-based recall effectiveness checks during localized or widespread recall events in order to determine the functionality and ease of the system in a real-world effectiveness check scenario. 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.

The 3 month pilot project to use 3rd parties to conduct recall effectiveness checks is underway and will be completed by September 30, 2010. A Request for Application (RFA) was drafted by California 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. Future action will be needed to analyze the data from the pilot and determine if and when the use of 3rd parties for recall effectiveness checks is appropriate.

A "whitepaper" was drafted on the appropriate use and implementation of traceback investigations during foodborne outbreaks where the epidemiological investigation fails to clearly identify a source. Future action is needed to finalize the paper.

Highlights from the project to assess current practices concerning the use of Incident Command Systems (ICS) in outbreak and food safety related emergencies from the state and local level were presented during the 50 state workshop.

FDA did not receive applications for the "Detail" (2-3 weeks) opportunity for state and local partners to come to the FDA's EOC during an outbreak or emergency response. FDA will readvertise and recruit for this opportunity to allow for federal, state, and local staff to improve understanding of how various agencies operates during an outbreak or in an emergency operations setting.

Christopher Melluso of FDA's Center for Veterinary Medicine and Elizabeth Higgins of the New Mexico Department of Agriculture presented an update on the **Pet Event Tracking Network** (PETNet). At the 2008 workshop, the Outbreaks/Food-Borne and Feed-Borne Investigations Workgroup proposed a concept system (PETNet)to detect, investigate, and report disease outbreaks in companion animals. A workgroup was formed to develop PETNET. The workgroup determined that the primary function of PETNet should be information sharing, as that was the main concern for all stakeholders. The group needed to find a way to give states access to the information that FDA collects, so that state regulators could look at the same developing picture. The result was PETNet, a web-based alert system for pet food products that is accessible to state and federal government officials. FDA's Center for Veterinary Medicine has invited up to four representatives from each state to participate in PETNet (including the State veterinarian, feed control officials and State diagnostic lab official). States were encouraged to respond by September 1, 2010. CVM expects that the system will be available by the end of 2010.

The final reports from all of the Workgroups for 2009-2010 will be posted on the FDA web page.

CURRENT ACTIVITIES OF THE INTEGRATED FOOD SAFETY SYSTEM TASK GROUPS

To ensure that FDA is able to support an integrated system, task groups were created in 2009 to build necessary infrastructure. Dr. Solomon described the eight task groups and their current scope of work.

The **National Standards** task group is charged with expanding the implementation of national standards for regulatory programs at all levels of government and continuing to enhance existing national standards to promote uniformity and high quality work. The group has developed a catalog of existing national regulatory program standard schemes for five main categories of food regulatory programs (e.g., Manufactured Foods, Grade 'A' Milk and Milk Products, Molluscan Shellfish, Retail Food Protection, and Animal Feeds) and analyzed the schemes to determine critical common elements and gaps. In addition, they have developed recommendations for the evolving process of developing these standards and updating them by seeking input from all stakeholders. Their challenge is to identify appropriate measures and metrics to characterize the progress made toward implementation of program standards and evaluation of their success.

The **Policy and Procedures** task group is developing and implementing policy and procedures to ensure that IFSS programmatic objectives and implementation activities are coordinated within FDA and with external stakeholders. So far, this group has implemented the interim governance structure for the Integrated Food Safety System by adopting the existing governance structure for the PFP; developed a communications strategy, including the creation of standard IFSS presentations and utilization of FoodSHIELD; drafted a 5-year strategic plan for IFSS implementation; and created FDA procedures for using state data to support FDA warning letters. Challenges for this group include communication (e.g., sharing the vision and progress and obtaining input and feedback), information sharing, and information technology issues.

The **Training and Certification** task group is charged to develop a training system that will help assure that all regulators have the knowledge and skills necessary to carry out their food/feed regulatory responsibilities with an emphasis on public health protection. The group has identified a core curriculum and catalogue of current food safety training courses (done in collaboration with the International Food Protection Training Institute); supported the PFP training workgroup in establishing a baseline of core competencies for food safety investigator/inspector with two years of experience or less; and worked with the PFP Training WG on the training vision document that describes the use of councils, centers of excellence, and training development and administration units to create a skilled food safety workforce.

