

After Action Report

Operation Keystone State

FSIS-State Food Defense Partnership Exercise

January 17, 2008

Food Safety and Inspection Service

**Final Report
February 25, 2008**

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 January 17, 2008, USDA's Food Safety and Inspection Service (FSIS) conducted a tabletop exercise, "Operation Keystone State", in Philadelphia, PA and at FSIS headquarters in Washington, DC. The 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; and
- 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 strengths and weaknesses that were observed during the exercise and offers recommendations for improvement.

Objectives

Operation Keystone 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 the exercise 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; and
- Private sector stakeholders in the food industry.

Strengths of the Exercise – What Worked Well?

The exercise involved participation by the following stakeholder groups:

- FSIS field and Headquarters personnel from OFO, OPEER, OPHS, OIA, OM, OPPD, OPACE and OFDER
- Staff from FBI, FDA, DHS, FEMA, APHIS, USDA Office of Inspector General, and the U.S. Attorney's Office
- State of Pennsylvania government agencies, including the Department of Health, Department of Agriculture, Pennsylvania Emergency Management Agency, and the Pennsylvania State University
- Local stakeholders, including Philadelphia Department of Public Health, Philadelphia Office of Emergency Management, and Southeastern Pennsylvania Regional Counter Terrorism Task Force
- Food industry, including the National Restaurant Association, Pennsylvania Food Merchants Association, Pennsylvania Restaurant Association, and the Hershey Company.

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

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

Exercise Structure

Several participants suggested that representation from regional EPA, Pennsylvania Department of Environmental Protection, local law enforcement and hospitals, and representatives from the meat and poultry industry would have improved the exercise.

Several participants commented that the pace of the second half of the exercise was too slow, with too few injects. Also, less time should be allowed for discussion within stakeholder groups and more time should be allowed for the debrief periods at the end of each phase.

Comments about the scenario included suggestions for reducing the number of injects; providing a more real-life timeline; and revising injects to more realistically reflect: (1) the additional clinical information likely to be available early in the scenario; and (2) likely industry responses.

Communication/Coordination

Participants should be cautioned about the use of acronyms, particularly in early phases of the scenario.

Stakeholder group Public Information Officers (PIOs) should be encouraged to participate in future exercises.

Some participants commented that they found the communication reminders were helpful, whereas, others stated that they were already doing what was communicated in the reminders.

Many participants noted that the exercise illustrated the need to improve communication and coordination among all stakeholder groups, especially with regard to creating a unified message. One commented that consumers often call for a single food safety agency after events like the exercise scenario because of the observed lack of coordination and communication among federal, state and local government agencies.

A number of participants felt that an Incident Command System (ICS) structure was lacking. An industry participant commented that it was not clear which organization was in charge of various response activities.

Incident Command System (ICS) Issues

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

- Local – hospital reports of public health impacts triggered city-wide response
- State of Pennsylvania – request for support from local government
- FSIS – public health outcomes of incident (illnesses, deaths)
- Industry – public health outcomes

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

- Local – coordination effective; early establishment of an Emergency Operations Center, Health Alert Network and EPI-X messages, and existing partnerships were key strengths.
- State of Pennsylvania – ICS effectiveness is improving; more frequent exercises lead to improvements
- FSIS – effective, but resources could have been better utilized
- Industry – difficult to comment on effectiveness of ICS structure

Who was in charge?

- Local – initial Incident Command was at the local level (local public health); then FSIS
- State of Pennsylvania – State response tracked through emergency support functions (Pennsylvania Emergency Management Agency Director); within 72-hours Emergency Council (all Agency Directors and Governor’s office) meets
- FSIS – local government initially; then FSIS
- Industry – not clear

Were decisions coordinated among stakeholder groups?

- Local – yes
- State of Pennsylvania – most stakeholder group representatives had not met before the exercise, so exercise helped participants get to know each other
- FSIS – stakeholders attempted to coordinate on decisions
- Industry – industry requested more involvement in decision making

Other Observations

The Local Government stakeholder table commented that discussion of product sampling and laboratory testing issues was fragmented and deserved more attention.

Industry participants commented that government agencies should be more aware of the 24-hour news cycle (press conferences are not enough), and more sensitive to the need for rapid responses to media requests. Therefore, incorporation of more realistic communication/media elements into the scenario would be helpful.

Government representatives should consult with industry to improve their understanding of the types of information industry could provide to enhance emergency response actions. Industry has a large network and can provide more background information in a more timely manner than reflected in the exercise scenario.

There was some confusion about the roles of FSIS versus FDA in regulating the products described in the scenario, and about how FSIS coordinates with other stakeholder groups.

Industry participants also commented there was little two-way communication – when contacted, industry was asked questions, but rarely informed about status by other stakeholder groups.

One participant commented that the focus of the exercise should be on roles and responsibilities of various stakeholder groups rather than on generating messages for the public.

Recommendations

A handout should be prepared on the sampling and laboratory analysis issues discussed in the scenario to help government agencies interested in revisiting treatment of these issues in their emergency response plans and procedures.

More discussion and coordination of disposal/decontamination issues with representatives from stakeholder groups that can help with response actions (EPA, Pennsylvania Department of Environmental Protection) is needed.

Improve coordination and communication among government agencies at all levels and industry to help industry understand the ICS structure and the role of the private sector in ICS.