

## **NATIONAL ORGANIC PROGRAM RESPONSE TO 2025 PEER REVIEW**

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**SUBJECT:** National Organic Program Response to 2025 Peer Review

### **Background**

The peer review process is a vital component of the U.S. Department of Agriculture (USDA) Agricultural Marketing Service (AMS) National Organic Program's (NOP) commitment to continuous improvement. The peer review process is described in [NOP 1031, "Peer Review of National Organic Program \(NOP\) Accreditation."](#) For its 2025 peer review, the NOP contracted with the ANSI National Accreditation Board (ANAB). The 2025 ANAB Peer Review Panel evaluated NOP staff compliance with NOP accreditation procedures and decisions, and conformance with ISO/IEC 17011, an international quality standard for accreditation bodies.

The ANAB auditors cited no opportunities for improvement this year and determined that NOP and its staff are in compliance with NOP's own policies and procedures, and in conformance with ISO/IEC 17011. ANAB shared some observations and positive feedback about several areas of program operations.

### **Summary of ANAB Observations and NOP Responses**

NOP values the feedback provided by the peer review, and thanks the ANAB team for its work. The following list summarizes ANAB observations and NOP's responses:

1. **Confidentiality:** The NOP website contains information on Confidentiality (FOIA); however, the Terms of Accreditation do not include the Confidentiality clause. NOP can improve the Handbook by mentioning the Confidentiality policy statement included in the Quality Manual.
  - *NOP Response:* NOP is working on updates to [NOP 2000, General Accreditation Policies and Procedures](#), and will include information about confidentiality requirements. Confidentiality requirements regarding nonpublic information in 5 CFR 2635.703 and in other statutes and regulations apply across the U.S. Federal government, including NOP, and NOP will continue to adhere to them.
2. **Document Control.** NOP controls changes to documents by saving previous versions of the document. However, it can sometimes take time to find the previous version, and changes are not always flagged. NOP can increase efficiency by tracking changes

through SharePoint with a summary of the reason for the change to the new version.

- *NOP Response:* NOP has found its approach to be adequate. We will consider ANAB's observation when making future improvements to file management and tracking changes.
3. **Records Control.** NOP is still working on a document with a table showing the type of records, responsibility, storage location, retention time, and final disposition. The document is still in Draft and approval is in process. The due date is the end of 2025.
- *NOP Response:* NOP will continue to work with the USDA records manager liaison to complete a file disposition plan, and a final draft may be completed in 2025. Once the draft is complete, NOP will submit the plan for approval through the USDA's clearance process.
4. **Peer Review.** NOP did not have a peer review conducted in 2024, in accordance with the NOP procedure. The 2024 Peer Review Panel was moved to 2025.
- *NOP Response:* NOP recognizes that there was an approximately 18-month gap between its two most recent peer reviews. NOP schedules peer reviews based on a number of factors, including availability of key staff and budget dynamics.
5. **Organic Integrity Database.** The recently implemented Organic Integrity Database (OID) system utilized by certifiers to generate standardized certificates of organic operation is not sufficient to reliably handle the volume of work in a timely manner. This is especially problematic for generation of NOP Import Certificates.
- *NOP Response:* NOP is continuing to work to stabilize and improve OID as resources allow.
6. **Appeals.** The NOP has identified one person responsible for review and recommendation for all appeals. There is significant risk associated with the lack of additional people familiar with the appeals process.
- *NOP Response:* Since the completion of the peer review, NOP has begun transitioning to a team approach for working on appeals. Knowledge transfer is ongoing. This will bolster continuity across the program.

### **Next Steps**

NOP relies on constructive feedback from ANAB Peer Reviewers to focus our continuous improvement efforts. We will continue to evolve our process controls and planning to align with current staffing levels. By focusing on quality and risk-aware processes, NOP staff continue to support the organic community and maintain organic integrity for all.