The **National Work Plan** task group is charged to develop, pilot, evaluate and implement a process to build and manage a national integrated risk-based work plan for food and feed. The group has created a position description for an FDA District Official Establishment Inventory (OEI) coordinator; held a workshop with States (4) on the FY' 11 Risk Based Inspection Model; started a survey to FDA districts to understand how they conduct work planning with their states (6 of 20 respondents); and issued a DON (Deoxynivalenol or vomitoxin) in Wheat

Assignment to FDA Districts and States. The National Work Plan task group is also working toward common definitions and clearly defining the farm to table universe and regulatory partners' coverage and jurisdictional authorities (e.g., who is regulating, who is controlling, and who is responding). Challenges for the group include: resources; factoring imports into the process; communication; lack of jurisdictional crosswalk of regulatory authorities; information sharing and IT compatibility.

The **Emergency Response** task group is charged to integrate Federal, state, local, tribal, and territorial emergency response efforts to strengthen emergency preparedness and enable faster and more effective response to food safety events. The group is working on encouraging consistency with the Council for Improving Foodborne Outbreak Response (CIFOR) guidelines. They are exploring how to best use the Incident Command System in public health response and have developed FDA specific training that is offered to state partners. They are also looking at methods to improve communication with stakeholders and addressing recovery issues including federal, state and local roles and responsibilities after a food emergency has occurred.

The **Laboratories** task group is charged to develop and implement standard laboratory practices and procedures to promote consistent and meaningful data for compliance, surveillance, and environmental samples. The Laboratories task group is also developing sample collection guidelines, defining mechanisms to assist laboratories move towards accreditation, and identifying and supporting the development of platforms for critical IT data sharing in real time. Their path forward leads to more cooperation with associations and they have planned a laboratories conference to convene stakeholders. A challenge for this group is there is no system is currently available for capturing lab analytical data for use by states and federal agencies in real time for compliance actions.

The **Oversight** task group is charged to design program oversight to include measurement of performance against the program standards to maintain the credibility of the IFSS. This group has a completed a concept paper on the FDA structure, staffing, budget, and operations for program auditing and individual certification. Additionally, with the support of the PFP Coordinating Committee, the group has developed a conceptual governance system for the Integrated Food Safety System.

The **Performance Measures and Outcomes** task group is working to assist in the development of quantitative performance measures and outcomes related to establishing and maintaining a risk-driven integrated food/feed safety system. The group has developed logic models and is working to better define mechanisms for reporting performances and outcomes. The task group is creating a food safety measurement inventory of those indicators that are currently being tracked at the federal, state, and local levels. This group is looking for more representation from other federal agencies and state and local governments.

For information on joining a task group, please contact: ORAPartnershipFoodProtection@fda.hhs.gov

MESSAGE FROM COMMISSIONER HAMBURG

In a video address, **FDA Commissioner Margaret Hamburg** praised the perspectives and range of expertise in food, feed, epidemiology, laboratory science, veterinary science, environmental science and public health gathered at the 50-State Workshop. She stressed that the success of an Integrated Food Safety System depends on input and assistance from all of the nation's state and local officials and our federal partners.

Dr. Hamburg underlined that advice and recommendations are needed from all of our regulatory and public health partners in the collaborative effort to enhance the safety of the American food supply. Participation in the 50-State workshop is an important step in ensuring that we have state and local officials' commitment for the IFSS. FDA is committed to optimizing coordination of food safety efforts with state, local, tribal and territorial regulatory and public health agencies to protect our food supply. Dr. Hamburg expressed her appreciation for everyone's attendance and participation in the workshop. FDA appreciates and values the partnerships that will be built during the workshop and through continued work afterwards.

"You are the experts and <u>leaders</u> positioned to guide the future of America's food supply ... which touches the life of every single American every single day...This year's workshop is another major step toward achieving uniformity and consistency in food and feed protection across the nation."

- Margaret Hamburg, M.D., Commissioner of Food and Drugs

MICHAEL TAYLOR KEYNOTE

Michael Taylor was pleased to attend a 50-State Workshop for the second time, this year as **FDA Deputy Commissioner for Foods**. In 2008, Mr. Taylor attended the 50 state workshop and presented research he was doing at George Washington University on "Enhancing the Roles of State and Local Government in an Integrated, Prevention-Oriented Food Safety System." He discussed how the real push for a national, Integrated Food Safety System began in the late 1990's and the progress that's been made since the 50 state meeting in 1998. People have understood for some time that with the vastness and complexity of the food supply, FDA cannot succeed without the state and local governments as full operational partners.

Mr. Taylor gave a brief update on the food safety legislation still in Congress, noting that the Integrated Food Safety System has been embraced by the White House and the theme is prominent in a report from the Institute of Medicine released in June on FDA's role in food safety. This evolution of a national, Integrated Food Safety System from first a good idea, then a consensus, and now to national policy, is significant.

