

STATE OF MICHIGAN
RICK SNYDER DEPARTMENT OF AGRICULTURE
GOVERNOR AND RURAL DEVELOPMENT

GORDON WENK DIRECTOR

Scan Dunleavy

DATE: July 9, 2018

TO: All Local Health Departments (LHDs)

Attn: Medical Director / Health Officer / Environmental Health Director

FROM: Sean Dunleavy, Manager

Quality Assurance Unit Food and Dairy Division

SUBJECT: Foodborne Illness Reporting and Documentation for Minimum Program Requirement (MPR) Compliance

This memo has been coordinated with Michigan Department of Health and Human Services (MDHHS) and replaces the February 3, 2006 memorandum entitled "Foodborne Illness Reporting and Documentation for Minimum Program Requirement (MPR) Compliance". Investigations conducted in accordance with this guidance will generally be considered to have met the intent of the current Minimum Program Requirements.

The following areas are addressed:

- 1. Standard operating procedures for foodborne disease surveillance and investigating foodborne illness outbreaks
- Initial documentation and data collection by local health departments (LHD)
- 3. Foodborne illness log record keeping and review requirement
- 4. Notification of State Agencies by LHD
- 5. Documentation and submittal of investigation findings

1. Standard operating procedures for foodborne disease surveillance and investigating foodborne illness outbreaks

- A. Document standard operating procedures for foodborne disease surveillance and investigating foodborne illness outbreaks that include:
 - (1) A description of the foodborne illness investigation team and the duties of each member. (MPR 16)
 - (2) Identify who will review log or tracking system for trends and how the reviews will be documented. (MPR 16)
 - (3) Outline the methods used to communicate foodborne illness as stated in the Food Law 3131(1) "A local health department shall develop and implement a communications system with other applicable governmental agencies, individuals, and organizations including, but not limited to, hospital emergency rooms and state and local police. The communications system shall provide the means to contact specific local health department employees and basic information necessary to initiate a foodborne illness outbreak investigation. The information provided in the communications system shall be updated annually." (MPR 16)

2. Initial documentation and data collection by local health departments (LHD)

- A. Record initial illness complaint by use of:
 - (1) Form A, or its equivalent (MPR 16), OR
 - (2) Agency electronic database (MPR 16)
- B. Intake must document the dates and times that initial reports of alleged foodborne illness are received and the date and time the investigation is initiated. All foodborne illness complaint investigations must be initiated within 24 hours. (MPR 15) (MPR 16)
- C. For complaints alleging foodborne illness, use ANY OF THE FOLLOWING in paper or electronic format to conduct interviews of both ill people and those who were also identified in the complaint who may not have been ill: (MPR 16)
 - (1) LHD electronic database form
 - (2) IAFP form C1/C2 OR equivalent
 - (3) Michigan Gastrointestinal Illness Complaint Interview Form,
 - (4) MDSS interview form or:
 - (5) An outbreak-specific questionnaire (if one is used).

NOTE: Persons with reportable laboratory confirmed illnesses must be entered into the Michigan Disease Surveillance System (MDSS)

3. Foodborne illness log record keeping and trend review requirements

- A. The foodborne illness complaint log (MPR 16) may take the form of:
 - (1) a paper log;
 - (2) electronic data-base
- B. Review log for trends each time an entry is made to discover potentially related cases and/or involvement of a common implicated food or place that might otherwise go undetected. (MPR 16)
- C. Document the date of this review and who completed the review on the complaint intake form or in the complaint database. (MPR 16)
- D. When an agency has multiple geographically separated offices, periodically share with or send copies of logs to a central coordinating office for review.

4. Notification of State agencies by LHD

- A. Outbreak Notification -
 - (1) Immediately notify MDARD of potential foodborne outbreaks by emailing an illness complaint information Form A or equivalent to MDARD's Emergency Response and Enforcement Unit (EREU) at MDARD-MI-FSPR@michigan.gov, even if telephone contact with MDARD has already taken place. (MPR 15)
 - (2) If the outbreak is associated with an MDARD-regulated facility, include an FI-238 form along with the Form A or equivalent (MPR 15). Send via email to MDA-Complaints@michigan.gov and MDARD-MI-FSPR@michigan.gov.
- B. Isolated foodborne illness complaints Please do not send alerts for isolated incidents involving one person or persons living in the same household, unless:
 - (1) The alleged illness(es) was/were caused by food obtained from an MDARD or Federally regulated facility report these incidents by emailing the FI 238 form and other additional documentation to MDA-Complaints@michigan.gov.
 - (2) It appears that the report involves a single family that is potentially part of a larger outbreak; or

(3) It concerns a suspected or confirmed case of botulism, mushroom poisoning, paralytic shellfish poisoning, histamine poisoning or other significant illness clearly linked to consumption of food.

5. Documentation and submittal of investigation findings

- A. A final written report must be sent to MDARD within 90 days of completing the outbreak investigation. Please do not send copies of completed interview forms with the final summary. Required outbreak documentation depends on the size of the outbreak as follows:
 - (1) For small outbreaks (typically < 5 persons)
 - No or uncertain potential for foodborne transmission submit by email a termination report (attached)
 - ii. Likely/Definitely foodborne submit to MDARD by email the final version of the CDC form 52.13 only within 90* days of investigation completion: (MPR 15)
 - (2) For larger outbreaks
 - i. No or uncertain potential for foodborne transmission submit by email a termination report only)
 - ii. Likely/Definitely foodborne A completed final version of CDC form 52.13* AND a written narrative containing the following sections is submitted to MDARD within 90 days of investigation completion: (MPR 15)
 - a. Introduction
 - b. Epidemiology (Methods & Results)
 - c. Laboratory (Methods & Results)
 - d. Environmental (Methods & Results)
 - e. Discussion/Conclusion
 - f. Recommendations

Memorandum 7/9/2018

Attachments

- 1. Revised Form A dated August 30, 2016
- 2. MI Gastrointestinal Illness Interview Form dated August 30, 2016
- 3. MDARD Termination Report dated August 30, 2016
- 4. MDARD FI 238 dated February 2018
- 5. Illness Complaint Investigation Protocol flow chart











Note: The 2016 Michigan Local Public Health Accreditation Program's, Section III, Indicator 3.4 as stated below, will be assessed during the communicable disease accreditation evaluation by the Michigan Department of Health and Human Services.

*For foodborne outbreaks, the local health department completes and submits the CDC 52.13 (foodborne) outbreak form to MDHHS and the Michigan Department of Agriculture and Rural Development (MDARD) within 60 days of the date the first case became ill. In the event that an investigation is still ongoing 60 days post first illness onset date, a preliminary 52.12 (waterborne) or 52.13 report (which includes data such as county of outbreak, onset date, exposure date, number of cases, and laboratory results) must be submitted to MDHHS within 60 days of the date the first case became ill; the completed final outbreak report form must then be sent to the appropriate agency(s) within 90 days.

cc: Jim Padden, Food Program Manager, Food and Dairy Division Emergency Response and Enforcement Unit: April Hunt, Manager; Lisa Hainstock, Justin Henderson, Jennifer Bonsky Quality Assurance Unit: Rodney Blanchard, Becky Krzyzanowski, Shane Green, Steve Czarnecki