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October 4, 2018

Ms. Michelle Arsenault, Special Assistant
National Organic Standard Board
USDA-AMS-NOP 1400 Independence Ave. SW.,
Room 2648-So., Mail Stop 0268
Washington, DC 20250-0268

Re: Docket Number: AMS-NOP-18-0029
Compliance Accreditation, and Certification Subcommittee Proposal on Training and Oversight
of Inspector and Certification Review Personnel

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Compliance Accreditation and Certification Subcommittee (CACS) proposal on Training and Oversight of Inspector and Certification Review Personnel. The Accredited Certifiers Association (ACA) is a nonprofit educational organization, and our membership includes 54 USDA Accredited Certification Agents and over 90% of US based certifiers and many international certifiers accredited by the USDA.

We appreciate the time the CACS has put into this topic. Because we agree it is an important conversation, the ACA formed a working group in 2017 to draft certifier guidance related to many of the topics addressed by this proposal. The [ACA Guidance on Organic Inspector Qualifications](#) was published in February of 2018. Many of our proposal responses are taken from that guidance document. Additionally, in summer of 2018 we collaborated with the International Organic Inspectors Association (IOA) to develop a survey of accredited certifiers related to inspector training and qualifications. We surveyed not just ACA members but all USDA-accredited certification agencies. Out of 81 accredited certification agencies, 55.5% responded to the survey. We had robust participation from within the United States and abroad. A survey summary is attached for reference, redacted for confidentiality. It should be noted that the ACA work in 2017 and 2018 has focused primarily on inspectors, as opposed to certification review staff. We considered feedback from our general membership before finalizing these comments.

We offer comments in response to each of the six approaches outlined by the CACS in this proposal.

- 1) The first approach outlined by the CACS relates to the standardization of trainings for inspectors and reviewers. To inform this conversation, we offer an overview of pertinent 2018 ACA / IOIA certifier survey results on the subject. For further details related to these highlights, and for additional survey information, please refer to the attached survey summary.
 - Two thirds (66.66%) of organizations who responded either agreed or strongly agreed that a standardized curriculum should be required for initial training of all new inspectors. Another 24.24% neither agreed nor disagreed, and 9.09% disagreed. (See question 28 of attached survey summary.)
 - Support for standardized advanced training was not quite as strong; just over half (54.24%) agreed or strongly agreed that standardized advanced trainings should be required for complex inspections. Another 27.27% neither agreed nor disagreed, and 18.18% disagreed. (See question 29 of attached survey summary.)
 - Nearly half (48.48%) of respondents said that new inspectors should be required to pass a standardized test beyond IOIA Basic Training before beginning inspection work. Another 24.24% neither agreed nor disagreed. An additional 27.27% either disagreed or strongly disagreed. (See question 31 of attached survey summary.)
 - For experienced inspectors, 36.36% either agreed or strongly agreed that periodic standardized testing should be required. Another 36.36% neither agreed nor disagreed. And 27.27% either disagreed or strongly disagreed. (See question 32 of attached survey summary.)
 - In terms initial training for new inspectors, 35.29% of organizations who responded said they require IOIA Basic Training for all inspectors. Another 17.65% said they require IOIA Basic Training for all contract inspectors, but they often training staff inspectors in-house. (See question 14 of attached survey summary.)
 - For mentored field training, nearly three quarters (74.29%) said field training is typically done by staff at their organization. Just over half (51.43%) require 2 - 3 mentored field training inspections for new inspectors. Another 14.29% said they require 4 - 5, and another 8.57% require more than 5. (See question 15 of attached summary.)
 - Policies related to qualifications for field trainers are described in question 16 of the attached survey summary.
 - Additional comments related to requirements for initial inspector training can be found in question 22 of the attached survey summary.
 - Policies related to continuing education of inspectors can be found in question 26 of the attached survey summary.

The ACA Guidance on Inspector Qualifications discusses five kinds of training that should be required before beginning supervised inspection work: education in the scope, general auditor training, standards training, specific organic inspector training, and training to certifier procedures and paperwork. Specific recommendations in each of these areas are outlined on pages 8 – 9 of the document, which is linked [here](#) and included as an attachment to this document.

- 2) The second approach outlined by the CACS relates to the National Organic Program (NOP's) development of a Learning Management System (LMS) for inspectors and reviewers. The ACA supports this concept and is in conversation with the NOP regarding a cooperative agreement for partnering in this effort. Question 36 in the attached survey describes skills that ACAs find most lacking in new inspectors who have completed basic training and field training. This list could be used to inform training topics that could be addressed within the LMS.
- 3) The third approach outlined by the CACS was for the USDA to facilitate the development of an apprenticeship and/or mentoring program. In addition to questions 15 and 16 on our survey (described above), which relate to field training requirements of ACAs, question 25 may also be relevant as it describes types of training typically provided for inspectors throughout the year by ACAs.

The ACA Guidance on Organic Inspector Qualifications could be used to help pinpoint areas of competence to be evaluated by a mentor or supervisor, along with evaluation criteria and methods. See pages 9-16 of the document for further details.

- 4) The fourth CACS approach relates to a standardized system of tracking inspector skills, background, and knowledge. A licensing or certification program of some type could be used to develop such a system. Our survey asked whether an inspector licensing or certification system would be useful in ensuring quality inspection and consistent training for all inspectors. Of those who responded, 42.42% either agreed or strongly agreed that something like this would be useful. Another 36.36% neither agreed nor disagreed, and 21.21% either disagreed or strongly disagreed.
- 5) The fifth CACS approach relates to a standardized system of inspector and reviewer feedback for use by organic certification agencies. The following are summarized from the aforementioned ACA / IOIA summary on inspector training and qualifications:
 - Nearly three quarters (73.53%) reported having a specific mechanism in place to ensure that meaningful reviewer feedback is provided to first-year inspectors early in the season. The remaining (26.47%) reported that they do not. (See question 20 in the attached survey summary, and note that this question is related to reviewer feedback to inspectors, as opposed to supervisory

monitoring of reports from brand new inspectors, which is asked about in questions 18 – 20.)

- When asked whether review staff offer feedback on every Inspection Report, 68.75% of organizations said this is true. The remaining 31.25% replied false.
- 100% of responding organizations reported that every inspector receives an overall performance evaluation each year. Most organizations 66.67% reported that annual performance evaluations are typically conducted in writing, without and face-to-face or voice-to-voice contact. Another 11.11% said phone or web conferencing are typically used. (See questions 39 and 40 of the attached summary.)
- Over half (59.38%) of respondents said annual performance evaluations are typically conducted by an inspection supervisor. (See question 41 of attached summary.)
- Just over half (51.61%) of respondents said their organization requires that the person who conducts inspector field evaluations must be someone who performs or has performed inspections. (See question 43 of attached summary.)

6) The sixth CACS approach said that the process of inspector oversight and training should be continually improved and updated as issues arise. We agree with this and understand this to be the intention of the NOP with regard to the LMS. The ACA Guidance on Organic Inspector Qualifications will continue to be updated as best practices are refined over time.

Thank you again for your work on this topic and for the opportunity to provide comments.

