

SOMETHING'S FISHY

SITUATION MANUAL



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COURSE AT A GLANCE

Time	Agenda
9:00-9:30 a.m.	Sign-In/Registration/Welcome/Introductions/Objectives (30 minutes)
9:30 to 10:00 a.m.	Module 1 (30 minutes) Presentation of scenario Conduct small group discussions related to specific responsibilities
10 to 10:15 a.m.	Break
11 to 11:10 a.m. 11:10 to 11:30 a.m. 11:30 a.m. to Noon	Module 2 (60 minutes) Presentation of scenario Conduct a small group discussion related to specific responsibilities Each group reports on its assessment of the situation and steps to be taken The whole group discusses how its work should be coordinated Gaps in coverage are identified
Noon to 1:00 p.m.	Lunch (60 minutes)
1 to 1:10 p.m. 1:10 to 1:30 p.m. 1:30 to 2 p.m.	Module 3 (60 Minutes) Presentation of scenario Conduct a small group discussion related to specific responsibilities Each group reports on its assessment of the situation and steps to be taken The whole group discusses how its work should be coordinated Gaps in coverage are identified
2 to 2:15 p.m.	Break
2:15 to 2:25 p.m. 2:25 to 2:45 p.m. 2:45 to 3:15 p.m.	Module 4 (60 minutes) Presentation of scenario Conduct a small group discussion related to specific responsibilities Each group reports on its assessment of the situation and steps to be taken The whole group discusses how its work should be coordinated Gaps in coverage are identified
3:15 to 4 p.m.	Wrap-Up (45 minutes) After-Action Report Evaluations, Certificates, and Close

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INTRODUCTION

Purpose

To protect the health of the American public, we must ensure that food products are safe for consumption. Everyone involved in the food chain, from farmers to consumers, has a responsibility to protect the food supply.

This scenario begins with a single consumer complaint regarding food quality. As the inspection process unfolds, the preliminary work on identifying unsafe food products is introduced. The scenario broadens as evidence of food fraud is discovered, and the investigation eventually crosses state boundaries. The concurrent activities of various agencies, including law enforcement, are included as part of this exercise.

The collaboration of regulators plays a pivotal role in ensuring compliance with industry standards and regulations, as well as facilitating transparency and accountability in addressing consumer health and safety concerns. Considering food defense and food fraud issues, it is incumbent that local, state, and federal governments, as well as industry partners, understand the roles and responsibilities of all participating entities to mitigate risks to the food supply and retail food service establishments, and to safeguard public health.

Participants

This scenario should include a cross-section of the law enforcement community, the food industry, state, local, tribal, and territorial regulatory agencies, plus other government and FDA representatives. Through collaboration and coordination with multiple stakeholders, many will benefit from participating in this scenario. We encourage others outside the outlined groups below to participate in this exercise so they can contribute to the overall understanding of the scenario, develop and/or strengthen working relationships with other organizations, and benefit from the collective dialogue.

This tabletop exercise is designed to facilitate discussion among various participating entities, including:

1. Food industry members
2. State, local, tribal, and territorial regulatory agencies
3. SRA Government and federal agencies (FDA, USDA, FSIS)
4. Law enforcement (USDA Office of Program Evaluation, Enforcement and Review and the Compliance and Investigations Division (OPEER CID), USA Office of Inspector General (OIG), state and local law enforcement agencies, Federal Bureau of Investigation (FBI), and the U.S. Department of Homeland Security (DHS))

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Goal

This tabletop exercise presents a food-related incident to participants that will require them to think critically about procedures and communications necessary to protect public health as the situation evolves. A large amount of information in this tabletop exercise will be generated from discussions among participants as they go through a hypothetical scenario. It will focus on the role that key personnel play in identifying and then containing the problem and protecting consumers. During the tabletop exercise, participants will assess plans, policies, and procedures, and think about how they would realistically apply them in the event of an incident. This tabletop exercise will help to facilitate discussion among various participating entities, such as emergency response, state and local entities, and the private sector.

