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National Organic Program Evaluating Auditor Performance

1. **Purpose**

This document explains the National Organic Program (NOP) policies and responsibilities for training and performance evaluations of auditors and technical experts who perform or participate in NOP audits.

2. Scope

This document applies to the performance and training evaluation process for NOP Auditors-in-Training and NOP Auditors, and Technical Experts. Subcontractors identified to perform work on behalf of the NOP shall have an equivalent system for evaluating auditors.

3. **Policy**

NOP uses NOP 2501-1 NOP Auditor-in-Training Evaluation Worksheet, and NOP 2501-2 NOP Auditor Evaluation Worksheet (Evaluation Worksheets) to monitor, evaluate, and record the performance and overall competence of NOP Auditors-in Training, NOP Auditors, and technical experts.

4. Responsibilities

4.1. **Evaluatees shall**

- a. Have a clear understanding of their role(s) and responsibilities and shall request clarifications when necessary.
- b. Seek feedback from the evaluator during training or as soon as possible after training occurs.
- c. Sign, date, and return the applicable Evaluation Worksheet to acknowledge discussion of the evaluation and return to the Evaluator within ten (10) working days of receipt. Signing the Evaluation Worksheet does not indicate agreement with the findings.
- d. Take steps to improve competence or performance when identified as needing improvement or unsatisfactory.

4.2. **Evaluator shall:**

- a. Conduct evaluations on all aspects of the accreditation process including but not limited to, onsite audits, witness audits, and desk audits.
- b. Document strengths, needs for improvement, and concerns on the applicable Evaluation Worksheet to determine the overall rating of individual being evaluated.

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- Submit the completed Evaluation Worksheet to the evaluatee, his/her supervisor, and the Accreditation Division (AD) Director as soon as possible after performing the evaluation, within ten (10) working days.
- d. Discuss the evaluation with the evaluatee, and his/her supervisor, as soon as possible after the evaluation is received. If the evaluation is conducted in person, as opposed to via desk audit, the evaluator is expected to discuss the evaluation results with the evaluatee at the conclusion of the audit activity.
- e. Conduct additional evaluation tasks as determined by the NOP AD Director.

4.3. **AD Director Responsibilities**

- a. Monitor the NOP AD Auditors' and Evaluators' competence and/or performance during Training Evaluations, Witness Appraisals, Desk Appraisals, other communications, and through Evaluation Worksheets provided by evaluators.
- b. Discuss individual and overall ratings lower than "Competent" and "Acceptable," as applicable, with the evaluatee as soon as possible after notification of the rating. Assist in improving NOP Auditors and Evaluators competence and/or performance in areas rated as needing improvement or unsatisfactory by developing a documented improvement plan.
- c. Report deficiencies or concerns regarding the evaluation of contracted auditors to their respective representatives.
- d. Maintain NOP Auditor Matrix to ensure that NOP Auditors conducting assessment activities have received required training and are performing assigned activity(s) at the competent level.

Frequency of Evaluations 5.

5.1. **NOP Auditor-in-Training Evaluations**

NOP Auditor-in-Training evaluations shall be completed by the evaluator each time an NOP Auditor-in-Training participates in an assessment. NOP 2501-1 NOP Auditor-in-Training Evaluation Worksheet shall be used to record the training and the competence of the NOP Auditor-in-Training.

5.2. NOP Auditor and Related Body's Auditors Performance Evaluations

NOP Auditor and Related Body's Auditors Performance Evaluations shall be used to verify the Auditor's competence and performance. NOP 2500-2 NOP Auditor Performance Evaluation Worksheet shall be completed by an evaluator at least annually (one evaluation must be concurrent with the annual NOP AD auditor performance appraisal, as appropriate).

- a. A Desk Appraisal shall be performed at least annually.
- b. A Witness Appraisal shall be conducted at least once every 3 years.

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6. **Determining Overall Rating for Evaluations**

Preliminary Rating System 6.1.

A five-level rating system shall be used to evaluate training and performance. The rating levels consistent of "Outstanding", "Strong", "Competent", "Needs Improvement", and "Unsatisfactory." "Not Observed" is used to identify areas that were not evaluated during the evaluation.

6.2. Definitions of Preliminary Ratings

- a. Outstanding means that performance is this area is *consistently outstanding*. Practices are demonstrated at the *highest* level of performance. The evalutee continuously undertakes additional, appropriate responsibilities.
- b. Strong means that the performance in this area is *frequently* high. Some practices are demonstrated at a high level while others are at a consistently adequate acceptable level. The evaluatee sometimes seeks to expand the scope of personal and professional qualities and often undertakes additional, appropriate responsibilities.
- c. Competent means that performance in this area is *generally effective* and practices are demonstrated at an acceptable level. The evaluatee maintains an adequate scope of personal and professional qualities and performs additional responsibilities as assigned.
- d. Needs Improvement means that performance in this area requires improvement to attain a minimum level of competency. Practices are not consistently demonstrated at an acceptable level.
- e. <u>Unsatisfactory</u> means that performance in this area is *ineffective* and requires extensive improvement to attain a minimum level of competency.
- f. Not Observed means that performance in this area was not observed and cannot be rated.

6.3. **Overall Rating**

A three-level overall rating system is used to determine an evaluatee's level of participation in future audit activities. The three levels are "Acceptable", "Acceptable with Conditions", and "Unacceptable."

6.4. Definitions of Overall Ratings

- a. Acceptable means that the evaluatee received preliminary ratings of Outstanding, Strong, or Competent in all activities. This rating means the evaluatee has no restrictions.
- b. Acceptable with Conditions means that the evaluatee received one or more preliminary ratings of Needs Improvement. This rating means that the evaluatee

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cannot serve as a Team Leader, but may participate as a Team Member, at the discretion of his/her supervisor and the program manager. The evaluatee must receive additional training, instruction, or other improvement plan activities, until s/he is determined to be competent in the activity(s) rated as Needs Improvement.

c. Unacceptable means that the evaluatee received one or more preliminary ratings of Unsatisfactory. This rating means that the evaluatee cannot serve as Team Leader or a Team Member. The evaluatee must receive additional training, instruction, or other improvement plan activities, until s/he is determined to be competent in the activity(s) rated as Unsatisfactory.

7. Records

The NOP Auditor Performance Evaluation Worksheet and the NOP Auditor-in-Training Worksheet records shall be maintained by the AD Division Director for evidence of meeting the NOP Auditor Criteria for the Specific Program and by the evaluatee's rating official as documentation of performance.

8. References

Other Laws and Regulations

ISO 19011:2011 Guidelines for auditing management systems

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

NOP 2000 General Accreditation Policies and Procedures

NOP 2500 NOP Auditor Criteria

NOP 2501-1 NOP Auditor-in-Training Evaluation Worksheet

NOP 2501-2 NOP Auditor Evaluation Worksheet