Respectfully submitted,



Jennifer Cruse
ACA Coordinator



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Guidance on Organic Inspector Qualifications

February, 2018

Summary and Background

With rapid growth in the organic industry, certifiers experience a pressing need to recruit, train, and oversee new organic inspectors. Within the National Organic Program (NOP) regulations, section 205.501(a)(1) states that certifying agents and their staff must “have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program under the Act and the regulations...” On April 27, 2012, the Deputy Administrator of the NOP issued a statement to accredited certifying agents stressing the importance the role organic inspectors play and the importance of assessing candidates to ensure appropriate expertise. At that time, the NOP planned to release draft guidance on specific qualifications. However, this draft guidance has not yet been provided. In the meanwhile, certifiers have implemented varying criteria for training and assessment of new inspectors. The ACA assembled a working group to develop guidance for increasing consistency in terms of training, knowledge, and experience of inspectors across certification agencies. With that goal in mind, the working group was also conscientious to avoid outlining recommendations so rigid that they would disqualify good inspectors from alternative backgrounds. As such, it is noted that the document may not be inclusive of all useful skills and knowledge and might not necessarily disqualify an inspector who possesses alternative attributes deemed appropriate by certification agencies.

In this document, ACA inspector criteria are considered within the four scopes of the National Organic Program (NOP) Regulations, i.e., crop production, wild crop harvesting, livestock production, and handling. The document also provides suggestions for continuing education and evaluation of experienced inspectors.

These recommendations are based on a draft document produced by the International Organic Inspectors Association (IOIA) for the NOP, “Criteria for Inspectors and Reviewers working for NOP Accredited Certifying Agencies,” which was used with the NOP’s permission.

Knowledge

There are six bodies of knowledge and facts required of organic inspectors.

- a. Regardless of the type of inspection (crop, wild crop, livestock, handling), a good understanding of inspection (auditing) techniques and protocols is required.
- b. Inspectors must have a demonstrated understanding of organic certification and inspection processes, knowing their role and limitations within them.

- c. Specific to the inspection scope, a demonstrated understanding of the applicable organic regulations (CFR Title 7 Part 205 NOP and OFPA) are required. This does not just mean knowing what the regulations say and where to find it, but most importantly, how to apply the regulations to practical situations. The inspector must be able to explain applicable standards and certification procedures to the operator.
- d. Sufficient understanding of production/handling processes and the capacity to evaluate process flow is a critical requirement. Knowledge of current practices in an operations conventional counterpart is a necessary tool for organic inspectors, enabling effective identification of risks to organic integrity in the organic production/handling process.
- e. Inspectors should be proficient – and current – in their understanding of the specific procedures, documentary requirements and forms of each certifier for whom they work. Certifiers each have their own versions of Organic System Plans and Inspection Report formats, as well as their own methods of organizing the OSP information such as organic product recipes, input profiles, and finished product labels.
- f. Organic inspectors should be aware of other rules and regulations applicable to the inspection scope, notable food safety requirements. Although such regulations are technically beyond the scope of organic inspections, if the organic inspector observes obvious violations of them, they are typically addressed in an addendum to the inspection report, for the certifier’s attention.

Skills/Areas of Expertise

Several skills (areas of expertise) are needed to conduct organic inspections and enable the organic inspector to fulfill inspection assignments effectively and efficiently.

- a. **Observation skills:** When conducting evidence-based inspections, a significant part of the on-site time is spent in the field or on the production floor, understanding the ‘big picture’ of a production system and observing the details which support (or contradict) the Organic System Plan.
- b. **Communication:**
 - 1. **Interviewing** is a technique inspectors use to gather information so appropriate interviewing techniques are required. Some good interview techniques are ¹ asking open ended questions, asking the same question a different way and paraphrasing.
 - 2. **Documenting/writing**²: This includes correct grammar and spelling; accurate writing that is clear, concise, and easily understood by the operator and reviewer; facts vs. opinion; reference supporting documentation; citation of appropriate NOP regulations; and explanation of issues of concern.
 - 3. **Active listening:** Active listening is a structured way of listening and responding. The elements of active listening are comprehending, retaining, and responding. The listener asks questions and paraphrases back to the speaker to clarify understanding. Listening carefully to operator responses reduces redundancy during the inspection, improves accuracy, and shows respect.

¹ IFOAM/IOIA Inspection Manual 2.3.5; ASQ Auditing handbook; ISO 19011 6.5.4

² ISO 19011 6.6.1; ASQ Auditing Handbook p 141

- c. **Intermediate Math skills:** Inspectors need to be able to convert easily from one unit of measure to another, calculate yields, calculate annual feed requirements in livestock operations, use formulas to verify in/out balances, and use percentages to validate recipes and production reports etc.
- d. **Organization and time management**³: managing preparation time, travel time, on-site time (e.g., multiple sites) and reporting time efficiently; respect certifier deadlines; use travel resources efficiently. Inspectors need to plan well, be prepared⁴, and be on-site at a time when organic operations can be verified⁵. The inspections must be conducted with the authorized operator representative is present, moving smoothly from one area of operations to another.
- e. **Information management** skills ⁶ are required, both in the office and on-site. Specific risks and conditions to certification are flagged in the preparation before inspection; these areas must be properly investigated, observations noted in an orderly way, and conclusions communicated to the certifier. Evidence of potential non-compliances must be substantiated, documented, tracked and accurately reported. Working documents need to be kept secure, archived and/or destroyed⁷, as appropriate. Basic computer skills including demonstrated proficiency in word processing, use of spreadsheets and database management may be required by individual certifiers.
- f. **Investigative skills** ⁸are required for all inspections, and especially those where the inspector finds inconsistencies during the on-site inspection (i.e., if prohibited substance use is suspected), when conducting complaint related inspections and in cases of suspected fraud.
- g. **Sampling procedures:** Correct sampling methods, appropriate handling of samples (packing, labeling, shipping) and proper chain of custody impact the validity of test results. These activities must be done according to the certifier's policies and contracted laboratory procedures. Individual certifiers may not require all inspectors to be trained on sampling procedures. An inspector must only take samples if they have been trained and are authorized by the certifier.
- h. **Skills specific to inspection scope:** Additionally, numerous skills specific to the scope of the inspection are required. The following table gives several examples for each scope but this list is by no means exhaustive.

³ ISO 19011 7.3.1; ASQ Auditing Handbook

⁴ ISO 19011 6.4.1 and 6.4.3

⁵ NOP 205.403 (b)(2)

⁶ IOIA Training program guide; ACA inspector position descriptions

⁷ ARC job description, IOIA training manual

⁸ ISO 19011 7.3.1; ASQ Auditing Handbook p 141

Inspection scope	Examples of skills specific to inspection scope. Skills outlined in Wild Crop and Livestock scopes are <i>in addition</i> to skills needed for Crop Scope.
Crop	<ul style="list-style-type: none"> ● ability to recognize weeds and assess impact ● ability to assess production capacity ● ability to assess soil structure and fertility by consulting soil test results, observing crop performance and observing signs of compaction, good tilth etc. ● ability to assess possible sources of contamination and recognize signs of pesticide injury to crops or other vegetation⁹ ● ability to assess natural resource conservation and biodiversity ● ability to assess crop rotations and management of pasture as a crop ● ability to evaluate farm inputs ● ability to evaluate manure and compost management
Wild crop	<ul style="list-style-type: none"> ● ability to assess sustainability of harvesting practices ● ability to read maps ● ability to recognize possible source of contamination and signs of damage to wild crops or other vegetation ● ability to determine damage to harvested crop and dependent species (plant and/or animal) by harvesting or over-harvesting¹⁰ ● ability to assess natural resource conservation and biodiversity
Livestock	<ul style="list-style-type: none"> ● ability to calculate dry matter intake for ruminant animals ● ability to assess native and tame pasture production ● ability to assess overall condition of herd/flock (animal behavior, physical appearance) ● ability to assess adequate nutrition and evidence of malnutrition or parasites etc.¹¹ ● ability to assess pasture quality and grazing practices for ruminant animals ● ability to assess the general animal husbandry practices used for species on operation ● ability to assess inputs for farms with livestock ● ability to assess feed handling procedures to avoid contamination on split operations