Exercise Objectives

1. Articulate their specific roles and responsibilities to other professionals in reacting to a discovered food fraud incident.
2. State the purpose of having multiple agencies assume distinct and sometimes overlapping duties to effectively address and remedy the situation.
3. Collaborate with a diverse group of responders that may not have worked together before (i.e., media, law enforcement, risk managers, etc.).
4. Identify other entities or agencies that are needed to properly address the situation, but have not been included on the team.
5. Propose comprehensive, collaborative, and effective ideas, strategies, and solutions to ensure the timely remediation of the discovered food fraud incident.
6. Identify the strengths and development needs of their own agencies to improve or enhance their team's ability to detect and respond to a food fraud incident.
7. Optional: test real-time communications with another jurisdiction.

Exercise Structure

This exercise is designed to be an interactive, facilitated tabletop exercise. Participants are encouraged to ask questions of each other and learn from one another. The scenario has been designed by a group of subject-matter and instructional-design experts to provide participants with a real-life, plausible food fraud scenario. The scenario itself and the discussion questions have been designed to encourage participant dialogue and bring to the surface topics that are critically important to detect and react to such incidents. The exercise has also been developed to provide participants with an opportunity to explore important topics like interagency collaboration, jurisdictional issues, and risk communication.

Note: This exercise was designed for two jurisdictions to collaborate in real time. However, the second jurisdiction may be simulated, if needed.

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This exercise was developed by Michigan State University and the Michigan Department of Agriculture and Rural Development. The Association of Food and Drug Officials (AFDO) and Food Safety Strategy, LLC, supported the finalization of the materials.

Participants will respond to four different modules through this exercise:

- **Module 1** – Pre-Incident
- **Module 2** – Early Incident
- **Module 3** – Late Incident
- **Module 4** – Aftermath

Exercise Guidelines

As with any learning experience, this exercise must be conducted in a safe learning environment so that all participants can share and explore concepts with one another while discussing multiple solutions and options for a given issue. This exercise will operate under the following guidelines:

- This will be an open, low-stress, and non-public learning environment and is not intended to set a precedent.
- Participants will listen to and respect the varying viewpoints of other participants.
- The scenario we will discuss is plausible, and the events occurred as presented. Suspend your disbelief, and feel free to discuss differing policies and procedures during the breakout discussion.
- Today's facilitator is not necessarily a subject matter expert, and participants are expected to provide the expertise needed to ensure that the discussion is accurate and thorough.
- Commit to applying learnings from today's activities to our jobs/functions and sharing key findings with colleagues.

Roles and Responsibilities

Lead Planner – The person who has overall responsibility for the tabletop exercise, including convening the Planning Team and all pre- and post-exercise needs.

Participants – Respond to the scenario based on their first-hand, experiential knowledge; current plans and procedures of their individual entity, agency, or jurisdiction; and insights from training and experience.

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Evaluator(s) – Records the highlights of the discussion at each breakout table. These people do not participate in the exercise but capture the essence of the dialogue for use in the After-Action Report. They are chosen based on their expertise in the areas they are to observe.

Facilitator – Generally leads the exercise, provides situation updates, and moderates discussions. They also provide additional information and resolve questions as needed. Key officials may also assist with the facilitation of subject matter experts during the exercise.

Table Discussion Leader – A representative from each table (volunteered by the group) who will lead the group as it explores discussion questions and does the breakout activities.

Table Recorder/Reporter – A representative from each table (volunteered by the group) who will ensure that the group discussions are kept on time, record the key themes discussed at the table, and be responsible for reporting out during the large group dialogue.

Personal Learning Inventory

Each participant receives a blank Personal Learning Inventory (PLI) form to complete on their own. The PLI is designed to provide you with a document to capture questions, improvement ideas, and action items. It is for your use only. PLIs will not be collected; however, you are encouraged to share your PLI with others as a record of your learning experience. Add to your PLI throughout the day and refer to it as needed.

