

# Lessons Learned for DOD Food Protection Planning and Support During the COVID-19 Global Pandemic

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The COVID-19 pandemic created many challenges for the Department of Defense when attempting to support the feeding systems necessary during troop movements associated with COVID-19 emergency responses. Throughout the pandemic, normal operating processes and systems in the food protection program proved to be cumbersome and sometimes insufficient to meet mission requirements. In many cases, food protection policy and procedural requirements were unknown to primary recipients of this support.

The Defense Health Agency Veterinary Services (DHA VS) and U.S. Army Medical Command (MEDCOM) requested that primary stakeholders submit issues and recommendations encountered throughout the pandemic support process to improve our food protection emergency response program.

Those topics are grouped into two sections:

Section 1. Operational Planning, Deployments, and Digital Training Support, and  
Section 2. Auditing Facilities, Monitoring Programs, and Lab Sampling.

The DHA VS formed a Lessons Learned Working Group (LLWG), a sub-component of the DOD VS COVID-19 Operational Planning Team Food Protection working group, to analyze food protection-related issues and recommendations and provide final recommended actions to the Chief, DHA VS, and the Veterinary Services and Public Health Sanitation (VSPHS) Directorate Army Public Health Center (APHC).

The LLWG was comprised of representatives from the following organizations: Defense Logistics Agency Troop Support (DLA-TS); APHC VSPHS; DHA VS; U.S. Air Force School of Aerospace Medicine (USAFSAM); and Navy Marine Corps Public Health Center (NMCPHC); and the Naval Supply Systems Command.

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This document forms the summation of the LLWG's work, analysis, and recommended actions to sustain or improve food protection support in response to emergency pandemic situations in the future. Note: To identify capability gaps and improve operational response processes, the Doctrine, Organization, Training, Materiel, Leadership and Education, Personnel, and Facilities (DOTMLPF) domains relevant to each of these topics has been identified for applicability and reference.

## **Section 1. Operational Planning, Deployments, and Digital Training Support**

### **ISSUE 1: Functional area Operational Planning Team (OPT)**

**Observation:** Setting up a functional area Operational Planning Team (OPT) early was critical to a successful VS effort in addressing pandemic-related challenges.

**Discussion:** DHA VS set up a DOD Veterinary Service COVID-19 OPT in January 2020. The parent OPT included representation from both Joint and Army veterinary stakeholders' organizations, including DHA, MEDCOM, and VSPHS Directorate, APHC. The OPT was subdivided into three areas: food protection, animal medicine, and diagnostics. These subgroups included broad stakeholder representation from all Services (where appropriate, i.e., food protection), Components, and fourth estate agencies. Early OPT establishment and its universal organizational representation facilitated the proactive DOD Veterinary Service response to the pandemic issues, synchronized efforts across the DOD food protection enterprise, and was invaluable when addressing concerns and providing guidance to the field. Additionally, the parent OPT represented the single point of contact with interagency partners to ensure DOD's veterinary-related efforts were incorporated and synchronized with those of the other Federal agencies. The OPT also set up a milSuite repository for all VS COVID-related products and guidance produced by the OPT. This site included weblinks to pandemic-related guidance and publications produced by other Federal agencies and national groups (e.g., American Veterinary Medical Association, Centers for Disease Control and Prevention) that were helpful resources for the field. The milSuite site was easily accessed and is a one-stop shop for all VS COVID-related information.

**Recommendation:** Early establishment of a multi-Component, multi-Service operational planning team is clearly a best practice that should be sustained in future crisis operations.

**DOTMLPF Domains:** D, O, L, P

### **ISSUE 2: Pre-deployment Site Survey (PDSS) and/or Advanced Operational Node (ADVON) team**

**Observation:** Lack of Veterinary Service (VS) personnel consultation or inclusion in pre-deployment site survey (PDSS) teams hindered force protection measures and deployment readiness support, particularly in the area of food protection (food safety and defense).

