1. PURPOSE

This document describes key elements for Rapid Response Team (RRT) communications during a food/feed incident, both within DFID and with relevant external partners.

2. SCOPE

This SOP should be followed in the response to a food/feed incident. It describes communications within DFID/MDA as well as with other agencies involved in the response to an incident including FDA, USDA FSIS, MDH, law enforcement, and delegated local health agencies.

This SOP does not include communication with the public, industry as a whole, or the involved facility(ies). This also does not include communication with outside agencies on issues of a more routine nature, for example FDA Contract work, etc. Finally, this does not include communications coordinated under the Standard Operating Guidelines for Nuclear Power Plant Incident Response.

3. BACKGROUND

Effective communication throughout a response framework is necessary for an effective response, regardless of the size and complexity of the structure and incident. The framework for food/feed response activities is the Incident Command System (ICS). The ICS basic command structure will coordinate the response and should expand or contract as determined by the size/complexity of the incident and the availability of resources. Post-response evaluations (e.g. After Action Reports) frequently identify weaknesses in communication among operational personnel and agencies as a reason for inefficiencies in the actual response. The central role of effective communication in a response necessitates a pre-established plan of communication (e.g. SOPs, meetings) to best utilize operational resources.
4. RESPONSIBILITY

**Dairy and Food Division Director** - The Dairy and Food Division Director (or designee) will review all policies and procedures that apply to DFID administrative and general division functions and issue final approval of those policies and procedures.

**Food/Rapid Response Team Program Manager** – The Food/ Rapid Response Team Manager will review all policies and procedures and issue final approval of all rapid response team policies and procedures.

**Regulatory, Educational and Outreach Program Coordinator** – The Regulatory, Educational and Outreach Program Coordinator will ensure that all staff are trained in carrying out the responsibilities of this SOP.

**Supervisors** - The Supervisor will ensure all assigned staff in their respective program area receive the appropriate training and follow the procedures described.

**Compliance Officers, Project Officers, Inspectors and Support Staff** – The Compliance Officer, Project Staff, Inspectors, and Support Staff will follow the procedures described as applicable to their position and notify their supervisor when the procedures cannot be followed.

5. DEFINITIONS

**Food** - human food (raw or ready to eat, ingredient or finished product) or animal feed

**Incident** - types of incidents that could be considered for inclusion by this SOP include but are not limited to: Weather related emergencies: flooding, tornado/wind, ice storms; a possible/known bioterrorism event; a known or suspect pathogenic contamination in a food processing facility (retail or manufacturing); or a known or suspect pathogen contamination of food.

**RRT (Rapid Response Team)** – A group of individuals within MDA DFID who are involved in the operational activity of an incident response, including managers, supervisors, field staff, and or subject matter experts.

6. PROCEDURES

6.1. Communication Considerations: Information Sharing and Etiquette

6.1.1. Sharing of Confidential Information

Always be cognizant of information-sharing regulations at the federal, state, and local levels; work out effective ways to work with the needs/restrictions of your partners.

a. Identify who in DFID is FDA Commissioned, Credentialed or has signed a confidentiality agreement so DFID and the FDA will know with whom they can share confidential information obtained by FDA. (For federal
regulations, see 21 CFR 20.88 and 20.91.) These lists are maintained on the RRT SharePoint site.

b. Information collected and/or shared during a food emergency response is subject to MDA Data Practices policies. (see data practices SOP)

6.1.2. Communication During an Incident

Internal and external communication will follow standard ICS terminology and protocols - See SOP – Incident Command System

6.2. Initial Notification

6.2.1. DFID Internal Notification

If a member of the DFID program staff receives information about an incident, they should notify a key representative of the RRT. See contact list for specific contact list. If an RRT member is not immediately available, they should notify their supervisor.

6.2.2. RRT Communications to External Agencies - FDA

DFID has established a special line of communication with FDA during incidents as described see below.

FDA Minneapolis District – FDA Minneapolis District shall notify MDA DFID of threats or probable threats to the food supply within the State of Minnesota and will communicate all necessary information to allow MDA DFID to adequately protect the citizens of Minnesota. FDA Minneapolis District shall also have primary responsibility for communicating with other districts or offices within the Food and Drug Administration.

MDA DFID – DFID RRT shall notify FDA Minneapolis District Office (MIN-DO) of threats or probable threats to the food supply both within and outside of the State of Minnesota and will communicate all necessary information to allow FDA MIN-DO to adequately protect the citizens of the United States. MDA DFID shall also have primary responsibility for communicating with other agencies within Minnesota and with other agencies in other states. The person(s) within MDA DFID charged with communicating with MIN-DO shall be determined on a case-by-case basis and may include Managers, Supervisors, Rapid Response Team members, or other staff. If MDA DFID has communication with agencies in other states, we will notify FDA MIN-DO so that they are aware of the situation should another FDA District become involved.