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MODULE 1 – PRE-INCIDENT

A consumer complaint about “bad smoked fish” triggers a routine inspection at Brad’s Convenience store in northern Michigan. The food inspector from the state food safety agency finds packages of smoked whitefish. The label says: “Doug’s Lake Superior Smoked Whitefish - 4500 Airpark Blvd, Duluth, MN.” The packages appear intact, are held at the appropriate temperature, and are within the sell-by date. The packaging said it was Lake Superior Whitefish, but it looked odd – the inspector was familiar enough with fish to recognize that these fish were not whitefish. They looked like tilapia.

The inspector noted other concerns in the store, including discolored red meat that appeared to have been refrozen, and some packaged candy on the counter that did not have English-language labeling. The convenience store manager said all of these items were purchased from John’s Distribution Warehouse, a few miles away.

The inspector knew the area and knew that John’s warehouse location was not licensed. The inspector issues a seizure order for the fish, meat, and candy not labeled in English and collects a sample of each. The inspector calls her supervisor, who was at a food safety conference, and relays what she has found. The supervisor knows his counterpart from the other jurisdiction, who is at the same conference, and provides the background on the smoked fish label.

Task

Use your allotted time to consider the developments and questions assigned by the lead planner/facilitator to your group for this module. If you are not sure which questions you have been assigned, just ask!

1. Identify a group leader and group recorder/reporter at your table.
2. Identify any additional requirements, critical issues, decisions, and questions you think should be addressed at this time.
3. Unanswered questions should be recorded for discussion with the entire group.
4. Add to your Personal Learning Index, as appropriate.

Open Questions for All Groups

1. Is there a public health threat? Would this be shared with public health? When? How?
2. What type of Food Fraud is possibly occurring?
3. Should this be reported? To whom? When?
4. What should happen to the samples?

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5. What is the legal authority for a seizure?

Questions for Participant Groups

Food Industry

1. What mechanisms do you have to develop rapport with your local regulatory and public health agencies? Is there an organization in your area that supports the establishment of these types of contacts during periods when there is not an emergency, so that the foundation is established if and when it is needed? If so, please describe the process.
2. For food stores with shoppers'/loyalty cards, how quickly can health and regulatory agencies be provided with all of the suspect products purchased by individuals?
3. At this point in the incident, officials have not issued a public warning about any implicated foods. Because fish is the suspect food, would you expect to receive notification regarding the investigation? If yes, who would you expect to notify you, and what information would you want provided?
4. Do you know what your local or State public health agency does to monitor public health emergencies and food safety?

What 'informal' mechanisms (e.g., social media, websites) do you have to keep abreast of local, regional, or nationwide food safety events?

State, Local, Tribal, Territorial Regulatory Agencies

1. In a food-related human health emergency, what is the role and responsibility of your agency? Are there processes and procedures for you to execute that role?
2. What would you be doing in the early stages of this scenario, when little is known about any risks from the suspect food?
3. What other data is needed before you will take action?
4. What activities or background investigation might you undertake when you have the information presented at the end of this module, before a food fraud or related illness is confirmed? When would you collect samples of a food product?
5. How do you weigh the evidence and balance the benefit of issuing a public health notice versus the damage that may be inflicted on the industry if the food is erroneously suspected of being fraudulent? How is this dependent on attributes of the suspected food, such as shelf life?
6. When a certain food is suspected of being fraudulent, what mechanisms are in place to alert the industry? What information is shared and by whom? When does this communication take place? What mechanisms are in place to alert the public?

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Government and Federal Agencies (FDA, USDA, FSIS, etc.)

1. How would efforts between States, such as the mapping of food supply chains, be coordinated by your agency?
2. How would you assist State, local, territorial, and Tribal governments during the investigation?
3. What activities can you engage in to interact with the State, local, territorial, and Tribal food regulatory and public health agencies, and the food industry in times when there is not an emergency?
4. How do you weigh the evidence and balance the benefit of issuing a public health notice versus the damage that may be inflicted on the industry if the food is erroneously suspected of being fraudulent? How is this dependent on attributes of the suspected food, such as shelf life?
5. When would a traceback/trace forward of the suspect food be?

