Conference for Food Protection
2010 Issue Form

Internal Number: 061
Issue: 2010 II-002

Council Recommendation:	Accepted as Submitted	_____	Accepted as Amended	_____	No Action	_____
Delegate Action:	Accepted	_____	Rejected	_____		

All information above the line is for conference use only.

Title:
Amend "Outcome" section of Program Standard No. 5

Issue you would like the Conference to consider:
One of the charges of the CFP National Voluntary Environmental Assessment Information System (NVEAIS) Committee was to *"Determine how a NVEAIS could be best supported by the Conference for Food Protection*. In addressing this, the committee explored the appropriateness of an amendment to Standard 5, FBI and Food Security Preparedness and Response. In this regard, the committee seeks the Conference's approval to incorporate the following statement in the "Outcome" section of Standard No. 5:
"Regulatory programs are encouraged to also participate in the CDC National Voluntary Environmental Assessment Information System (NVEAIS). NVEAIS is designed to provide a more comprehensive approach to foodborne disease outbreak investigation and response and will provide a data source to measure the impact of food safety programs to further research and understand foodborne illness causes and prevention."
For full text of Standard 5 including recommended addition, see attachment titled: Attachment: Voluntary National Retail Food Regulatory Program Standards, Standard 5 - April 2009

Public Health Significance:
In 1998 the Food and Drug Administration (FDA) developed the *Voluntary National Retail Food Regulatory Program Standards* (hereafter called the Standards), which consist of nine standards. Standard 5 is designed to establish best practices related to FBI response and establishes criteria for the surveillance, investigation, response and review of food related incidents. The CDC NVEAIS tool is designed to collect foodborne illness outbreak environmental assessment data and report that data to CDC. As a result, CDC can provide better information to programs on the causes of foodborne outbreaks. This information can be used to identify and monitor contributing factors and their environmental antecedents thus providing information needed to prevent or reduce the risk of foodborne outbreaks associated with food service. This amended language has also been endorsed by the CFP Program Standards Committee and the FDA Clearinghouse Work Group.

Recommended Solution: The Conference recommends...:

that a letter be written to FDA endorsing and recommending that the amendment below (indicated in underline format) be included to the OUTCOME Section of FDA's *Voluntary National Retail Food Regulatory Program Standards, Standard 5 - April 2009:*

A food regulatory program has a systematic approach for the detection, investigation, response, documentation, and analysis of alleged food-related incidents that involve illness, injury, unintentional, or deliberate food contamination.

Regulatory programs are encouraged to also participate in the CDC National Voluntary Environmental Assessment Information System (NVEAIS). NVEAIS is designed to provide a more comprehensive approach to foodborne disease outbreak investigation and response and will provide a data source to measure the impact of food safety programs to further research and understand foodborne illness causes and prevention. (The following link provides additional information regarding NVEAIS: http://www.cdc.gov/nceh/ehs/)

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Attachments:

- "Voluntary National Retail Food Regulatory Program Standards, Standard 5 - A"

It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.

STANDARD 5 FOODBORNE ILLNESS AND FOOD DEFENSE PREPAREDNESS AND RESPONSE

This standard applies to the surveillance, investigation, response, and subsequent review of alleged food-related incidents and emergencies, either unintentional or deliberate, which results in foodborne illness, food-related injury*, and outbreaks.

REQUIREMENT SUMMARY

The program has an established system to detect, collect, investigate and respond to complaints and emergencies that involve foodborne illness, food-related injury*, and intentional and unintentional food contamination.

DESCRIPTION OF REQUIREMENT

1. Investigative Procedures

a. The program has written operating procedures for responding to and /or conducting investigations of foodborne illness and food-related injury*. The procedures clearly identify the roles, duties and responsibilities of program staff and how the program interacts with other relevant departments and agencies. The procedures may be contained in a single source document or in multiple documents.

b. The program maintains contact lists for individuals, departments, and agencies that may be involved in the investigation of foodborne illness, food-related injury* or contamination of food.

c. The program maintains a written operating procedure or a Memorandum of Understanding (MOU) with the appropriate epidemiological investigation program/department to conduct foodborne illness investigations and to report findings. The operating procedure or MOU clearly identifies the roles, duties and responsibilities of each party.

d. The program maintains logs or databases for all complaints or referral reports from other sources alleging food-related illness, food-related injury* or intentional food contamination. The final disposition for each complaint is recorded in the log or database and is filed in or linked to the establishment record for retrieval purposes.

e. Program procedures describe the disposition, action or follow-up and reporting required for each type of complaint or referral report.

f. Program procedures require disposition, action or follow-up on each complaint or referral report alleging food-related illness or food-related injury* within 24 hours.

g. The program has established procedures and guidance for collecting information on the suspect food's preparation, storage or handling during on-site investigations of food-related illness, food-related injury*, or outbreak investigations.

h. Program procedures provide guidance for immediate notification of appropriate law enforcement agencies if at any time intentional food contamination is suspected.

i. Program procedures provide guidance for the notification of appropriate state and/or federal agencies when a complaint involves a product that originated outside the agency's jurisdiction or has been shipped interstate.

