

Formal Recommendation
From: National Organic Standards Board (NOSB)
To: National Organic Program (NOP)

Date: October 25, 2018

Subject: Training and Oversight of Inspector and Certification Review Personnel

NOSB Chair: Tom Chapman

The NOSB hereby recommends to the NOP the following:

Other: Guidance on various suggested topics for training inspectors and certification agency review personnel.

Statement of the Recommendation:

The NOSB has provided subject areas in which various stakeholders have identified a need to strengthen the skills and abilities of inspectors who perform on-site reviews of organic operations, and certification review personnel who assess the organic system plans of organic operations and the inspection reports of these operations. This document describes larger subject areas and specific topics where additional knowledge would improve certifier and inspector review of organic operations.

Rationale Supporting Recommendation

The specific recommendations in this document rely upon the experience and knowledge of NOSB members as well as considerable public comment received from organic inspectors, accredited organic certification agencies, and organic operations. The NOSB, along with the NOP, have identified training as an important activity to lessen instances of fraud. These recommendations set a comprehensive roadmap for training inspector and certification review personnel which will improve oversight, compliance and enforcement of the USDA organic regulations.

Organic Foods Production Act of 1990, as amended, Sec. 2115 [7 U.S.C. 6514] (a)(2)
Accreditation Program

7 CFR Part 205.501(a)(1) General Requirements for accreditation

7 CFR Part 205.504(a) Evidence of expertise and ability

NOSB Vote:

Motion to adopt the proposal as guidance to the NOP: Inspector and Certification Review Personnel Training and Oversight.

Motion by: Harriet Behar

Seconded by: Rick Greenwood

Yes: 15 No: 0 Abstain: 0 Absent: 0 Recuse: 0

Outcome: Motion Passed

National Organic Standards Board
Compliance Accreditation and Certification Subcommittee Proposal
Training and Oversight of Inspector and Certification Review Personnel
August 17, 2018

I. INTRODUCTION & BACKGROUND

In Spring 2018, the CACS brought forward a proposal entitled Inspector Qualifications and Training which recommended the establishment of mandatory qualifications, ideal levels of experience or background, and compulsory continuing education. The goal of this proposal was to further strengthen the skills and abilities of the inspector pool and bolster the certification system on the whole. The proposal passed with broad support of the Board and organic stakeholders, both of whom clearly expressed interest in being involved in the establishment of such qualifications, as well as expanding the scope to include certification review staff.

As the Program moves forward with the Board's recommendation, it has requested specific areas of training that could be incorporated into the USDA's Learning Management System (LMS), an online platform for remote learning. This proposal summarizes public comments regarding improvement of inspection skills, identifies specific areas that could be included in the LMS, and provides further approaches for strengthening inspector and review staff.

II. RELEVANT AREAS OF THE STATUTE, RULE and RELATED DOCUMENTS

[205.501\(a\) General requirements for accreditation.](#)

(a) A private or governmental entity accredited as a certifying agent under this subpart must:

- (1) Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part;
- (4) Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part;
- (5) Ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.
- (6) Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services;

[NOP Memo to Accredited Certifying Agents: Criteria and Qualifications for Organic Inspectors, April 2012](#)

[NOP 2027, Instruction: Personnel Performance Evaluations, March, 2017](#)

[CACS Proposal: Personnel Performance Evaluations of Inspectors, April 2017](#)

[Accredited Certifiers Association Guidance on Organic Inspector Qualifications, February 2018](#)

[CACs Discussion Document: Import Oversight, February 2018](#)

[CACs Proposal: Inspector Qualifications and Training, May 2018](#)

III. DISCUSSION

Many commenters noted the essential and critical work on-site inspectors and office certification review staff perform, especially in the complicated area of import oversight. There are specific skills needed to address the challenges of tracking diverse organic products through both domestic and international supply chains as the products move through numerous physical handlers as well as brokers and others who do not take physical possession of the products. International, U.S. federal, state and local regulations contribute to the risk to organic integrity through phytosanitary and other requirements. NOP accreditation auditors should have the skills, background and expertise needed as described in the [NOP 2500 Auditor Criteria](#), to provide certification oversight and to continually improve their knowledge along with inspectors and certification personnel.

