

# Collaborative Food Safety Forum (CFSF)

## Enhancing Early Outbreak Investigations - Supply Chain Consultation Process: Key Decisions, Action Items, and Themes

January 9, 2014  
Washington, D.C.

### Background

The Collaborative Food Safety Forum workshop on the Supply Chain Consultation Process (Consultation Process), held on January 9, 2014, included representatives from federal agencies, industry, consumer advocacy groups, and state public health departments; most, but not all of whom, had been involved in the three previous meetings. The purpose of this session was to review the pilots conducted, highlight and address necessary refinements to the Consultation Process, and determine next steps in establishing it as part of the government's outbreak investigation efforts if it is deemed to have value going forward.

Over a number of months and meetings, Collaborative Food Safety Forum (CFSF) participants developed the Consultation Process, which entails tapping into real-time food production supply chain and distribution information early on (i.e., when several candidates have been identified as the potential contaminated food source or sources, and no single entity, supply chain, or brand has been determined) in a foodborne illness outbreak to expedite the investigation. Including new participants in this specific session was important for gaining feedback on the intent, organization, and value of the Consultation Process. After a previous workshop in February 2013, participants committed to testing the proposed Consultation Process over a 6-8 month time period before reconvening to review, evaluate, and determine whether or not to move forward with using it, when appropriate, as a part of outbreak investigations.

During that time period, the relevant Agencies (CDC, FDA, and USDA) identified and agreed on testing the Consultation Process in two outbreak investigations, first, during an outbreak of *Salmonella* Saintpaul in the spring of 2013 (ultimately identified as associated with cucumbers), and second, during an ongoing outbreak of *Listeriosis*. The second test case completed some, but not all, of the steps in the Consultation Process at the time of this workshop. The first test case, therefore, went through the three main stages of the Consultation Process: 1) agreement of the agencies to use the process in the outbreak; 2) consultation with industry experts; and 3) de-brief and evaluation of the process (*see attached diagram*).

Those directly involved in these test cases provided a timeline and descriptive overview of each case. Following each, participants deliberated on a range of questions and topics to fully analyze: whether and how the Consultation Process was useful; how it was distinct from, but complementary to, other tools involving exchange of information between the public and private sectors in an outbreak investigation; and how to improve the Consultation Process going forward. Key Decisions and Action Items

The primary purposes of this meeting were to:

- Make a determination as to whether the Supply Chain Consultation Process, developed by participants from the Collaborative Food Safety Forum, had demonstrated value during the testing period and is anticipated to continue being a useful mechanism in the future; and
- If the process does have value, what adjustments, improvements, or next steps need to be achieved in order to operationalize this tool as one of several in the epidemiologist's toolbox to use early in foodborne-illness outbreak investigations.

Participants did affirm that the Consultation Process has added, and will continue to add value to outbreak investigations. This Consultation Process is not unique in providing a mechanism for gathering information early on in an outbreak investigation when hypothesis generation is underway but officials are having difficulty narrowing down the list of suspected foods. Other mechanisms, ranging from tapping subject matter experts (SMEs) within agencies, or one-on-one informal outreach efforts, or others, also could be used at this point. However, the Supply Chain Consultation Process is distinct from these other mechanisms given the combination of *unique design aspects*, including:

- Coordination among the key agencies to determine and agree upon a candidate outbreak and work together over the course of the Consultation Process;
- Rapid access to information with low administrative burden through largely informal structures and procedures;
- Promotion of problem-solving through deliberation, involving not only information exchange, but applying different expertise to sharpen questions and insights for improved hypotheses; and
- Inclusion of continuous improvement of the Consultation Process by all stakeholders with an evaluation de-brief and feedback loop, as well as the commitment of the CFSF participants to stay in communication and engaged over time.

The determination that the Consultation Process has value was based on the two test investigations: the first identified cucumbers as the contaminated food in the *Salmonella* Saintpaul outbreak; and the second, which, while the outbreak investigation is still on-going, provided investigators with useful information about co-packing practices. These two test cases provided important information to investigators and reinforced the value of expeditiously tapping private-sector expertise to provide outbreak investigators with useful information about supply chain patterns and food-production practices.

CFSF workshop participants further agreed on proposed improvements to the Consultation Process, and identified next steps to fully operationalize this process. Specific decisions and recommended next steps are outlined below.

### **Finalization of the Process Protocols**

A key aspect of the Consultation Process is its ability to provide rapid input regarding critical food production and/or distribution information early on in an outbreak investigation. In order to leverage this ability, private sector participants must be prepared to provide information useful to investigations very quickly. Critical to being well-prepared is familiarity with what this

Consultation Process is, what participation entails, and how outbreak investigators will use the information provided. As transition from a test phase to a more established mechanism occurs, a broader number of private sector representatives will be asked to participate on an as-needed basis. Accordingly, much of the workshop discussion focused on how best to improve upon the current aspects of the Consultation Process to expand familiarity with this mechanism by food industry representatives and to explain how providing clear information is essential in order to meet the Consultation Process's goal with quick input of information to improve hypothesis generation in an investigation.

After talking through several possible options and scenarios, participants determined that more formal procedures, such as the use of non-disclosure agreements, were not necessary as the information shared is part of the public record and does not include specific brands or other commercially sensitive information. Use of formal procedures and non-disclosure agreements would more likely place the process on a regulatory track, which would bog down the process. Furthermore, the participants concluded that creating formal steps such as these could undermine the Consultation Process's most useful feature – rapid information-sharing.

