CHAPTER 6
FOOD EMERGENCY RESPONSE PLANS (FERPS)

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1.0. PURPOSE

Human and animal food emergency response planning is a key element of all-hazards preparedness. This chapter identifies best practices and tools to help agencies better develop multi-agency response plans.

2.0. SCOPE

This chapter focuses on Food Emergency Response Plans (FERPs), referencing the National Association of State Departments of Agriculture (NASDA) Food Emergency Response Template. This chapter also clarifies the complementary

roles of high-level plans such as FERPs and more operational documents such as job aids.

The key planning considerations, steps, templates, examples, and resources identified in this chapter will most directly apply to state agencies and the FDA inspectorate divisions developing FERPs for responding to complex and/or multi-jurisdictional emergencies. However, these are neither comprehensive nor specific to unique situations. State, local, and federal agencies seeking to improve multi-agency food emergency responses (e.g., States, FDA Office of Inspections and Investigations (OII)) may utilize this chapter to assess and improve their response capabilities. Agencies with varying responsibilities (e.g. regulatory, public health, feed/animal health, law enforcement, laboratory) and target response capability levels may differ in how they customize and apply these best practices.

3.0. RESPONSIBILITY

3.1. RRT (or investigatory team, in states without an RRT) Leadership

RRT Leadership is responsible for ensuring that their respective response partners are aware of existing human and animal food emergency response plans, policies and procedures and are offered the opportunity to provide input as appropriate when plans are updated.

3.2. RRT Members

RRT Members are responsible for ensuring that they are familiar with their agency's emergency response plans, policies, and Standard Operating Procedures (SOPs) and that they can fulfill their assigned roles during multi-agency responses.

4.0. DEFINITIONS

The following terms are used frequently in this chapter: Food Emergency Response Plan (FERP).

See "Glossary of Key Terms" for definitions.

5.0. BACKGROUND

The National Response Framework and the National Preparedness Guidelines consider human and animal food emergency response planning to be an essential element of all-hazards preparedness.

In general, a standardized written framework for response consists of:

- High level plans (e.g., the FERP) which clarify agency roles and responsibilities regarding the "who," "what," and "when" of human and animal food emergency responses.

- More detailed operational procedures for specific subject matter tasks, which identify the "how" of specific aspects of the response.

6.0. SAFETY

General safety considerations should be addressed in agency policies and procedures and fleshed out in specific response plans.

7.0. EQUIPMENT/MATERIALS

N/A

8.0. PROCESS DESCRIPTION

8.1. General Approach

Development of both a high-level FERP and more specific response documents (e.g., procedures) requires a high degree of coordination among all the partners involved in food emergency response. It is very important to review and apply the "Working with Other Agencies" Chapter of this manual, which addresses the roles and activities of the different agencies involved in a response, as the foundation for development of an effective FERP.

8.2. Recommendations for Developing a High-Level FERP

- **Primary Tool: The NASDA FERP Template**
  - **Background:** The NASDA FERP template was developed jointly among federal partners (e.g., US Department of Agriculture, Food Safety Inspection Service (USDA FSIS), FDA, Department of Homeland Security (DHS)), state partners (e.g., agriculture, health) and other associations (e.g., Association of Food and Drug Officials). This template is designed to assist states with development of a plan for conducting coordinated responses to food-related emergencies, either as a stand-alone plan or an addendum to an existing state emergency response plan. The template, developed beginning in 2005, was based on the information and response plans collected from states. This template document also identifies how states would integrate within the National Response Framework.
  - **How to use the template:** The template provides background (e.g., "Appendix A - Planning Considerations"), references, and a guide for developing a food emergency response plan. *(Attachment A of this chapter summarizes the recommended FERP elements identified in the NASDA template.)* Examples of state FERPs are included in the

supplement to the NASDA template as a tool to customize, complete, and/or improve a state-specific plan.

- **Additional Tools**
  - **Consider other state plans.** If interested in reviewing additional tools and examples, contact the FDA Office of Domestic Partnerships (ODP) at ODP.Feedback@fda.hhs.gov.
  - **Evaluate how FERP fits into all-hazards preparedness.** There are many frameworks and tools related to building preparedness and response. One example is the Food and Agriculture Readiness Measurement (FARM) Toolkit, which is a tool to examine program all-hazards preparedness.

8.3. Recommendations for Developing More Detailed Response Documents

- **Background:** Detailed response documents may include documents such as SOPs, checklists, and job aids. These complement and provide specifics to the concepts described in the higher-level FERP. These should be consistent with national standards whenever possible.
- **How to begin developing these documents:** Attachment B ("Example Areas to Develop Detailed Response Documents") identifies an example of areas covered in a State's compendium of RRT SOPs. This set of topics, while not comprehensive, provides an example of some common/important areas for which specific SOPs and other specific tools need to be developed to effectively execute the strategy described in the FERP.

