

Operation
“Flu for Thought”

FSIS
HUMAN PANDEMIC EXERCISE

MARCH 7, 2007

FINAL SUMMARY REPORT
MARCH 22, 2007

Background

Concerns exist about the potential for avian influenza to mutate into a human to human transmissible strain and potentially cause an influenza pandemic. The Homeland Security Council's Implementation Plan for the National Strategy for Pandemic Influenza requires Federal departments and agencies, including FSIS, to develop operational plans addressing considerations raised during a pandemic, including protection of employees, maintenance of essential functions and services, support of the Federal response, and the communication of messages about pandemic planning.

FSIS has an essential role as part of the ongoing federal efforts to prepare for the possibility of a human pandemic influenza. FSIS is actively addressing the need to coordinate response actions in the event of a pandemic in the United States. During a crisis, it is critical that FSIS be able to efficiently and effectively coordinate with its staff in the field to maintain essential functions.

In accordance with USDA guidance, operational plans in the event of a human influenza outbreak or pandemic are to be tested/exercised on a routine basis. FSIS' *Human Pandemic Operations Plan* (November 2006) states that the Agency's plan will be tested on an annual basis. On March 7, 2007, FSIS conducted a tabletop exercise simulating an influenza pandemic. The exercise, held at USDA's Emergency Operations Center in Washington, DC and at the FSIS Atlanta District Office, provided an opportunity to:

- test and validate the *FSIS Human Pandemic Operations Plan*;
- identify gaps in the Agency's current capabilities, policies, and procedures;
- identify where pandemic plans need to be refined or modified;
- raise awareness about the impact of pandemic influenza on FSIS operations; and
- increase understanding of the responsibilities of FSIS Program Offices and Local Human Pandemic Coordinators.

This report provides a high level summary of the issues discussed at the exercise. It also outlines the action items identified for revision of the Agency's plan, and describes the next steps in the Agency's program to strengthen preparedness for human pandemic influenza.

Goals of the Exercise

The exercise was focused on the following objectives:

1. Test the *FSIS Human Pandemic Operations Plan*
 - Communications
 - Coordination
 - Response actions
2. Stimulate interactions among:
 - Department, including Office of Food Safety
 - FSIS Headquarters/Emergency Management Committee
 - FSIS Local Human Pandemic Coordinators (LHPCs)
 - Area 20 (Delaware, Maryland, District of Columbia & Virginia)
 - Area 22 (Georgia)
 - Area 25 (FSIS Headquarters)

Participants

The exercise involved the participation of a total of 23 players from the following stakeholder groups:

- Department - USDA – including the Deputy Assistant Secretary for Administration, as the USDA Human Pandemic Coordinator, and the Deputy Under Secretary for the Office of Food Safety, as the Food Safety Human Pandemic Action Officer.
- Food Safety and Inspection Service – including the Administrator and representatives from the Office of Food Defense and Emergency Response (OFDER); Office of Public Affairs, Education and Outreach (OPAEO); Office of International Affairs (OIA); Office of Program Evaluation, Enforcement and Review (OPEER); Office of Field Operations (OFO); Office of Policy, Program & Employee Development (OPPED); Office of Public Health Science (OPHS); and Office of Management (OM), as well as representatives from Area 20, Area 22, and Area 25.

Issues Discussed

1. Employee Tracking

Several aspects of the Agency's ability to track its employees during a pandemic were discussed at the exercise, including the following:

Responsibility – The Plan currently identifies the LHPCs as the individuals responsible for tracking employees in each Area. However, several participants noted that some Program Offices are developing systems to track employees, and suggested that employee tracking during a pandemic might be more effectively executed by the Programs.

Tracking Systems – The Plan currently states that in the event of a near-term pandemic, LHPCs will manually collect, compile and report employee absenteeism information to OFDER. The Plan also discusses automated systems that are under development which could be utilized in the event of a future pandemic. Participants suggested that automated reporting systems currently under development (e.g., AssuranceNet, AgWorks), which provide information on much of the Agency's field staff, should be used to maximize efficiency, reduce transcription reporting errors, and minimize the burden on District Offices. The need for a redundant system (e.g., telephone-based system included in the Plan), to use in the event that automated systems are not functional, and for staff across all Program Offices, was also identified and discussed.

Employee Travel - In the event of an outbreak of an influenza pandemic overseas, it would be critical for FSIS to identify which, if any, employees had been or were presently in those affected countries. Although it would be possible to determine which employees in the effected countries were on official business, it may not be possible to identify employees who were on vacation or personal travel.