Law Enforcement (USDA OPEER CID, USDA OIG, State and local law enforcement agencies, FBI, DHS)

1. In the case of a potential food fraud, from whom might you receive the initial notification? Please identify the channels that might be used to share this information.
2. Describe the interaction that you would like to occur between your organization and other law enforcement/government entities during an intentional adulteration investigation.
 - a. How do you work with Federal agencies like the USDA, FDA, and CDC? What organizations within those Federal entities would you be in contact with?
 - b. How do you work with local and State public health departments?
 - c. How do the Federal, State, and local law enforcement agencies overcome potential jurisdictional issues to ensure public safety?
3. In a case like this, where there may be food fraud, what is your protocol for informing the public about the status of the event and the risk factors?
 - a. What other organizations (Federal, State, and local) do you work with to create the messages?
 - b. Who reviews the messages?
 - c. Who approves the messages?
 - d. Who decides what information not to release to the public to protect the investigation?

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MODULE 2 – EARLY INCIDENT

The state food safety agency had only received a single consumer complaint, and there were no reported illnesses related to the fish, meat, or candy at the time. The food safety official from Michigan attending the conference has called back to their office regarding the smoked fish.

John's Distribution Warehouse is located within the inspector's district, and the inspector proceeds to the facility. At John's Distribution Warehouse, the inspector introduces herself and asks for the person in charge. The inspector can see a bank of coolers as well as pallets of food products, including:

- More of the candy is not labeled in English
- National-brand infant formula
- Chain store-brand canned vegetables

In the corner, two people appear to be filling small plastic bags with spices or seasoning. There is also a label printer.

A man appears and identifies himself as John. The inspector asks John if he was aware he needed a food license. John apologizes, asks if he can pay for one immediately, and if there is something wrong. The inspector says there was a complaint about smoked fish being sold at Brad's Convenience store, and says that Brad's received it from this location. The inspector asks if they have any of the fish, and John says they do, in the cooler.

There are many more similar packages of fish in the cooler, along with more of the same kind of discolored red meat. The inspector asks John if he knows what whitefish looks like. At this point, John starts becoming agitated and mutters, "I knew that crook Doug was ripping me off!"

Task

Use your allotted time to consider the developments and questions assigned by the lead planner/facilitator to your group for this module. If you are not sure which questions you have been assigned, just ask!

1. Identify a group leader and group recorder/reporter at your table.
2. Identify any additional requirements, critical issues, decisions, and questions you think should be addressed at this time.
3. Unanswered questions should be recorded for discussion with the entire group.
4. Add to your Personal Learning Index, as appropriate.

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Open Questions for All Groups

1. What should the inspector do next?
2. Are there potential public health threats? How would we know?
3. What are the potential issues with each of those products?
4. What potential food frauds exist at this point?
5. Would you report it? To whom? When? How?

Questions for Participant Groups

Food Industry

1. At your facility, do you have a crisis management plan for handling a recall situation based on detected fraudulent food? Does that crisis management plan address the kind of situation described here?
2. If your firm is contacted by a regulatory agency because one of your products is associated with fraud, how do you put your crisis management plan into motion? How quickly can your firm react?
3. If your brand were implicated, what would you be doing at this point? How would the decision be made to recall? How would the scope of the recall be determined? Would you consider stopping production or holding inventory? Why or why not?
4. What types of communication would you have with your suppliers, customers, and employees? What type of communication would you have with the public through the media or other means? Do you have a relationship with contacts at your local regulatory agency?
5. In this scenario, if the products you produced, packed, shipped, and sold were implicated as being fraudulent, how would you be able to trace the origin(s) and destination(s) of the product?
 - e. Would you be able to identify the upstream source of the incoming product? Who is responsible for maintaining records related to such products?
 - f. Can you provide all source and customer distribution records electronically to health and food regulatory authorities within 24 hours?
 - g. How would you quickly and effectively notify your customers about the situation?
6. Do you have a supplier certification program and/or incoming testing criteria to monitor your received products?