Mr. Taylor emphasized that we are at a turning point as to how to sustain the IFSS. The idea has already taken hold because people understand the concept of food safety and have mobilized to act to get us where we are today. He commended the efforts of the work groups' progress towards this Integrated Food Safety System because it is critical to implementing the farm-to-table, prevention-oriented system that also has been recognized as key to our food safety strategy.

"The purpose for the whole effort to build a national Integrated Food Safety System is to get the most out of what we do, have the most benefit come from that work, the most impact on public health." This integrated system is critical to implementing the farm-to-table prevention-oriented system that is recognized as key to our food safety strategy."

- Michael R. Taylor, Deputy Commissioner for Foods, FDA

LUNCH DISCUSSION

Michael Taylor, FDA; Art Liang, CDC; David Goldman, USDA's Food Safety and Inspection Service; and Mary Frances Lowe, Environmental Protection Agency (EPA), gave updates on how federal government agencies are working together on food safety. The panel members gave examples such as the White House's creation of the Food Safety Working Group, which is chaired by the Secretaries of Health and Human Services and USDA. In addition, the federal agencies are working closely together on more collaborative investigations and the identification of outbreaks and HHS and USDA are collaborating to develop food safety metrics. The FDA has also been working with USDA on compliance with the Good Agricultural Practices (GAP) Standards for produce. Ms. Lowe stressed that while pesticide use is less dramatic than disease outbreaks, in terms of long-term affects, it is still part of a comprehensive system of food safety and EPA relies on their federal and state partners for regulation and enforcement.

Mr. Taylor called on the audience for suggestions and comments on how the federal agencies can work better with their state and local partners. Two suggestions made were state and local agencies would like timelier sharing of information from federal agencies and a request for federal agencies to translate data into statistics of disease and outbreak prevention.

HOW THE INCIDENT COMMAND SYSTEM CAN WORK FOR FOODBORNE OUTBREAK RESPONSE

One of the projects for the PFP's Response Workgroup was to lead a discussion at the 50 state workshop on how the Incident Command System (ICS) can be used during a foodborne outbreak response / investigation. [FYI - The ICS, is a model system to manage emergencies for command, control, and coordination of a response. Incident Command Systems provides a means to coordinate the efforts of individual agencies as they work toward the common goal of stabilizing the incident and protecting life, property, and the environment. ICS is part of the Federal Emergency Management Agency's (FEMA) National Interagency Incident Management System (NIIMS)].

Scott Holmes, from the Lincoln-Lancaster County Health Department in Nebraska, moderated this session that featured FDA's **Joseph Reardon**, CDC's **Art Liang**, South Carolina Department of Health and Environmental Control's **CP Kanwatt**, and **Tressa Madden** from Oklahoma's Department of Health. These participants spoke about the strengths, weaknesses, and their experiences with the ICS.

The strengths of the system for food safety are derived from its organizational structure. Predefined roles and responsibilities make preparation, response, and recovery more fluid. In addition, a clear chain of command ensures coordinated leadership and improved efficacy, enhancing the performance of all food safety partners during an emergency. The panelists described how ICS can be used on a small scale or expanded with a developing crisis. Its interoperability among all food safety partners, as displayed, for example, during a 2009 Salmonella outbreak, makes it an effective system.

Federal, state, and local partners have also identified some drawbacks to the ICS. One of the primary causes for concern was loss of autonomy and control at the state and local levels. There was frustration when command came from high-up at the federal level, especially when knowledge of the event and expertise resided with those on the front line. Examples cited showed that ICS succeeded best when all roles and responsibilities were clearly defined and followed. Another challenge was that stakeholders often used different terminology. For the ICS to be successful in food safety, a common set of defined terms needs to be understood by all partners for effective communication during a crisis.

The ICS takes advantage of pre-planning and pre-defined responsibilities and has been used successfully in South Carolina, Oklahoma, and other states. On the federal level, CDC and FDA also use ICS during foodborne outbreak response and other emergencies. FDA has developed food safety specific ICS courses for Federal staff, which will hopefully soon be available to state and local food safety professionals.

The ICS is being used with increasing frequency to deal with recalls, outbreaks, and other food-related crises. The Integrated Food Safety System can benefit from the organization and response capabilities that the ICS model offers.

THE RESOURCE CRISIS: IT'S HERE - WHAT CAN WE DO TO ADDRESS IT?