**Discussion:** DOD Instruction 6490.03, "Deployment Health," establishes the requirement for the Secretaries of the Military Departments to provide deployment health support, which includes "food protection including DOD approved sources of food and water," and for Combatant Commanders to use DOD approved sources for food and water during deployments. As the sole provider of Veterinary Services within the DOD, it is the responsibility of Army VS personnel to assist operational planners across the Services in the assessment and early identification and establishment of approved commercial food and water resources in order to support deploying troops, such as the Urban Augmentation Medical Task Forces (UAMTF) that deployed in response to COVID-19. An insufficient understanding of these requirements exists within both the medical and non-medical communities, particularly within Navy and Air Force, which leads to a lack of inclusion of VS

personnel in PDSS and/or ADVON teams or consultation with VS personnel about how to meet deployment food protection requirements. Lack of notification about pending PDSS/ADVON team deployments to support troop deployments precludes the inclusion of VS personnel and identification of approved sources of food and bottled water to support deploying troops. Because the Army has Veterinary Corps Officer (VCO) representation at the Army Service Component Command (ASCC) level, this problem is magnified for Navy or Air Force deployments due to the absence of VCO representation in supporting staff surgeon cells. Furthermore, a contractual requirement exists for the use of approved sources of food and bottled water for any DOD contracts involving subsistence, an issue which is discussed later in this publication. ASCC VCOs who are proactive and have robust food protection knowledge and both operational and generating force experience are a valuable resource to work across Services within the Combatant Command to inform both Military Health System (MHS) and non-MHS leadership on the deployment health requirements associated with food protection.

**Recommendation:** Combatant Commands/ASCCs should include VS personnel on all PDSS or ADVON planning sessions, and ideally as part of the PDSS/ADVON deployment team. DHA Veterinary Services should coordinate with the Navy Bureau of Medicine (BUMED) and Air Force Public Health as required to socialize this issue and assist in setting a requirement for the inclusion of VS personnel in deployment health planning sessions.

Army Service Component Commanders should carefully review the knowledge, skills and abilities of applicants when determining which VCO is best suited to enable mission success at the ASCC level. Army Veterinary Services (64B Consultant to the Army Surgeon General; Chief, Veterinary Corps Branch, Human Resources Command) should continue to encourage VCOs with the appropriate knowledge, skills, and abilities to seek ASCC staff positions. This will facilitate the necessary flow of communication both up and down the ASCC/Combatant Command chain that is required to ensure food protection requirements are accurately captured.

**DOTMLPF Domains:** D, O, L, P

### **ISSUE 3: Analysis of alternate COAs, policy, or models to support rapid deployments under emergency conditions**

**Observation:** The current commercial food protection audit process that exists to verify food safety, sanitation, and food defense for DOD beneficiaries during routine, non-emergency times is too cumbersome and lengthy to meet crisis action food protection deployment health requirements.

**Discussion:** The DOD Veterinary Service COVID-19 OPT recognized early in the pandemic that a more agile and responsive commercial food protection audit process was needed to adequately support rapid, CONUS-based COVID-19 deployments. The Food Protection sub-working group of the OPT convened to establish and publish a modified process to supporting organizations (e.g., Army Medical Detachments (Veterinary Service Support) and Army Public Health Commands) by March 2020. This process was in support of initial commercial food protection audits for facilities not already listed as sanitarily approved sources. Updated procedures included streamlining the pre-audit questionnaire for food processing plants/caterers and adjusting timelines for lab sampling requirements.

The tasking process from audit request to completion was abbreviated, with direct support being provided by the VSPHS Directorate, APHC, to both the requesting and tasked units, tremendously shortening the tasking process. This resulted in a 5-day turnaround from initiation to approval of facilities, a process that can take up to 8 weeks during non-emergency situations. The VSPHS Directorate provided a COVID-19 audit tip sheet to guide auditors on how to conduct audits safely in a COVID environment.

There was interest among both veterinary and non-veterinary MHS personnel in leveraging the Food and Water Risk Assessment (FWRA) process to support food protection requirements for these deployments. Current Department of Defense Veterinary Service Activity policy and DOD doctrine (Military Standard 3041, "Requirements for Food and Water Risk Assessments") specify that FWRAs are solely for use outside the United States or its territories when conducting a commercial food protection audit is not feasible. Streamlined audit processes precluded the need to extend the use of FWRAs to CONUS, which enabled VS to maintain the highest standard of food protection – commercial food protection audits – and provide optimal food protection support to feeding plans for deploying personnel.