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7. At your facility, is there a protocol in place for the handling of samples to be tested? Is this done internally or by an outside laboratory? Who ensures that the protocols are up-to-date and being followed?
8. Who has the authority to halt production or distribution if products do not conform to quality standards?

State, Local, Tribal, and Territorial Regulatory Agencies

1. If a similar event occurred in your jurisdiction, what would you be doing when you were made aware of the potential for Food Fraud? Are there protocols in place for collaboration with other agencies/entities within your jurisdiction in a Food Fraud incident? Are these protocols communicated to the appropriate offices and individuals? How would it work in this scenario?
2. Are there systems in place for communication with other regulatory agencies in neighboring jurisdictions in your state and between the State and local officials? If so, based on the information in this scenario, what would be happening at this point? If no systems are in place, how would your agency improvise and conduct communications?
3. What type of communication do you have with local media? Consumers? During a food fraud incident, what type of communications do you have with your staff? Are all aware of the detected event and the ongoing investigation?
4. How would the collection of fraudulent food samples from consumers' homes work in your jurisdiction? What agency would collect from the homes of the affected individuals? Which agency would collect samples from the processor or retail/foodservice facilities if needed?
5. Once a public notification is issued, what action does your agency take to amplify and reinforce this message? What are the repercussions if the information is later found to be inaccurate?
6. Once consumers are warned not to consume the fraudulent food, is there a system in your jurisdiction to communicate that to the retail and foodservice community, so they stop selling the implicated product? If so, please describe.
7. Would your organization conduct any verification that suspect products were from commerce?
8. Do you have routine periodic contact with your regulated industry to build rapport prior to a food fraud incident? Do you have mechanisms to communicate with the produce and retail/foodservice industries to update them during an event like this?
9. Who maintains a list of contacts and backup contacts in other agencies (Federal, State, and local) that would be partners in dealing with a food-related human health emergency?
10. Who maintains a list of legislative and administrative authorities that may be used by your agency in the event of a human health emergency?

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Federal Agencies (FDA, USDA FSIS, etc.)

1. With the contemporary electronic communication systems we have, information is usually widely available to those consumers who have access to it. Does your organization have any other mechanisms to reach the underserved populations who may not have access to electronic media to get information about public health issues?
2. Would the investigation have proceeded differently if the suspect food was not intended for consumers' homes? How would the investigation have proceeded? What impact would this have on human health?
3. At what point would the food product be declared "safe" again? How is this decision made? How is it communicated?
4. Would this situation warrant the implementation of the Incident Command System (ICS)? What would need to happen in order to initiate this? How could this have changed the nature of the investigation?

Law Enforcement (USDA OPEER CID, USDA OIG, State and local law enforcement agencies, FBI, DHS)

1. Describe how your crime scene investigative units work with public health departments and clinical practitioners to conduct and verify evidence collection and scientific testing. For a criminal investigation, how do you manage the transfer of evidence and maintain its security?
2. Is there a way to expedite search warrants in the event of a criminal action?
3. In order to keep abreast of all the various agencies that have a role in this investigation, would the law enforcement lead agency establish an Incident Command Structure (ICS) to maintain communication and data flow and analysis? If so, what might that look like?
4. What would your agency do or have done differently IF the identification of fraudulent food were not as quickly determined?
5. Do you have communication systems and information sharing agreements in place to facilitate a law enforcement management and response to this situation?

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MODULE 3: LATE INCIDENT

The inspector has gone back to her car and called her supervisor. The supervisor calls the nearest inspector to have her also go to John's. He then calls his supervisor located in the state capital. He also tells his colleague from the other jurisdiction at the conference that this may be a bigger issue and that Doug's may soon know that the labeling is being looked into.

Task

Use your allotted time to consider the developments and questions assigned by the lead planner/facilitator to your group for this module. If you are not sure which questions you have been assigned, just ask!

