



Centers for Disease Control
and Prevention (CDC)
Atlanta GA 30333

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SEP 27 2004

Patrick J. McConnon, M.P.H.
Executive Director
Council of State and Territorial Epidemiologists
2872 Woodcock Boulevard, Suite 303
Atlanta, Georgia 30341-4015

Dear Mr. McConnon:

Thank you for your letter regarding the Council of State and Territorial Epidemiologists' (CSTE) position statement 04-ID-06 entitled "Improved Inter-Agency Coordination for Multi-State Outbreaks Associated with Salmonella Species." The Centers for Disease Control and Prevention (CDC) strongly supports CSTE's position.

Salmonella and other enteric pathogens constitute a persistent threat to public health and are leading causes of foodborne diseases. Ground beef and ground poultry represent foods of particular concern because production is concentrated in a small number of facilities in which hundreds or thousands of animal carcasses are commingled daily into product lots, and numerous lots come in contact with the same machinery and surfaces in the plants. These conditions have facilitated contamination of large quantities of meat, causing large multistate outbreaks of drug resistant *Salmonella*.

While these circumstances have contributed to the occurrence of large outbreaks, they also represent an opportunity for improving food safety. Rigorous microbiological and process monitoring, identification of safety failures, and their systematic correction can over time reduce the risk of pathogen transmission.

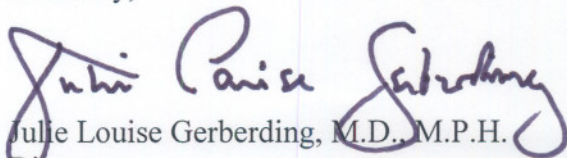
With respect to the two action items proposed for CDC, our comments are as follows:

1. CDC has already been working with state public health officials and others on arranging a conference related to transmission of *Salmonella* Typhimurium Definitive Type 104 from ground beef, documented in a multistate outbreak investigated in late 2003 and 2004.
2. At present, routine *Salmonella* antimicrobial resistance testing of human *Salmonella* isolates is conducted at CDC, and the testing of food and animal isolates is done at the Food and Drug Administration's Center for Veterinary Medicine and the U.S. Department of Agriculture's Agricultural Research Service laboratories, under the National Antimicrobial Resistance Monitoring System.

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Please be assured that CDC will work with CSTE to further improve interagency coordination to reduce the risk of *Salmonella* and other enteric infections causing multistate outbreaks.

Sincerely,

A handwritten signature in purple ink, reading "Julie Louise Gerberding". The signature is fluid and cursive, with the first name "Julie" being particularly prominent.

Julie Louise Gerberding, M.D., M.P.H.
Director



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

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Mr. Patrick J. McConnon, MPH
Executive Director
Council of State and Territorial Epidemiologists
2872 Woodstock Boulevard, Suite 303
Atlanta, Georgia 30341-4015

Dear Mr. McConnon:

Thank you for your June 24, 2004, letter to Under Secretary Elsa Murano on behalf of the Executive Committee and members of the Council of State and Territorial Epidemiologists (CSTE) about the CSTE position statement, "Improved Inter-Agency Coordination for Multi-State Outbreaks Associated with *Salmonella* species." The Under Secretary has asked me to respond to your letter.

The Food Safety and Inspection Service (FSIS) is the public health agency of the Department of Agriculture (USDA) responsible for ensuring that meat, poultry, and processed egg products are safe, wholesome, and accurately labeled. FSIS enforces the Federal Meat Inspection Act, the Poultry Products Inspection Act, and the Egg Products Inspection Act, which require Federal inspection and regulation of meat, poultry, and processed egg products prepared for distribution in commerce for use as human food.

We appreciate receiving a copy of the CSTE position statement on improving inter-agency coordination for investigation of multi-State outbreaks of foodborne illness associated with *Salmonella*. FSIS is considering how best to approach the important public health issue of antimicrobial resistant *Salmonella*, and it would be most useful if CSTE and its members submitted data to FSIS that the Agency could use in addressing this issue. In particular, FSIS would like to request data from CSTE members on the predominant serotypes of *Salmonella* in human patients that exhibit resistance to antimicrobial drugs and time trends in human infection rates caused by these antimicrobial resistant *Salmonella* strains. Ideally, these data should be population-based. In addition, FSIS needs more data on risk factors for both sporadic and outbreak-associated human infections caused by these strains.

FSIS agrees that improved inter-agency coordination is necessary to address the public health issue of antimicrobial resistant *Salmonella*. FSIS will be working with the Food and Drug Administration, FoodNet, and the Animal and Plant Health Inspection Service (APHIS) to obtain data on the predominant strains of antimicrobial resistant *Salmonella* that have been detected by retail food and veterinary surveillance systems. FSIS is also interested in learning about potential methods for screening and rapid detection of antimicrobial resistant *Salmonella* that could be applied in meat and poultry slaughter environments.

Mr. Patrick J. McConnon

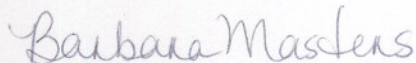
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With regard to *Salmonella* isolates collected under the Hazard Analysis and Critical Control Point (HACCP) regulations, FSIS sends the isolates to the National Veterinary Services Laboratory in Ames, Iowa, where the APHIS serotypes the isolates. Then, the Agricultural Research Service (ARS) tests the isolates for antimicrobial susceptibility. Finally, the data is entered into the national AntiMicrobial Resistance Monitoring System (NARMS) database. ARS is now developing the capability to conduct DNA fingerprinting for these isolates, using standard PulseNet protocols.

On the matter of rapid and expanded site inspection protocols, FSIS intends to develop a series of food safety assessment procedures that are pathogen and product specific. These pathogen and product specific assessment protocols will be available for use in establishments that have been associated with a particular problem that appears to have public health significance. Regarding the recommendation for the Centers for Disease Control and Prevention (CDC) to set standards for *Salmonella* antimicrobial susceptibility testing among PulseNet and FoodNet associated laboratories, isolates from samples collected by FSIS are tested by ARS using a method approved by the National Accrediting Agency for Clinical Laboratory Services.

Your interest is appreciated. Again, thank you for writing.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Masters".

Dr. Barbara Masters
Acting Administrator