**Recommendation:** The streamlined commercial food protection audit process was comprehensive, effective, and agile enough to meet the deployment health requirements of the NORTHCOM Commander. The details of this modified process should be codified by VSPHS Directorate, APHC, and identified as a best practice that can be utilized during the next crisis response operation, as appropriate. Consider including a requirement for a modified commercial food protection audit process in policy and the details of the process in doctrine.

**DOTMLPF Domains:** D, T

#### **ISSUE 4: Coordination between Veterinary Service personnel and sustainment elements**

**Observation:** Execution of commercial food protection audits could be delayed due to the lack of integration and coordination with veterinary personnel in sustainment elements.

**Discussion:** Commercial food protection audit execution requires effective pre-planning and coordination between sustainment element contracting officials and veterinary personnel to effectively support safe feeding plans for deploying personnel. Proactive and timely coordination between appropriate staff elements is critical to identifying requirements for food protection audits to support the desired feeding plan.

**Recommendation:** Early and ongoing close coordination between the supporting Army Service Component Command staff veterinarian and supporting sustainment element contracting personnel is critical. This will ensure that commercial food protection audit requirements are identified, Veterinary Corps Officers are tasked, and the audits are performed to support the feeding plan for deploying personnel. Food protection audits are critical to providing a safe food supply for DOD personnel.

DOD should be prepared to execute the commercial food protection audit as a part of the PDSS Team. Integrate VS personnel with the 13th Sustainment Command (Expeditionary)/

13th ESC or any sustainment element that arrives prior to the UAMTF. Execute audit with at least 3 potential vendors so that they are on the approved source list in advance of contract award which would require coordination between the contracting officer (KO) and the ARNORTH MEDCOM personnel. Note that VS personnel cannot actively seek sources on their own; they must remain disinterested parties and audit sources requested by the KO.

**DOTMLPF Domains:** D, M, P

### **ISSUE 5: Potential increased risk to Service members for per diem-based feeding plans**

**Observation:** No DOD food protection requirements exist to support per diem-based feeding plans, which could put deployed personnel at risk. This was a particular concern early in the pandemic when it was unknown if the COVID-19 virus could be transmitted through food.

**Discussion:** Many feeding plans to support personnel deploying across CONUS in support of the COVID-19 pandemic response were based on per diem, i.e., paying Service members a daily stipend to purchase their own food. Deployed personnel on per diem can purchase food from any available source. During a DSCA event such as the response to COVID-19 pandemic, Service members either eat at a contracted facility (e.g., hotel) or are on per diem. Current DOD policy only requires commercial food protection audits to evaluate DOD-contracted food production facilities (including caterers) that provide subsistence for DOD personnel, based upon Worldwide Directory applicability requirements for specific products. **Veterinary Service personnel do not have the legal or regulatory authority to audit vendors that Service members patronize while on per diem, even if requested to do so by the Army Service Component Commander.** DOD veterinary and preventive medicine personnel had no direct recourse to evaluate risk associated with potential transmission of the SARS-CoV-2 virus through food/food packaging (an unknown early in the pandemic) due to the regulatory inability to perform audits or inspections at food establishments patronized by deployed personnel on per diem. The only available risk mitigation in these cases is based on informing Service members of the risk and incorporating mitigation measures such as robust hand hygiene. For the COVID-19 pandemic, the Under Secretary of Defense for Personnel and Readiness was proactive in publishing and updating force health protection (FHP) guidance. The initial FHP guidance was published on January 30<sup>th</sup>, 2020, and detailed individual measures to prevent virus spread, based on guidelines from the Centers for Disease Control and Prevention. This guidance has been repeated in numerous Service-specific products, and it is incumbent upon commanders and leaders to ensure their Service members receive such guidance. Many of the FHP guidance documents were distributed to leadership by the DOD Veterinary Service COVID-19 OPT.

