

Foodborne Illness Reporting Responsibilities

Guideline

Revision Date: 07/16/2021

Applies To: All food service operations on the Ann Arbor campus and Michigan Medicine.

This Guideline is issued by the Department of Environment, Health & Safety to provide guidance and consistency in management of reporting and response to foodborne illness at the University of Michigan.

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Summary

This Guideline provides procedures for reporting suspected or confirmed foodborne illness or food contamination to the University of Michigan’s (UM) Environment, Health & Safety (EHS) department and the subsequent responsibilities that will be followed in accordance with the Michigan Food Law.

Scope

This Guideline is in effect whenever UM students, faculty, staff, or visitors exhibit symptoms suspected of being associated with the consumption of contaminated food or water from a University food service establishment, in a university building or as part of a university group activity.

Michigan Medicine, UM University Health Service, UM Division of Public Safety & Security (DPSS), Washtenaw County Health Department (WCHD), Michigan Department of Agriculture and Rural Development (MDARD), Michigan Department of Health & Human Services (MDHHS) are included in this communication process.

If the food service operation is not affiliated with the University but is in close proximity and affects the University community, EHS will be available to assist with the control, containment, and communication efforts, in accordance with the Agency Agreement and the **Michigan Multi-Jurisdictional Food Emergency Response Guidance** document.

Reference and Regulations

- “Agency Agreement” between the University of Michigan, Washtenaw County Health Department, and the Michigan Department of Agriculture and Rural Development, revised September 2019.
- *Control of Communicable Diseases Manual*, 20th Edition 2013, American Public Health Association
- [Guidelines for Foodborne Disease Outbreak Response, Council to Improve Foodborne Outbreak Response \(CIFOR\)](#)
- [2009 Michigan Modified Food and Drug Administration \(FDA\) Food Code](#)
- *Foodborne Illness Response Strategy (F.I.R.ST.) for Michigan, MDCH & MDARD, December 2001*
- [Michigan Food Law \(Act No. 92 of 2000, as amended\)](#)
- *Michigan Multi-Jurisdictional Food Emergency Response Guidance document*

Definitions

TERM	DEFINITION
Employee Illness	Section 2-201.11 of FDA Food Code, food service employees having reportable Foodborne Illness-like Symptoms or are diagnosed with the following illnesses, designated as the “Big 5” foodborne pathogens must be excluded from food service establishments until they are free of symptoms or disease for at least 24 hours (may be dependent on lab testing): <ul style="list-style-type: none">• Norovirus• Hepatitis A virus• <i>Shigella</i> spp.• Enterohemorrhagic or Shiga Toxin-Producing <i>Escherichia coli</i>• <i>Salmonella</i> Typhi
Foodborne Illness Outbreak	An incident involving two or more unrelated individuals, living separately, and reporting similar symptoms or excreting the same pathogen, with a time or place association between them. However, a single case of a rare disease such as botulism or mushroom poisoning is considered an outbreak.
Food contamination	The presence of foreign material in a food product that should not be present. Examples could include a cherry pit, egg shell, nut shell, metal shavings, etc.

TERM	DEFINITION
Foodborne Illness-like Symptoms	Acute gastroenteritis such as vomiting, diarrhea, jaundice, sore throat with fever, or a lesion containing pus, such as a boil or infected wound that is open and draining.
Person-in-Charge	The individual present at the food establishment who is responsible for the operation.
Sanitarian	EHS staff members responsible for food safety issues on campus.

Responsibility

EHS

- Receive reports of potential foodborne illness or food contamination. Suggest that ill persons seek immediate medical attention. The information must be immediately referred to the EHS Sanitarians or the Operational Health & Safety (OH&S) manager for follow-up. This includes calls received by the EHS on-call staff.
- The EHS Sanitarians will be responsible for the following:
 - Communicate with person making complaint and with implicated food service operation, if known.
 - Communicate and coordinate with affected University departments to assure the necessary procedures are followed to minimize further illness.
 - Conduct an investigation of a potential foodborne illness outbreak jointly with the WCDPHEHD as provided for in the “Agency Agreement.”
 - Take immediate action to minimize the potential spread of a suspected or confirmed foodborne illness.
 - Make the necessary contacts, as noted in the Procedures section of this Guideline.
 - If the complainant has eaten at a food service facility away from the University, the appropriate local health department must be notified.
 - Document all actions taken, disseminate as necessary, including a final report.
 - Review this Guideline on an annual basis. Communicate changes to the groups identified in the Responsibility section of this Guideline.
 - Serve as the University liaison for local, county, state, and federal agencies regarding health and safety issues.

U-M Food Service Person-In-Charge

- Gather pertinent information about the ill person(s), including name, phone number, address, nature of complaint, and symptoms. Suggest that ill persons seek immediate medical attention.
- Provide a sample of the suspect food item, the foreign object, or the menu of suspect meal, if available to EHS. Include side dishes, desserts, and beverages of the meal to assist in a more accurate interview process with the exposed persons.
- Determine if ill person is a food service worker. Ensure that employees are reporting foodborne illness-like symptoms to the Person-in-Charge.
- Ensure that ill employees are restricted to non-food duties, or excluded from the food service establishment. This is dependent on the illness.
- Contact EHS as indicated in the Procedures section of this Guideline.

