

# **United States Department of Agriculture**

Agricultural Marketing Service, Specialty Crops Program, Specialty Crops Inspection Division

#### SUPERVISORY REVIEWS OF AGRICULTURAL COMMODITY GRADERS

This instruction provides guidance on conducting supervisory reviews on non-probationary Agricultural Commodity Graders (ACGs) regarding their grading, inspection certification, documentation, and other inspection related elements. ACGs in probationary status fall under a more comprehensive review schedule not covered by this instruction. Supervisory reviews are intended to help management observe the application of Division instructions and identify inspection related performance non-conformities to be addressed. In addition to this instruction, it is expected that supervisors perform regular informal performance spot checks on inspection personnel throughout the year or season as inspection services are being performed.

A Supervisory Review will consist of two portions: onsite-observations (conducted in-person or virtually) and document review (desk review of completed inspection documents).

Supervisory reviews will be completed by supervisors (or delegates) as defined below. Supervisors (or delegates) will only perform reviews on ACGs of equal or lower grade/seniority.

### **Definitions**

# Agricultural Commodity Grader (ACG)

- A non-supervisory Agriculture Commodity Grader employed by SCI.
- SCI Inspectors-in-Charge are considered non-supervisory ACGs.
- An unrestricted fresh fruit and vegetable market licensee employed by a Federal-State cooperative state agency licensed by SCI for the purpose of conducting market inspection.

### Supervisory Agricultural Commodity Grader (ACG)

• An Officer-in-Charge, Assistant Officer-in-Charge, Sub Area Supervisor, Training Officer, or Federal State Supervisor that is an Agricultural Commodity Grader or inspector employed by SCI or state agency for the purpose of supervising or training market inspection.

### Full-Time and Split Time

• Full-time within this policy shall mean employed 40 hours per week, 52 weeks per year with 80% of their time performing, supervising or training market inspections, processed inspections, or a combination of both.

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• If time is split between market inspection <u>and</u> processed inspection follow the guidance aligned to the type of inspections performed, supervised or trained the most during the performance year.

# Market Inspection

• The term "market inspection" includes terminal market inspection and Section 8e inspection services of fresh products performed by the Specialty Crops Inspection (SCI) Division or Federal-State cooperative state agency.

# Supervisor

- A supervisor is an Agricultural Marketing Specialist, Regional Inspection Operations Branch Chief, Assistant Regional Inspection Operations Branch Chief, Officer-in-Charge (OIC), Assistant OIC, Shift Supervisor, Sub Area Supervisor, Federal-State Supervisor, Federal Program Manager.
- Supervisor responsibility may be delegated to an Inspector-In-Charge (IIC) or Training Officer (TO) as needed. A supervisor must co-sign the Supervisory Review Report completed by the IIC or TO.
  - An IIC or TO may not perform a supervisory review on a supervisor.

#### Unannounced

• Unannounced means the supervisor conducts the onsite observations in-person without advance notice to the ACG.

### Frequency and Scope

Frequency of reviews noted below may be increased at the supervisor's discretion if performance deficiencies persist, are critical or in conjunction with an approved extension on an in-plant assignment longer than five years. It is the responsibility of each supervisor to ensure that resources are in place to meet this goal.

# Market Inspection

- A. For full-time non-supervisory ACGs performing market inspection, **four supervisory reviews** must be conducted each performance year with an optimal frequency of one per quarter.
  - Two reviews will have the on-site observations conducted in-person and be unannounced.
  - Two reviews will have the on-site observations conducted either in-person or virtually and may be announced or unannounced.

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For less than full-time ACGs, one supervisory review must be conducted every three months (alternating in-person/unannounced and virtually/announced/unannounced) or one per season if less than three months (must be in-person/unannounced).

- B. For supervisory ACGs performing market inspection, **two supervisory reviews** must be conducted each performance year with an optimal frequency of only one within any quarter.
  - One review will have the on-site observations conducted in-person and be unannounced.
  - One review will have the on-site observations conducted either in-person or virtually and may be announced or unannounced.