**Recommendation:** Feeding plans based on a DOD contracted food supply should be the primary source of subsistence for deployed personnel. Effective communication strategies must be established by leaders at all levels to inform deploying DOD personnel of individual, mission-specific FHP measures to mitigate the risks associated with these types of deployments.

**DOTMLPF Domains:** T (Policy)

## **ISSUE 6: Food Protection Support to Deployed USNS Ships**

**Observation:** A lack of food protection inspections occurred on prime vendor subsistence deliveries to the USNS Comfort while deployed in support of the COVID-19 pandemic.

**Discussion:** A misunderstanding exists across relevant supporting Army Veterinary Service elements of the difference between logistical management of Navy ships ('USS' hull) and Military Sealift Command (MSC) ships, which includes USNS hulled Hospital Ships. This difference led to confusion and misunderstanding between AVS food protection personnel and personnel from the MSC program that supplies USNS Hospital Ships on how food protection support should be provided to USNS Hospital Ships while deployed. Army Veterinary Service has mechanisms in place to provide robust food protection support to deployed USS hulled Navy ships, including the Veterinary Food Inspector Ship rider program. Because USNS Hospital Ships fall under a different MSC program, the assumption that AVS could provide seamless support through similar mechanisms to deployed USNS Hospital Ships led to the confusion. The central points of contact for provision of AVS food protection support to these ships are different; because these relationships were not established and cultivated ahead of time, neither personnel at the MSC program that supplies USNS Hospital Ships nor supporting AVS personnel were able to effectively plan for support. AVS food protection personnel were not informed of subsistence deliveries to the USNS Comfort, and in more than one instance, Veterinary Food Inspectors were not allowed onto the docks to inspect delivered subsistence. The sole prime vendor inspection that was able to occur while the USNS Comfort was docked in New York City returned potential unwholesomeness issues in a large amount of delivered subsistence, resulting in a rejection of the product. This clearly demonstrates the need for food protection support to these ships.

Current food protection policy and doctrine publications do not contain guidance on provision of support to USNS Hospital Ships. These documents describe support to the US Navy on a Service basis; no differentiation in support is made based on vessel type. No details for support to USNS Hospital Ships are included.

### **Recommendation:**

USNS Hospital Ships may request a Veterinary Food Inspector for deployments under the Ship rider Program, as stated in the current MOU between VS and MSC. In order to facilitate this critical support, supporting AVS Public Health Regional personnel should establish an ongoing relationship with the centralized points of contact for galleys aboard the USNS Hospital Ships. A request for food inspection support must come from the MSC, and not from Army Veterinary Services. Therefore, it is critical that personnel at the MSC program that supplies USNS Hospital Ships are aware of the value and importance of providing this support.

The U.S. Army Veterinary Preventive Medicine Officer assigned to the Naval Supply Systems Command (NAVSUP) headquarters should be leveraged to provide any required liaison assistance between Public Health Region veterinary personnel and the MSC. This liaison should be supplemental to communication lines and relationships previously

established in local Public Health Region/Activity Veterinary Service Installation Support Plans. Through established relationships, personnel at the MSC program supplying USNS Hospital Ships and AVS should identify veterinary food inspection support as both a planning factor and a mission requirement. Current food inspection policy and doctrine must clearly identify the support available to USNS Hospital Ships. The only mention of support available to USNS Hospital Ships is in the current MOA between VS and MSC. Doctrine must explain the availability of assigning Ship riders to USNS Hospital Ships while deployed, the possibility of food inspection support while deployed in support of DSCA missions, and the availability of inspection support while at homeport, if required. Supporting units at Naval Stations Norfolk, VA, and San Diego, CA, must be aware of the POCs at the MSC who oversee management of galleys on the USNS Hospital Ships.

**DOTMLPF Domains:** D, O, P

### **ISSUE 7: Virtual audit training**

**Observation:** DOD travel restrictions combined with commercial food plants barring entry to any personnel other than plant employees made for a challenging training/certification environment. DOD veterinary personnel employed new methods of training and certification during the pandemic.

