

A Guide for Conducting Food Safety Root Cause Analysis







A Guide for Conducting a Food Safety Root Cause Analysis

https://www.pewtrusts.org/en/researchand-analysis/reports/2020/03/a-guide-forconducting-a-food-safety-root-causeanalysis

Approaches for investigating contamination incidents and preventing recurrence

Presentation Outline

- Pew's Root Cause Analysis (RCA) Initiative
- Approach to RCA guide
- Guide content



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Burden of foodborne illness

Estimated yearly cost of illnesses

 15 major foodborne pathogens cost the U.S. economy \$15.5 billion per year in medical care, lost time from work, and losses due to premature death.





Source: USDA, Economic Research Service, Cost of Estimates of Foodborne Illnesses data product. https://www.ers.usda.gov/data-products/chart-gallery/gallery/chartdetail/?chartId=88113. pewtrusts.org

Why is RCA a priority for Pew

- Foundation of a prevention-based food system
 - But it's underutilized, ineffectively shared, lost opportunities
- Improvements require collaborative approach
- Better alignment among FDA, CDC, FSIS, state & local gov, industry would lead to improved public health



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Guide information sources





Guide information sources

- 1. Key topics discussed in Convenings
 - What is an RCA
 - Considerations before conducting an RCA
 - How should an RCA be conducted
 - How should findings be communicated

Became structure for the guide \rightarrow

- 8 What is an RCA?
- 12 What should be considered before conducting an RCA?
- 17 How is an RCA conducted?
- 25 How should findings from an RCA be communicated?



Guide information sources

- 2. Initial research questions
 - How are other organizations conducting RCA?
 - How do they decide when to conduct a RCA?
 - How do they perform the RCA?
 - How are the key findings disseminated and used?
 - What is working & what is not?



Audience

- Food industry; federal, state, local food safety agencies; trade and professional associations; academia; consulting companies
 - Practitioners
 - Managers/leadership
- Varying backgrounds, experience, food settings





- Convince organizations to conduct RCAs
- Improve conduct of RCAs
- Improve reporting and communication of RCA findings



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Guide content

Introduction

- Examples from other sectors
- Value for food safety
- Challenges

Approaches for
RCAs

- What is RCA
- Prepare for RCAs
- Conduct RCAs
- Report findings and conclusions

Conclusions & next steps

 Develop plans and allocate funds for future RCAs

• Reporting system

Resources

- Training, RCA courses
- Guidance, manuals, toolkits from other sources



I. Introduction

- Purpose
 - Improve food safety by encouraging the use of RCA in food operations
- Suggested usage: Template & reference for developing RCA practices and procedures
 - Plan RCAs
 - Ensure process includes steps essential to finding root causes
 - Design corrective actions that will prevent recurrence



I. Introduction

- History in other industries
 - Car industry: Taiichi Ohno credited with development in 1950s
 - Space flight
 - Civil aviation
 - Oil & gas
 - Patient safety
 - Recreational diving







Modern food safety and associated challenges



Example: Patient Safety

Data sharing & communication



- U.S. Department of Veterans Affairs (VA) National Center for Patient Safety
 - Developed and mandated RCA process
 - Maintains Patient Safety Information System database of RCAs

– Enables analysis of RCA's impact

Study found postoperative complications higher at VA medical centers that performed fewer RCAs



II. What is a root cause analysis?

- Retrospective investigation used to identify why a problem occurred
 - Environmental assessment = RCA
- Contributing factor vs. Root cause
 - WHAT happened vs. WHY it happened
- When, where, who for different food settings





Example: Processed Food

 \rightarrow Item is re-contaminated after heat treatment and enters the market

- Contributing factors:
 - Machine corrosion from improper cleaning
 - Product not monitored post-processing

- Root causes:
 - Lack of defined maintenance SOPs
 - Unable to hire adequately trained staff



III. What should be considered before conducting an RCA?

- How should the scale be determined?
- Is sufficient capacity available?
- How long should it take?



