

VERMONT AGENCY OF AGRICULTURE, FOOD & MARKETS
FOOD SAFETY CONSUMER PROTECTION DIVISION
Meat Inspection Service
MONTPELIER, VT
Anson Tebbetts, Secretary



MIS DIRECTIVE

Adopted from FSIS Directive 8080.3 Rev.3

8080.3
Revision 3

1/25/23

FOODBORNE ILLNESS INVESTIGATIONS

I. PURPOSE

This directive provides personnel integral program personnel the procedures they are to follow when assisting in the investigation of foodborne illnesses potentially associated with VT-regulated meat, poultry products. It also identifies the factors that trigger a foodborne illness investigation.

II. BACKGROUND

- A. In the state of VT, the VT Department of Health, Division of Health Surveillance, is the Department that conducts Foodborne epidemiological investigations, including foodborne illness. Foodborne illness investigations are conducted regardless of implicated product.
- B. If VT regulated meat or poultry product may be associated with human illness, the VT Department of Health contacts VAAFM Food Safety Consumer Protection in order to coordinate activities, etc.
- C. VDH takes the lead in investigative activities and coordination with other entities, including other state and federal resources.
- D. A foodborne illness investigation is a multi-faceted, multidisciplinary undertaking that includes, but is not limited to collecting and analyzing data from epidemiologic, laboratory, and environmental assessments. The objectives for VAAFM to ascertain from the VDH foodborne illness investigation are to:
 - 1. Determine whether reported human illness is associated with an VT-regulated product;
 - 2. Identify the source and scope, as well as the distribution, of suspect meat or poultry product;
 - 3. Gather information that VAAFM can use to guide its response to ensure that the product associated with illness is not available for consumption;
 - 4. Develop information to guide efforts to prevent further exposure of consumers to the contaminated product;

5. Collect information and evidence that can be used to support or lead to an enforcement action or to recommend the recall of the identified products;
6. Identify contributing factors, including addressing potential system failures; and
7. Recommend actions or new policies to prevent future occurrences.

E Although this directive focuses on foodborne illness associated with microbial hazards, the same process is generally applicable for investigation of foodborne illnesses with other deleterious substances in food.

F. This directive supplements, but does not conflict with or supersede the procedures used by the Vermont Department of Health.

III. ROLES AND RESPONSIBILITIES

A. VT Department of Health, Division of Health Surveillance

1. Functions as the Agency lead and principal coordinator for foodborne illness investigations as well as the conduction of the investigation;
2. Conducts surveillance and initiates the foodborne illness investigation process;
3. Serves as an Agency point of contact for local, state, and territorial public health and agriculture officials;
4. Coordinates requests for information to and from the Centers for Disease Control and Prevention (CDC) Outbreak Response and Prevention Branch (ORPB) and in coordination with the FSIS Liaison to CDC;
5. Analyzes epidemiologic and other investigation-related information;
6. Assists other program areas to ensure factual, technical, and scientific accuracy in public communications;
7. Shares information with other program areas to facilitate effective field investigative activities;
8. Coordinates follow-up and close out meetings and compiles information;
9. Conducts consumer complaint surveillance and investigation activities
10. Coordinates media, consumer, trade group, and stakeholder communication; and
11. Epidemiological branch serves as a point of contact for the public to report problems or illnesses possibly associated with VT-regulated food products.

B. VAAFM may be called upon to assist in the following:

1. Conducts traceback/traceforward activities at official establishments to determine product source and location product in commerce
2. Controls adulterated or misbranded product in commerce;
3. Collects and submits samples of product upon request of VDH;
4. Obtains administrative subpoenas for records, if necessary;

5. Investigates situations that may involve criminal, civil, or administrative activities;
6. Coordinates investigations involving alleged tampering or terrorist activities with the Attorney General Office, and other law enforcement agencies;
7. Assists at official establishments; participates in verification activities or product identification and control.
8. Locates and controls product that has not left the official establishment
9. Conducts in-plant investigations and actions
10. Analyzes, reviews and verifies inspection records
11. Coordinates potential recall activities

C. Vermont Department of Health Laboratory

- a. Performs laboratory testing, including subtyping analyses, of investigation-associated samples and isolates; and
- b. Coordinates requests for laboratory information to and from the CDC PulseNet in coordination with the FSIS Liaison to CDC.