**Discussion:** Virtual dairy audit training was used as refresher training for a cohort of veterinary personnel due to constraints presented by the global pandemic. This method seemed effective and could be maintained as refresher training (after initial in-person training) on a recurrent basis based on feedback received about the effectiveness of more frequent training. This method of initial in-person training, combined with recurrent virtual refresher training could be extended to other commodities as well, such as slaughterhouse training. The use of virtual refresher training has the added benefit of expanding to an audience regardless of geographical location. However, multiple technological barriers to learning must be resolved for this training to be most effective, such as the identification of the most appropriate platform to which all attendees have access and resolution of specific technological issues associated with the platform for some users.

**Recommendation:** Maintain the use of innovative technologies, such as virtual reality and other virtual tools, as a method to accomplish required training and certification. These methods should be reserved to augment in-person training and certification, and are most appropriate during time of emergency, such as the COVID-19 pandemic, or during extreme funding shortages. Virtual methods are not appropriate as the sole method of audit training or certification. DOD draft regulations have been updated to include the acceptability and effectiveness of virtual training as an augmentation to in-person training and certification.

**DOTMLPF Domains:** D (+/-), T

## **Section 2. Auditing Facilities, Monitoring Programs, and Lab Sampling**

### **ISSUE 8: Contracting officer understanding of approved sources requirements**

**Observation:** Unfamiliarity of some contracting officers with the requirements identified in



both DoDI 6490.03, "Deployment Health," and AR 40-657/NAVSUP 4355.4H/MCO P10110.31H, "Veterinary/Medical Food Safety, Quality Assurance, and Laboratory Service," for use of approved sources for subsistence purchased with either appropriated or non-appropriated funds resulted in delays in contracts, commercial food protection audits, or both. Furthermore, recognizing the urgency of the situation, proactive contracting officers on occasion scheduled the initial food protection audit for the DOD veterinary auditor. This ultimately resulted in audit delays due to proper procedures not being understood or followed in tasking and scheduling food protection audits (e.g., pre-audit questionnaires) and led to confusion for both the auditor and the establishment being audited.

**Discussion:** Both contracting and veterinary personnel, particularly those at Geographic Combatant Commands and Service Component Commands, bear responsibility in ensuring that all relevant stakeholders understand food protection requirements to support feeding plans for deployments and have familiarity with relevant aspects of the commercial food protection audit process to support those feeding plans. A common understanding of food protection audit policies will maximize force health protection and minimize food protection risk to deployed personnel.

**Recommendation:** Command or staff veterinary personnel must be proactive in engaging contracting personnel during non-emergency periods to ensure they are aware of approved sources requirements, contractual obligations, and relevant aspects of the auditing process for planning purposes. Contracting officers will then be aware of these requirements and procedures during crisis action responses. Contracting personnel must understand these requirements and seek veterinary advisement when developing contracts that involve subsistence. For the CONUS COVID-19 pandemic response, the DOD Veterinary Service OPT published the information paper (IP) in Appendix A to assist senior and ASCC staff veterinary personnel in informing appropriate supporting contracting officers of these requirements. The IP details food protection requirements as well as the process to request a food protection audit of an establishment. An additional measure that should be examined is whether adequate procedures currently exist to inform a common understanding across the applicable DOD contracting framework and within NORTHCOM and subordinate Service commands to establish safe food sources for DOD personnel. Centralized training, such as a Joint Knowledge Online course, for contracting personnel may need to be developed and implemented by Joint Culinary Center of Excellence (JCCoE), who trains contracting officers. This should be a collaborative effort with the Army Medical Center of Excellence (MEDCoE).

**DOTMLPF Domains:** D, O, T, L

### **ISSUE 9: Performing audits prior to contract award or start of production**

**Observation:** Delays in performing audits prior to the award of the DOD contract and misunderstandings by DOD personnel on the requirement for the commercial food establishment to be in production during an audit resulted in delays in commercial food establishment approval.