Example: National Transportation Safety Board

- Scaling an accident investigation
 - 1. Accident notification
 - 2. "Go Team" composition based on
 - Number of injuries & fatalities
 - Location
 - Public interest
 - Magnitude of tasks
 - Previous accidents of same type







RCA capacity

- Assess current capacity to conduct RCAs and need for capacity development
 - For organization and individual investigators
- Identify core team members, technical expertise appropriate for RCA scope and tasks





IV. How is an RCA conducted?

- What happens before the investigation begins?
- Steps for conducting RCA
- How do you know you've found a root cause?
- How can changes be maintained?
- What if you can't find a root cause?



General steps for conducting RCAs





Characteristics of effective RCAs

Timely investigation

Frequent stakeholder communications

Comprehensive & systematic

Appropriate technical expertise available

Unbiased & transparent

Conclusions based on & driven by evidence

Clearly & concisely reported

Tools

- Cause & effect diagrams
 - Fishbone/Ishikawa
 - Fault tree
- KNOT chart
 - Classify evidence
- 5 whys
 - Very simple, use with other techniques





Tools: Drive investigation decision-making

	Specific Data Item	Know	<mark>Need</mark> to know	Opinion	Think we know	Action
D1	80% Humidity and Temperature of 84 degrees F at 2:00 PM	X				
D2	Belt Speed on the machine <i>appeared</i> to be slower than usual			Χ		Locate and interview other witnesses
D3	Operator said she was having a difficult time cleaning the contacts			Χ		Locate and interview other witnesses
D4	Press Head speed was set at 4500 rpm				Χ	Verify by review of Press Head logs
D5	Oily Substance on the floor?		Χ			Interview Cleaning Crew
D6						

Duphily 2014

Tools: Ensure basic categories of causes are considered



V. How should findings from an RCA be communicated?



- Report sharing
 - Academic institutions
 - Industry associations
 - Government networks
- Education and training
- Policy action



VI. Conclusions & next steps

- Need mechanisms and platforms to share relevant lessons learned
 - E.g., confidential, nonpunitive reporting systems
 - Aviation Safety Reporting System, VA Patient Safety Information System
- RCA fosters food safety culture



Challenges for Food Safety RCAs

Finding root causes more difficult as time passes

Product factors, closed facilities vs. open facilities Consumer behavior & individual susceptibilities

Crosscontamination

- Corrective actions can still be designed with incomplete information
 - May be broad in scope & more expensive, but necessary for prevention
 - Every investigation is a learning opportunity, still have actionable findings



Final thoughts

- Need to improve weaknesses in food safety systems
 - RCA makes good business sense
- Provide guidance, gauge progress



Highlight existing resources & provide value without duplicating efforts



Thank You!

Questions?

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Resources

- <u>https://www.pewtrusts.org/en/research-and-analysis/reports/2020/03/a-guide-for-conducting-a-food-safety-root-cause-analysis</u>
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- Kumar, S. and S. Schmitz (2011). "Managing recalls in a consumer product supply chain root cause analysis and measures to mitigate risks." International Journal of Production Research 49(1): 235-253.
- Card, A. J. (2017). The problem with '5 whys'. BMJ Qual Saf, 26(8), 671-677.
- Duphily, RJ. Root Cause Investigation Best Practices Guide. Aerospace Report No. TOR-2014-02202. http://aerospace.wpengine.netdna-cdn.com/wp-content/uploads/2015/04/TOR-2014-02202-Root-Cause-Investigation-Best-Practices-Guide.pdf
- Percarpio KB, Watts BV, et al. 2013. A Cross-Sectional Study on the Relationship Between Utilization of Root Cause Analysis and Patient Safety at 139 Department of Veterans Affairs Medical Centers. Joint Commission Journal on Quality and Patient Safety, Volume 39, Issue 1, 32 – 37.
- NTSB. 2002. National Transportation Safety Board Aviation Investigation Manual: Major Team Investigations.
- <u>https://www.ntsb.gov/investigations/process/Documents/MajorInvestigationsManual.pdf</u>