Participants did agree that a succinct description of the Consultation Process is needed, including details of its purpose and procedures, as well as expectations of those who participate. This kind of information will assist with establishing the preliminary information shared prior to the public-private consultation protocols and preparing new participants who will most likely be less familiar with the Consultation Process generally. A one- page overview has been used when contacting potential private sector participants by representatives from the Agencies involved in the test phase. They shared it with the group during the meeting, received feedback on the document, and asked for additional comments following the meeting.

- **Action Item:** When finalized, the document will be circulated to the CFSF participants and beyond to provide information on the Consultation Process.

### **Development of Private Sector Participant Roster**

During the test phase, CFSF participants agreed to limit industry consultants to people already participating in the workshops for purposes of expediency and familiarity with the Consultation Process, its intended purpose, and envisioned flow. They also agreed when designing the Consultation Process that the eventual roster of consultants would need to expand beyond the current list of participants and continuously evolve given that each outbreak is different, might require a broad array of expertise, and the knowledge needed will not always be held by a set roster of candidates. However, having no organization could impede broader dissemination of information about the Consultation Process as well as preliminary preparation for effective participation in it. Workshop participants discussed various aspects of, and options for, distributing information broadly (*see below*), as well as whether and how a roster of private sector participants should be established.

After much discussion, the group determined that a roster, for all intents and purposes, already has been started, drawing from participants in the CFSF and to be supplemented by members

of the Safe Food Forum – a group constituted by many proactive, progressive food industry leaders – as well as others going forward.

- **Action Item:** *Engage with members of the Safe Food Forum through CFSF participants who are members of the Forum; draw on its membership and add other expertise and representation.*
- **Action Item:** *Identify other sources, such as trade associations, to help supplement the developing informal roster of participants who may be tapped to participate in the Consultation Process.*

### **Appropriate and Effective Communication of the Consultation Process**

Communication about the Consultation Process is critical to its *effectiveness (familiarity will better prepare future participants for engaging in the process)*, as well as its *credibility (not only with those who might ultimately participate, but also with those who should be informed of its existence, function, and value)*.

At the same time, a balance must be struck between providing appropriate insight and transparency, while being clear that this Consultation Process is one of several means of gathering data from the private sector, and not over-promising the Consultation Process' contribution to enhancing outbreak investigations. In sum, the CFSF participants discussed a list of options that included varying degrees of communication striking a balance between informing the public and involving the private sector, while framing and contextualizing the appropriate use of this mechanism during outbreak investigations. Examples of such information dissemination actions highlighted by participants included:

- 1) Placing information on websites (such as the Collaborative Food Safety Forum, the sponsoring organizations – The Pew Charitable Trusts and Robert Wood Johnson Foundation, and the Agencies' websites) about the existence and description of the Consultation Process, how it works, the general types of people potentially tapped to be involved (i.e. "representatives from these sectors..."), as well as its intended outcomes, along with periodic updates over time and metrics for demonstrating its value;
  - 2) Holding webinars to provide similarly mentioned information to a broader audience; and
  - 3) Presentations at conferences or sessions on the Consultation Process where there is representation of the targeted audiences.
- **Action Item:** *Federal agencies will work with their colleagues and IFORC's (Inter-agency Foodborne Outbreak Response Collaborative) communications working group to determine how best to frame the Consultation Process information and specific vehicles, to distribute the information among different stakeholders.*
  - **Action Item:** *CFSF participants will identify suggested venues or platforms for communicating information to their respective colleagues, including links to websites (such as RESOLVE's CFSF project website, and eventually, the Agencies' websites) to further disseminate information on the Process.*

## Continued Coordination and Communication are Necessary as the Consultation Process is Operationalized

In order to continue to encourage ongoing use of the Consultation Process, gauge its value, and fine tune its mechanism, updates will be shared with this CFSF group, as well as translated into appropriate public information, about when the Consultation Process is used and associated results and analyses.

- **Action Item:** *Collect information about instances when the Consultation Process was used in an outbreak investigation.* Once the Consultation Process has been used in approximately 10 cases, a more thorough evaluation could be conducted and written up. The CFSF participants also suggested collecting these data in real time, for example in an excel spreadsheet, so that metrics to evaluate its effectiveness over time could be standardized as much as possible. These data could then be analyzed to determine what in particular is improving hypothesis generation and other related considerations, and what is not working. This information will assist in developing more specific metrics for evaluation and highlight information to share more broadly, as well as provide opportunities for continuous improvement. *(IFORC and RESOLVE to follow up on this proposed action item.)*
  
- **Action Item:** *Reconvene this core CFSF group via conference call or webinar in approximately 6 months.* While this was the last full CFSF workshop meeting dedicated to this topic, a webinar or conference call, to check in on progress and updates, is of interest *(RESOLVE will take the lead with scheduling in 6 months or so).*
  
- **Action Item:** *Discuss the Consultation Process at meetings, sessions, workshops or other gatherings of stakeholders interested and involved in food safety, including those who might be potential candidates for participation, as well as those not involved directly.* Outreach on many fronts is critical to building familiarity with and transparency of this process, ultimately contributing to its success and credibility:
  - Participants proposed to highlight or roll out the Supply Chain Consultation Process at a Safe Food Forum meeting or other similar event to begin to expand familiarity with, and understanding of, the Consultation Process with those not yet involved or aware of it.
  - Identify venues more specifically targeting to the consumer advocacy community, such as the Safe Food Coalition and Food Policy Conference.
  - Continue information dissemination within and across involved agencies through the IFORC and other agency-specific channels (i.e., CORE, FSIS, and CDC).