

**AFTER ACTION REPORT**

**OPERATION PRAIRIE STATE**

**JULY 20, 2006**

**FOOD SAFETY AND INSPECTION SERVICE**

**FINAL REPORT**  
**SEPTEMBER 15, 2006**

## **Background**

The U.S. Department of Agriculture (USDA) is actively addressing the need to maintain the safety and defense of the country's food supply. During a crisis, it is critical that the Department be able to efficiently and effectively coordinate with its counterparts at the state and local level, as well as within other Federal agencies and the private sector. On July 20, 2006, USDA's Food Safety and Inspection Service (FSIS) conducted Operation Prairie State in Chicago, IL and at FSIS headquarters in Washington, DC. The Operation Prairie State Exercise focused on the roles of Federal, state, and local government agencies and the food industry to work together to detect, respond to, and recover from a non-routine emergency incident. Emphasis was placed on a team approach to incident response, coordination, integration of capabilities, problem identification, and resolution through preparation, response, recovery, and multi-agency coordination. The exercise offered FSIS the opportunity to test and validate operating guidelines and directives for responding to a non-routine incident involving the intentional adulteration of food products within an FSIS inspected facility. The ultimate goals were:

- Minimizing suffering, loss of life, and personal injury
- Minimizing damage to property
- Minimizing disaster- or emergency-related service disruption, which would have an adverse impact on the government, the communities, and the businesses and their employees, reputation, and product brand names

This report identifies areas of strength and weakness that were observed during the exercise and offers recommendations for improvement.

## **Objectives**

Operation Prairie State focused on enhancing the coordination and communication between FSIS, other regional Federal agencies, state and local government agencies, and industry stakeholders. The objectives for Operation Prairie State were to clarify roles and responsibilities and improve coordination and communication among:

- FSIS Program Offices and associated field staffs
- State and local public health and emergency response agencies
- Primary Federal emergency response organizations
- Private sector stakeholders in the food industry

## **Strengths of the Exercise – What Worked Well?**

The exercise involved strong participation by the following stakeholder groups:

- FSIS field and Headquarters personnel from OFO, OPEER, OPHS, OIA, OM, OPPED, OPAAEO and OFDER
- Staff from FDA, FBI, and FEMA Region V
- Illinois government agencies, including the Illinois Department of Public Health, Illinois Department of Agriculture, Illinois Emergency Management Agency, and the University of Illinois Medical Center
- DuPage County, City of Chicago Department of Public Health
- Food industry, including Cargill, Kraft, Jewel-Osco, Schad Meats, Rochester Meat Company, U.S. Foodservice,

Participants were actively engaged in the exercise. There was open dialogue and good networking among stakeholder groups.

## **Areas for Improvement – What Did Not Work Well in the Exercise?**

The scenario did not address sampling and laboratory issues that could be significant in an actual incident.

The Local EOC initially refused industry participation. Industry stakeholders were later told that they could participate in the Local EOC if they signed a Non-Disclosure Agreement.

The Local EOC agreed to share information with the State Unified Command. However, there was some confusion about whether the Local EOC would share information directly with FSIS, or if the lines of communication between the Local EOC and FSIS would need to run through the State Unified Command.

Participation by Regional EPA and State environmental representatives would have helped with the discussions about facility decontamination and product disposal.

## **Incident Command System (ICS) Issues**

*What triggered each stakeholder group to organize into or participate in a multi-agency incident command structure?*

- Local/County – Local law enforcement talking to public health about adverse health effects from restaurants and other institutions triggered decision to activate OEM. Requests from multiple sources exhausted local resources, so support was requested from State of Illinois.

- State – EOC activated based on potential regional nature of public health impact and scale and scope of incident; also based on unusual symptoms and suspicious circumstances
- FSIS – FSIS ICS structure activated early based on scope of incident and multiple stakeholder (e.g., local and state government agency) involvement.
- Other federal – triggers vary by agency; i.e., FBI - reports of product tampering: FDA - Regional Office contacted by state EOC; Regional Office notifies FDA Headquarters and Office of Criminal Investigations
- Industry – Request from local law enforcement; standard industry emergency management/crisis management response actions. Industry eventually sent representatives to participate in the FSIS ICS structure and the state EOC as subject matter experts.

*What was the effectiveness of the ICS structure for this exercise?*

- Federal, state, and local government stakeholders generally felt that the ICS structure helped improve communications among the different groups.
- The processing industry representatives were first rebuffed by the local ICS, then went to FSIS for input to the ICS structure. Retail industry representatives found it easier to work with state representatives in the Unified Command.

*Who was in charge?*

- There was some confusion by industry about who was in charge at different phases in the exercise (e.g., local law enforcement in Phase 1), although processing industry representatives typically work with FSIS.
- FSIS initially took control of the product and worked with industry to obtain product distribution information.
- Initial Incident Command was in charge at the local level.
- The state assumed command once the EOC was activated.
- Local law enforcement and then FBI would take charge of the criminal investigation but not of public health protection.

*Were decisions coordinated among stakeholder groups?*

- Federal and state agency participants felt that there was generally good coordination among decision makers, as appropriate (e.g., joint press releases, referral of questions to the Unified Command).
- Local participants felt that there was coordination with the state, but coordination with industry was less effective.
- Industry participants felt that decisions were not coordinated initially (e.g., recall decision), but that coordination improved as the response actions continued to unfold.

## **Other Observations**

Some stakeholders commented that a better understanding of the jurisdictional issues among law enforcement and the public health agencies would be helpful.

FSIS should examine existing recall procedures to determine if they need to be modified for incidents involving intentional adulteration of food products. Although the objective of recalls is protection of public health, some of the details of implementation in an intentional adulteration scenario, such as accumulating products and returning them to centralized locations or staging areas, may require further consideration and coordination than typical industry voluntary recalls.

## **Recommendations**

FSIS should work with FBI to develop a plan to coordinate public health and criminal investigation sampling activities in the event of an actual incident.

FSIS Headquarters representatives should be encouraged to attend the exercise and work with other stakeholders in the same room in a true “tabletop” environment.

Better coordination and communication among all stakeholder groups is needed. In particular, government at all levels needs to work with industry to help industry understand the ICS structure and the role of the private sector in ICS.

Stronger participation by state and local emergency management personnel would add realism and strength to the exercise.

Since Federal agency response actions may be influenced by DHS alert levels, a better understanding is needed of DHS’ decision making process for changing alert levels in an intentional adulteration incident.