⁹ IFOAM/IOIA International Organic Inspection Manual 4.1.1

¹⁰ IFOAM/IOIA International Organic Inspection Manual 4.8

¹¹ IFOAM/IOIA International Organic Inspection Manual 5.1.2

Inspection scope	Examples of skills specific to inspection scope. Skills outlined in Wild Crop and Livestock scopes are <i>in addition</i> to skills needed for Crop Scope.
Handling	<ul style="list-style-type: none"> ● ability to compare proposed recipes, actual production and finished product labels ● ability to verify compliance of organic ingredients, non-organic ingredients, food additives and processing aids ● ability to assess compliance of facility pest management protocols ● ability to assess equipment for commingling or contamination potential ● ability to assess label compliance ● ability to assess production capacity ● ability to identify and report major and obvious food safety concerns ¹²

Abilities (capacity, talents)

Beyond knowledge and specific skills, it is recommended that organic inspectors develop certain abilities to facilitate their work:

- a. Analytical
- b. Accuracy
- c. Consistency
- d. Attention to detail without losing sight of the whole
- e. Ability to differentiate between technical assistance, inspection and consulting¹³
- f. Discernment¹⁴: ability to differentiate between evidence and opinions¹⁵
- g. Judgment: ability to interpret and adapt general guidelines to specific situations
- h. Awareness of trends and developments in conventional and organic aspects of agriculture or food science
- i. Self-assessment: ability to recognize own opportunities for improvement, can accept constructive criticism and ask for a second opinion when the situation exceeds their knowledge capacity.

¹² IFOAM/IOIA International Organic Inspection Manual 6.2 and 6.3

¹³ NOP 205.501(a)(11); IOIA curriculum; NOP 2614 Technical Assistance

¹⁴ ISO 19011 6.5.5; ASQ Auditing Handbook p 141; IOIA Training program guide

¹⁵ IOIA curriculum

Personal Attributes

Inspectors should possess personal attributes¹⁶ to enable them to perform inspections in accordance with principles of auditing. An inspector should be:

- a. *Honest and ethical.* Integrity of the certification system rests on the integrity of its players, including inspectors and reviewers. In quality systems, inspectors must be free of conflicts of interest with the operations for which they inspect. Conflicts of interest are declared annually¹⁷ and inspectors should defer any inspection assigned to them by a certifier with which they have a conflict of interest. Confidentiality¹⁸ is also important. Information learned about operations must be kept confidential in order to gain trust of operators and not be used by inspectors for personal gain. Inspectors also have a responsibility to report suspected fraud.
- b. *Impartial and non-discriminatory.* Inspectors should be fair and objective¹⁹ during inspections and when reporting their observations to certifiers. Inspectors should be open-minded to the types of people and management strategies they encounter. They need to treat all operators with respect and without bias. An inspector should also be aware of the cultural environment in which he/she is working.²⁰
- c. *Professional in their conduct.* Inspectors must be fit and in good mental health. As most inspectors work alone, they need to be self-reliant and able to function autonomously and decisively. During the inspection, the inspector represents a certifier and must follow certifier policies and procedures. They must follow all governmental laws that apply to their status, whether employees or contractors (ex. valid driver's license, reporting income, etc.) They should be punctual for appointments as well as meeting certifier deadlines. Inspectors should wear appropriate attire, pay attention to biosecurity requirements, and have an awareness of personal safety. They should turn down work if too busy or if a proposed assignment is beyond their realm of competence. Inspectors must be willing to travel and should strive to efficiently group inspections in order to meet the expense expectations of the certifier. Timely, thorough response to certifier inquiries, and communication related to inspection status, scheduling, etc., is critical.

¹⁶ This is a compilation from a variety of sources: NOP Regulations; ISO 19011 6.6.2 and 7.2; ASQ Auditing Handbook; Codex Alimentarius 6.6.a; ISO 65 4.2.f; IOIA Codes of Conduct and Ethics, IOIA training program guide; IOIA crops and handling curriculum; IFOAM Accreditation Criteria 1.4.11; and ACA inspector position descriptions.

¹⁷ NOP 205.504 (c)(2) requires that inspectors file an annual conflict of interest disclosure report form, identifying any food or agriculture related business interests, including business interests of immediate family members that cause a conflict of interest.

¹⁸ NOP 205.501 (a)(10) requires inspectors hold information confidentially.

¹⁹ The USDA prohibits discrimination in all its programs and activities on the basis of race, color, national origin, gender or marital status (not all prohibited status apply to all programs),

²⁰ IOIA promotes a 2 defect guideline when inspecting foreign operations (see IOIA Code of Conduct and Ethics, which refers to knowledge of culture, language and crop.) Also addressed in ARC job description.

- d. *Curious and tenacious.* Asking open-ended questions is an important method used by inspectors to gather information. They must be curious about the systems they are observing in order to ask appropriate questions. They also must be systematic and continue asking questions until they have a good understanding of whether an operation is in compliance.
- e. *Perceptive and versatile.* Inspectors must be perceptive to quickly grasp an understanding of the variety of operations they encounter. They should have the flexibility to adjust to different situations and people.
- f. *Diplomatic.* Inspectors must strive to maintain a pleasant and non-confrontational atmosphere throughout the inspection even while asking difficult questions and responding to conflict. The inspection can be an exhausting process for the operator. It covers many areas of his/her operation in a relatively short period of time and patience of the operator may wear thin.
- g. *Support goals of organic farming and handling.* This last personal attribute is important as the attitude of the inspector toward his/her work is evident to the operator during an inspection. A lack of support can undermine the authority needed by an inspector.

Work Experience

Organic inspectors should have a **minimum of one year work place experience in the scope**²¹ in which they will be inspecting. Examples of possible workplace experience are given below:

Inspection scope	Examples of workplace experience
Crop	<ul style="list-style-type: none"> ● Growing up on a farm and actively participating in daily and seasonal tasks ● Operate own farming operation ● Employment on farming operation ● Farm manager ● Agricultural educator ● Other applicable industry experience
Wild crop	<p>In addition to experience as a crop inspector:</p> <ul style="list-style-type: none"> ● Experience as harvester of wild crops ● Work in a field of natural resource management ● Other applicable industry experience
Livestock	<p>In addition to experience as a crop inspector:</p> <ul style="list-style-type: none"> ● Growing up on a livestock farm and actively participating in daily and seasonal tasks ● Operate own livestock farming operation ● Employment on livestock operation ● Livestock farm manager ● Herdsman ● Veterinarian or veterinary assistant ● Extensive 4-H or FFA experience ● Agricultural educator

²¹ IOIA training prerequisite

	<ul style="list-style-type: none"> • Other applicable industry experience • Experience appropriate to scale and production system
Handling	<ul style="list-style-type: none"> • Production worker in food processing facility • Management or shift foreman • Employment in food retail and/or preparation • Research and development in food processing • Food science educator • Other applicable industry experience • Site appropriate experience in assessing compliance

Training

It is recommended that five kinds of training be required before beginning supervised inspection work:

1. Education in the scope
2. General auditor training
3. Standards training
4. Specific organic inspection training
5. Training to certifier procedures and paperwork

Initially, this training will be intense and over an extended period of time. As inspection experience is gained, training will take the form of refresher courses or specialty modules, addressed below in the section called “Recommended Professional Development Activities.” Initial inspector training requirements are summarized in the table below.