2. Reporting Procedures

a. Possible contributing factors to the food-related illness, food-related injury* or intentional food contamination are identified in each on-site investigation report.

b. The program shares final reports of investigations with the state epidemiologist and reports of confirmed foodborne disease outbreak*s with CDC.-

3. Laboratory Support Documentation

a. The program has a letter of understanding, written procedures, contract or MOU acknowledging, that a laboratory(s) is willing and able to provide analytical support to the jurisdiction's food program. The documentation describes the type of biological, chemical, radiological contaminants or other food adulterants that can be identified by the laboratory. The laboratory support available includes the ability to conduct environmental sample analysis, food sample analysis and clinical sample analysis.

b. The program maintains a list of alternative laboratory contacts from which assistance could be sought in the event that a food-related emergency exceeds the capability of the primary support lab(s) listed in paragraph 3.a. This list should also identify potential sources of laboratory support such as FDA, USDA, CDC, or environmental laboratories for specific analysis that cannot be performed by the jurisdiction's primary laboratory(s).

4. Trace-back Procedures

a. Program management has an established procedure to address the trace-back of foods implicated in an illness, outbreak or intentional food contamination. The trace-back procedure provides for the coordinated involvement of all appropriate agencies and identifies a coordinator to guide the investigation. Trace-back reports are shared with all agencies involved and with CDC.

5. Recalls

a. Program management has an established procedure to address the recall of foods implicated in an illness, outbreak or intentional food contamination.

b. When the jurisdiction has the responsibility to request or monitor a product recall, written procedures equivalent to 21 CFR, Part 7 are followed.

c. Written policies and procedures exist for verifying the effectiveness of recall actions by firms (effectiveness checks) when requested by another agency.

6. Media Management

a. The program has a written policy or procedure that defines a protocol for providing information to the public regarding a foodborne illness outbreak or food safety emergency. The policy/procedure should address coordination and cooperation with other agencies involved in the investigation. A media person is designated in the protocol.

7. Data Review and Analysis

a. At least once per year, the program conducts a review of the data in the complaint log or database and the foodborne illness and food-related injury* investigations to identify trends and possible contributing factors that are most likely to cause foodborne illness or food-related injury*. These periodic reviews of foodborne illnesses may suggest a need for further investigations and may suggest steps for illness prevention.

b. The review is conducted with prevention in mind and focuses on, but is not limited to, the following:

1) Foodborne Disease Outbreaks*, Suspect Foodborne Outbreaks* and Confirmed Foodborne Disease Outbreaks* in a single establishment;
2) Foodborne Disease Outbreaks*, Suspect Foodborne Outbreaks* and Confirmed Disease Outbreaks* in the same establishment type;
3) Foodborne Disease Outbreaks*, Suspect Foodborne Outbreaks* and Confirmed Foodborne Disease Outbreaks* implicating the same food;
4) Foodborne Disease outbreaks*, Suspect Foodborne Outbreaks* and Confirmed Foodborne Disease Outbreaks* associated with similar food preparation processes;
5) Number of confirmed foodborne disease outbreaks*;
6) Number of foodborne disease outbreaks* and suspect foodborne disease outbreaks*;
7) Contributing factors most often identified;
8) Number of complaints involving real and alleged threats of intentional food contamination; and
9) Number of complaints involving the same agent and any complaints involving unusual agents when agents are identified.

c. In the event that there have been no food-related illness or food-related injury* outbreak investigations conducted during the twelve months prior to the data review and analysis, program management will plan and conduct a mock foodborne illness investigation to test program readiness. The mock investigation should simulate response to an actual confirmed foodborne disease outbreak* and include on-site inspection, sample collection, and analysis. A mock investigation must be completed at least once per year when no foodborne disease outbreak* investigations occur.

OUTCOME

A food regulatory program has a systematic approach for the detection, investigation, response, documentation, and analysis of alleged food-related incidents that involve illness, injury, unintentional, or deliberate food contamination.

"Regulatory programs are encouraged to also participate in the CDC National Voluntary Environmental Assessment Information System (NVEAIS). NVEAIS is designed to provide a more comprehensive approach to foodborne disease outbreak investigation and response and will provide a data source to measure the impact of food safety programs to further research and understand foodborne illness causes and prevention (The following link provides additional information regarding NVEAIS:
http://www.cdc.gov/nceh/ehs/**."**