**Discussion:** Audits of commercial food establishments identified to support feeding plans for the CONUS deployment of DOD personnel were delayed due to misunderstanding by DOD personnel on the requirement for the establishment to be in production. For example,

VS personnel were unable to conduct an audit in Baton Rouge, Louisiana, during the initial attempt because the vendor was waiting for the DOD contract to be awarded prior to rehiring their employees. This resulted in no cooking operations at the facility during the audit attempt and no available food samples for laboratory analysis. Additionally, DOD contracting personnel should give identified food establishments as much notice as possible about the requirement for an audit while in production to maximize the amount of time both food establishment personnel and Veterinary Service auditors have to prepare for the audit. Though expedited audit preparation procedures were established to support feeding plans for rapid CONUS deployments, this preparation process normally takes weeks, and any additional lead time will assist in preparations during crisis action response situations. **Per regulation, audits are authorized to be conducted prior to contract award, if the facility is in production.** Veterinary personnel conducting audits on establishments already identified by the KO during the pre-deployment site survey (PDSS) or by veterinary personnel included on the ADVON team will facilitate the availability of approved establishments to support feeding plans in a timely manner, instead of relying on audit requests once the PDSS team returns. Audits performed after the contract award will delay the use of the food establishment until the facility has passed the audit, which delays the use of these facilities to support feeding plans for rapid deployments. To ensure DOD contracting personnel were aware of these requirements, the DOD Veterinary Service COVID-19 OPT and the APHC Veterinary Service and Public Health Sanitation Branch discussed these requirements with the ARNORTH staff veterinarian with a request that he engage DOD contracting personnel. Supporting efforts included an information paper drafted and submitted by APHC to selected DOD contracting personnel. (See appendix A)

**Recommendation:** Veterinary Services auditors must be included in PDSS and/or ADVON teams to facilitate timely audits of food establishments identified to support feeding plans of deploying personnel (see issue #2). DOD contracting personnel must inform identified food establishments as early as possible of the requirement for an audit, while the facility is in production, for consideration as an approved source for the DOD. Combatant Command or Army Service Component Command staff veterinarians must engage with DOD contracting personnel as early as possible when feeding plans are being determined to discuss food protection contractual requirements.

**DOTMLPF Domains:** D, T, M, L

## **ISSUE 10: Performing audits prior to Service member consumption of food**

**Observation:** Delays in audit execution resulted in audits being performed after deployed Service members were already eating at the establishment in some cases, increasing the force health protection risk to these Service members.

**Discussion:** Delays in audit tasking and execution occurred, particularly in the earliest CONUS deployments to support the COVID-19 response. These issues included lack of veterinary personnel inclusion on advance or pre-deployment site survey teams (issue 2); a cumbersome tasking process for veterinary personnel to perform audits (issue 3); lack of effective coordination between ASCC veterinary staff and sustainment personnel (issue 4); delays in food establishments being in production, precluding timely audits (issue 9); unfamiliarity of some contracting officers with the requirements to use approved sources (issue 8); and rapid deployments of Urban Augmentation Medical Task Forces and other

response forces resulting in a short or no-notice notification to veterinary personnel to support identified feeding plans. This resulted in deployed Service members eating at establishments that had not yet been audited, increasing both food safety and food defense risk to the deployed force. Commanders may not realize the risk they are assuming in these cases. The importance of appropriate food protection contractual requirements and of auditing establishments that are supporting feeding plans for deployed personnel became apparent during the January-March, 2021, deployment of National Guard personnel to the US Capitol. The media reported multiple instances of possible foodborne outbreaks in this cohort of deployed personnel. Department of Defense veterinary support was not solicited to conduct food protection requirements (auditing food establishments) for this US Capitol deployment.

**Recommendation:** In order to appropriately identify and mitigate food protection risk to deployed personnel, establishments supporting feeding plans must always be audited by Army veterinary personnel prior to use. An additional measure to assist in closing this gap is to set the requirement within pandemic preparedness plans for Veterinary Corps Officers to advise on feeding plans and contracts for feeding plans.

**DOTMLPF Domains:** T, M, L

#### **ISSUE 11: Conditional approval of food facilities pending receipt of laboratory sample results**

**Observation:** Conditional approval of food facilities prior to the receipt of laboratory food sample results facilitated the use of these food establishments to support feeding plans for CONUS- deployed Service members as quickly as possible.