Public budgets at all levels of government are declining, due to the current economic situation. The revenues needed to sustain important public programs are not materializing and recovery is a precarious notion. Public health budgets are no exception. Health and Agriculture Departments at the state and local levels are fighting for the limited available funding to keep American families safe from foodborne illness and outbreaks.

A major component of an Integrated Food Safety System is leveraging resources at all levels to have the greatest public health impact. Workshop participants were divided into groups on the afternoon of Day 1 and asked to discuss the consequences of declining resources, strategies for leveraging resources during these times of crises, and the potential benefits an integrated system will have on our ability to leverage resources. Each group's facilitator presented a summary of the findings to the general session.

The **consequences** of fewer resources are no secret, but it is important that those consequences be recognized. Fewer resources mean fewer public health and food safety officials to participate in partnerships, decreased ability to respond to a foodborne illness outbreak, and cuts in preventative programs. With less funding, laboratory testing equipment becomes outdated and results are processed and released more slowly. As resources decline, preparedness, action, and recovery actions suffer, causing a negative impact on public trust. While these programs languish, the public is receiving their information about recalls and outbreaks from various media and online outlets, thereby instilling less confidence in our public institutions.

The resource crisis affects the quality and quantity of work and the morale of staff due to forced personnel reductions, lay-offs, and retirement. The lack of adequate staff increases the risk to the public as departments see more violations due to fewer inspections and longer lab response times. As regulatory resources wane and violations remain undiscovered, an uneven playing field develops throughout industry, which places the public at risk of even greater harm.

There are several approaches for **leveraging** limited food safety resources. Participants discussed potential ways to improve an organization's use of its limited resources. One idea for utilizing limited personnel resources more effectively was for cross-training/job sharing of staff who can then be more versatile and provide depth in the organization for addressing different needs. It was noted that cross-training is not a panacea for personnel needs and that caution should be taken in having one person take on too many responsibilities or not seeking out necessary administrative staff or experts.

In general, progress toward the IFSS will result in increased access to a broader range and depth of resources, while also helping to reduce duplicative work. Utilization of new technologies to streamline work and also reduce some activities requiring staff hours would also serve to ensure better long-term use of resources. Lastly, various efforts such as applying for grants and

increasing service fees may be worthwhile pursuits to obtain some additional funding to bolster the existing program initiatives.

It is also important to work with and seek compliance with national program standards and assessments. Compliance with the applicable program standards not only leads to improved integration of the national food safety system, but will help the organization to assess current efficiency and program levels in a national context, thus facilitating the identification of priority areas of work or improvement, informing difficult choices on how to use limited resources, and helping to evaluate the existing risk assessment process(es). Such standardization leads to improved capabilities and understanding and translation of capabilities among programs across the nation. An example of where this would have a strong impact is in training, where standardized programs ensure maintenance of needed competencies among staff and helps provides a framework for training programs.

Making a successful argument to state legislatures for increased funding for food protection requires telling an effective story. State and local officials need to use narrative that (rightly) portrays food safety as a public safety issue so it will resonate with a vast majority of constituents. Part of this story relies on selling the **benefits** of an Integrated Food Safety System.

Some participants suggested the story of food safety is more convincing to decision makers and the public when the programs deliver results: the benefit of having safe, healthy food. To get these results, integration of public health programs into the greater public safety arena requires effective program management and oversight. The strongest and most stable programs are those that are consistent and unified. Federal, state and local agencies will have to convince Congress, industry, and the public that food safety programs deserve continued and consistent resources. Participants suggested the ultimate benefit of investing in food safety is a reduction in foodborne illness that results in healthy families and fewer illness and deaths.

It was suggested that State and local officials need to illustrate food safety aspects as well as economic impact in the community. It is worthwhile to invest in a marketing plan to do so. Officials need to make it a point to meet with legislatures to present the impact their department is having within the community. In creating a story, they need to put a "face" on food safety by making it personal and relatable. Some participants suggested state and local officials leverage not just illness data, but inspection data, and tie in risk based successes that are science driven. Officials need to use the teachable opportunities that occur when there is an outbreak or recall. When selling the benefits, state and local officials could use a typical business model of cost-benefit analysis.