Based upon public comment regarding the Import Oversight discussion document, as well as the Inspector Qualifications and Training Proposal passed at the Spring 2018 meeting, the NOSB received practical solutions for improvement to our pool of inspectors and certification review staff. Some of these comments follow under the relevant topic area:

Accounting Skills

- Improve skills and background for performing in/out mass balance audits, and include a clear description in the inspector report on what was reviewed and discovered on-site
- Improve performance of rigorous trace backs from received product through the entire chain to original source
- Increase command of basic accounting skills and understanding of tracking of financial records through a variety of accounting systems
- Inform clients that the organic inspection could include more detailed review of financial records, including bank statements, deposits, etc.

Technical and Interpersonal Skills

- Increase awareness and skill in reviewing organic certificates and other documentation to identify areas of weakness where fraud could occur
- Improve communication, including interview and listening skills
- Improve skills in how to diffuse negative situations

Organic System Plan

- Add a specific section where the operator provides a sample audit in their OSP, with sample documents and how they interact with each other, to aid the on-site inspector when they are tracking a sale with this “roadmap”

Inspector Training and Oversight

- Trainings should be rigorous and include testing
- Continuing education should be required
- Mandatory minimum qualifications
- Some commenters proposed a system of licensing or accrediting inspectors, however there was no consensus around this idea

- Specialized trainings by type of operation
- Inspectors should be categorized by scope and skills to aid certifiers in choosing qualified inspectors for each entity
- Improve and expand inspector mentoring for beginning inspectors, peer mentoring for experienced inspectors
- Encourage team inspections
- Create more robust systems for client and reviewer/inspector feedback to identify areas of weakness and strength
- Increased understanding of import protocols and requirements

In order to meet these challenges, the NOSB recommends a variety of approaches:

1. The current system of training inspectors on the organic regulations through the International Organic Inspectors Association (IOIA), the Accredited Certifiers Association (ACA), and individual certifiers should be improved and become more standardized. This would improve professionalism and confidence in our system. Accreditation of training programs through a third party such as ISO should be a long-term goal. A cost/benefit analysis of this accreditation should be completed. The NOP could fund a task force to develop a baseline curriculum and attendee testing protocols, using templates from other sectors of the food industry.
2. The USDA should provide organic inspectors and certification review personnel access to the Learning Management System. The following areas, available through LMS, would be most appropriate to the organic industry: investigative skills, auditing, organic regulations, and other items as needed.
3. The USDA could facilitate the development of a practical and comprehensive apprenticeship/mentor/peer mentor program, to enhance the skills of all levels of organic inspectors and review staff. This could include one-on-one in-person mentorships, long distance communication and learning through conference calls or webinars, and on-line courses with testing.
4. A standardized system of tracking inspector skills, background and knowledge should be developed, to aid certifiers in choosing appropriate inspectors for specific jobs. This could also encourage inspectors to improve their resumes with continued education, such as taking an accounting course at a local technical college. This would then be added to their list of skills. This information should be publicly available.
5. A standardized system of inspector and reviewer feedback should be developed for use by organic certification agencies, to provide consistency and confidence in how inspectors are chosen between various certifiers.
6. This process of inspector oversight and training subject areas should be continually improved and updated by the NOSB and NOP, to address issues as they arise.

IV Subcommittee vote

Motion to adopt this proposal as guidance to the NOP: "Inspector and Certification Review Personnel Training and Oversight".

Motion by: Harriet Behar

Seconded by: Rick Greenwood

Yes: 8 No: 0 Abstain: 0 Absent: 0 Recuse: 0

Approved by Scott Rice, Subcommittee Chair to transmit to NOSB, August 17, 2018