

**Conference for Food Protection
2014 Issue Form**

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

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Title:

Salmonella as a reportable illness (as opposed to Salmonella Typhi and NTS)

Issue you would like the Conference to consider:

Amend paragraph 2-201.11 (A) (2) of the 2013 Food Code to combine *Salmonella* Typhi and nontyphoidal *Salmonella* (NTS) into one category as *Salmonella* as a reportable illness for action by the Person in Charge. Guidance for *Salmonella* illnesses would include the most restrictive criteria unless the employee can provide documentation from a health practitioner demonstrating the diagnosis is NTS and providing a release to return to work.

Public Health Significance:

Nontyphoidal *Salmonella enterica* serotypes are the *Salmonella* serotypes most commonly associated with foodborne illnesses and most frequently isolated in CDC clinical samples. For this reason, NTS was added to the 2013 food code as a reportable illness in addition to the "Big 5". *Salmonella* Typhi has been a reportable illness in previous editions of the Food Code; however, it is much less frequently associated with foodborne illness than NTS. Alternatively, infections from *Salmonella* Typhi can be more severe than that of NTS. *Salmonella* Typhi and *Salmonella* Paratyphi cause Typhoid fever (FDA Bad Bug Book, 2ed. pg. 9-13

<http://www.fda.gov/downloads/Food/FoodborneIllnessContaminants/UCM297627.pdf>,
http://www.cdc.gov/foodborneburden/PDFs/FACTSHEET_A_FINDINGS_updated4-13.pdf)

In the 2011 FoodNet report (*Salmonella* Typhi was ranked number 18 out of the top 20 laboratory confirmed *Salmonella* serotypes and accounted for 0.8% of the cases (http://www.cdc.gov/foodnet/PDFs/2011_annual_report_508c.pdf). The other nineteen serotypes were nontyphoidal *Salmonella* serotypes with *S. Enteritidis*, *S. Typhimurium* and *S. Newport* leading the list. In the FoodNet reports for 2009 and 2010, *Salmonella* Typhi accounted for less than 1% with a total of 0.9% of the cases both years. *Salmonella* Paratyphi did not appear on any of the lists of the top 20 clinical isolates (http://www.cdc.gov/foodnet/PDFs/FoodNetAR2009_FINAL.pdf,
http://www.cdc.gov/foodnet/PDFs/2010_annual_report_508c.pdf).

The CDC estimates that approximately 5,700 cases of Typhoid Fever occur annually in the US. Most cases, up to 75% are acquired while traveling internationally (http://www.cdc.gov/nczved/divisions/dfbmd/diseases/typhoid_fever/). An estimated 1.2

million cases of Salmonellosis (NTS) occur annually in the US. Efforts to prevent foodborne illness should focus on the prevention of illnesses caused by NTS.

The goal is to identify the illnesses that present the highest risk of contamination of food during handling and to exclude workers if they have the symptoms or are diagnosed with these illnesses. NTS are significant foodborne pathogens and adding NTS to the list of reportable illnesses in the 2013 Food Code was appropriate. Listing *Salmonella* Typhi and Nontyphoidal *Salmonella* as separate illnesses in a list of six could lead to confusion among the intended audience and challenges during training. The goal is to encourage reporting of symptoms and illness diagnosis so that employees can be excluded or restricted and reassigned if appropriate. Having numerous criteria for restrictions and exclusions depending on exposures and diagnosis is also counterproductive. Restriction and exclusion criteria should be simple so that it can be followed universally by all food establishments. Restriction and exclusion criteria should be based on sound science and based on guidelines from the CDC.

The CDC in the List of "Pathogens Transmitted by Food Contaminated by Infected Persons Who Handle Food, and Modes of Transmission of Such Pathogens" (<http://www.cdc.gov/foodsafety/pdfs/pathogens-by-food-handlers-508c.pdf>) listed NTS and *Salmonella* Typhi separately and in a footnote under *Salmonella* Typhi referred to the Kauffmann-White scheme for designation of Salmonella serotypes. While the CDC may list them as separate pathogens, they both are Salmonella serotypes. In addition, the list contains over 20 pathogens and not all of them are listed exactly as they are in the Food Code, e.g. *E. Coli*.

In the case of employee illness with Salmonellosis, since the exclusion and restriction criteria is different for *Salmonella* Typhi and NTS, the most restrictive criteria can be used unless the *Salmonella* has been serotyped and the employee can provide documentation from a health practitioner that the diagnosis is NTS and provide a release to return to work. Listing *Salmonella* Typhi and NTS in paragraph 2-201.11 (A)(2) of the Food Code as *Salmonella* is recommended for several reasons.

1. Big 5 is easy to remember and widely used in training materials
2. Target audience is not familiar with microbiology or the nomenclature of microorganisms
3. The goal is to have employees report the symptoms
4. Most of the time, the diagnosis stops with *Salmonella* and the serotype is not identified
5. Most foodborne illnesses caused by *Salmonella* are NTS
6. *Salmonella* Typhi is rare with less than 1% incidence according to CDC FoodNet surveillance
7. Using two different types of *Salmonella* illnesses as reportable may cause confusing with nomenclature and other serotypes and could lead to incorrect reporting and actions taken.
8. Simple is better with food establishment workers and with training

Recommended Solution: The Conference recommends...:

That a letter be sent to the FDA requesting the 2013 Food code be amended as follows (language to be removed is in strikethrough format):

1. 2-201.11 (A)
(2) Has an illness diagnosed by a HEALTH PRACTITIONER due to:
 - (a) Norovirus, P
 - (b) Hepatitis A virus, P

- (c) Shigella spp., P
- (d) SHIGA TOXIN-PRODUCING ESCHERICHIA COLI,
- (e) Salmonella Typhi; ~~or~~
- (f) nontyphoidal Salmonella; ~~P~~

2. Also, the FDA should work with the CDC to simplify the restriction and exclusion criteria to be easily understood by food establishment management staff and base criteria on sound science.

Submitter Information:

Name: Hilary Thesmar, PhD, RD, CFS
Organization: FMI
Address: 2345 Crystal Dr Suite 800
City/State/Zip: Arlington, VA 22202
Telephone: 202-220-0658 Fax:
E-mail: hthesmar@fmi.org

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