Training Topic	Recommended Training
Sector education	<ul style="list-style-type: none"> • College degree in agriculture or food science or related field, or relevant workplace experience
Auditor training	<ul style="list-style-type: none"> • ISO auditing overview or equivalent auditing protocol training (1-2 hours)
Standards training	<ul style="list-style-type: none"> • Basic standards training <ul style="list-style-type: none"> ○ Crop (6 hours) ○ Wild Crops (Crop Training +1 hour focused wild crop training) ○ Livestock (6 hours) ○ Handling (6-8 hours)
Organic inspection training	<ul style="list-style-type: none"> • Basic organic inspection training in appropriate scope (IOIA level 100 or equivalent.) 4.5 days/scope²² • Recommended: 2-3 mentored inspections or IOIA Field Training, and 7 monitored reports.²³ The inspection performed at the IOIA Basic

²² IOIA basic trainings have traditionally been 4.5 days per scope, on site (not web-based), with 4 days of instruction and 0.5 day of testing

²³ Note: It is not feasible to apply all requirements, especially field training, to the wild crop scope separately from crop. It is recommended that any inspector qualified to inspect crops could also inspect wild crops, provided they received training specific to wild crop standards and inspection. At this time, wild crop inspection has been included in 100 level training content. Specific 200 level wild crop training could be required for wild crop inspection.

	<p>Training could count toward number of monitored inspection reports, but not the number of mentored inspections.</p> <ul style="list-style-type: none"> • Certifiers might utilize different processes for determining what mentoring and monitoring looks like at their organization. • A field evaluation as a “capstone” to the mentoring process can provide clarity about inspector readiness to inspect independently. • Qualifications for mentoring inspectors will be determined by the certifier. Mentors should be highly experienced in the specific scope.
Certifier procedures	Training to certifier procedures and paperwork

It should be noted that the above training recommendations apply to brand new inspectors, or inspectors who are brand new to a scope. Inspectors who are simply new to a specific certification agency will require training on the new certifier’s paperwork and procedures, along with routine quality monitoring.

Specialized training is required for inspectors dealing with:

- Operations that handle imports and/or exports.
- Operations with complex recipes and correspondingly complex in-out balances.
- Long or complex supply chains, especially when certified organic ingredients/product are sourced through uncertified handlers.
- Operations in which fraud is suspected, especially to ensure the Inspection Report will withstand legal scrutiny.

Certification agencies need to be sure their Organic System Plans clearly capture the necessary details prior to inspection assignment.

Inspection Experience

Only in exceptional circumstances can a perfect combination of knowledge, skills, abilities, personal attributes, prior work experience and training be sufficient to autonomously conduct organic inspections. Some certifiers ensure that new inspectors are mentored by experienced inspectors. Inspections are conducted by the apprentice under supervision of the mentor; exit interview documents and reports are written by the apprentice but approved and co-signed by mentor.

Furthermore, it is recommended that beginning inspectors should only be assigned simple inspections. Certifiers should have a systematic way to document the level of inspector and the corresponding level of complexity of the operations they have been assigned. In this way, operators will work with inspectors sufficiently trained for their type of operation, inspections will be efficient, and organic compliance issues will be systematically addressed.

Performance Evaluation Standards

Annual performance evaluations contribute to the continuous improvement of inspectors as well as being a requirement pursuant to the NOP Final Rule, 205.501(a)(6) and 205.510(a)(4). Observation during inspection by a representative from the certifier would be periodic but not

necessarily annual. Observation during inspection may also include an inspection witnessed by a peer (another inspector). An evaluation checklist (attached) has been developed by IOIA with feedback from a number of certification agencies, and may be used for evaluation with permission from IOIA. Alternatively, evaluation forms may be developed by individual certification agencies. The below tables provide competencies to be evaluated in three categories along with evaluation criteria and method of evaluation.

	Area of Competence to be Evaluated	Evaluation Criteria	Evaluation Method
Responsibilities	Review file and assignment from certifier; prepare an inspection plan and make arrangements with operator, taking care to schedule the inspection at a time in the production cycle when organic operations can be observed	Inspection well-prepared (audit plan, checklist for use during inspection); Inspection appropriately scheduled.	Feedback from operators; Observation during inspection; Interview inspector.
	Conduct an opening interview with the operator and relevant personnel	Opening interview covers essential elements (scope, audit plan, safety/bio-security, confidentiality, verifying accuracy of information provided, etc.	Observation during inspection.
	Verify accuracy of OSP and all other information, with particular attention to areas where organic integrity is at risk (buffers, inputs, split operations)	Organic Control Points systematically verified. Materials appropriately reviewed.	Observation during inspection. Review of inspection report.
	Verify production/handling capacity (yield estimates); conduct on-site inspection of in/out balance and traceability	Record keeping system assessed. Random trace back conducted. In/out balance completed.	Review of inspection reports. Observation during inspection.
	Verifying label and packaging	Labels and packaging verified.	Review of inspection reports. Observation during inspection.
	Clarify issues of concern which were identified in the pre-inspection review.	Issues of concern which were identified in the pre-inspection review are clarified.	Review of inspection reports. Observation during inspection.
	Assess corrective actions taken to address minor non-compliances for certified operators.	Previous conditions reviewed and verified.	Review of inspection reports. Observation during inspection.

	Area of Competence to be Evaluated	Evaluation Criteria	Evaluation Method
	Identify and summarize areas of potential non-compliance	Potential areas of non-compliance identified and summarized.	Review of inspection reports. Observation during inspection.
	Identify and communicate additional information to be submitted by operator.	Missing information identified and communicated.	Review of inspection reports. Observation during inspection.
	Gather samples, provide receipt, maintain chain of custody, and according to certifier procedures	Samples gathered as per certifier and contracted laboratory procedures.	Review of inspection reports. Observation during inspection.
	Conduct and document an exit interview with the operator according to certifier procedures	Exit interview conducted, covering all essential elements.	Review of inspection reports. Observation during inspection.
	Communicate the findings to the certifier according to certifier procedures.	Report filed punctually. Report well-written, clear, concise and needing no further information from inspector.	Review of inspection reports.
Knowledge	Auditing techniques protocols	Auditing protocols followed.	Review of training record, course content and result. Observation during inspection.
	Organic certification and inspection processes	Certification and inspection procedures understood and followed.	Observation during inspection.
	NOP regulations	Organic requirements understood; could clearly explain to operator.	Review of training record, course content, and result. Review of inspection reports Observed inspection.
	Organic (and conventional) production and handling processes	Understands system being inspected; using terminology specific to system being inspected; thorough assessment of Organic Control Points.	Review of training record, course content and result Observation during inspection

	Area of Competence to be Evaluated	Evaluation Criteria	Evaluation Method
	Certifier procedures	Uses certifier forms correctly. Follows certifier procedures.	Review of training record, course content and result Review of inspection reports Feedback from reviewers
	Optional: Related laws and regulations.	Asks questions and makes observations during inspection pertaining to related laws and regulations. Accurately reports findings.	Review of training record, course content and result Observation during inspection Review of inspection report
Skills	Observation	Attention to detail Relevance of questions	Observation during inspection
	Communication: Interviewing, Documenting/writing, Listening	Use of open-ended questions, paraphrasing Correct grammar, spelling Accurate, clear, concise Active listening	Observation during inspection Review of inspection reports
	Evaluation	Analyzes data, draws conclusions based on evidence, identifies and assesses OCPs	Observation during inspection Review of inspection reports
	Math	Verification of rations, DMI, recipes etc. Verification of in/out balances Logical analysis of results	Review of training record, course content and result Review of inspection reports