Action Triggers:

At what stage does FSIS begin tracking employees? Is this determined at the Department level, or should it be specified in the Plan?

Suggested Actions:

Hold an "FSIS Employee Tracking System Summit" to discuss the issues and establish a timeline for decisions and implementation. Unlike previous FSIS workgroups that have evaluated this requirement, participants in the Summit should have decision-making and funding authority.

2. Location-Specific Implementation of Plan Elements.

The Plan discusses decision triggers for response actions, including implementation of employee tracking, social distancing, and communication messages. The participants suggested that as Area Plans are revised, consideration should be given as to whether the timing of these decisions should be regionally-based instead of Agency-wide. For example, if we can identify gateway locations:

- Will employees at gateway locations be tracked differently or sooner?
- Will social distancing recommendations be implemented sooner at gateway locations?
- Will specific communication plans need to be prepared for gateway locations?

Suggested Actions:

Revise Area Plans to address the potential need for local triggers.

3. Revisit Customs and Border Protection Rule Sets

There was general discussion about the need to consider reviewing the Agency's current Rule Sets with DHS Customs and Border Protection (CBP) in the event of a pandemic. These rule sets identify high risk imported products. In the event of a pandemic that originates overseas, the CBP Rule Sets specific for a pandemic could be developed for and applied to pandemic-affected countries and/or products to provide additional scrutiny and preclude entry of the pandemic virus into the U.S. through packages and other fomites.

Suggested Actions:

OFDER will work with CBP to develop Rule Sets specific for a pandemic.

4. Federal-State Coordination

The exercise participants discussed several issues related to working with state agencies in response to a human pandemic.

State Preemption - Every state is sovereign and, therefore, is able to make determinations about response actions to protect the health and welfare of its citizens in the event of a human pandemic. States may begin making unilateral decisions. If this happens, how does FSIS ensure delivery of essential functions? Several areas of concern were discussed, including the following scenarios:

- Can a state mandate a federal establishment to operate without a federal inspector to mitigate a shortage in the local food supply?
- If the state decides to implement social distancing plans by closing a state building, how would FSIS offices/staff in the building react?
- What happens if a state implements its plan, and the actions impact FSIS' ability to deliver essential functions? For example, suppose a state decides to close its borders, close public schools, or impose restrictions upon state employees in the event of a human pandemic, how would FSIS offices/staff in the state react?

State-Federal Partnerships – Several participants suggested that the Area LHPCs should be actively involved in working with state emergency response coordinators. Enhanced lines of communication with partner state agencies may help address concerns such as the following:

- What if the states begin to ask for FSIS personnel for assistance with their essential functions? How should these requests be handled?
- Do the states know who to contact at FSIS in an emergency?
- Is FSIS actively participating with the states as they develop and implement their pandemic plans?

Suggested Actions

State Preemption

1. According to the Department, in the event of a pandemic, FSIS staff will be considered Critical Infrastructure Personnel. This designation will facilitate access and movement across state borders. However, coordination with the states still will be required.
Action: Identify and prepare FSIS staff for deployment as critical emergency personnel (e.g., “Grab and Go” kits, credit cards).
2. According to the Department, designation as Critical Infrastructure Personnel will also mean that FSIS staff will have priority consideration for vaccination when the vaccine becomes available.
Action: FSIS needs to develop a plan for vaccine administration.

3. FSIS needs to understand state public health emergency laws and consider their impact on limiting federal authority in revising Area Plans.

State-Federal Partnerships

1. Since USDA will review state emergency response plans, the Department has an opportunity to provide input on federal contacts. FSIS Local Human Pandemic Coordinators (LHPCs) for each Area should be identified as the points-of-contact for coordination on all pandemic preparedness and response planning, including implementation of social distancing. The LHPCs should also participate in state ICS structures.
2. LHPCs should reach out to state pandemic staff for participation in FSIS Area Incident Coordination Teams.
3. FSIS should conduct additional human pandemic exercises with state agencies. A suggestion was made to consider adding a human pandemic component to the FSIS-OFDER's regional food defense emergency response exercises.
4. Food Shield directories should include state contacts for pandemic preparedness, response, and recovery.

5. Tele-Working Capabilities

The FSIS *Human Pandemic Operations Plan*, specifically the Social Distancing Plan included in Annex F, identifies tele-working as a mechanism to assist in ensuring delivery of essential functions upon implementation of social distancing plans. However, discussions during the exercise indicated that the Agency's capabilities for tele-working need to be further refined.