The benefits of an effective food safety program create a compelling narrative. Getting the attention of lawmaker's is difficult, especially considering how many agencies are looking for additional resources. We need to get creative when telling the food safety story. Public health and public safety are two separate and often unequal concepts. Some participants suggested "public safety" elicits greater reaction and concern from state legislatures than the notion of

"public health." Public health is undoubtedly an integral part of public safety and consequently deserves a place in the messaging directed at state legislatures when stating the case for more food safety resources. State and local officials must integrate their public health message into the greater concept of public safety, supporting the narrative with benefits that result in a robust food safety system.

Follow up work will be done on the suggestions from this session and talking points will be provided to the participants and other officials to use as they deem appropriate to address the resource crisis.

DAY 1 CLOSING COMMENTS

Dr. Jeff Farrar, FDA's Associate Commissioner for Food Protection, closed the first day of the 2010 50-State workshop stating that the stakeholders in food safety are clearly turning a corner. It is not a question of whether, but how quickly we can move to an Integrated Food Safety System. If it is passed, and if resources are provided, the legislation making its way through Congress will significantly assist us in this effort. There is also a strong commitment from FDA for implementing manufactured food regulatory program standards and other food safety standards. Resources are being devoted to the IFSS, therefore underlining the theme of this workshop, which is the need to tell a compelling, unified food safety narrative. We must convey the critical importance of a national Integrated Food Safety System.

DAY 2 – Wednesday, August 18

BREAK-OUT SESSIONS

For all the successes to date, the development and implementation of an Integrated Food Safety System still has many unanswered questions: How do federal, state and local agencies work through challenges and conflicts? What does an integrated response system look like? How do we measure success in an integrated system? How do we conduct effective joint investigations? How do we develop and implement an integrated communication system?

On the second day, 50-State workshop participants were split up into five groups for break-out sessions designed to facilitate ideas and provide short term action steps and recommendations for each of the above questions. This was an opportunity to draw from the expertise and gain new perspectives from state and local officials at the workshop. The participants attended 2 different break-out sessions on Day 2. Each break-out session focused on a specific topic but all started by asking the participants to address these questions:

- A successful Integrated Food Safety System is one that...
- A successful Integrated Food Safety System has...
- A successful Integrated Food Safety System results in...

DAY 3 – Thursday, August 19

RECOMMENDATIONS FROM THE BREAK-OUT SESSIONS

On the final day of the workshop, representatives from each break-out group presented their group's top recommendations and proposed action items to the general session.

Do We All Have to Agree? Yes, No, Maybe... Addressing Challenges and Conflict

Charge: Significant challenges and conflicts will arise though our efforts to integrate the food safety system. Anticipating challenges and conflicts and developing strategies to address these proactively will further our efforts to move towards integration. This group is charged to think critically about how your interactions with federal, state, and local food safety partners will change in an Integrated Food Safety System. Areas of importance include barriers to integration presented by legal, ethical, political, and programmatic obstacles.

Integrating the food safety system will not happen without challenges and conflicts. However, anticipating and developing strategies to handle disagreement proactively will make the collaborative process more effective. This group thought critically about how their interactions with federal, state, and local food safety partners will change in an Integrated Food Safety System. Areas of particular importance included barriers to integration presented by legal, political, and programmatic obstacles. The group collaborated on outlining a participatory process for addressing challenges in a fully functional IFSS, ensuring everyone has a voice in the process, and developing strategies for overcoming the challenges and conflicts identified.

Developing and sharing a work-plan between federal, state, and local agencies, and accrediting federal, state, local and other programs to the same standards, will aid in overcoming some of those conflicts and challenges. Mastering and understanding one's own role and exchanging best practices with peers will help ensure that everyone has a voice in the participatory process of an integrated food system.

It was recognized that there is a need to build relationships between federal, state, and local agencies. Some suggestions from this group included joint training, collaborative work/work-planning, conducting joint inspections, and regular communication. Participants suggested creating a database of the roles and responsibilities of each governmental partner and clarifying their roles and responsibilities. Lastly, the groups recommended establishing a participatory process to clarify the vision and mission of a national Integrated Food Safety System (i.e. reduces foodborne illness, identify sources of risk throughout the system, reduces time to detect and respond) as a priority in overcoming the challenges and conflicts.

Summary: The recommendations from this group are to: (1) Develop and share a work-plan between Federal, State, and local agencies; (2) Accredit Federal, State, local and other programs to the same [program] standards; (3) Master and understand one's own role and exchange best practices with peers; (4) Build relationships between Federal, State, and local

agencies through joint training, collaborative work and working together on planning work, joint inspections, and regular communication; (5) Create a database of the roles and responsibilities of each Federal, State and local agency and clarify the roles and responsibilities; and (6) Establish a participatory process to clarify the vision and mission of a national Integrated Food Safety System.