9.0. DESIRED OUTCOMES (ACHIEVEMENT LEVELS)

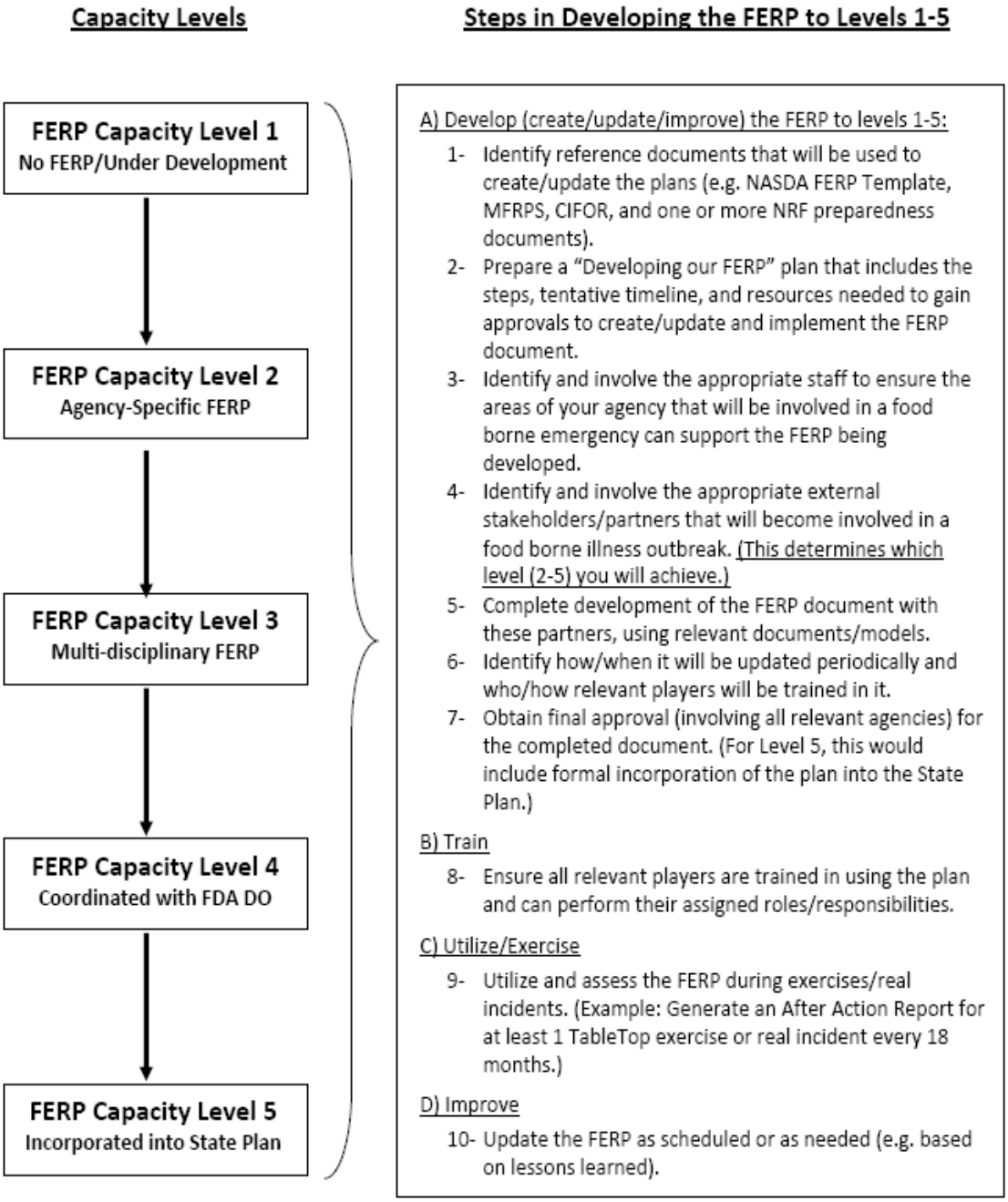
9.1. Achievement Levels

The levels below illustrate a progression that agencies can pursue to incrementally develop capacity, with each level building on the previous one.

Level	Description
1	The agency does not have a FERP. (If "no," is one currently under development?)
2	The agency has an agency specific FERP addressing its responsibility.
3	The state has a multidisciplinary FERP that has been coordinated with appropriate state agencies to ensure that food regulatory, laboratory, epidemiology, and law enforcement responsibilities are addressed.
4	The FERP has been coordinated with the appropriate FDA inspectorate division.
5	The agency plan is incorporated into, or otherwise linked with, the state all hazards response plan. (Should be exercised, at a minimum, every 18 months.)