	Area of Competence to be Evaluated	Evaluation Criteria	Evaluation Method
	Organizational skills and time management	Plans well. Punctual. In control of agenda. Efficient.	Observation during inspection Review of time began and time ended inspection Submission of inspection report
	Information management	Well organized; prepares and uses checklists; Demonstrates appropriate computer skills.	Observation during inspection Review of inspection report
	Investigative skills	Asks good questions; Is inquisitive; Documents findings; Evidence based approach.	Observation during inspection Review of inspection report
	Sampling procedures	Samples gathered as per certifier and contracted laboratory procedures. Maintains sample integrity and chain of custody.	Review of training record, course content and result
	Skills specific to inspection scope (see examples in table 2.2.2.i)	Demonstrates competence specific to inspection scope.	Observation during inspection Review of reports Feedback from operators
Abilities	Attention to detail	Satisfactory performance: Inspectors demonstrate attention to detail during the inspection. Reviewers do not need to get further information from the inspector, inspection paperwork is clear and complete as submitted.	Observation during inspection Review of reports Feedback from reviewers

	Area of Competence to be Evaluated	Evaluation Criteria	Evaluation Method
	Able to differentiate between inspection and advice	Does not provide advice to the operation; does not assist operators to overcome barriers to certification.	Observation during inspection.
	Discernment	Demonstrates good sense of judgment; shows ability to interpret and adapt general guidelines to specific situations.	Observation during inspection. Review of reports.
	Analytical	Demonstrates logical approach.	Observations during inspection (specifically traceability tests).
	Accuracy	Absence of error.	Review of reports. Feedback from operators.
	Consistency	Methodical approach.	Review of reports. Feedback from reviewers.
	Awareness of trends and developments in conventional and organic – aspects of agriculture or food science	Appears to be up to date and knowledgeable.	Review of training records.
	Capacity for self-assessment	Open to constructive criticism. Proactive in seeking additional training opportunities.	Annual performance review; Field evaluation. Response to Feedback
Personal attributes	Integrity, confidentiality, freedom from conflict of interest, ethical behavior, open-mindedness, diplomacy, perceptiveness, versatility, tenacity, decisiveness, self-reliance, punctuality; does not provide advice for inspected operations; professional in their conduct at all times; be fit and in good mental health; economical in their use of travel	Satisfactory performance declarations kept current (confidentiality, C of I).	Feedback from operators. Observation during inspection. Review of complaints filed naming the inspector. Review of annual documentation.

	allowances; cultural sensitivity, willingness to travel		
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Professional Development Activities

A wide range of professional development activities are available for ongoing inspector training. Trainings should be documented and included in the inspector's résumé, supported by course certificates and content lists whenever possible. This is a partial list of possible professional development activities and topics:

- Residue testing
- Fraud detection and investigation
- Conferences
- Workshops
- Community college and university courses
- eOrganic webinars
- ATTRA
- On-farm demonstrations
- Subscriptions to trade magazines
- Independent study/reading
- Networking²⁴ (professional associations, list-serves, etc.)
- Peer Field Evaluation
- Performance review from certifiers: Per NOP regulation and accreditation requirements, certifiers must conduct an annual performance review of their inspection staff/contractors. At a minimum, reports, training records, feedback from operators, and complaints naming the inspector must be reviewed. Additionally, it is recommended that periodically (not every year) a qualified certifier representative accompany the inspector on an inspection and assess their performance, then meets with the inspector to give verbal and written feedback and discuss opportunities for improvement.
- Private coaching
- IOIA 200 level courses and 300 level courses (IOIA Training Institute intermediate, advanced and specialty modules)
- IOIA training modules with tests²⁵
- NOP Trainings (including The Path interactive video), webinars, Program Handbook
- Non-organic training
- Food safety (GAP, HACCP, FSMA)
- Participation in committees and working groups
- Local chapter meetings
- Preparation of training modules

²⁴ Documentation can be through verification of membership, list-serve email, etc.

²⁵ Testing and exams rated fairly highly in the 2010 IOIA certifier survey

- Updates from the certifier on paperwork, procedures, etc.
- Training in related disciplines
- Relevant training from private training providers
- Annual update to standards and national list
- Scope-specific training on changes to standards, processes, procedures



Inspector Evaluation Checklist

Inspector:	
Evaluator:	
Date of Field Evaluation:	
Organic Scope(s):	
Certifier of Operation:	
Brief Description of Operation Inspected:	
Final Score (Finding from the Rating Summary Page):	
Final Score:	
<p>Scoring is as follows:</p> <p>5: <u>Exceptional</u>: Performance outstanding. Practices are demonstrated at the highest level.</p> <p>4: <u>Exceeds Expectations</u>: Performance is high. Practices demonstrate a high level.</p> <p>3: <u>Competent</u>: Performance is effective. Practices are demonstrated at an acceptable level.</p> <p>2: <u>Acceptable with Conditions</u>: Performance requires improvement.</p> <p>1: <u>Unsatisfactory</u>: Performance is ineffective and requires extensive improvement.</p> <p>N/O: <u>Not Observed</u>.</p> <p>N/A: <u>Not Applicable</u>.</p>	
I attest that the information provided above and on the attached pages is complete and accurate to the best of my knowledge.	
Evaluator:	[Signatures are not required; however, space is provided if you would like to enter your electronic signature].
Date of Report:	



Organization Skills and Time Management	Direct Observations	Score 5-1	Comments
	Materials		
1	Has certifier instructions and recent correspondence, if applicable. Has organic system plan (OSP), all appropriate international plans/applications, and a list of current certified products.		
2	Has current standards [i.e. National Organic Program (NOP) Standards], applicable standards and/or equivalency agreements (hard or electronic copy).		
3	Has inspection document (template or form in printout or electronic version).		
4	Has all tools necessary to complete the inspection (for example: camera, scanner, calculator, etc.)?		
	Inspection Preparation & Scheduling		
5	Is attired according to GMPs or GAPs. Employs appropriate biosecurity precautions.		
6	Reviewed file and was prepared for inspection.		
7	Arrives on time or if unable to do so, notifies client appropriately with reasonable advance notice.		
	Total (7)	0	



On-Site Tasks	Direct Observations	Score 5-1	Comments
Inspection Flow			
8	Is in control of the inspection agenda.		
9	Conducts opening meeting (1) Introduces himself/herself and other authorized participants; (2) Clearly communicates the purpose of the inspection; (3) Explains/Discusses the inspection flow process; (4) Asks the operation's representative if they have any questions. (See IOIA Opening Meeting Procedure for reference.)		
10	Conducts an exit interview with client according to applicable regulations and certifier procedures. (See IOIA Exit Interview Procedure for reference.)		
11	Summarizes next steps in certification process during the exit interview.		
Action Items Addressed			
12	Addresses and follows up on any non-resolved compliance issues identified during the pre-inspection document review.		
13	Assesses corrective actions taken to address non-compliance.		
14	Verifies that the application, OSP and supporting documentation are complete and accurate.		
15	Asks for additional information and minor OSP updates, per certifier policy.		
Document Items			
16	Verifies that the products grown, handled or manufactured are consistent with those listed or requested for certification.		
17	Verifies cleaners, sanitizers, and crop materials were used or to be used are consistent with those listed in the OSP, that they are compliant, and all annotations have been followed.		
18	Verifies pest control materials and practices are compliant and consistent with OSP, including required preventative practices, and if applicable, pest hierarchy and all annotations.		
19	Reviews all appropriate records: Processing: Product formulations vs batch records, ingredients (organic and non-agricultural), receipts, production, compliance documents and manufacturing activities, sanitation practices, labels; Crop/Livestock: Input records/receipts, seeds/receipts, parcel history (for new parcels), equipment cleaning logs, buffer harvest, feed, maps, raw manure app. time, fertility, rotation, cover cropping practices, pest control hierarchy, health inputs.		
20	Conducts an appropriate audit traceback.		
21	Conducts an appropriate verification audit (in/out balance, ingredients and/or harvest/yield).		
22	Verifies that current labels and labeling are consistent with OSP and with applicable standards.		
23	Addresses potential natural resource or biodiversity issues on the operation.		
Facility/Operation Premises			
24	Inspects all areas of premises as appropriate to the operation: Processing: receiving, ingredient, product, packaging and sanitizer storage, materials, all processes, pest control; Crop/Livestock: parcels, material and seed storage, buffers, boundaries, animals, housing, feed storage.		
25	Confirmed points of potential contamination, including identifying risks to organic integrity (organic control points).		
Total (18)		0	



