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## National Organic Program Auditor Criteria

### 1. Purpose

This document describes the qualifications, responsibilities, and selection criteria for the National Organic Program (NOP) auditors and audit teams. The audit team, including technical experts, may include internal, external, temporary, permanent, full-time, or part-time personnel.

### 2. Scope

This document applies to the audit activities conducted by, or on behalf of, the Accreditation Division (AD). Related body's auditors and subcontractors identified to perform work on behalf of the AD shall meet these or equivalent requirements, as appropriate.

AD activities include accreditation of certifying agents to the NOP Regulations, reviews and assessments of state organic programs, review of export arrangements, and reviews and assessments of foreign governments' accreditation programs operating under recognition agreements or equivalency arrangements.

### 3. Definitions

#### 3.1. NOP Auditor

An NOP employee or contracted auditor qualified to conduct audits on behalf of the National Organic Program.

#### 3.2. NOP Evaluator

An NOP employee or other USDA staff qualified to conduct evaluations of NOP Auditors, Related Body Auditors, and Contracted Auditors on behalf of the National Organic Program.

### 4. Auditor Criteria

The NOP Auditor Criteria is based on 5 core principles: personal attributes, education, work experience, auditor training, and audit experience; these principles are further defined below.

**An auditor is considered an NOP Auditor-in-Training until s/he meets the requirements outlined in sections 5.1 through 5.3, at which time s/he is qualified as an NOP Auditor.**

#### 4.1. Personal Attributes

An NOP Auditor-in-Training must:

- a. Possess personal attributes important in the performance of assessing activities. These attributes are described in clause 7.2 of *ISO 19011* and are included in the *NOP Auditor-in-Training Performance Evaluation Worksheet, NOP 2501-1*, and
- b. Demonstrate the ability to effectively communicate orally and in writing.

#### 4.2. Secondary Education



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An NOP Auditor-in-Training must have a high school diploma or equivalent diploma.

#### **4.3. Post-Secondary or Higher Education, Work Experience, or a Combination of Post-Secondary or Higher Education and Work Experience**

An NOP Auditor-in-Training may qualify as a NOP Auditor-in-Training with a degree from a post-secondary or higher educational institution, as described below; with at least 5 years of related work experience, as described below; or with a combination of post-secondary or higher education and work experience.

- a. Post-Secondary or Higher Education: An NOP Auditor-in-Training must hold a 4-year degree in one or more fields relating to agricultural science, production, processing, economics, business, statistics, or related agricultural field including but not limited to (1) animal, crop, food, range, or environmental science, (2) food technology, (3) horticulture, (4) entomology, (5) biology, (6) chemistry (7) quality assurance, quality control, or quality management, (8) economics, or (9) law.
- b. Work Experience: An NOP Auditor-in-Training must have at least 5 years work experience in a position of progressive responsibility related to accreditation, certification, or inspection of production or handling of agricultural products.
- c. Combination of Post-Secondary or Higher Education and Work Experience:
  - i. Combinations of successfully completed post-high school education and work experience may be used to meet total qualification requirements for the 5 years of work experience.
  - ii. These may be computed by (1) determining the total qualifying work experience as a percentage of the 5 years of work experience required; (2) determining the education as a percentage of the education required for the grade level; and (3) adding the two percentages.
  - iii. The total percentage must equal at least 100 percent to qualify.

*NOTE: For examples of how to calculate the percentage, see the OPM's Group Coverage Qualification Standards for Administrative and Management Positions.*

#### **4.4. Knowledge and Training on Audit Criteria**

An NOP Auditor-in-Training must have completed training on the following:

- a. *ISO 19011 Section 4 Principles of Auditing and Section 6 Audit Activities*
- b. *Successfully completed a RABQSA or IRCA Certified ISO 9001 Lead Auditor Course*
- c. *ISO/IEC 17011 Conformity Audit General Requirements for accreditation bodies accrediting conformity audit bodies*



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- d. *ISO/IEC 17065 – General requirements for bodies operating product certification systems*
  - e. NOP Regulations, the NOP Program Handbook, and/or NOP Procedures, as applicable.
  - f. Any other training deemed appropriate.

#### **4.5. Audit Experience**

An NOP Auditor-in-Training must:

- a. Demonstrate the ability to manage and coordinate the tasks assigned during reviews and/or assessments, and
- b. Perform at the overall “Acceptable” level for 2 audit activities within a 1-year period.
- c. Obtain written approval by the AD Director that 4.5.1 and 4.5.2 have been satisfied and s/he is qualified as an NOP Auditor.

### **5. Maintaining Auditor Qualifications**

An NOP Auditor must meet the Audit Experience, Performance, and Continual Professional Development requirements to maintain his/her qualifications as an NOP Auditor.

#### **5.1. Audit Experience**

An NOP Auditor must participate in at least three audit activities annually.