1. Identify a group leader and group recorder/reporter at your table.
2. Identify any additional requirements, critical issues, decisions, and questions you think should be addressed at this time.
3. Unanswered questions should be recorded for discussion with the entire group.

Add to your Personal Learning Index, as appropriate.

Open Questions for All Groups

1. At what point does it become dangerous for the food inspector? When should law enforcement be engaged and at what level?
2. Where does the safety of the inspector fit into law enforcement's priorities? Does the possibility of multiple fraud situations impact this?
3. What are the legal options for the state food safety agency?
4. What steps should the state food safety agency be taking?

Questions for Participant Groups

Food Industry

1. At your facility, do you have a crisis management plan for handling a recall situation based on a food fraud incident? Does that crisis management plan address the kind of situation described here?

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2. If your firm is contacted by a regulatory agency because one of your products is associated with illness, how do you put your crisis management plan into motion? How quickly can your firm react?
3. If your brand were implicated, what would you be doing at this point? How would the decision be made to recall? How would the scope of the recall be determined? Would you consider stopping production or holding inventory? Why or why not?
4. What types of communication would you have with your suppliers, customers, and employees? What type of communication would you have with the public through the media or other means? Do you have a relationship with contacts at your local regulatory agency?
5. In this scenario, products you produced, packed, shipped, and sold were implicated as part of a food fraud incident. How would you be able to trace the origin(s) and destination(s) of the product?
 - a. Would you be able to identify the upstream source of the incoming product? Who is responsible for maintaining records related to such products?
 - b. Can you provide all source and customer distribution records electronically to health and food regulatory authorities within 24 hours?
 - c. How would you quickly and effectively notify your customers about the situation?
6. Do you have a supplier certification program and/or incoming testing criteria to monitor your received products?
7. At your facility, is there a protocol in place for authenticating samples? Are microbial tests performed? Is this done internally or by an outside laboratory? How is the frequency of microbial testing determined? Who ensures that the protocols are up-to-date and being followed?
8. Who has the authority to halt production if operations are not in conformance with SOPs? How do you identify laboratory resources identified that have the capability to do advanced pathogen testing to support your firms' needs in time of emergency? What arrangements (e.g., with other laboratories) have been made in the event that additional (emergency) product testing is needed?

State, Local, Tribal and Territorial Regulatory Agencies

1. If a similar event occurred in your jurisdiction, what would you be doing when you were made aware of the fraudulent food? Are there protocols in place for collaboration with other agencies/entities within your jurisdiction in a food fraud event? Are these protocols communicated to appropriate offices and individuals? How would it work in this scenario?
2. Are there systems in place for communication with other regulatory agencies in neighboring jurisdictions in your state and between the State and local officials? If so, based on the information

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in this scenario, what would be happening at this point? If no systems are in place, how would your agency improvise and conduct communications?

3. What type of communication do you have with local media? Consumers? Upon discovery of the fraud, what type of communications do you have with your staff? Are all aware of the incident and the ongoing investigation?
4. How would the collection of suspect food from consumers' homes work in your jurisdiction? What agency would collect from the homes of the affected individuals? Which agency would collect samples from the processor or retail/foodservice facilities if needed?
5. If it had taken longer to confirm the fraudulent food and consumers no longer had suspect food in their homes, how would this have impacted the investigation?
6. Once a public notification is issued, what action does your agency take to amplify and reinforce this message? What are the repercussions if the information is later found to be inaccurate?
7. Once consumers are warned not to consume the suspect food, is there a system in your jurisdiction to communicate that to the retail and foodservice community, so they stop sale of the implicated product? If so, please describe.
8. Would your organization conduct any verification that the product associated with the incident was removed from commerce?
9. Do you have routine periodic contact with your regulated industry to build rapport prior to a Food Fraud incident? Do you have mechanisms to communicate with the produce and retail/foodservice industries to update them during an event like this?
10. Who maintains a list of contacts and backup contacts in other agencies (Federal, State, and local) that would be partners in dealing with a food-related human health emergency?
11. Who maintains a list of legislative and administrative authorities that may be used by your agency in the event of a human health emergency?