# Processed Product Inspection

- A. For full-time ACGs performing inspections on processed product **two supervisory reviews** must be conducted each performance year with an optimal frequency of only one within any quarter.
  - One review will have the on-site observations conducted in-person and be unannounced.
  - One review will have the on-site observations conducted either in-person or virtually and may be announced or unannounced.

For less than full-time ACGs, one supervisory review must be conducted every three months (alternating in-person/unannounced and virtually/announced/unannounced) or one per season if less than three months (must be in-person/unannounced).

- B. For supervisory ACGs performing inspections on processed product **one supervisory review** must be conducted each performance year.
  - Review will have the on-site observations conducted in-person and be unannounced.

### **Portions**

A Supervisory Review will consist of two portions: onsite-observations (conducted in-person or virtually) and document review (desk review of completed inspection documents).

### On-Site Observations

The supervisor will observe the performance of an ACG to evaluate proper inspection procedures are followed, scoring defects are in accordance with current guidelines and proper completion of the inspection documentation (i.e., notesheets, tally sheets, worksheets or certificates).

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• Non-conformities must be addressed immediately to prevent inspection results from being reported incorrectly.

- If three or more non-conformities requiring a corrective action are discovered, additional on-site observations will be conducted monthly until the supervisor has determined the corrective actions have been successful.
- If a single non-conformity results in the overturning of the inspector's assigned grade, additional on-site observations will be conducted monthly until the supervisor has determined the corrective actions have been successful.

On-site observations will be made in-person or virtually.

#### A. In-Person

The supervisor will accompany the ACG or, as appropriate, arrive at the inspection location unannounced to conduct on-site observations and evaluate whether the ACG is following proper inspection procedures, scoring defects in accordance with current guidelines and properly completing the inspection documentation (i.e., notesheets, tally sheets, worksheets or certificates).

- The supervisor is there to observe, not lead, but may participate in the inspection-related activity. They must ask questions if necessary to ensure that the product has been properly inspected or inspection-related activity has been properly performed and completed.
- When feasible supervisors will initial and/or sign corresponding notesheets, worksheets, tally sheets and certificates for inspections observed.
- Where applicable, the supervisor will accompany the ACG on a plant sanitation tour (before or during operation), for applicable facilities, to observe the performance and effectiveness of the inspector performing the tour.
- The supervisor will review inspection equipment and tools used by SCI employees and report conditions that do not meet SCI instructions on cleanliness and/or sanitation. All equipment used must be in good working order and properly calibrated with documentation of the calibration(s) maintained.
- Where applicable, the supervisor will ensure that all Good Manufacturing Practices (GMPs), as outlined in the AIM Inspection Series, <u>Sanitation Manual</u> and <u>Safety Manual</u>, are being practiced by the facility.
- ACGs must follow SCI instructions on safety. Safety equipment must be available and in use by employees.
- Analytical and grade deviants must be applied correctly. Lot grades must be correctly designated. Proper terminology is necessary for non-scoreable quality factors.
- Instructions and standards must be used correctly.
- Where applicable, performance of microscopic analysis must comply with SCI instructions. Documentation of analysis must be current and accurate. All microscopes must have appropriate lighting and be in good working order.

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• Whenever possible, supervisors will accompany the ACG while sampling to observe adherence to instructions and GMPs.

#### B. Virtual

Virtual option may only be used where telecommunication devices are permitted for use in the facility. The supervisor will conduct on-site observations and evaluate whether the ACG is following proper inspection procedures, scoring defects in accordance with current guidelines and properly completing the inspection documentation (i.e., notesheets, tally sheets, worksheets or certificates) utilizing virtual options such as live streaming, Microsoft Teams video chats, or digital image sharing. The ACG will source the video or digital images via their issued devices such as a laptop, tablet or mobile device with camera capabilities.