Knowledge, Skills and Abilities	Direct Observations	Score 5-1	Comments
	Organic Regulations		
26	Refers to the organic regulations during inspection, when needed.		
27	Understands organic regulations, and can clearly explain to client when needed.		
	Organic and Conventional Production and Processes		
28	Understands both the organic and conventional counterpart to the operation, as applicable.		
	Certifier Procedures		
29	Demonstrates an understanding of certifier procedures, and forms.		
	Professionalism		
30	Displays a positive and professional behavior with client and represents the certifier in a positive and professional manner.		
31	Demonstrates the ability to differentiate between inspection and consulting.		
32	Responds accurately and helpfully to questions from client regarding applicable regulations and ACA certification procedures and requirements.		
	Communication		
33	Active listening skills.		
34	Open ended questions (inspector does not answer questions for producer); pertinent questions asked.		
	Sampling		
35	Is prepared to take a sample.		
36	Gathers samples per procedure, provides inspected party with a receipt and maintains chain of custody.		
	Total (11)	0	



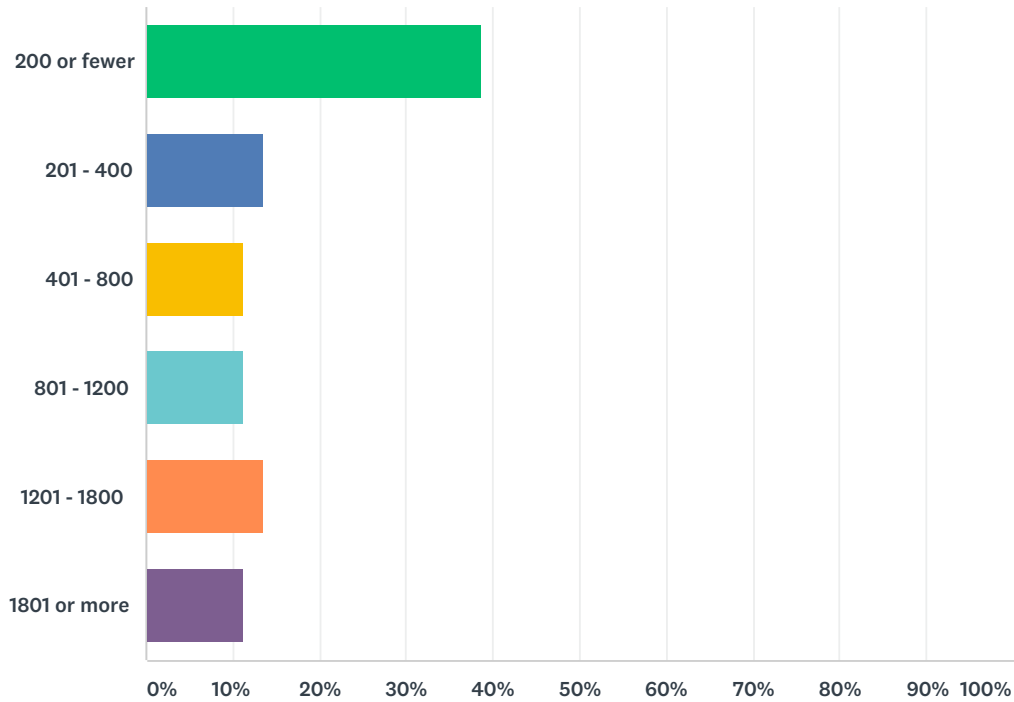
Reporting	Direct Observations	Score 5-1	Comments
	Reporting		
37	Thoroughly completes inspection document according to established procedures.		
38	Clearly communicates all issues of concern and applicable regulations.		
39	Clearly communicates requests for additional information and/or documents sufficient for certifier to make a certification decision.		
40	Applies and communicates applicable regulations accurately.		
41	Report is complete, clear and concise.		
42	Report accurately reflects all issues noted during the inspection and listed on the Exit Interview.		
43	Report is submitted to Evaluator within certifier due date.		
	Total (7)	0	



Rating Summary	Grading Score Summary	Score	Comments
	Total Organization		
	Total On-Site Tasks		
	Total Knowledge, Skills, Abilities		
	Total Reporting		
	Total	0	
	Divided by Total Questions (43); Deduct N/A Answers.		
	Average Rating		
	Scoring is as follows: 5: Exceptional: Performance outstanding. Practices are demonstrated at the highest level. 4: Exceeds Expectations: Performance is high. Practices demonstrate a high level. 3: Competent: Performance is effective. Practices are demonstrated at an acceptable level. 2: Acceptable with Conditions: Performance requires improvement. 1: Unsatisfactory: Performance is ineffective and requires extensive improvement. N/O: Not Observed. N/A: Not Applicable.		

Q1 How many operations does your organization certify to the USDA organic regulations?

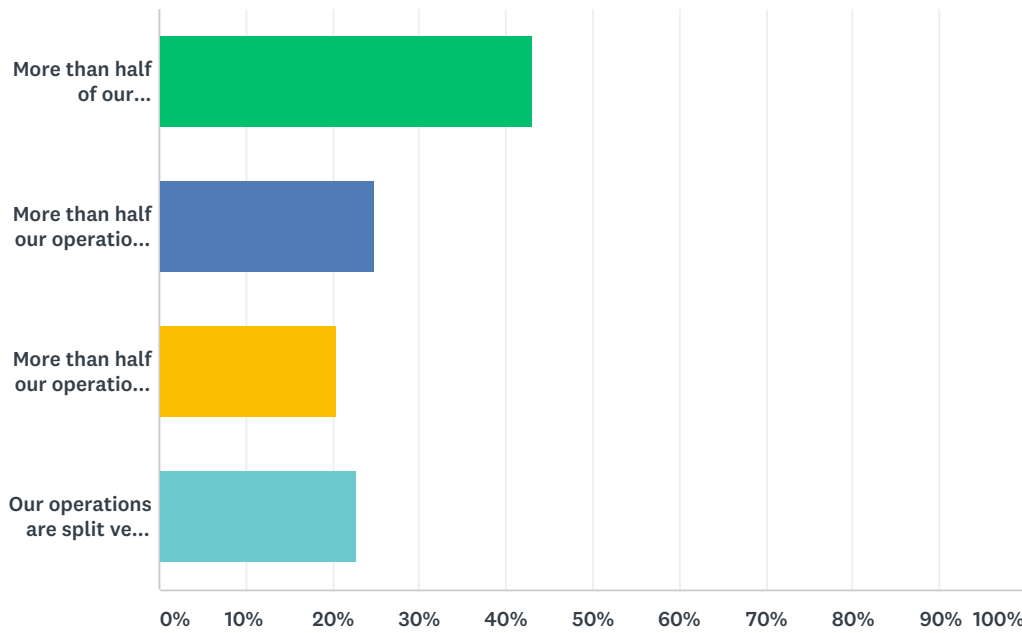
Answered: 44 Skipped: 1



ANSWER CHOICES	RESPONSES	
200 or fewer	38.64%	17
201 - 400	13.64%	6
401 - 800	11.36%	5
801 - 1200	11.36%	5
1201 - 1800	13.64%	6
1801 or more	11.36%	5
TOTAL		44

Q2 Please tell us about your primary scopes of certification. You can select more than one option.