Federal Agencies (FDA, USDA FSIS, etc.)

1. With the contemporary electronic communication systems we have, information is usually widely available to those consumers who have access to it. Does your organization have any other mechanisms to reach the underserved populations who may not have access to electronic media to get information about public health issues?
2. Would the investigation have proceeded differently if the fraudulent food in consumers' homes did match those from the investigation? How would the investigation have proceeded? What impact would this have on human health?
3. At what point would this type of food be declared "safe" again? How is this decision made? How is it communicated?

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4. Would this situation warrant the implementation of the Incident Command System (ICS)? What would need to happen in order to initiate this? How could this have changed the nature of the investigation?

Law Enforcement (USDA OPEER CID, USDA OIG, State and local law enforcement agencies, FBI, DHS)

1. Describe how your crime scene investigative units work with public health departments and clinical practitioners to conduct and verify evidence collection and scientific testing. For a criminal investigation, how do you manage the transfer of evidence and maintain its security?
2. Is there a way to expedite search warrants in the event of a criminal action?
3. In order to keep abreast of all the various agencies that have a role in this investigation, would the law enforcement lead agency establish an Incident Command Structure (ICS) to maintain communication and data flow and analysis? If so, what might that look like?
4. What would your agency do or have done differently IF the identification of fraudulent food were not as quickly determined?
5. Do you have communication systems and information sharing agreements in place to facilitate a law enforcement management and response to this situation?

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MODULE 4: AFTERMATH

The Department has coordinated with law enforcement and has control of the warehouse. Multiple food inspectors are on the scene reviewing labels and records. Notifications of other agencies are occurring.

Task

Use your allotted time to consider the developments and questions assigned by lead planner/facilitator to your group for this module. If you are not sure which questions you have been assigned, just ask!

1. Identify a group leader and group recorder/reporter at your table.
2. Identify any additional requirements, critical issues, decisions, and questions you think should be addressed at this time.
3. Unanswered questions should be recorded for discussion with the entire group.
4. Add to your Personal Learning Index, as appropriate.

Open Questions for All Groups

1. As the state food safety agency realizes that products within the warehouse are misbranded, mislabeled, stolen, counterfeit, and smuggled into the country, what should it do to address each of these situations?
2. Based on the identified products, are there different priorities?
3. Which other agencies should be involved?
4. What role does law enforcement play now?
5. When would the industry/brand owners be notified?
6. What would the public and the media be told?

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WRAP-UP ACTIVITIES

We will spend the remaining time synthesizing what we discussed today, identifying important action steps to include in the After-Action Report and Improvement Plan (AAR/IP), and obtaining your feedback on the overall exercise. An AAR/IP is an important tool used to evaluate the exercise addressing outcomes, strengths, weaknesses, and lessons learned. The facilitator will let you know when to expect to receive the final AAR/IP. The AAR/IP should be treated as a “For Official Use Only” document and only shared with those having a need to know.

At your table, please take a few minutes to discuss the questions below as directed by the facilitator. We will then take some time as a group to identify common themes and takeaways. At the conclusion of this discussion, we ask that you complete the feedback form that will be provided by your facilitator.

Overarching Group Discussion Questions

1. What is the most important thing you learned today in terms of managing an incident that impacts multiple jurisdictions?
2. What information do you need to make informed decisions during such an event? If you don't have that information, how do you get it or what needs to be done to make a decision without it?
3. Do you think this exercise will prompt your organization to evaluate your protocols, policies, and procedures?
4. What top three actions should be taken to ensure proper event management based on what you have learned from this exercise?
5. What went right, and what can you improve on at each stage of the incident investigation?
6. What are the roles and responsibilities of the various clinical, public health, regulatory and laboratory communities engaged in this investigation?
7. What could be done through all phases to reduce the time from the first signal to implementation of effective controls to final resolution in order to protect public health and reduce the economic impact on the entire industry?
8. What are some key lessons related to risk communication that you discussed today? What can you commit to doing to ensure that your organization supports a consistent, multi-jurisdictional, science-based message in the event of a foodborne illness incident?
9. At any point during the investigation, did you consider that contamination might have been intentional? How would this have changed the investigation?

