

# Conducting a Mock Recall of Fresh Produce: A Case Study

## October 14



ABC School District's school nutrition program is planning a district-wide mock recall of a fresh produce item. The school district operates 18 sites with approximately 15,000 students. Seventeen schools have on-site kitchens, and one school has only storing, reheating, holding, and serving capabilities. ABC School District's high school kitchen prepares approximately 300 meals per day, using bulk service, for the school site without on-site preparation capacity. The produce distributor delivers weekly to the 17 on-site kitchens. Each site manager places his or her produce order every Wednesday for delivery on the following Tuesday.

During the previous summer, the school nutrition director reviewed and updated the following SOPs:

- Handling a Food Recall
- Receiving Deliveries
- Storing Foods
- Transporting Food to Remote Sites

The director also updated the emergency notification contact list based on information requested in end-of-year documents in June. There were no personnel changes over the summer.

At the annual "Back-to-School" workshop for site-level managers held in August, the school nutrition director handed out and discussed the updated SOPs. In addition, managers were given the emergency contact list and asked to review, update, and send the revisions to the central office within one week. The final emergency contact list was emailed to all site-level managers by the first day of school.

One month later, the school nutrition director contacted Star Produce Company, the district's produce vendor, to discuss conducting a mock recall of fresh produce. Pre-cut salad mix was selected as the item to be used in the exercise because the majority of schools purchased this item weekly. The vendor confirmed that the company would be able to provide tracking information using product code numbers, including lot number, best if used by date, ship date, and quantity shipped to each site.



The school nutrition director and central office staff met and identified Thursday, October 13th at 11:00 as the date and time for the mock recall. All site-level staff were unaware of the mock recall. The school nutrition director and central office staff chose this date and time to test recall procedures because it would be inconvenient for site-level staff who were participating in National School Lunch Week, where most of the schools promote increased participation in school lunch and encourage health and wellness. The time was selected because the majority of sites serve lunch at 11:00 am. The goal for completing the recall exercise was set at three hours, or by 2:00 pm (the end of the work day).

The school nutrition director contacted school officials, including the communication's officer and emergency manager to inform them of the upcoming mock recall of produce and to assure them that the produce would be safe. The school nutrition director emphasized that the scheduled recall would only be a drill to determine how quickly staff at the schools could locate the product and evaluate the effectiveness of existing procedures.

On the day produce was delivered, the distributor provided the school nutrition director with the tracking information via fax as requested in advance of the exercise. The school nutrition director made a copy for the school nutrition administrative assistant, as well as a copy of the recall worksheet. The school nutrition administrative assistant emailed all school nutrition site managers and notified them of the pre-cut salad mix recall as outlined in the Handling a Food Recall SOP and reminded them that "this is a test." At noon, the administrative assistant called all managers who had not yet responded. Voice mail messages were left for the seven managers who had not responded either via email or phone. Three of the seven responded by 12:30 pm. The administrative assistant emailed the remaining four managers at 1:00 pm. By close of day, 2:00 pm, all but one manager had responded to the recall notification. The central office did not get the recall information from the last school, George Washington Elementary, until the following morning.



The school nutrition director learned that the response from George Washington Elementary was delayed because the manager was out and did not report his absence to the central office. No one at the site had access to the manager's email or phone messages. The central office had not included contact information outside of the work day on the emergency contact list.

The following day, the school nutrition director calculated the mock recall efficiency at 88%. One site did not respond at all, and three sites could not locate some of the product. These three sites had difficulty because the salad mix had been commingled, and the boxes with the tracking information were discarded. Also, product transported to the satellite site was not recorded and could not be traced.

A	Amount delivered	<u>42 cases</u>
B	Amount in inventory	<u>32 cases</u>
C	Amount in food production	<u>4 cases</u>
D	Amount served or consumed	<u>1 case</u>

$$\frac{(B+C+D)}{A} \times 100 = \% \text{ Mock Recall Effectiveness}$$

$$32 + 4 + 1 = 40 \text{ cases divided by } 42 \text{ cases} \times 100 = 88\%$$

During the debriefing, the school nutrition director and central office staff identified several corrective actions that would improve their crisis management of a food recall. Staff members were assigned responsibilities with clear timelines to complete these next steps.

- Update the emergency contact list to include how to reach staff outside of school.
- Review Handling a Food Recall SOP at upcoming manager's meeting, including timely response.
- Review manager absence notification procedures at upcoming manager's meeting.
- Identify a key person at each site who is responsible for checking phone messages in the event of a manager's absence.
- Create a school district email address for key personnel at each site.
- Review Storing Foods SOP at upcoming manager's meeting, including maintaining tracking information and preventing commingling of product in storage.
- Plan a future mock recall of fresh produce within three months to retest the system.

Corrective Action	Person(s) Responsible	Timeframe
Update emergency contact list	School nutrition director and administrative assistant	October 28 (2 weeks)
Identify a key person at each site who is responsible for checking phone messages in the event of a manager's absence	School nutrition director, all managers	October 28 (2 weeks)
Create an email address for key personnel at each site.	School nutrition director, all managers, technology department	November 6 (3 weeks)
Review SOP for handling a food recall	School nutrition director, all managers	Next manager's meeting (November 15)
Review manager absence notification procedures	School nutrition director, all managers	Next manager's meeting (November 15)
Review storing foods SOP	School nutrition director, all managers	Next manager's meeting (November 15)
Determine date for next mock recall and coordinate with produce vendor	School nutrition director and central office staff	Next manager's meeting (November 15)

## Glossary

**Commingling:** Combining different sources (i.e. lots or batches) of produce into one container. Traceability may be impaired.

**Global Trade Item Numbers (GTIN):** The GS1 Identification Key used to identify products such as a specific brand and product. The key is comprised of a GS1 or U.P.C. company prefix and an item identification number.

**Lot:** The batch or lot number associates an item with information the manufacturer considers relevant for traceability e.g., the time and date it was manufactured.

**Recall:** A process used to remove products from the marketplace when there is reason to believe the products may be contaminated, misbranded, or cause health problems.

**Standard Operating Procedure (SOP):** Detailed written instructions for a process that must be followed to ensure a desired outcome.

**Traceability:** The ability to trace the origin, movement, or location of a product.

**Trace or track back:** The ability to determine the path a product took through the supply chain before it reached the end customer.

**Trace or track forward:** The ability to determine the path a product takes through the supply chain on its way to the end customer.