



**MICHIGAN STATE**  
**UNIVERSITY**



# Food Fraud Table Top Exercise

Pilot for the  
Food Related  
Emergency Exercise  
Bundle  
**(FREE-B)**

# Table of Contents

<b>Introduction</b> .....	<b>3</b>
<b>Purpose</b> .....	3
<b>Participants</b> .....	3
<b>Exercise Objectives</b> .....	3
<b>Exercise Structure</b> .....	4
<b>Exercise Guidelines</b> .....	4
<b>Roles and Responsibilities</b> .....	5
<b>Personal Learning Inventory</b> .....	5
<b>Module 1 – Pre-Incident</b> .....	<b>6</b>
<b>Task</b> .....	7
<b>Open Questions for All Groups</b> .....	7
<b>Questions for Participant Groups</b> .....	7
<b>Module 2 – Early Incident</b> .....	<b>9</b>
<b>Task</b> .....	10
<b>Open Questions for All Groups</b> .....	10
<b>Questions for Participant Groups</b> .....	10
<b>Module 3 – Late Incident</b> .....	<b>13</b>
<b>Task</b> .....	13
<b>Open Questions for All Groups</b> .....	13
<b>Questions for Participant Groups</b> .....	13
<b>Module 4 – Aftermath</b> .....	<b>16</b>
<b>Task</b> .....	16
<b>Open Questions for All Groups</b> .....	16
<b>Questions for Participant Groups</b> .....	16
<b>Suspicious Activity Reports</b> .....	<b>17</b>
<b>Insights from Reports</b> .....	17
<b>Wrap Up Activities</b> .....	<b>18</b>
<b>Appendix A: Resources</b> .....	<b>19</b>
<b>Appendix B: Acronyms Used</b> .....	<b>20</b>

# Introduction

## Introduction

### Purpose

To protect the health of the American public, it is crucial that we ensure that food products are safe for consumption. Everyone involved in the food chain, from farmer through consumer, has a responsibility to keep the food supply safe.

At any point during production or distribution, food can be contaminated either accidentally from employee error, or on purpose from sabotage, fraud or terrorist activities. Regardless of the circumstances, the US [Food and Drug Administration](#) (FDA) and United States Department of Agriculture [Food Safety and Inspection Service](#) (USDA FSIS), collaborating with State and local agencies, work closely to safeguard the American food supply.

Through this working relationship, the FDA and USDA FSIS continuously seek new ideas and strategies to reduce the incidence of human health emergencies and to support food defense-related innovation. In light of food defense concerns, it is incumbent that local, State and Federal governments and industry partners understand the roles and responsibilities of all participating entities.

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 Food Fraud is discovered and the investigation eventually crosses state boundaries. The concurrent activities of various agencies including law enforcement are included.

### Participants

Through the collaboration and coordination with multiple stakeholders, many will benefit from participating in this scenario. We encourage as many of the following groups to participate in this exercise so that 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.

Participants in this scenario should include a cross section of the law enforcement community, food industry, risk communicators, local, State, Tribal, territorial and Federal regulators, and public health professionals.

### Exercise Objectives

At the conclusion of this tabletop exercise, participants will be able to:

- Articulate their specific roles and responsibilities to other professionals in reacting to a discovered Food Fraud incident

# Introduction

- State the purpose of having multiple agencies assume distinct and sometimes overlapping duties to effectively address and remedy the situation
- Collaborate with a diverse group of responders that may not have worked together before (i.e. media, law enforcement, risk managers, etc.),
- Identify other entities or agencies that are needed to properly address the situation but who have not been included on the team
- Propose comprehensive, collaborative and effective ideas, strategies and solutions to ensure the timely remediation of the discovered Food Fraud incident
- 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

## Exercise Structure

This exercise is designed to be an interactive, facilitated tabletop exercise. Participants are encouraged to learn from each other and ask questions of one another. The scenario is based on a potentially real situation and 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 surface topics that are critically important to detecting and reacting 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.

This exercise was developed as part of a FDA grant given to the Michigan Department of Agriculture and Rural Development (MDARD) and Michigan State University's Food Fraud Initiative. This scenario was produced in cooperation with the Minnesota Department of Agriculture.

This exercise is a multimedia, facilitated tabletop exercise (TTX). Participants will respond to four different modules:

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

Not included in the exercise are several Suspicious Activity Reports designed to allow participants to independently explore the different input sources of detected Food Fraud incidents.

## Exercise Guidelines

As with any learning experience, it is important that this exercise is 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:

# Introduction

- This will be an open, low-stress and non-public learning environment and is not intended to set precedents.
- Participants will listen to and respect the varying viewpoints of all of the other participants.
- The scenario we will discuss is plausible and the events could occur 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 our discussion is accurate and thorough.
- Commit to applying learnings from today's activities to our job/functions and share 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.

**Evaluator(s)** – Record the highlights of the discussion at each breakout table. These people do not participate in the exercise but capture the essence of the dialog 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 as subject matter experts during the exercise.