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APPENDIX A: RESOURCES

Food & Drug Administration – Overview of Economically Motivated Adulteration or Food Fraud

<https://www.fda.gov/food/compliance-enforcement-food/economically-motivated-adulteration-food-fraud>

This resource includes videos, links to the latest articles and insights, as well as references to the latest regulations.

Food & Drug Administration – FSMA Final Rule for Mitigation Strategies to Protect Food Against Intentional Adulteration

<https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-mitigation-strategies-protect-food-against-intentional-adulteration>

Food & Drug Administration – General Page on Food Defense <https://www.fda.gov/food/food-defense>

Congressional Research Service – Food Fraud and “Economically Motivated Adulteration” of Food and Food Ingredients <https://sgp.fas.org/crs/misc/R43358.pdf>

Institute for Food Science & Technology – Food Fraud

<https://www.ifst.org/resources/information-statements/food-fraud>

Michigan State University – Food Fraud Initiative Webinar Series

https://www.dnv.us/assurance/webinars/food/190227_Food-Fraud-Michigan-State-University-Intro

SITUATION MANUAL

APPENDIX B: ACRONYMS USED

Acronym	Organization
AAR	After-Action Report
AAR/IP	After-Action Report and Improvement Plan
CDC	Centers for Disease Control and Prevention
CID	Complaint and Investigation Division (USDA OPEER)
FAQ	Frequently Asked Questions
FDA	Food and Drug Administration
ICS	Incident Command System
LEO	Law Enforcement Officer
OCI	Office of Criminal Investigations (FDA)
OIG	Office of Inspector General (USDA)
OPEER	Office of Program Evaluation, Enforcement & Review (USDA)
PLI	Personal Learning Inventory
TTX	Tabletop Exercise
USDA FSIS	United States Department of Agriculture and Food Safety Inspection Service

SITUATION MANUAL

APPENDIX C: PERSONAL LEARNING INVENTORY

This is your Personal Learning Inventory (PLI). Use it throughout the day to record your notes, questions, and discoveries. Not only is the PLI a convenient place to capture the significant events of today's tabletop exercise, but it can also be highly useful later for documenting your experience and reviewing the key points. The PLI is your personal document and will not be collected by the facilitator or evaluators. This is your personal journal.

Participant Name		Tabletop Exercise	
Date		Facilitator	

What are the most important things you learned today?

What are some key follow-up items you will undertake based on your participation in today's tabletop exercise?

What are some new resources that you learned about that will help you in your daily activities?

SITUATION MANUAL

APPENDIX D: AFTER-ACTION REPORT

Information and data collection for the evaluation of discussion-based exercises comes from the information that evaluators record as the exercise takes place. Typically, the evaluator (not to be confused with the group spokesperson or the group recorder) records for each breakout group certain specific information as the discussion is taking place. The kinds of information that evaluators should record include: issues identified, how decisions are made, roles and responsibilities (of participating entities), coordination/cooperation issues, and recommendations made by the breakout group.

For the analysis phase of the exercise, evaluators should, as a group, try to address the following facets of the exercise:

1. How well would personnel from the exercising jurisdiction and other participating entities have been able to perform the necessary or critical tasks?
2. What decisions were required, and who should have made them?
3. Were additional resources required? If so, how should they have been sourced?
4. Would existing plans/protocols/policies enable the full performance of critical or necessary tasks? Were participants familiar with those documents?
5. How well did personnel from various entities and jurisdictions coordinate and cooperate to accomplish necessary tasks? Are there agreements in place (among entities, agencies, and/or jurisdictions) to support cooperative accomplishment of necessary tasks?
6. What lessons were learned from the exercise?
7. What changes/improvements are recommended?