The Unexpected Happens... Now What? Integrating Response Efforts

Charge: Agencies at the local, state and federal levels are working to improve their responses to food emergencies. We want to identify successes and develop recommendations on next steps that local, state and federal agencies can take to achieve integrated government responses in the future. This group is charged with identifying recommendations for improving response and recovery efforts in an integrated system. The group should build on past successes, identify barriers and challenges, and identify critical needs (infrastructure, information sharing, etc.) to enable more rapid, coordinated response efforts.

Conversations in these sessions put an emphasis on developing successful partnerships and collaborations; continuous quality improvement and feedback; operational success; early detection and rapid response; and effective mitigation of hazards.

Partnerships and collaboration can be increased by constructing relevant standard operating procedures (SOP) and establishing Memoranda of Understanding (MOUs) that agencies can use, plus the design and implementation of a food safety-specific ICS. The SOPs and MOUs should be defined by and exist between federal, state, and local partners for the purposes of communication and information sharing when mapping out current operations for all involved. Participants discussed using an Incident Command System format for foodborne illness outbreaks and recommended the development of a "guide book" or "cook book" discussing how to form and implement an ICS for food and feed outbreaks. A continuous quality improvement and feedback loop would assess a state's current response system and communication structure, develop after-action reports, and identify environmental root causes to prevent recurrences.

The group put an emphasis on early detection, rapid response, and effective mitigation of hazards. Successful early detection and response relies on resources to create a well-trained staff, create communication and surveillance networks, and identify gaps. To mitigate hazards, an effective communications plan needs to be established. This could include leveraging existing arenas such as the Food Safety and Defense Taskforces to build partnerships, and using ICS during emergency response activities.

Summary: The recommendations from this group are:

- Early Detection and Rapid Response: Recommend Continual development and training of staff; and Establish a surge capacity strategy for all levels of government to handle multiple events.
- Effective Mitigation of Hazards: Recommend a Communication Plan; Charge Workgroup to Address Training and Use of Public Health Oriented ICS; and Develop Catalog of Legal Tools Available to All Agencies.
- 3. Develop Successful Partnerships/ Collaborations: Recommend Construct relevant SOP's and MOU's between Agencies (e.g., Between federal partners and between federal, state and local partners; SOP's and MOU's must include communications mechanisms;
- 4. Design a "How to Implement ICS Guidebook" for Food and Feed.
- 5. Develop Continuous Quality Improvement and Feedback: Recommend Consensus event reports (All participants contribute to the development of the report; "One Official Story" of multi jurisdictional events is shared with all participants.
- 6. Qualified and Adequately Trained Staff: Recommend Civil Service Hiring Reform; Create Career Roadmap; and Implement Job Shadowing/Cross-Training.
- 7. Effectively Conveying Stories to Policy-Makers and the Public: Recommend Engage the Media; Utilize Social Media/Network; and have Well-Trained Public Information Officers.

All Together Now – How Do We Conduct Joint Inspections and Investigations?

Charge: The ability to work together across jurisdictions and disciplines is critical to an Integrated Food Safety System and utilizing resources for the greatest public health impact. This group is charged with developing a model for conducting joint inspections/investigations across federal, state, local, tribal, and territorial agencies and with all disciplines that each agency represents. The model may include, among other things, a process for pre-planning meetings, how to get all disciplines to that meeting, identification of resources, developing operational objectives, assigning responsibility for the inspections/investigations, and utilizing and coordinating laboratory capacity.

This group identified that performance measures are needed to demonstrate success of conducting joint inspections and/or investigations. A distinction was made regarding inspections vs. investigations, and most participants agreed that there is significant difference between the two. One idea postulated was that investigations use the ICS when dealing with foodborne outbreaks, and therefore investigations (joint or otherwise) would be handled using the ICS model. For purposes of discussion, the morning group decided to keep inspections and investigations separate and addressed the questions posed to apply to inspections.

In order to be effective, joint inspections need to have a cohesive enforcement strategy to reduce or eliminate risks, and to identify the root cause of any underlying outbreak or situation. One common element that was repeatedly stressed was the need for shared communication, not only among regulators but with industry representatives as well. This theme was also

expressed in the discussion that any final report written would be a common report and follow-up actions would be mutually agreed upon. Joint briefings should be held while an inspection is conducted and any final decision should be mutually agreed upon. This will result in uniformity and consistency of inspections, as well as increased consumer confidence and resource savings.