9.2. Process Overview

Achievement of each of Capacity Levels 2-5 requires that agencies conduct the steps identified in sections A-D (Steps 1-10), see figure. The combination of partners engaged during Step 4 will determine which final Capacity Level is achieved.



10.0. RELATED DOCUMENTS

(Full citations are in the References Section, "List of Reference Documents," listed by author.)

- National Response Framework (https://www.fema.gov/national-response-framework)
- Multistate Foodborne Outbreak Investigations: Guidelines for Improving Coordination and Communication, National Food Safety System Project, Outbreak Coordination and Investigation Workgroup, February 2001 (https://cifor.us/clearinghouse)
- National Preparedness Guidelines (https://www.dhs.gov/national-preparedness-guidelines)
- Target Capabilities – Epidemiological Surveillance and Investigation, Food and Agricultural Safety and Defense, Public Health Laboratory Testing, and Environmental Health
- Universal Task List

11.0. REFERENCES AND OTHER RESOURCES

(Full citations are in the References Section, "List of Reference Documents," listed by author.) Note: These documents are summarized in Attachment C.

- National Association of State Departments of Agriculture (NASDA) FERP Template Version 4.0 https://www.nasda.org/wp-content/uploads/2024/04/FERP-Supplemental-Information.pdf
- Manufactured Foods Regulatory Program Standards (MFRPS, 2022) – Standard 5 (https://www.fda.gov/media/131392/download)
- Council to Improve Foodborne Outbreak Response (CIFOR) Guidelines for Foodborne Disease Outbreak Response (http://cifor.us/products/guidelines)

12.0. ATTACHMENTS

- Attachment A – FERP Elements in the NASDA FERP Template
- Attachment B – Example "Table of Contents" for a State's Response Operations Manual
- Attachment C – Summary of the following references: MFRPS, NASDA, and CIFOR

13.0. DOCUMENT HISTORY

Version #	Status*	Date	Author
1.0	I	9/26/2011	RRT FERP Working Group (TX**, MI, WA, FL, OP**)
1.1	R	2/1/2012	ORA/OP
1.2	R	1/24/2013	ORA/OP
1.3	R	5/26/2017	ORA/OP
2.0	R	5/1/2023	ORA/OP-AFDO Compiled Revisions
3.0	R	12/1/2024	ODP-AFDO Compiled Revisions

*Status Options: Draft (D), Initial (I), Revision (R), or Cancel (C)
**Workgroup Lead

Change History

1.1 – Editorial revisions made by ORA for document clearance.
1.2 – Minor editorial revisions made to Attachment A for clarification purposes.
1.3 – Minor editorial revisions to formatting to align with overall 2017 RRT Manual Edition revision effort.
2.0 – AFDO compilation for 2023 Edition of RRT Manual
3.0 – AFDO compilation for 2025 Edition of RRT manual. Updated FDA program names resulting from the 10/2024 FDA reorganization

Attachment A – FERP Elements in the NASDA FERP Template (v 4.0)

Version 4.0 available at: https://www.nasda.org/wp-content/uploads/2024/04/FERP-Supplemental-Information.pdf.

The "FERP Supplement v 4.0" outlines planning considerations and examples to assist initial development of a plan. This is available at: https://www.nasda.org/wp-content/uploads/2024/04/FERP-Supplemental-Information.pdf

FERP Table of Contents:

1. Introduction
2. Purpose
3. Scope
4. Situations
5. Assumptions
6. Concept of Operations
    a. Incident Identification
    b. Incident Management
    c. Defining Response Actions
    d. Communication and Coordination
    e. Assessment, Control, and Containment
        - Food Emergency Response Teams
        - Food Safety Surveillance
        - Foodborne Contamination or Adulteration Surveillance & Investigation
        - Laboratory Services
        - Recovery
7. Principal Parties (State, Federal, Tribal, Local, Private Sector)
8. Actions
9. Organizations and Assignment of Responsibilities
10. Direction, Control, and Coordination
11. Information Collection and Resources
12. Communications
13. Administration
14. Plan Development and Maintenance
15. Authorities and References

Attachment B – Example "Table of Contents" for a State's Response Operations Manual

Below is an example of a "Table of Contents" of a State's RRT Procedures/Field Operations Manual. This is not comprehensive but identifies some areas for which a program would need to develop specific procedures and job aids to effectively carry out activities associated with an emergency response.

EXAMPLE: State X Rapid Response Team Standard Operating Procedures

A. Overarching Concepts

- Rapid Response Team Organization…….
- Incident Command System (ICS) principles…….
- Safety…….
- Training…….

