

NATIONAL ORGANIC PROGRAM RESPONSE TO 2023 PEER REVIEW

February 27, 2024

FROM: Jennifer Tucker, Ph.D.
Deputy Administrator
National Organic Program (NOP)

SUBJECT: National Organic Program Response to 2023 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 2023 peer review, the NOP contracted with the ANSI National Accreditation Board (ANAB). The 2023 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 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. **Quality Manual.** The NOP quality manual refers to file management procedures that are not consistently followed, such as watermarking obsolete documents as "archived."
 - *NOP Response:* NOP will continue to revise some details of the file management procedures to reflect current practice as the program finalizes its migration to a new web-based file management system in 2024.
2. **File Plan.** NOP currently saves all records, because its USDA record retention and file disposition plan is in draft form and has not yet been finalized and approved.
 - *NOP Response:* NOP will continue to work with the USDA records manager liaison to finalize a file disposition plan and anticipates a final draft will be completed in 2024. Once the draft is complete, NOP will submit the plan for approval through the clearance process.

3. **Preventative Actions.** NOP implements risk-based preventative actions, as evidenced by the management review meeting notes; however, the NOP quality manual does not describe the preventative actions taken to mitigate risks identified by NOP.
 - *NOP Response:* NOP will update the quality manual to include a reference to the management review process, which documents preventative actions taken to mitigate identified risks.
4. **Adequate Staff and Training.** NOP should continue to maintain appropriate staffing levels and training in preparation for the March 2024 implementation of Strengthening Organic Enforcement.
 - *NOP Response:* Each NOP division is actively developing and providing training for staff to prepare for and support a robust implementation of Strengthening Organic Enforcement final rule at the program level. We also continue to engage in robust outreach with external stakeholder groups.
5. **Accreditation Timelines.** NOP has reduced the amount of time to complete accreditation assessment processes and should continue to strive for timely completion.
 - *NOP Response:* NOP has made significant improvements in the timeliness of its accreditation processes and will continue to assess timeliness as a key success metric in support of NOP's goals and priorities.
6. **Cross-Trained Staff.** While NOP has trained additional staff to support the appeals intake process, the position of appeals management is staffed by one person, with no other staff cross-trained on this position. As the NOP grows, it is important to have more than one person able to fulfill the requirements of this position.
 - *NOP Response:* NOP continues to cross-train staff and develop teams where possible to support knowledge sharing for continuity across the program. Several roles were identified that would benefit from training additional staff for support, and NOP continues 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.