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

**Table Recorder/Reporter** – 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 will 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 back to it as needed

# Module 1 – Pre-Incident

## 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 finds packages of smoked whitefish. The label says: “Doug’s Lake Superior Smoked Whitefish - 4500 Airpark Blvd, Duluth, MN”. The packages appear intact, are being held at 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 the 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 Minnesota counterpart, who is at the same conference, and provides the background on the smoked fish label.

# Module 1 – Pre-Incident

## Task

Use your allotted time to consider the developments and questions assigned to your group for Module 1.

- Identify any additional requirements, critical issues, decisions and questions you think should be addressed at this time.
- Unanswered questions should be recorded for discussion with the entire group.

## 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?
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 shopper's/loyalty cards, how quickly can health and regulatory agencies be provided with all of 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?
5. 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 there is little know 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?

# Module 1 – Pre-Incident

6. When a certain food is suspected as 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?

## **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 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/traceforward 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?



# Module 2 – Early Incident

## Module 2 – Early Incident

The Department had only received the single consumer complaint, and there were no reported illnesses related to the fish, meat, or candy at the time.

The food safety official from Minnesota 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, 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 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 and asks if he can pay for one immediately. John also asks if there is something wrong. The inspector says there was 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 yes, 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!"

# Module 2 – Early Incident

## Task

Use your allotted time to consider the developments and questions assigned to your group for Module 2.

- Identify any additional requirements, critical issues, decisions and questions you think should be addressed at this time.
- Unanswered questions should be recorded for discussion with the entire group.

## 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 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?
  - 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 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?

# Module 2 – Early Incident

## State, Local, Tribal and Territorial Regulatory

1. If a similar event occurred in your jurisdiction, what would you be doing when you were made aware of the potential 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 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 sale of 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?

## 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 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?

# Module 2 – Early Incident

## **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 and 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?

# Module 3 – Late Incident

## 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 in Lansing. He also tells his Minnesota colleague 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 to your group for Module 3.

- Identify any additional requirements, critical issues, decisions and questions you think should be addressed at this time.
- Unanswered questions should be recorded for discussion with the entire group.

### 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? Do the possibility of multiple fraud impact this?
3. What are the legal options for the Department?
4. What steps should the Department 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?
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?

# Module 3 – Late Incident

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**

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 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 by, 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?

# Module 3 – Late Incident

3. At what point would this type of food 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 and 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?

# Module 4 - Aftermath

## 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 to your group for Module 4.

- Identify any additional requirements, critical issues, decisions and questions you think should be addressed at this time.
- Unanswered questions should be recorded for discussion with the entire group.

### Open Questions for All Groups

1. As the Department 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. Which other agencies should be involved?
3. What role does law enforcement play now?
4. When would the industry / brand owners be notified?
5. What would the public and the media be told?

### Questions for Participant Groups

#### Food Industry

1. See open questions for all groups

#### State, Local, Tribal and Territorial Regulatory

1. See open questions for all groups

#### Federal Agencies (FDA, USDA FSIS, etc.)

1. See open questions for all groups

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

1. See open questions for all groups



# Suspicious Activity Reports

## Suspicious Activity Reports

Explore the concepts of how information that can disclose Food Fraud incidents comes in and what you do with it.

- Scenario 1: A citizen calls the Fusion Center
- Scenario 2: A food inspector spots something “odd” (e.g. the Free-B scenario)
- Scenario 3: A citizen calls the State food safety agency’s 800#
- Scenario 4: A citizen complains to retailer

## Insights from Reports

- Is there a threat of violence towards the inspectors?
- When should law enforcement officers be involved?
- What was learned from the series of suspicious activity reports?
- What is a best practice to gathering information on Food Fraud?
- For an incident

What would happen?

What should happen?

How can that be enabled?

# Wrap Up Activities

## 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 large 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.

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 upon 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?

# Appendix A

## Appendix A: Resources

CDC. National Outbreak Reporting System. Guidance document for NORS users.

[http://www.cdc.gov/outbreaknet/pdf/NORS\\_Guidance\\_5213\\_06232009%28compliant%29.pdf](http://www.cdc.gov/outbreaknet/pdf/NORS_Guidance_5213_06232009%28compliant%29.pdf)

IAFP. Procedures to Investigate Foodborne Illness <http://www.foodprotection.org/files/other-publications/procedures-forms.pdf>

CIFOR manual; Diagnosis and Management of Foodborne Illnesses: A Primer for Physicians and Other Health Care Professionals <http://www.cdc.gov/mmwr/preview/mmwrhtml/rr5304a1.htm>;  
<http://www.cifor.us>.

Epi-Ready Foodborne Illness Response Strategies [http://www.neha.org/epi\\_ready/](http://www.neha.org/epi_ready/)

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# Appendix B

## Appendix B: Acronyms Used

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 Question
FDA	Food and Drug Administration
ICS	Incident Command System
LEO	Law Enforcement Officer
OIG	Office of Inspector General (USDA)
OPEER	Office of Program Evaluation, Enforcement & Review (USDA)
MDARD	Michigan Department of Agriculture and Rural Development
MIOC	Michigan Intelligence Operations Center – a Fusion center staffed by many agencies
MSP	Michigan State Police
MSU	Michigan State University
PLI	Personal Learning Inventory
TTX	Tabletop Exercise
USDA FSIS	United States Department of Agriculture and Food Safety Inspection Service