B. Communication and Collaboration with Multi-Disciplinary Partners

- Communication…….
- Epidemiology ……
- Laboratory……
- Environmental Health…….

C. Investigational/Follow-Up Activities

- Traceback (Investigational and Regulatory)…….
- Field Team Organization and Operations……..
- Coordination of Joint Investigations…….
- Sampling……
  - Food……
  - Environmental ……
- Environmental Assessments……..
- Recalls…….
- Commodity-Specific Investigational Procedures……..
- Surveillance/Preventive Strategies…….
- Communications: Social Media and Public Notification…..
- Final Report Writing, Editing and Distribution……

D. Important References

- Standard Definitions…….
- Acronyms…….

Attachment C – Summary of References: MFRPS, NASDA, CIFOR Guidelines, and NIMS

- **The Manufactured Food Regulatory Program Standards (MFRPS)** were developed by a committee of FDA and State officials responsible for the regulation and inspection of food manufacturing facilities. The first version was published in 2007 and this was updated in 2010, 2013, 2016, 2019, and 2022. **Standard 5** identifies several written procedures and guidance documents that state food regulatory programs should have in the area of food emergency response.
    - Purpose: The MFRPS are a set of ten standards that establish the critical elements of a regulatory program designed to protect the public from foodborne illness and injury.
    - Perspective: Mid-level guidance to identify key capabilities needed in the food protection program to facilitate effective emergency responses.
    - Scope: Focuses on general capabilities but requires documentation of resources and procedures.

  Website: https://www.fda.gov/media/131392/download

- **The National Association of State Departments of Agriculture (NASDA) developed the Food Emergency Response Plan Template** as part of a cooperative agreement with USDA's Food Safety Inspection Service (FSIS), the Food and Drug Administration (FDA), and the Department of Homeland Security (DHS). The original template (2006) was revised in 2011 to be consistent with various developments in national frameworks (e.g., National Response Framework (NRF), Comprehensive Preparedness Guide (CPG) 101). In addition, this revised template has been reviewed and approved by federal, state, and private sector subject matter experts.
    - Purpose: This template is designed to assist states with developing a food emergency response plan. This identifies best practices and guidelines for state and local groups involved in protecting the nation's food and agricultural sector.
    - Perspective: High-level guidance to assist states to integrate within the National Response Framework (incorporation of DHS and emergency management concepts).
    - Scope: Focuses on preparing for larger scale incidents of national significance rather than procedures for specific food emergency response tasks.

  Website: https://www.nasda.org/wp-content/uploads/2024/04/FERP-Supplemental-Information.pdf

- **The Council to Improve Foodborne Outbreak Response (CIFOR) Guidelines** are a set of recommendations developed through the collaboration of public health and food safety officials from local, state, and federal agencies over the course of three years.
    - Purpose: To aid agencies responsible for preventing and managing foodborne diseases by describing the overarching functions and related activities that are common to most outbreak investigations.

- Perspective: Addresses the reality that multi-state food emergency responses are multi-agency (local, state, federal) and multidisciplinary (epidemiology, laboratory, and environmental health/food regulatory as core disciplines).
- Scope: Strategic more than operational and does not include procedures for specific food emergency response tasks. Note that the CIFOR Toolkit is an additional resource that helps to identify areas for development of specific procedures, etc. for implementation of the recommendations outlined in the guidelines. (https://cifor.us/products/toolkit)

Website: http://cifor.us/products/guidelines

- **The Federal Emergency Management Agency (FEMA) National Incident Management System (NIMS)** serves as a nationwide template to enable all levels of government, nongovernmental organizations, private sectors, and community stakeholders across the Nation to work together to prevent, mitigate, respond to and recover from any type of incidents and emergencies. Originally issued in 2004, NIMS guidance was revised in 2008, and the third and latest edition was published in 2017, which incorporated best practices and lessons learned as NIMS capabilities have matured and risk environments constantly evolving over the years.
  - Purpose: To provide stakeholders across the whole community with the shared vocabulary, systems, and processes to successfully deliver the capabilities described in the National Preparedness System.
  - Perspective: Key partners managing national outbreaks or incidents have varying authorities, management structures, communication capabilities and protocols, and many other factors. NIMS serves as a common framework to allow all participating stakeholders the ability to integrate these diverse capabilities and achieve common goals when collaborating and coordinating their efforts during incident management responses.
  - Scope: The NIMS framework applies to all incidents from traffic accidents to major disasters, including foodborne outbreaks or food safety incidents. This basic framework offers systemic approaches focusing on resource management, command and coordination, and communications/information management that can be applied to food emergencies. The components included in NIMS serve as essential building-blocks to food incident management and vital to successful responses.

  Website: https://www.fema.gov/sites/default/files/2020-07/fema_nims_doctrine-2017.pdf