USDA Foods Recalls

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Overview

• Food and Nutrition Service responsibilities in USDA Foods recall
• Understand State and school roles and responsibilities in keeping children safe from illness or injury when USDA Foods are recalled
• Identify tools and strategies to communicate and receive USDA Foods recalls
Concerns About Food Safety

Food safety is a serious public health issue

- About 48 million people get sick per year (1 in 6 Americans)
- 128,000 are hospitalized
- 3,000 die
Food Recalls

• An action to remove food products from commerce when there is a reason to believe the products may be unsafe, adulterated, or mislabeled.

• The action is taken to protect the public from products that may cause health problems or possible death.
Recall Communication

Food Manufacturer — Consignee

FSIS — Recall Press Release
Office of Food Safety

• Provide food safety technical assistance, education, and training

• Increase awareness, visibility, and impact of food safety on USDA nutrition assistance programs

• Represent FNS programs in the wider Federal and State food safety community

• 24/7 coverage of food safety issues due to possible adverse health consequences to our recipients

OFS and FNS have no regulatory authority
Office of Food Safety

• Liaison to Federal food safety regulatory agencies:
  • Food Safety Inspection Service (FSIS)
  • Food and Drug Administration (FDA)

• Monitor USDA Foods complaints for food safety concerns

• Monitor and review recall FSIS and FDA surveillance

• Work with Food Distribution to identify if recall involves USDA Foods
Food Distribution Division

• Notify State Distributing Agencies of USDA Foods recall
• Rapid Alert System in Web Based Supply Chain Management (WBSCM)
• Instructions on what to do with product
Food Distribution Division

• Provide specific product information:
  • Vendor name
  • Brand name
  • Case markings
  • Contract number
  • Sales order number
  • Product tracking information (can codes, lot numbers, product date (use-by date))
Food Distribution Division

• Collect reimbursement claims and destruction verification forms from SDA
• Verify forms are complete and accurate
• Submit claims to AMS for payment
• Conduct an after-action with OFS to discuss what went right and lessons learned
USDA Foods Options

Direct Delivery

Bulk for Processing

USDA DoD Fresh Fruit and Vegetable Program
USDA Foods Direct Delivery

- Products purchased by USDA
- FDD will notify SDA if direct delivery USDA Foods product is recalled
- Provide instructions for what to do with product
- Reimburse or replace recalled product
USDA Foods Bulk for Processing

- Bulk products purchased by USDA
- FDD will notify National Processing Agreement (NPA) processors and SDAs if bulk USDA Foods they received was recalled
- NPA processor determines if recalled product was substituted with commercial product
USDA Foods Bulk for Processing

- Recall of USDA Foods shipped to NPA processor
- FDD notifies NPA processor
- Processor determines recalled product was used to produce end products
USDA Foods Bulk for Processing

• NPA processor notifies SDAs, SFAs and distributors received USDA Foods
• Distributors provide inventory information to processor
• SFAs provide information to SDA
• Processor compiles information, reports to SDA and FDD
• USDA Foods vendor responsible for replacement or reimbursement
USDA Foods USDA DoD Fresh

• FDD manages the USDA DoD Fresh Program
• Department of Defense (DoD) manages the contracts with produce vendors
• Produce vendors notify schools if produce is recalled
Timely Response to Recall is Critical
State Roles and Responsibilities

Prior to a recall:

• Assign State Food Safety Coordinator and alternate
• Annually update their contact information in Web Based Supply Chain Management (WBSCM)
• Develop and annually train staff on recall procedures
• Establish a notification system
  • State Emergency Notification System (SENS)
• Be knowledgeable of local waste disposal regulations

USDA Foods in Schools
State Roles and Responsibilities

During a recall:

• Immediately notify Recipient Agencies, in-state processors, and distributors

• Provide product identification information and product disposal instructions

• Request product quantity and location information be sent to State within defined time period

• Compile inventory data submit to FNS
State Roles and Responsibilities

After a recall:
• Complete and submit recall reimbursement claims and destruction verification forms to FDD
• Conduct an after-action to discuss what went right and lessons learned
Recipient Agencies Roles and Responsibilities

Prior to a recall:

• Assign State Food Safety Coordinator and alternate
• Provide their emergency contact information to SDA and keep information updated
• Develop recall procedures
• Train all staff on recall procedures
• Be knowledgeable of SDA’s recall communication tool
Recipient Agencies Roles and Responsibilities

During a recall:

• If RA further distributes food, immediately notify all sites of recall
• Provide product identification information and product disposal instructions
• Isolate recalled product and label “Do Not Use”
• Request product quantity and location information be sent to State within defined time period
• Compile inventory data and submit to SDA
Recipient Agencies Roles and Responsibilities

After a recall:

• Follow instructions for destruction/disposal of product
• Complete and submit recall reimbursement claims and destruction verification forms to SDA
• Participate or conduct an after-action to discuss what went right and lessons learned
Food Safety Regulatory Agencies

After a Recall FSIS and FDA Conduct Effectiveness Checks

• Verification customers have been notified of recall and product is no longer available
• Conducted by FSIS and FDA field staff
• No prior notification given
Recall Resources – SDA Recall Checklist

**USDA FOODS RECALL PREPAREDNESS & RESPONSE CHECKLIST**
**STATE DISTRIBUTING AGENCY RESPONSIBILITIES**

State Distributing Agency (SDA): Agency that administers one or more USDA nutrition assistance programs in a state; also referred to as the State Agency.