A proposed charge listing the components and issues of a joint inspection model was presented to the groups. Additional or missing components proposed by the groups included: inspection procedures or protocols; an MOU between agencies before preplanning workshops; training conducted prior to initiating an inspection; a data collection tool or electronic database in order to capture information collected during joint inspections and a process to share data among agencies; a common glossary or thesaurus needs to be developed to avoid confusion; administrative awareness and buy-in by management; timeframes or expected timeframes; and post-inspection conference and follow-up activities, including a media communication strategy.

By creating a joint inspection model, participants felt that actions taken would be defensible and reproducible, regardless of when or where joint inspections are performed. There can be different ways to ensure safe food and voluntary compliance. In order to accomplish this, there needs to be a willingness to take on innovation and different tactics, as well as having buy-in from the federal, state and local investigators and inspectors. Consistency should create a level playing field throughout industry but there also needs to be some measurable outcomes in order to determine success. Any decisions need to be able to stand up to public scrutiny. The end result of conducting joint inspections is safe food and feed through enhanced working relationships between partners.

Do You Hear Me Now? Communication in an Integrated World

Charge: Effective communication is critical to the efforts of multiple organizations trying to reach the common goal of protecting public health. For an Integrated Food Safety System to be successful, all members have to clearly communicate their goals, priorities, needs, and successes. Understanding the benefits and weaknesses of the communication tools available (both current and emerging technologies) is a key step to being able to reach both internal stakeholders, such as regulatory and public health partners, and external stakeholders (industry, academia, Congress, state legislators, and the public). This group is charged with discussing the current state of communication and the tools and methods available to develop communication strategies for reaching all stakeholders.

Morning and afternoon groups were asked to identify short term action items pertaining to communication in an Integrated Food Safety System. During the sessions, participants defined the strengths and weaknesses in existing internal and external communications systems. During the brainstorming sessions, the two groups took different paths toward developing a communication strategy, yet still ended up drawing similar conclusions.

The groups recommended forming a workgroup to develop, in collaboration with the IIT workgroup, internal and external communications strategies focusing on a structure that

identifies communication system elements and needs of the Integrated Food Safety System structure. Stakeholders in the food safety system need to enhance and foster collaboration by allocating resources for training and recognizing the policy and regulatory limitations for information-sharing.

The groups recommended that the Integrated Food Safety System consider including a communication workgroup and the IIT workgroup in the governance structure. Finally, the group recommended the Integrated Food Safety System have in place a communications strategy to promulgate progress, utilizing web-based solutions to disseminate the steps being taken.

Summary: The recommendations from this group are to (1) Form a workgroup in collaboration with the IT workgroup to develop internal and external communications strategies; (2) Create a communication workgroup and have it become a key part of the governance model of IFSS; (3) Include the IIT workgroup in the governance model of the IFSS; (4) Create an IFSS communication strategy to disseminate progress (i.e. web-based).

Working Hard or Hardly Working? Measuring Successful Integration

Charge: Integrating government resources will necessitate a common approach to defining successful integration, and the ability to show the success and public health impact of investments in an Integrated Food Safety System will be critical to the sustainability of the system. This group is charged with defining what success looks like for an Integrated Food Safety System, identifying current and additional data needed to enable these measurements, proposing methods for sharing performance data across all levels of government, and developing strategies for measuring the success of an Integrated Food Safety System.

The metrics breakout sessions were tasked with the job of defining what are the characteristics of an effective IFSS, how to recognize such a system, and what are possible measurements and metrics both currently available and yet to be developed for demonstrating successful integration.

The groups were quite clear on what a successful IFSS should look like. The groups agreed there should be clear lines of authority, seamless execution, transparency, provability, and risk and science-based decision-making, with the best use of scarce resources, and wide spread information sharing. There should be clearly defined and documented processes.

The groups agreed that there are numerous sources of information at the federal, state, and local levels that could be used as performance measures. However, the groups felt that these sources had not been sufficiently utilized and integrated so that successful performance could be demonstrated. The metrics groups defined successful integration as reducing foodborne illnesses across the board, resulting in faster resolution time and fewer outbreaks and illnesses, eliminating waste and duplication, coordinating and effectively communicating at all levels of government, and participating in partnerships with industry and academia. Media coverage

could be used more effectively to get across the message of valuable public health interventions. Public perception of effective food safety efforts by federal, state, and local officials could possibly help secure sustainable funding for an Integrated Food Safety System.