6.2.2.1. FDA Response Communications Groups-

Email boxes have been established by MDA and FDA MIN-DO for alert notification for various levels of response. These emails will be used for initial notification of a Reportable Food Registry (RFR) Notification, Incident or Emergency based on the apparent nature of the event.
6.2.2.2. Notification Types

6.2.2.2.1. Reportable Food Registry (RFR) Notifications

When an RFR report is received, the MIN DO Emergency Response Coordinator will contact MDA RRT via the established communication group email address to discuss and coordinate next steps as appropriate for the event.

6.2.2.2.2. ‘Incident’

When there is an event where there does not appear to be an imminent health risk or the affected food has been dealt with by the firm, an email shall be sent to the other agencies’ notification group (as noted above)

- Email Subject line shall say INCIDENT: (brief statement of nature of the incident)
- Planning meeting/call to be held within 24 hours
- Body of the message shall include additional details about the event
  - conference call number to be used
  - known facts about the incident
  - whether an ICS structure has been or will be established
  - resource availability
  - possible options for response (joint, individual agency response)

6.2.2.2.3. ‘Emergency’

When there may be a more imminent public health risk, there is known food contamination (recall may or may not have been initiated), acts of terrorism or deliberate
contamination, etc, an email shall be sent to the other agencies notification group (as noted above)

- Email Subject line shall say EMERGENCY: (brief statement on the nature of the emergency)
- Planning meeting to be held as soon as possible
- Body of the message shall include additional details about the event
  - conference call number to be used
  - known facts about the incident
  - whether an ICS structure has been or will be established
  - resource availability
  - possible options for response (joint, individual agency response)

### 6.3. RRT Communications to External Agencies – Other Agencies

- **USDA FSIS**
  - If an incident occurs that involves a Minnesota food or meat facility that is regulated by USDA FSIS, the Office of Field Operations (OFO) Minneapolis District Office shall be notified.
  - If, during a foodborne illness outbreak investigation, an FSIS-regulated product is suspected of causing human or animal illness, the Office of Public Health Science (OPHS) Public Health & Epidemiology Liaison for Minnesota shall be notified. This notification should happen as soon in the investigation as possible – as soon as an FSIS-regulated product is a potential suspect as the source, even if it has not been confirmed.
  - If an FSIS-regulated product is analyzed by the MDA Laboratory and found to be adulterated, prompting a recall, both the OFO Minneapolis District Office and the OPHS Public Health & Epidemiology Liaison for Minnesota shall be notified.
  - If intentional contamination of food item is suspected or implicated, the Office of Field Operations (OFO) Minneapolis District Office shall be notified.
  - Contact information for USDA contacts can be found in the MN RRT Contacts List [https://inside.mn.gov/sites/mda/dfid/rrt/RRTResourceLibrary/Forms/AllItems.aspx](https://inside.mn.gov/sites/mda/dfid/rrt/RRTResourceLibrary/Forms/AllItems.aspx)
• MDH and MDA Delegated Agencies
  o If an individual case or case cluster of suspected foodborne/waterborne illness is detected in a Minnesota resident, refer the ill person(s) to the Minnesota Foodborne Illness Hotline (1-877-366-3455 or 651-201-5655) and notify the MDH Foodborne, Vectorborne, and Zoonotic Diseases Unit (Foodborne Epidemiology).
  o If MDA begins an investigation of a cluster of suspected foodborne/waterborne illness (such as a traceback investigation) which includes retail firms or firms in delegated agency territories, notify appropriate MDA delegated agencies and MDH Environmental Health Division.
  o If a food product is analyzed by the MDA Laboratory and found to be adulterated, prompting a recall, notify MDH Environmental Health Division, MDA delegated agencies, and MDH Foodborne Epidemiology and request the MDA Laboratory to share isolate information with MDH Public Health Laboratory.
  o If intentional contamination of food item is suspected or implicated, the MDH Environmental Health Division, MDA delegated agencies, and MDH Foodborne Epidemiology shall be notified.
  o Contact information for MDH Environmental Health, MDH Foodborne Epidemiology, and MDA delegated agency liaison contacts can be found in the MN RRT Contacts List https://inside.mn.gov/sites/mda/dfid/rrt/RRTResourceLibrary/Forms/AllItems.aspx