**Discussion:** The expedited commercial food protection audit measures established to support rapid CONUS-based COVID-19 deployments included a measure to conditionally approve food facilities with acceptable audit results pending the receipt of laboratory food sample results. The receipt of laboratory sample results can take a week or longer, even with the prioritization of samples supporting the COVID-19 deployments by the DOD Food Analysis and Diagnostic Laboratory. Conditional approval enabled food facilities with acceptable audit scores to begin supporting DOD personnel; the DOD accepted minimal risk while waiting for laboratory results and prevented delays in desired feeding plans to support deployed personnel. In the case that a facility's laboratory results were outside of acceptable limits, its use as a source of food for the DOD would be immediately discontinued. Note: to the authors' knowledge, this did not occur.

**Recommendation:** Continue to allow conditional approval of the facility and its use pending receipt of laboratory sample results as a best practice during emergency situations only. This practice should be limited to catering establishments.

**DOTMLPF Domains:** D, T, M

#### **ISSUE 12: Destination Monitoring Program for food laboratory samples**

**Observation:** The Destination Monitoring Program (DMP), a subsistence laboratory sampling program, pivoted during the COVID-19 pandemic to incorporate subsistence

items that were of specific concern due to pandemic emergency procedures or constraints. This contributed to the overall DOD pandemic food protection response to ensure a safe food supply for deployed personnel and other beneficiaries during the entirety of the pandemic.

**Discussion:** DMP plans for commodities/samples that are identified as potential problem areas in future crisis action response situations lend flexibility and relevancy to the DMP program. It also makes the DMP program a valued part of emergency response plans and part of the holistic DOD food protection effort to ensure a safe food supply. The DMP is one method that can be used to identify issues in commercial food facilities listed as approved sources when audits are unable to be conducted due to constraints associated with the emergency (such as travel restrictions, or establishment restrictions on personnel entry as occurred during the pandemic). Military facility customer complaints and issues identified during formal military sanitation inspections at DOD installation establishments, among other methods, are mechanisms to identify other areas where the DMP should be focused during crisis action response situations.

**Recommendation:** Maintain the flexibility and relevancy of the DMP as a surveillance tool that can pivot to address areas of concern during disasters, emergency, and/or DSCA responses to maintain the safest food supply during uncertain times. This recommendation should be codified in the new edition of AR 40-657/NAVSUP 4355.4H/ MCO P10110.31H, “Veterinary/Medical Food Safety, Quality Assurance, and Laboratory Service.”

**DOTMLPF Domains:** D, T

### **ISSUE 13: Flexibility of the commercial food protection audit system during emergencies**

**Observation:** Global challenges associated with the COVID-19 pandemic resulted in an inability to conduct in-person food protection audits for plants already listed in the Worldwide Directory of Sanitarily Approved Food Establishments for Armed Forces Procurement at the required frequency.

**Discussion:** The DOD Veterinary Services COVID-19 OPT quickly recognized that in-person commercial food protection audits were not executable at required frequencies during the pandemic. The VSPHS Directorate at APHC initially extended suspense dates for routine audits by 90 days. During this time, the DOD Veterinary Service COVID-19 OPT began working on mitigation measures for food protection risk in the event the pandemic impacted the conduct of in-person audits for longer than expected. When APHC further extended audit dates for another 180 days due to pandemic-related constraints on performing in-person audits, the virtual Systems Review Audit (SRA) process that VSPHS Directorate developed and the OPT approved was activated. The SRA process afforded opportunities to stratify food protection risk by commodity, plant history, and specific country factors, and authorized an SRA when deemed appropriate. This also aligned with the FDA’s COVID-related initiative of performing virtual audits of plants. The extensions in due dates for routine audits both prevented plants from being suspended from the Worldwide Directory and also prevented auditors from having to repeat an initial audit when permitted per pandemic conditions. Audit extensions, combined with the SRA process mitigated supply shortages while maintaining a safe food supply for DOD beneficiaries worldwide.

**Recommendation:** During emergencies and/or disasters, maintain flexibility within the audit system while appropriately minimizing food protection risk. Benchmark best practices implemented during the COVID-19 pandemic for potential future use as a template as appropriate.