Major hurdles to achieving the IFSS include the numerous levels of governmental authority and the lack of coordination and communication, not only among federal, state and local officials, but with appropriate policymakers. There is also a lack of communication between information technology systems with incompatible software, hardware, and terminology of data. Another challenge is the perceived lack of trust and "turf" battles between components of the current public health system. Group members emphasized the need for rapid and effective response leading to increased stakeholder confidence.

Summary: The recommendations from this group are to (1) Create a "Goals and Metrics" workgroup with Federal/state/local/tribal/territorial/industry/public/policy makers charted with providing recommended metrics and a strategy for measuring successful integration, (2) Charge the National Standards group with developing appropriate metrics for reporting compliance with the Manufacture Food Regulatory Program Standards and the Retail Program Standards and exploring with the American Association of Feed Control Officials the development of program standards for feed.

CLOSING COMMENTS

Following the presentations and question and answer portions of each work group, closing remarks were made by **Steven Solomon**, **Joseph Reardon**, and **Michael Taylor**.

After thanking the participants, facilitators, and planners, **Dr. Solomon** referred back to his presentation on the first day of the conference, reiterating the reasons supporting the development of a national Integrated Food Safety System. Work groups have been a key part of the success to date, because they require collaboration and build a sense of community. The work groups will continue to offer an opportunity for leadership and a way to become more engaged. He outlined the current work-groups and encouraged all participants to volunteer by signing up for one. Additional workgroups may be created after the Coordinating Committee reviews the recommendations from this workshop.

- National Standards: Develop and implement standards to promote a nationally Integrated Food Safety System
- Policy and Procedures: Develop and implement policy and procedures to ensure IFSS programmatic objectives met
- Training and Certification: Develop training and certification system to assure all regulators have necessary knowledge and skills
- National Work Plan: Implement a process for a national integrated risk-based work plan for food and feed
- Emergency Response: Integrate response efforts to strengthen preparedness and enable faster and more effective response
- Laboratories: Develop and implementation standard lab practices and procedures to promote consistent and meaningful data
- Oversight: Design program oversight of performance against the program standards to maintain program credibility
- Performance Measures and Outcomes: Assist in the development of quantitative performance measures and outcomes
- Information Technology

Joseph Reardon opened the floor up for comments and questions regarding the presentations by breakout groups. He thanked everyone for their hard work and participation over the past few days and noted that we, as food safety officials, are at a unique point in history and can no longer look back; we've "pushed the boat away from dock." We've all agreed on the elements of what we need to do and laid out the framework. Now, everyone can play a valuable role in seeing it to completion. Mr. Reardon stated the commitment of the Division of Federal-State Relations to continue to build the infrastructure to support the state and local agencies.

"There is no doubt that federal-state partnership is crucial to the success of the Integrated Food Safety System. We've all worked hard to come to an agreement on the pieces that are in place today. Now you, our State and Local partners, can move forward confidently knowing that FDA and the Division of Federal-State Relations are committed to supporting you every step of the way."

- Joseph Reardon, Director, Division of Federal-State Relations, FDA

Michael Taylor closed the workshop by expressing his gratitude to everyone in the room for their hard work in the workshop sessions and the progress and milestones they have made so far. He said that it is important that we sustain the momentum by having a 50-State Workshop every two years, stating that the goal we have set for ourselves is huge, and the motivation is strong. Our goal is to protect people and the food supply and the way to do this is through the creation of an Integrated Food Safety System. The agenda for getting there is ambitious, and it's going to be a long-term process.

Mr. Taylor acknowledged that FDA needs state and local agency input on how to improve and he will depend on states and locals to help identify issues, such as improved timeliness of information sharing.

There is enormous momentum and commitment to implement an integrated system and the challenge now is to sustain it.

"In the end it's about people, it's about relationships with people, it's about real understanding among people of the contribution that each of us makes. That's the critical idea of a wheel metaphor; every element of that wheel- from the hub, to the spokes, to the wheel itself- is essential, you can't do without any of them. That's what integration is all about; building on unique contributions we all make...and it's about trust."

- Michael Taylor, Deputy Commissioner for Foods, FDA

APPENDIX

Council of Association Presidents (CAP)

American Association of Feed Control Officials
Association of Food and Drug Officials
Association of Public Health Laboratories
Association of State and Territorial Health Officials
Council of State and Territorial Epidemiologists
National Association of City and County Health Officials
National Association of Local Boards of Health
National Association of State Animal Health Officials
National Association of State Departments of Agriculture
National Environmental Health Association
U.S. Animal Health Association