Known Food Defense Weaknesses

• Not part of traditional food safety inspection process
• Limited food defense training opportunities
• Operators not challenging unfamiliar persons for identification
• Security vs. courtesy
2012 Vulnerability Field Study

- Imitated imposter inspectors
- Covert “intrusion” test
- Non-public entrances
- Unfamiliar inspectors
- No Visible ID
- 24 sites: restaurant institutional, grocery
- Local law enforcement informed
2013 Field Vulnerability Study

Documented on survey:

• Access to non-public areas?
• Were we asked to identify ourselves?
• Were we escorted?
• How long did we spend unidentified in non-public areas?

Reviewed results with Gen. Mgr.
2013 Vulnerability Field Study

- Only 1 food facility asked for formal I.D. badge
- Not a single grocery or restaurant asked for formal I.D.
- Approximately 530 “covert” total (Almost 9 hrs) in non-public areas: Potential opportunities for contamination.
- Only 2 of 24 facilities had all non-public exterior entrances secured
- Only 1 grocery had a formal food defense plan
- Never escorted
- Results anonymous
Workshops

• Held 2 workshops (east and west)
• 218 retail food industry attendees
• Presented findings
• Brainstormed easy, low cost solutions to address weaknesses
• Attendees received flash drive with info
2013 Lessons Learned (Response)

• Post large signs stating that all visitors to non-public areas are required to sign-in and obtain a visitor’s badge
• Empower employees to stop unfamiliar person(s) and escort to management for I.D./verification
• Call the Health Dept. (or other) for verification
• Manager or employee escort…
• Secure non-public exterior doors (self-closing/locking)
• Always report suspicious behavior
• CCBH should include food defense in trainings
FOOD DEFENSE

What are the threats?
Intentional biological, chemical or physical contamination
Intruders with access to food and equipment

How can we detect them?
Be alert
Ask questions, especially if your gut tells you something is wrong

How can we prevent them?
Train staff, equip buildings
Never prop open doors

Increase employee awareness and have a policy for handling disgruntled employees or vendors

Protect against deliberate or intentional acts of contamination or tampering

Locate known food defense weaknesses with increased security

Tips to prepare against threats to food security:

Require guests to wear a visitor’s badge.
Always have a manager or employee escort visitors in non-public areas.
Ask for identification if visitors neglected to obtain a badge and escort them back to the sign-in area for badging.
Reward employees who enforce the visitor badge policy.
Create a “catalog” of I.D.’s for frequent vendors and visitors.
Install self-closing, self-locking exterior doors and never allow doors to be propped open.
Equip your building with security cameras and adequate lighting.
Train employees to contribute to your organization’s security.
Alert management if customers, employees or vendors are disgruntled.
Encourage employees to alert management if something seems wrong or if they are worried about risks to food or other employees.

When in doubt, throw it out; never risk serving contaminated food.

Cuyahoga County Board of Health
Your Trusted Source for Public Health Information
5550 Venture Drive Parma, Ohio 44130
216-201-2000 www.ccbh.net
Republican National Convention (RNC)

• Created additional malicious adulteration concerns, as terrorism is often politically motivated
• >50,000 visitors
• Attract attention-seekers…
• An act of terrorism (including one involving the retail food supply) could redirect international attention from RNC to attackers’ cause
Advisory: Consumers Urged to Throw Away Potentially Contaminated Foods

Agency: Agriculture and Rural Development

Update on the ongoing investigation of intentional contamination of food at grocery stores in Michigan

MDARD immediately responded to this threat to food safety. MDARD sent inspectors to each implicated store to assess the foods, review inventory records and cleaning practices, examine video footage taken at the stores and re-enforce food security and food safety protocols. Additionally, MDARD contacted the corporate offices and store managers to notify them of a possible food issue in the stores. If potential risks to food safety were identified, food was placed under seizure, removed from sale, and immediately disposed of.
Integrated Food Defense

- Goal: food defense integration:
  - Board of Health food protection program
  - Supermarket chain operations
- 2015/16 Grant Support
- Vulnerability assessments during routine inspections
- Print food defense toolkits to address findings & provide training
- Post - toolkit assessments

FDA

CCBH
Why Grocery Chain Stores?
More Opportunities!

• Large batches of uniformly mixed food

• Access: buffets, bulk, produce, meat

• Grocers provide the common food supply for almost everyone
  – 54 Large grocery stores, >1,375,000 ft² of floor space

• Rapid integration within chains

• Easy to get lost in the shuffle, add products

• Products that reach key demographics

• Pillars of the economy
2015/16 Field Assessment Approach

- 12 Large grocery chain stores
- 54 Total stores in jurisdiction
- Integrated with routine inspections
- Unfamiliar inspector enters through public door, check in, with no visible ID
- Did not have to inform police prior to each
- Won’t interrupt routine inspection
- Specific ID verification tiers
- More policy-focused, based on FDA FD mitigation strategies database
# Integrated Food Defense Field Assessment Survey

Please fill in the circles completely where applicable. Thank you.