Suggested Actions

1. Prioritize the re-imaging of computers for essential personnel
2. Examine feasibility of utilizing Blackberrys as a tool for high speed internet access for essential employees
3. Periodically revisit tele-working capability as new technology becomes available

6. Alternative Staffing Options

In the event of a human pandemic, FSIS must have staffing options to ensure delivery of essential functions. Options should include possible cross-utilization of state and federal personnel across program and agency lines.

Suggested Actions

1. Develop a crash training course for personnel to be deployed to in-plant line positions
 - a. develop in a format compatible with distance learning for self-administration
 - b. Test utility of training tool and revise content as needed.
2. Consider and address pandemic-driven requirements on FSIS personnel, e.g., requests to staff ESF functions.

7. Industry Coordination

During the exercise, a number of discussions involved FSIS' interactions with industry. In the event of a pandemic, industry will most likely be experiencing its own shortage of personnel and dealing with the same issues with respect to raw material procurement and transportation of finished products as other infrastructure sectors. It will be critical for FSIS to maintain communication with industry. In order to keep establishments running, it may be necessary to consolidate plant operations within a local area to maximize the utilization of available personnel resources. Industry may not be familiar with FSIS' human pandemic response plan.

Suggested Actions

1. Work with associations (at national level) and companies (at local level) to develop agreements on plant operation levels at the varying levels of FSIS staff absenteeism expected during a pandemic. Proactively create local MOUs with industry to address potential operational consolidations.
2. Conduct additional human pandemic exercises with industry participation.
3. Develop staffing and deployment strategies

8. Priority Facility Access

During a human pandemic, certain FSIS employees may need priority access to USDA facilities that may have been closed to perform their essential functions. For example, Office of the Chief Information Officer (OCIO) staff need access to the Agency servers located in USDA HQ, Washington, DC for maintenance and repairs in order to allow other FSIS staff to work remotely. OFDER staff may need access to classified documents which are stored in secure facilities at USDA Headquarters.

Suggested Actions

1. Determine priority facility access requirements of other Program Offices
2. Establish priority access agreements at GSA building locations for certain personnel
3. Assess the feasibility of moving back-up servers to an alternate location outside Washington, DC.

9. Review Other Agency Human Pandemic Plans

As FSIS revisits its Plan, the Department suggested that the human pandemic plans of other federal agencies (e.g., U.S. Public Health Service) should be reviewed for guidance to inform and/or features (e.g., levels of operation; volunteer outreach) that can be incorporated to help the Agency improve its preparedness.

Next Steps

At the end of the exercise, the following next steps were discussed:

1. Complete action items to resolve the issues identified during the exercise
2. Revise Plans to address resolution of the issues, remembering to:
 - Anticipate changes; and
 - Consider dual uses
3. Conduct additional human pandemic exercises with state and industry participants
4. Based on results of future exercises, revise Plans and retest at least annually

Appendix A

Comments from the Exercise Evaluation Forms

Twenty of the 23 players (87% of participants) completed an exercise evaluation form. Their feedback is summarized below.

Strengths of the Exercise

Overall

- The majority of participants stated that the exercise was useful and an “excellent start”. Respondents to the evaluation felt that the exercise was an excellent way to begin the discussion of how FSIS would respond to a pandemic.

Areas for Improvement

Injects

- Some participants felt the injects were too general and that more specific information on absenteeism would have allowed for greater interaction and provided an opportunity to develop problem-specific responses.

Expand the Participant List

- Many participants stated that the exercise should be expanded to include more stakeholders, specifically industry and state and local representatives.

Logistics and Materials

- One participant asked that a copy of the FSIS Human Pandemic Operations Plan be provided to all participants in future exercises.
- Two participants requested that exercises be limited to a half day.
- Another respondent asked that the written report be circulated to all participants.
- One participant suggested that an “Exercise 101” be given prior to the start to teach the players how to maximize the exercise experience.

Plan Issues/Revisions Recommendations

- Employee tracking
- Tele-work capability
 - OM confirmation of technology access
 - Agency laptop procurement policy
- Social distancing implementation/deactivation (i.e., gateway locations)
- Logistics on in-plant staffing/deployment
- Communications plans (internal and external)
- Determine minimum essential functions staffing needs in each Area
- Priority facility access/COOP
- Employee training
- Policy for critical and essential personnel, driven by designation as critical infrastructure
- State/local contacts for LHPCs
- Review state public health laws and CDC Quarantine Division for framing of federal authority in public health response