### Prior to a recall
- Have recall procedures in place.
- Ensure all State Agency staff is aware of, and trained, in recall procedures.
- Assign a State Food Safety Coordinator and an alternate. Ensure their name, title, and contact information is updated annually in Web Based Supply Chain Management (WBSCM). Contact information should be provided for 24 hour access to speed the notification process.
- Designate at least two food safety contacts at each of the State’s recipient agencies (RAs).
- Establish a notification system for food safety contacts at RAs. SDAs may use the free, USDA provided, State Emergency Notification System (SENS), or another communication system/method of their choosing. The system effectiveness should be verified at least annually.
- Become familiar with State or local requirements for solid waste disposal. Information on proper methods of disposal must be obtained from state or local agencies responsible for environmental protection and/or solid waste regulations.

### Upon notification of a recall
- Contact RAs as soon as possible, but within 24 hours or less, after receiving recall notification. To the extent possible, SDAs should confirm receipt of the notification by RAs to ensure the message was received and understood.
  - Be sure to provide product identification information needed by RAs to track the product.
  - Provide instructions on handling the affected food, as directed by FNS.
  - Provide specific product disposal instructions, as directed by FNS, based on state/local solid waste regulations.
- Contact the in-state processors and state contracted distributors, directing them to handle the affected product, as directed by FNS.
- Instruct RAs, processors, or distributors to provide the SDA, within a directed timeframe:
  - The location and amount of recalled product remaining in storage.
- Compile inventory data provided from RAs, processors, or distributors. Submit data to FNS on the WBSCM recall response form, in accordance with FNS instructions.

### After a Recall
- Complete recall reimbursement claims paperwork, and submit to FNS.
- Conduct an “after-action” meeting to discuss what went right and lessons learned.

### Resources
- Responding to a Food Recall
- FNS Office of Food Safety
- WBSCM
- SENS
- USDA Commercial Food Recalls
- FDA Commercial Food Recalls
Recall Resources – RA Recall Checklist

Recipient Agencies (RA): Agencies authorized to receive USDA Foods for distribution to eligible recipients, for use in meals served to eligible recipients, or for distribution to other recipient agencies in accordance with an agreement with a State Distributing Agency. A School Food Authority is an example of a recipient agency.

Prior to a recall
- Have recall procedures in place.
- Ensure all Recipient Agency (RA) staff is aware of, and trained in, recall procedures.
- Assign a food safety coordinator and an alternate. Ensure their name, title, and contact information is provided to the State Distributing Agency (SDA). Contact information should be provided for 24 hour access to speed the notification process.
- If the RA further distributes food, maintain a contact list for RA serving sites, distributors, and other recipients. It must be possible to trace recalled food to the final recipient.

Upon notification of a recall
- If the RA further distributes food, notify all sites about the recall as soon as possible. To the extent possible, RAs should confirm receipt of the notification by sites to ensure the message was received and understood.
  - Be sure to provide product identification information needed by sites to track the product.
  - Provide instructions on handling the affected food as directed by the SDA.
  - Provide specific product disposal instructions if directed by the SDA.
- Find and isolate the affected product and label “DO NOT USE” to avoid accidental use.
- Conduct an inventory assessment, ideally in 48 hours or less, of affected product:
  - Amount remaining in stock and location (school, warehouse, distributor).
  - Further distributed to program participants.
  - Redirected for further processing.
- Submit the inventory assessment information to the SDA within the directed timeframe.
- Follow applicable storage/destruction/disposal instructions provided by the SDA.

After a Recall
- Conduct, or participate in, an “after-action” meeting to discuss what went right and lessons learned.

Resources
- Responding to a Food Recall
- FNS Office of Food Safety
- Handling a Food Recall SOP
- USDA Commercial Food Recalls
- FDA Commercial Food Recalls
Recall Resources

• FSIS Recalls

• FDA Recalls
  https://www.fda.gov/Safety/Recalls/default.htm
Recall Resources

• Responding to a Food Recall Procedures for Recalls of USDA Foods
Recall Resources

• USDA Foods Recall Preparedness and Response Recall Videos and Checklist
  • State Distributing Agency Responsibilities
  • Recipient Agency Responsibilities

State Emergency Notification System

We have found that SENS provides us with an efficient and robust tool for communicating rapidly with our Recipient Agencies. The flexibility is setup pre-determined lists for who is to be contacted and how they are to be contacted, in a given situation. gives us the ability to quickly and efficiently communicate with our agencies.

We like that!

Woody Lewis
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https://www.fns.usda.gov/ofo/state-emergency-notification-system