**Facility ID:** ________________  **Date:** ___/___/___

## Field Observations

### Check-in:

1. During check-in a staff member asked for my I.D. (If not, skip to question #2):
   - [ ] Yes
   - [ ] No

2. As part of the check-in process, the facility closely examined my I.D. badge:
   - [ ] Yes
   - [ ] No

3. As part of the check-in process, the facility contacted the CCBH in order to confirm my identity:
   - [ ] Yes
   - [ ] No

4. As part of the initial check-in process, the facility issued a visitor pass to me:
   - [ ] Yes
   - [ ] No

5. After my inspection began, at least one store member asked for my I.D. (If not, skip to question #3):
   - [ ] Yes
   - [ ] No

6. After my inspection began, at least one store member closely examined my I.D.:
   - [ ] Yes
   - [ ] No

7. After my inspection began, at least one store member contacted the CCBH to confirm my identity:
   - [ ] Yes
   - [ ] No

8. After my inspection began, the facility issued a visitor pass to me:
   - [ ] Yes
   - [ ] No

9. During my inspection, a manager or designee escorted me:
   - [ ] Yes
   - [ ] No

10. I was escorted approximately ___% of the time:
    - [ ] Yes
    - [ ] No

5. If I was issued a visitor pass, it was a (circle all that apply):
    - [ ] I. Sticker Badge
    - [ ] II. Badge with pin
    - [ ] III. Badge with lanyard
    - [ ] IV. Vest
Please complete the following survey to the best of your ability. If a policy is in writing, mark the box on the far right with a "Y" and please show the policy to the Cuyahoga County Board of Health (CCBH) representative. Otherwise, please mark "N" in the box. If you have any questions, please ask your CCBH representative. **Results will be kept anonymous.**

<table>
<thead>
<tr>
<th>Facility I.D.</th>
<th>Date: <strong>/</strong>/__</th>
<th>Always</th>
<th>Sometimes</th>
<th>Never</th>
<th>N/A</th>
<th>Policy In Writing? (Y or N)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>The following policies are in place:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Job applicants must pass a criminal background check</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>2</td>
<td>All information provided on employment applications is verified</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>All references used by an applicant are checked</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>4</td>
<td>Frequent job changes are checked with former employers</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Our employees are trained to ask unknown persons in non-public areas for their I.D.</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Employees report unknown persons in non-public areas directly to management</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>7</td>
<td>Employees are trained to report suspicious behavior directly to management</td>
<td></td>
<td></td>
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<tr>
<td>8</td>
<td>Employees are trained to watch for unusual behavior by co-workers (e.g., staying unusually late after end of shift, asking questions on sensitive subjects, threatening other employees, bringing in outside chemicals)</td>
<td></td>
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<tr>
<td>9</td>
<td>The facility identifies staff that have unlimited access to all areas of the facility with a visible badge and/or uniform.</td>
<td></td>
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<tr>
<td>10</td>
<td>The facility limits staff access to non-public areas so staff enter only those areas necessary for their job functions and only during appropriate work hours</td>
<td></td>
<td></td>
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<tr>
<td>11</td>
<td>The facility collects uniforms, name tags, keys, etc. when a staff member is no longer with the company</td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>12</td>
<td>The facility changes IT passwords when those designated staff are no longer employed with the company</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
Please assist the CCBH representative in completing the remainder of the survey (questions 32-36). Results will be kept anonymous.

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
<th>Verified Outside? (Y or N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>32</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The following exterior security measures are in place:</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Security personnel</td>
<td>o</td>
<td>o</td>
<td></td>
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<tr>
<td>Monitored video cameras</td>
<td>o</td>
<td>o</td>
<td></td>
</tr>
<tr>
<td>Working lighting fixtures at non-public entrance(s)</td>
<td>o</td>
<td>o</td>
<td></td>
</tr>
<tr>
<td>33 Are any doors propped open?</td>
<td>o</td>
<td>o</td>
<td></td>
</tr>
<tr>
<td>If so, how many doors are propped open?</td>
<td></td>
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<td></td>
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<tr>
<td>If propped open, what is holding the door(s) open?</td>
<td></td>
<td></td>
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<tr>
<td>34 Open bay doors are attended by at least 1 employee</td>
<td>o</td>
<td>o</td>
<td></td>
</tr>
<tr>
<td>35 All non-public exterior doors are self-closing</td>
<td>o</td>
<td>o</td>
<td></td>
</tr>
<tr>
<td>36 All non-public exterior doors are self-locking</td>
<td>o</td>
<td>o</td>
<td></td>
</tr>
</tbody>
</table>
2015/16 First Round Surveys

During Check-in

- Identification requested: 5
- Closely Examined: 2
- Identification verified: 0

During Inspection

- Identification requested: 5
- Identification closely examined: 3
- Identification verified: 0

→ One Grocery store requested ID during check-in AND during inspection
Preliminary Results

• 42 of 54 facilities escorted inspector
• 28 escorted during 100% of inspection
• 1 door propped open

• Marked improvements from 2012!
2015/16

Average % Time Inspector Escorted

Mean = 56%
Next Steps

• Print food defense toolkits
• Field interventions with targeted education, food defense toolkits, prior to RNC (intervention)
• Post-toolkit integration field surveys
• Comparison of pre/post results
Intervention (Our Response)

- Occurred between surveys, before RNC
- Forty-five days to complete in 54 stores
- FD toolkit (policies, mitigation strategies, signs) distribution to raise awareness
- Reviewed materials with store manager
- Reinforced policies with employees (targeted education)
- Posted placards with store manager