**DOTMLPF Domains:** D, T, P

#### **ISSUE 14: Collaboration with Preventive Medicine on food safety and food service sanitation requirements**

**Observation:** Synergizing efforts with Preventive Medicine personnel across Services during the early chaotic stages of the pandemic reinforced existing food safety and food service sanitation guidance/regulations with food facility personnel, particularly on DOD installations. This was critically important due to early speculation that food might be a transmission vehicle for the coronavirus.

**Discussion:** The DOD Veterinary Service COVID-19 OPT was informed early in the pandemic that auditors and inspectors noted that some food establishments were using inappropriate concentrations of sanitizers and disinfectants due to confusion of what is authorized on food contact surfaces vs. what concentration is required to “disinfect” for the coronavirus. During the first months of the pandemic, the possibility that food may be able to transmit the coronavirus led to concern in food establishment personnel about taking appropriate measures to ensure their facilities were appropriately sanitized and disinfected to prevent possible transmission. Preventive Medicine personnel at the Army Public Health Center (APHC) Veterinary Service and Public Health Sanitation Branch published guidance for food establishment personnel reinforcing current standards on proper cleaning, sanitizing, and disinfection procedures during the pandemic. The DOD Veterinary Service COVID-19 OPT, APHC, and the Services widely distributed this guidance across the Services for use by food establishment personnel, inspectors, and auditors. The installation Medical Authority is responsible for ensuring this guidance is followed at food establishments on DOD installations. **Of note, off-post establishments contracted to provide food service to DOD using appropriated funds are subject to inspection requirements by Veterinary Services and Preventive Medicine personnel. Off-post establishments that are not contracted by the DOD but that are patronized by DOD personnel are not subject to DOD inspection/regulations but must follow local/state health department food safety guidelines.**

**Recommendation:** Early collaboration with Service Preventive Medicine personnel must occur to ensure all aspects of food safety, food service sanitation, and food defense are addressed. This will result in the safest possible food supply for Service members and beneficiaries during emergency situations.

**DOTMLPF Domains:** D, T, L

## Appendix A. INFORMATION PAPER

MCHB-PH-SFP

15 December 2020

SUBJECT: Troop Feeding during COVID-19 Support Operations in CONUS

1. Purpose: To inform unit-level Contracting Officers (KO) on the requirements and procedures to request a commercial food protection audit for troop feeding during COVID-19 Support Operations in CONUS.
2. Facts: Due to the ongoing national Public Health Emergency, unit-level KOs often must develop short-notice and short-term troop feeding solutions for contingency or COVID-19 support operations. Some unit-level KOs might not be familiar with the requirements of AR 40-657, Veterinary/Medical Food Safety, Quality Assurance, and Laboratory Service, which states, "Off-post caterers and civilian restaurants, furnishing meals purchased with appropriated or NAF funds, must have sanitary approval to include use of approved sources for food items and ingredients used in meals prepared and served." KOs can find approved sources of food, to include caterers and restaurants, in the Worldwide Directory of Sanitarily Approved Food Establishments for Armed Forces Procurement. The Directory and requirements for requesting audits for additional approved sources are found on the following website: <https://vets.health.mil>.
3. KOs requesting sanitary approval of off-post caterers and civilian restaurants or additional approved sources for food items must submit the following:
  - a. Signed letter of request for audit from the commercial food processor, restaurant, or caterer. The letter of request should include the following: establishment name and physical address (production facility); food safety point of contact along with their position (title), phone number, and email address; hours of operation of all shifts; federal and/or state plant number(s) for the establishment, along with the agency and score of the most recent regulatory inspection/audit; and a list all products produced, stored, or distributed at this establishment that are requested for DOD procurement.
  - b. Endorsement memo or official government email from KO which clearly states what troop-feeding operation the approved source supports.
4. The KO should submit the audit request packet via e-mail to [usarmy.apg.medcom-aphc.mbx.food-protection@mail.mil](mailto:usarmy.apg.medcom-aphc.mbx.food-protection@mail.mil). Questions may also be sent to this email address or directed to CW4 Lawrence at the number below.

Prepared by: CW4 Lawrence Approved by: LTC Todd