• Law Enforcement/Federal Bureau of Investigation
  o If an incident occurs that may have a criminal aspect to it, local law enforcement must be notified.
  o If the agency suspects a threat involving biological, chemical, or radiological agents or indications that instances of disease may not be the result of natural causes, the Department of Justice (DOJ) must be notified through the DOJ/Federal Bureau of Investigation (FBI), Weapons of Mass Destruction Operations Unit. The FBI, in turn, immediately notifies the National Operations Center (NOC) and the National Counterterrorism Center.
  o Examples of these kinds of incidents include the following:
    ▪ Products or commodities which are suspected to have been tampered with (may be contaminated with chemical, biological, or physical hazards)
    ▪ Compromised access to a facility
    ▪ Discovery of or notification by industry of counterfeit food products
    ▪ Verbal or written threats to a specific food product, food facility, group of facilities or an industry
    ▪ Notification of other malicious, criminal or terrorist action (or if found during an investigation or inspection)
All action undertaken in response to such an incident must be conducted in such a way so as to avoid compromising a law enforcement investigation.

When the RRT (or other member of management/supervision in absence of RRT) becomes aware of this kind of incident, they must contact local law enforcement (or the Federal Bureau of Investigation) to notify the responsible agency of the potential for criminal acts.

Contact local law enforcement by dialing 911 or contact information can be found on MN Statewide Emergency Contact Info list [https://inside.mn.gov/sites/mda/dfid/rrt/RRTResourceLibrary/Forms/AllItems.aspx](https://inside.mn.gov/sites/mda/dfid/rrt/RRTResourceLibrary/Forms/AllItems.aspx)

Contact information for the Federal Bureau of Investigation can be found in the MN RRT Contacts List [https://inside.mn.gov/sites/mda/dfid/rrt/RRTResourceLibrary/Forms/AllItems.aspx](https://inside.mn.gov/sites/mda/dfid/rrt/RRTResourceLibrary/Forms/AllItems.aspx)

### 6.4. Minimum Incident Notification Requirements

<table>
<thead>
<tr>
<th>Situation</th>
<th>Agencies to Contact*</th>
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<tbody>
<tr>
<td>[Local cluster(s) of suspected foodborne/waterborne illness detected]</td>
<td>Local Health Required</td>
</tr>
<tr>
<td>[Clusters across multiple counties, cases dispersed throughout state, or cases with matching serotype/subtype/PFGE]</td>
<td>State/Local Regulatory in other states Required</td>
</tr>
<tr>
<td>[Clusters detected in multiple states, Food product or water suspected or implicated]</td>
<td>Centers for Disease Control Required</td>
</tr>
<tr>
<td>[Microbiological food testing by regulatory agency prompts recall. ]</td>
<td>Local Health Required</td>
</tr>
<tr>
<td>[Illness or positive sample finding prompts major recalls requiring significant resources to effectuate]</td>
<td>State/Local Regulatory in other states Required</td>
</tr>
<tr>
<td>[Intentional contamination of food item is suspected or implicated. ]</td>
<td>Local Health Required</td>
</tr>
</tbody>
</table>

*See contact list for specific information
6.5. Communication with the MDA Laboratory Services Division

If the incident may involve sample collection and analysis, as soon as possible, discuss the following with the key contact in the microbiology or chemistry sections: laboratory capacity, type of analyses to be performed, timeframe (when to expect sample results), sample scheduling, and expertise. See RRT contact list for key points of contact.

6.6. Public Communication

Communication with the public and media should be coordinated with the ICS Information Officer or the MDA Communications Director pursuant to the Communications with the Public SOP as well as the Data Practices SOP.

7. RELATED DOCUMENTS (includes References, Attachments)

- MN RRT Contact List
- FMD 50 FDA-State Communication Field Management Directive (including FDA SOPs related to Communications During an Event)
- MOU with MN Dept of Health
- Other DFID/RRT SOPs Food Emergency Response Plan, Joint Investigations, Traceback, ICS, etc.

8. EQUIPMENT/MATERIALS NEEDED

- Telephones, cell phones, smartphones, email/internet access, computer, fax machines, scanners, and/or mail.
- Access/use of DFID RRT SharePoint Site

9. SAFETY

No additional safety requirements are required.

10. CIRCULATION

This policy will be circulated to the following individuals within DFID: the Dairy and Food Inspection Director, Rapid Response Team Manager, Program Managers, Program Supervisors, Compliance Officers, and inspection staff, and office support staff. This SOP would be shared with all relevant agencies, including regulatory, public health, animal health, law enforcement, laboratory, delegated agencies etc. partners
A standing version will be stored electronically on the DFID server.
## 11. APPROVAL/DOCUMENT HISTORY

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<th>Status (I, R)</th>
<th>Change History</th>
<th>Date</th>
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<td>I</td>
<td>I</td>
<td>Initial Policy Drafting.</td>
<td>1/31/2013</td>
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Approved By: Date

Approved By: Date

I = Initial document; R = Revised document