U-M University Health Service/Michigan Medicine Emergency Department

- Determine if the ill person exhibits foodborne illness-like symptoms.
- Determine if the ill person is employed as a food service worker.
- Collect any necessary fecal, blood, or other samples to determine if an illness is caused by Norovirus, Hepatitis A virus, Shigella spp., Shiga Toxin producing Escherichia coli 0157:H7 or non-0157, or Salmonella typhi. The Food Code singles out these diseases due to their high potential for communicability through food.
- Contact EHS as indicated in the Procedures section of this Guideline.

Michigan Dining, University Housing, and Auxiliary Facilities

Gather pertinent information about ill students. If necessary, suggest medical treatment. Contact EHS when similar symptoms are noted in several students. See UM Food Service Person-in-Charge section above.

U-M Division of Public Safety & Security

Receive and direct food related complaints to EHS. After hours, contact the EHS on-call emergency responder. Suggest that ill persons seek immediate medical attention. Investigate potential criminal contamination complaints.

Washtenaw County Health Department (WCHD)

Receive food related complaints from UM affiliates and direct to EHS, jointly conduct foodborne illness investigations, as specified in the “Agency Agreement.” The County Outbreak Team, including EHS staff meets on a quarterly basis to discuss illness outbreaks, control, prevention, and recommendations for process improvement.

Michigan Department of Agriculture and Rural Development (MDARD) and Michigan Department of Health & Human Services (MDHHS)

MDARD and MDHHS will provide consultation and advice in conducting a foodborne illness investigation, assist in collecting and processing data generated during an investigation, and coordinate efforts that fall beyond the scope of a single health district. This will be in accordance with the Michigan Multi-Jurisdictional Food Emergency Response Guidance document.

When to Contact EHS

Contact EHS at (734) 647-1142 to report suspected, apparent, confirmed, or exposed cases of foodborne illness or food contamination.

Report any food service employee who resists restriction and may be infected with a gastro-intestinal or respiratory disease in a communicable form or ill with the “Big 5” or who has an infected wound on a hand or arm but refuses to wear appropriate plastic gloves.

Internal EHS Procedures

- Initial Activities

The EHS Sanitarians must receive reports of suspected, apparent, confirmed, or exposed cases of foodborne illness, food contamination, and ill food service workers for follow-up. The best contact is by phone to assure the information is received. Based on the information obtained during the investigation, decisions will need to be made regarding the continuation of food service operations and the necessary notifications to be made.

- Notifications must immediately be made to the following:
 - OH&S Manager
 - EHS Executive Director
 - WCHD, Environmental Health Director
 - MDARD (Email notification of suspected outbreak to: MDA-Complaints@michigan.gov)
 - UM University Health Service (to alert for additional cases)
 - Michigan Medicine Emergency Department (to alert for additional cases)

A more extensive, secured Contact List is contained in Appendix A.

Information on illnesses attributed to food is provided in Appendix B.

- Conducting an Investigation

When a suspect foodborne illness outbreak has been identified, EHS will proceed by initiating a prompt epidemiological investigation using a task-oriented approach. The WCHD, MDARD and MDHHS must be notified and will be consulted for additional resources and/or technical guidance, as necessary.

Investigation procedures will follow those outlined in the IAFP (International Association for Food Protection) *Procedures to Investigate Foodborne Illness* book utilizing the following outline:

1. Case History Interviews

- Collect additional case history information to supplement any previously collected information.
- Ill persons should be advised to seek medical attention if they have not already done so.
- If necessary, a [U-M Injury and Illness Report](#) form may need to be submitted to Work Connections.

2. Evaluation of Food Service Facility

- An inspection of the food service establishment will be conducted including, interviewing food service personnel regarding food sources, preparation methods, storage, display, and transportation utilized at the time of the suspect meal.
- Review the food handling practices, personal hygiene, equipment operation, pest control, illness reports, plumbing, proper waste disposal, and the water supply.
- If possible, obtain an attendance list for the suspect meal.

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3. Collection of Suspect Food
 - A sample of each food from the suspect meal, if available, should be collected for laboratory analysis of the suspected pathogen.
 - Samples should be clearly labeled, refrigerated at 41°F or below, and stored in a secure location to avoid accidental use.
 4. Collection of Clinical Specimens:
 - EHS will share pertinent investigation information to the medical personnel involved.
 - Samples will be collected from exposed persons and food handlers based on professional judgment or when ordered by the Washtenaw County Medical Director.
 5. Summary and Report Preparation
 - In accordance with the Michigan Food Law, Section 289.3129, EHS will prepare a report summarizing the findings of the investigation, test results, and any corrective action necessary to protect the public health.
 - The report will be issued to the EHS Director, director and management staff from the suspect food service establishment, other affected University departments, the WCHD, and MDARD.

Technical Support

All referenced guidelines, regulations, and other documents are available through EHS (734) 647-1142.

Attachments

- Appendix A - Contact Information
- Appendix B - Illnesses Attributed to Food Information