#### **5.2. Performance**

- a. An NOP Auditor must perform audit activities at the “Acceptable” level.
- b. An NOP Auditor receiving an overall rating of “Acceptable with Conditions” or “Unacceptable” shall:
  - a. Receive additional training, instruction, or complete other improvement activities to correct deficiencies for individual element(s) rated Needs Improvement and/or Unsatisfactory.
  - b. Perform 2 audit activities under the supervision of an evaluator to verify that s/he is performing the individual element(s) previously rated Needs Improvement and/or Unsatisfactory at a competent level.
  - c. If after the 2<sup>nd</sup> evaluation, the NOP Auditor continues to perform at the Needs Improvement and/or Unsatisfactory level, the AD Director shall determine if additional training is needed or if the employee shall not be qualified as an NOP Auditor.

#### **5.3. Continual Professional Development**



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- a. An NOP Auditor shall fulfill continual professional development requirements by completing a combined total of 80 hours continual professional development, excluding travel and social time, during a 3-year period. This period is calculated per calendar year.
    - a. This period starts when initial NOP Auditor status is achieved and ends on its third anniversary; then consecutively satisfied every 3 years thereafter.
  - b. The following items are examples of activities that will qualify for continual professional development:
    - a. Complete AgLearn courses that support the improvement of personal and professional skills necessary to conduct audit activities;
    - b. Attend conferences, seminars or workshops related to audit activities;
    - c. Teach courses or present information related to audit activities;
    - d. Attend courses related to audit activities;
    - e. Attend meetings or courses related to assessment, certification, or inspection activities, including but not limited to meetings and training opportunities sponsored by American Society for Quality (ASQ), International Organic Inspectors Association (IOIA), International Federation of Organic Agriculture Movements (IFOAM), or other technically or professionally based organizations; or
    - f. Participate on committees related to audit activities, ASQ, or other professional associations that contribute to the advancement of the quality profession which may be on a section, division, technical, national, or international level.
    - g. Other activities determined and approved by the AD Director to satisfy the continual professional development requirement.

## **6. Internal Auditor Criteria**

An internal Auditor must meet the following criteria:

- a. Meet section 5 criteria above;
- b. Perform audit activities at the “Acceptable” level;
- c. Demonstrate the ability to manage and coordinate assessments; and
- d. Be independent of the activity being assessed.

## **7. Technical Expert Criteria**



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A technical expert must meet the following criteria:

- a. Meet section 5.1, 5.2, and 5.3; and
- b. Possess specific knowledge and/or experience as required for the task, as appropriate.

## **8. Selection of Audit Team**

**8.1.** The audit team is selected by the AD Director.

**8.2.** In determining the size and composition of the audit team, consideration is given to the following:

- a. Audit objectives, scope, criteria, and estimated duration of the assessment.
- b. The overall competence of the audit team needed to achieve the objectives of the assessment.
- c. Statutory, regulatory, contractual, accreditation requirements, and certification requirements, as applicable.
- d. The need to ensure the independence of the audit team from the activities to be assessed and to avoid conflict of interest.
- e. The ability of the audit team members to work together as well as their ability to interact effectively with the applicant or certifying agent.
- f. Physical location of the audit team members.
- g. Overall cost of supplying service to the certifier.
- h. The audit team members' qualifications.
- i. The auditor(s) latest audit performance evaluation.
- j. The audit team members of the previous 2 assessments. Every effort should be made to rotate audit team members at least once every third assessment.
- k. The audit team member may not have been employed by the applicant or certifying agent within the past 2 years of the assessment.

**8.3.** Selected auditor(s) and/or expert(s) are notified by e-mail. The notification clearly defines the assignment given to the audit team.

**8.4.** Members of the audit team must inform the AD Director, prior to the audit, about any existing, former, or perceived link or competitive position between themselves or their organization and the applicant or certifying agent to be assessed.



- 8.5. The audit team is provided with the appropriate criteria documents, previous audit reports, and the relevant documents and records of the certifier.
- 8.6. The applicant or certifying agent is notified of the assigned auditor(s) and/or expert(s). The applicant or certifying agent provides consent for NOP to use the assigned auditor(s) and/or expert(s).

## 9. Records

- 9.1. The AD Director maintains copies of NOP Auditor resumes, training records, audit assignments and Conflict of Interest and Confidentiality Agreements.
- 9.2. The AD Director monitors Related Bodies' auditor's audit performance in accordance with *NOP 2501 Auditor Performance and Evaluation*.

## 10. References

### Other Laws and Regulations

ISO 19011:2011 Guidelines for auditing management systems

ISO 9001:2015 Quality Management Systems

ISO/IEC 17011:2004 Conformity Assessment - General requirements for accreditation bodies accrediting conformity assessment bodies.

ISO/IEC Guide 17065:2012 Conformity assessment - Requirements for bodies certifying products, processes and services.

### **NOP Program Handbook: Guidance and Instructions for Accredited Certifying Agents and Certified Operations**

NOP 2000 General Accreditation Policies and Procedures

NOP 2501 Evaluating Auditor Performance