IV. DETERMINING THE NEED FOR A FOODBORNE ILLNESS INVESTIGATION

A. In the state of VT, the VT Department of Health, Division of Health Surveillance, is the Department that conducts Foodborne epidemiological investigations, including foodborne illness. Foodborne illness investigations are conducted regardless of implicated product.

V. PRODUCT SAMPLING AND LABORATORY ANALYSIS

- A. VDH Division of Health Surveillance determines whether to submit case-patient or retail product samples for laboratory analysis.
- B. Investigative sampling: If it is determined that VAAFM should conduct investigative sampling at an implicated establishment or at a retail location, VDH will coordinate with VAAFM. VDH makes science-based recommendations regarding the types and quantities of samples to be collected and the specific analyses to be performed to maximize the chance of generating data that can inform decision making.
- C. Collecting, preparing, and shipping product samples:
 1. Investigator and in-plant personnel responsibilities. When collecting, preparing, and shipping product samples for laboratory analyses as part of a foodborne illness investigation, personnel are to refer to procedures in VT Directive 8010.3.
 2. IPP and investigators are to contact the office if they have any questions on how they are to collect, prepare, or ship product samples collected as part of a foodborne illness investigation.
 3. Office personnel are to notify the affected establishment of the Agency's collection of product samples for laboratory analyses at a retail setting, another inspected establishment or from a case's home.

NOTE: If samples are taken from product that has not moved into commerce, and positive results support that product is adulterated, office personnel notify the establishment that the sampled lot of product cannot enter commerce. This

approach is consistent with the Agency's policy and procedures that require establishments to hold or control product pending certain VAAFM test results.

4. Investigator is to notify the affected retail firm when a product sample in commerce is collected for laboratory analyses.
5. Investigators may coordinate with VDH personnel to assist with the collection of samples from a case-patient's residence.

VI. PRODUCT TRACEBACK AND TRACEFORWARD

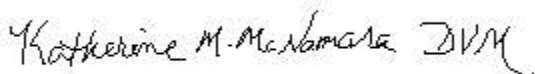
A. VAAFM activities during foodborne illness investigations

1. VDH is to request assistance from VAAFM if more information is needed about product under the control of an official establishment. VDH may need VAAFM to obtain traceback and traceforward information about a product, obtain information about the establishment's suppliers, or locate like- or same-coded intact package product that has not left the establishment, submit product samples for laboratory analyses, collect information about production practices in the plant, or conduct other activities to determine whether there is an association between product and illness. VAAFM may identify the need to perform a public health risk evaluation, (PHRE) and/or food safety assessment (FSA), which may yield information relevant to the investigation.

VII. AGENCY ACTION

- A. If there is a basis to conclude that VT-regulated product contains a pathogen or is otherwise harmful to human health, and the investigation has identified a specific product that VAAFM could recommend be recalled, VAAFM and VDH follow VT Directive 8080.1 and the VDH-VAAFM recall protocol.
- B. The other Agency actions that could occur in response to the findings of a foodborne illness investigation will depend on the evidence collected, and how strongly human illness is linked to an VAAFM-regulated product. Examples of Agency actions other than recommending a product recall or public health alert that may result from a foodborne illness investigation include, but are not limited to:
 1. Increased or enhanced inspection activities;
 2. Investigation at a firm in commerce per Directive 8010.2;
 3. Increased frequency of microbial testing in commerce;
 4. Conduct a PHRE as described in Directive 5100.4, Enforcement, Investigations and Analysis Officer (EIAO) Public Health Risk Evaluation (PHRE) Methodology; perform an in plant FSA per Directive 5100.1, Enforcement, Investigations, and Analysis Officer (EIAO) Comprehensive Food Safety Assessment Methodology or intensified verification testing (IVT) per Directive 10,300.1, Intensified Verification Testing (IVT) Protocol for Sampling of Product, Food Contact Surfaces and Environmental Surfaces for *Listeria Monocytogenes* (Lm).

Refer questions through supervisory channels.



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