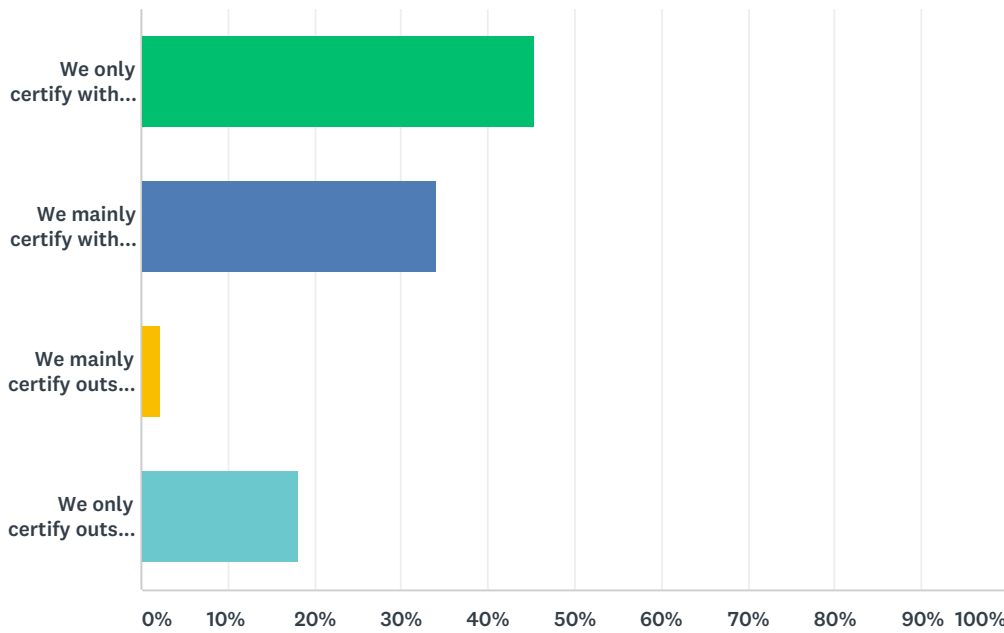
Answered: 44 Skipped: 1



ANSWER CHOICES	RESPONSES	
More than half of our operations produce organic crops.	43.18%	19
More than half our operations produce organic crops, and more than a quarter of our operations produce organic livestock.	25.00%	11
More than half our operations are processors/handlers.	20.45%	9
Our operations are split very evenly (close to 50/50) between producers and handlers.	22.73%	10
Total Respondents: 44		

Q3 Please tell us more about where you certify to the USDA organic regulations. Select the option that is most accurate.

Answered: 44 Skipped: 1



ANSWER CHOICES	RESPONSES	
We only certify within the United States.	45.45%	20
We mainly certify within the United States.	34.09%	15
We mainly certify outside the United States.	2.27%	1
We only certify outside the United States.	18.18%	8
TOTAL		44

Q4 Please tell us the approximate number of U.S. states in which you certify to the USDA organic regulations.

Answered: 44 Skipped: 1

Answer Choices	Responses	
0	18.2%	8
1 - 10	36.4%	16
11 - 20	13.6%	6
21 - 30	4.5%	2
31 - 40	11.4%	5
41 or more	15.9%	7

Q5 Approximately how many inspectors did you contract with last year?

Answered: 45 Skipped: 0

Answer Choices	Responses	
0	22.2%	10
1 - 15	40.0%	18
16 - 30	13.3%	6
31 - 45	6.7%	3
46 - 60	11.1%	5
61 or more	6.7%	3

Q6 Approximately how many of your staff performed inspections last year?

Answered: 45 Skipped: 0

Answer Choices	Responses	
0	6.7%	3
1 - 5	40.0%	18
6 - 10	37.8%	17
11 - 15	6.7%	3
16 - 20	4.4%	2
21 or more	4.4%	2

Q7 Approximately what percentage of inspections were performed by contract inspectors last year?

Answered: 45 Skipped: 0

Answer Choices	Responses	
0%	24.4%	11
1 - 25%	13.3%	6
26 - 50%	13.3%	6
51 - 75%	2.2%	1
76% or greater	46.7%	21

Q8 If the percentage of inspections performed by contract inspectors versus staff inspectors varies greatly by scope (for example, if you work with a higher number of contract inspectors for handling operations compared to crop operations), please describe here.

Answered: 21 Skipped: 24

- Our staff inspect a higher proportion of processing inspections than contract inspectors.
- Does not vary by scope
- Two percent of inspectors of the agency is part of the staff inspectors
- Most handler inspections are done by contractors, but we are looking to even those numbers more.
- It is close to the same.
- Contract inspectors do more of our distant inspections, but types of inspections handled are the same between staff and contract.
- We only work with inspectors by contract and result, we do not have inspectors with a fixed contract. The inspectors of handle are the quarter of the contracted and the rest are inspectors of crops. Therefore we have more crop inspectors than the management ones.
- We only have staff inspectors.
- Contract inspectors will often take on more complex or larger operations, especially with sufficient experience or IOIA training.
- We work with a higher number of contract inspectors for producer inspections. In 2018, all inspections conducted by a contract inspector are of a producer operation.
- USUALLY FOR UE ORGANIC (99 % OF OUR BUSSINESS) WE HAVE ABOUT 30% OF CONTRACT INSPECTORS AGAINST THE TOTAL
- We work more with a higher number of Contract inspectors in general for both Crop and Handling.
- No
- [8 respondents entered "N/A"]

Summary: No strong indication that portion of inspections performed by contractors varies by scope as a general pattern.

Q9 Optional: If you have noticed differences in cost effectiveness when you compare staff inspections to contracted inspections, we invite you to share your observations.

