



National Organic Program
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NATIONAL ORGANIC PROGRAM RESPONSE TO 2022 PEER REVIEW

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SUBJECT: National Organic Program Response to 2022 Peer Review

Background

The peer review process is a vital component of the U.S. Department of Agriculture (USDA) Agricultural Marketing Service 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 2022 peer review, the NOP contracted with the ANSI National Accreditation Board (ANAB). The 2022 ANAB Peer Review Panel evaluated NOP staff compliance with NOP accreditation procedures and decisions, and 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 ISO/IEC 17011. ANAB shared some observations and positive feedback about several areas of program operations.

Summary of Observations

1. **Quality Manual.** The NOP quality manual includes links that are no longer active and refers to file management details that are not consistently followed, such as watermarking archived files.
2. **File Plan.** NOP currently saves all records, because its USDA file disposition plan is in draft form and has not yet been approved. NOP needs to update its records plan with a retention and final disposition schedule.
3. **Cross-Trained Staff.** NOP has increased its staffing and cross-divisional work over the past two years. There are isolated instances where there is a lack of depth in personnel. Specifically, the position of appeals management is staffed by one person, with no cross-training. As the NOP grows, it is important to have more than one person able to fulfill the requirements of this position.

NOP Response

NOP values the feedback provided by the peer review, and thanks the team for its work. In response to these observations, the NOP is implementing the following actions:

1. **Quality Manual.** NOP will update its quality manual to correct broken links and revise some details of the file management plan as the program shifts to a new web-based file management system.
2. **File Plan.** NOP will continue to work with the USDA records manager liaison to finalize a file disposition plan. Once the draft is complete, NOP will submit the plan for approval through the clearance process.
3. **Cross-Trained Staff.** NOP is actively working to cross-train staff and develop teams where possible to support knowledge sharing for continuity across the program. NOP has identified several roles that would benefit from training additional staff to support and back-up specialists in the event of an absence. NOP will continue to develop personnel depth through training and documentation of standard operating procedures to support this knowledge transfer.

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 as the program grows in response to ANAB's comments and feedback. By focusing on quality and risk-aware processes, NOP staff continue to support the organic community and maintain organic integrity for all.