- The supervisor will coordinate with the ACG to virtually observe inspection-related activity and ask questions if necessary to ensure that the product has been properly inspected or inspection-related activity has been properly completed.
- Where applicable, the supervisor will ensure that all Good Manufacturing Practices (GMPs), as outlined in the AIM Inspection Series, Sanitation Manual and Safety Manual, are being practiced by the facility.
- ACGs must follow SCI policy and instructions on safety. Safety equipment must be available and in use by employees.
- Analytical and grade deviants must be applied correctly. Lot grades must be correctly designated. Proper terminology is necessary for non-scoreable quality factors.
- Instructions and standards must be used correctly.
- Whenever possible, supervisors will observe the ACG while sampling to ensure adherence to instructions and GMPs.

#### Documentation Review

The supervisor will complete a desk review of completed inspection documentation or when applicable will validate results of submitted review samples in order to evaluate whether proper inspection procedures, scoring of defects and proper documentation of results have occurred.

- A listing of the certificates and/or inspection records reviewed must be kept on a <u>SC-383</u>
  <u>SCI Division Records Review</u> form and filed with the Supervisory Review Checklist.
- Determine if any vital points on the notesheet, worksheet, tally sheet, or certificate have been omitted.
- Determine if statements are substantiated by information on the notesheet, worksheet, tally sheet, or certificate.
- For in-plant inspections, review five consecutive inspection days of sanitation score sheets for proper documentation of deficiencies, including ratings and corrective actions.
- Non-conformities found must be clearly noted, along with the corresponding corrective actions, in the Remarks section of the Checklist.

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• If three or more non-conformities requiring a corrective action are discovered, additional document reviews will be conducted monthly until the supervisor has determined the corrective actions have been successful.

• If a single non-conformity results in the overturning of the inspector's assigned grade, additional document reviews will be conducted monthly until the supervisor has determined the corrective actions have been successful.

# A. Market Inspection

- A Document Review is required for **two** supervisory reviews conducted per year. If a Document Review was not conducted the reviewer will note as such in remarks on the SC-397 Supervisory Review Checklist.
- Document Reviews shall consist of **25** of the most recent certificates issued. If less than this amount had been issued within the previous 12 months, all those that have been issued will be reviewed. Sample certificates proportionally among the various types issued by the ACG during the review period.

# B. Processed Product Inspection

- A Document Review is required for **each** supervisory review.
- Document Reviews shall consist of **10** inspection records relevant to ACG's grading assignment. If less than this amount had been completed within the previous 12 months, all those that have been completed will be reviewed. Sample records proportionally among the various types completed by the ACG during the review period.

# **Supervisory Review Checklist**

Supervisory Reviews will be documented via the <u>SC-397-Supervisory Review Checklist</u>. Each Supervisory Review Checklist must be completed, signed, and filed electronically. The Checklist will be used to document on-site observations made, inspection services being performed and a certification/documentation review on services and results previously issued. Listed scopes will be evaluated for conformance to all relevant policies and procedures. All deficiencies and corrective actions will be noted in the Remarks section.

- Reviewer will notate on the Checklist, under Remarks, whether Section I: On-Site Observation was conducted in-person or virtually.
- The ACG will be evaluated under the listed scopes for conformance to all relevant policies and procedures.
- Non-conformities found must be clearly noted, along with the corresponding corrective actions, in the Remarks section of the Checklist.
  - O If three or more non-conformities requiring a corrective action are discovered, or a single non-conformity results in the overturning of the inspector's assigned grade, additional on-site observations or document reviews will be conducted monthly until the supervisor determines corrective actions are successful. The completed

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Checklist will be sent to the Regional Inspection Operations Branch Chief and Assistant Branch Chief for review and awareness.

- Checklists may be completed by IIC or TO but must also be reviewed and signed by the supervisor prior to reviewing with the employee.
- The Checklist will be completed, signed, and filed electronically.
- The Checklist will be reviewed, with performance and corrective actions discussed with the ACG. The reviewer, supervisor (if different from the reviewer) and ACG will sign and date the Checklist.
- Checklists will be reviewed by the supervisor during subsequent mid-year and year-end performance evaluation timeframes as a tool to report measured and meaningful performance.

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