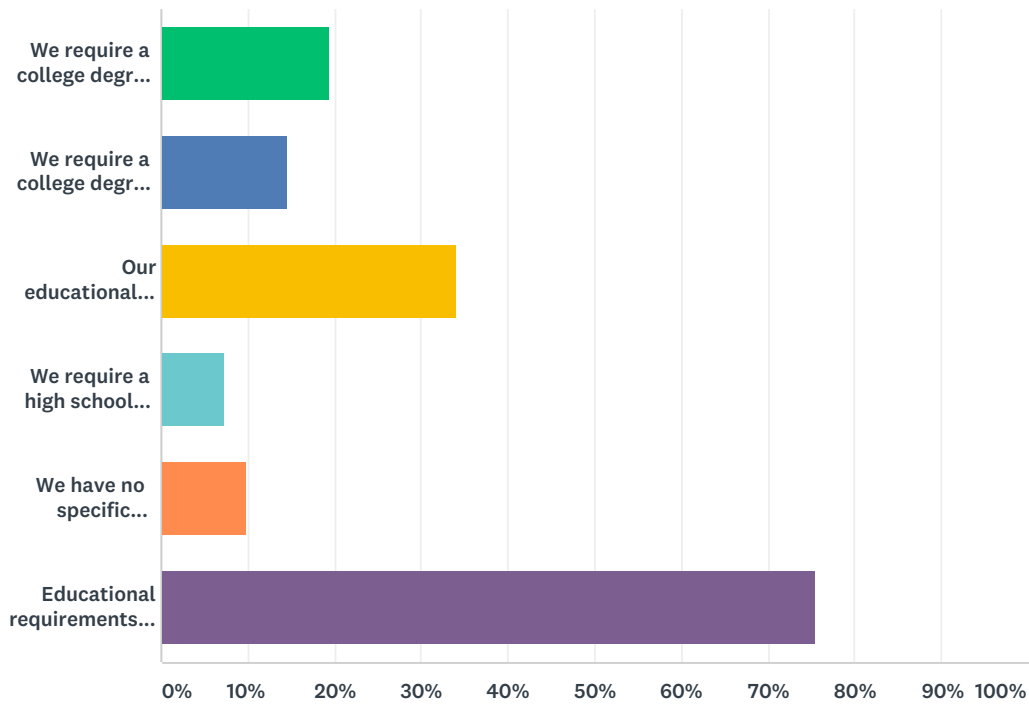
Answered: 21 Skipped: 24

- The inspections conducted by staff are often less costly for our clients that inspections conducted by contract inspectors. Most of the difference is due to mileage cost. Additionally, we find that inspections conducted by staff reduces expenses for our agency. The income received from our clients for inspections conducted by staff goes to salaries rather than get paid to contract inspectors.
- Staff inspectors are cheaper.
- Contracted Inspector costs are higher than Staff Inspector Costs. There seems to be a shortage of well trained contracted inspectors and the well trained inspectors have the higher rates.
- Staff inspections are less expensive overall.
- Staff inspectors are more cost effective because they have access to electronic files and understand how to submit invoices, travel vouchers, etc.
- Not much difference when averaged.
- REDACTED FOR CONFIDENTIALITY (Summary is that staff inspections cost more.)
- There are new inspectors who will charge less to get started and this has an impact when staff rates are higher. We don't work with contract inspectors whose rates are higher than staffs. Some contract inspectors are good at planning/being cost effective but a lot aren't. This could be a valuable training area.
- It is more cost effective to use staff inspectors, but we have to balance that with the other work they do (all staff inspectors are also certification specialists and final reviewers). Our crop work is pretty seasonal so we don't have a lot of winter work for contract inspectors.
- As a general rule staff do not bill for time in the same way contractors do so staff inspector positions tend to be less cost effective for us. It is one but not the principal reason we use mainly contractors
- Time spent with Travel Vouchers, Invoicing, etc. is greater.
- We can not compare because we do not hire full time, since there are no inspections throughout the year and work is concentrated from February to August, only results are paid after each inspection and when everything is in order. But all receive training throughout the year and also according to the needs detected. Preferred contract for result since 5 months have no inspections and would have to pay only to fulfill the contract. It is better to pay for the result that makes them more effective in their work.
- It is more cost effective for us to higher contract inspectors, but due to the quality of work we receive from staff inspectors are primary objective is to only assign staff inspectors to the operations we certify. We only use contract inspectors when needed, which is primary due to staff turnover or a unaccepted increase in workload.
- IN [REDACTED], THERE ARE NOT TOO MAY OPTIONS TO KEEP CONTRACT INSPECTORS FOR A LONG TIME IF YOU CONTRACT A HIGH AMOUNT OF INSPECTIONS BECAUSE LEGAL ISSUES SO WE ARE IN THE WAY TO CHANGE SOME OF OUR CONTRACT INSPECTORS INTO STAFF.
- We have moved to only having staff inspectors this year. It ensures greater consistency and control.
- It is more effective to have staff inspectors, but we do not recommend to not have enough work to use only staff inspectors
- same rates for both types of inspectors
- Yes, staff inspections are much more thorough. As apposed to the contracted inspectors do the minimal when completing reports (some not all).
- [3 respondents marked the question as "N/A"]

Summary - Most certifiers says staff inspections are more cost effective.

Q10 Please describe your requirements for academic education of new organic inspectors. You can select more than one.

Answered: 41 Skipped: 4



ANSWER CHOICES	RESPONSES	
We require a college degree for inspectors.	19.51%	8
We require a college degree in a specific field (e.g., a degree in math, science, or agriculture) for inspectors.	14.63%	6
Our educational requirements differ according to scope of certification (producers versus handlers).	34.15%	14
We require a high school diploma or GED for inspectors.	7.32%	3
We have no specific educational requirements for inspectors.	9.76%	4
Educational requirements vary depending upon the other strengths of the inspector, such as experience and training.	75.61%	31
Total Respondents: 41		

Q11 Please use this space to elaborate upon educational requirements of new inspectors, including any specific degrees that you require.

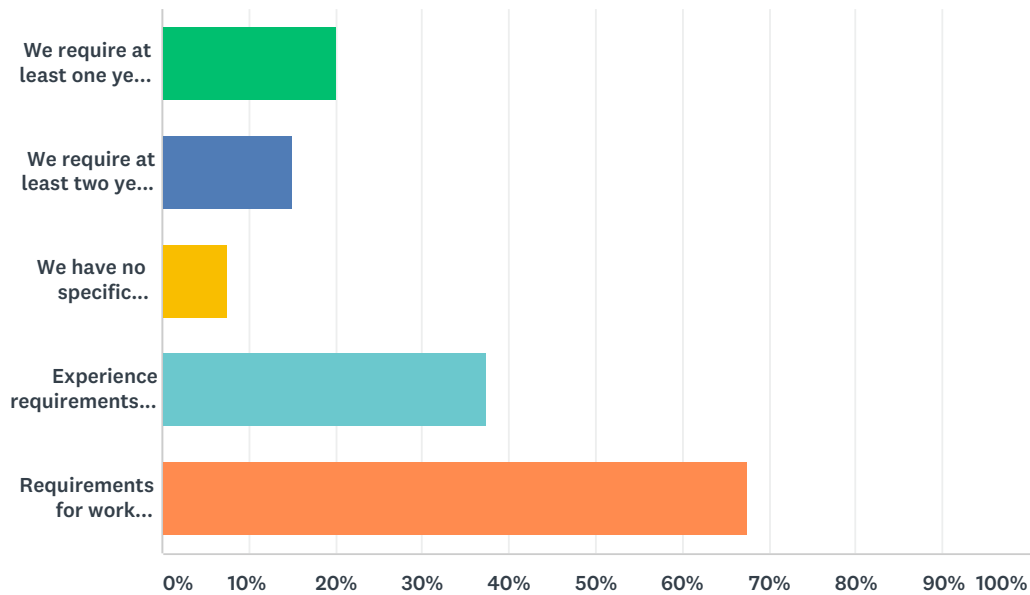
Summary: Few certifiers have hard and fast requirements for college degrees, though they are often preferred.

Answered: 31 Skipped: 14

- Our agency does not have specific educational requirements, although educational background is weighted along with experience and training to make decisions on hiring new contract inspectors.
- The majority of our inspectors have college degrees. However, just as Steve Jobs did not have a college degree, we maintain the philosophy that individuals can achieve self-education and competency at levels equivalent or exceeding individuals with a college degree. Therefore our education requirements are applied on a per-person basis. We require that inspectors have college graduate level literacy and comprehension skills. We would oppose any scheme to make a college degree a firm requirement.
- training depends on scope and resume of inspector. Company training, IOIA training and shadow inspections may be required.
- IOIA training.
- We require knowledge of audit procedures and agricultural background.
- We require no specific degrees. New inspectors are required to have the on-site IOIA training and beyond that is a case-by-case basis of selection.
- Science based degree
- They should have complete knowledge and experience of the scope they are inspecting.
- The quality of their inspections and writing is more important than their education. Higher education does not always correlate with higher quality.
- For new inspectors with little to know prior experience and/or training, we require a degree in agriculture or other science field.
- Qualifying as an Inspector Organic inspectors contracted by ##### must be qualified, by specialized training and an appropriate combination of education and/or experience, to perform inspections of organic production or handling operations for the ##### program. Minimum standards. The following minimum standards must be met: Education. Inspectors must have sufficient education and experience to communicate clearly (verbally and in writing), to read & comprehend complex written standards, and to accurately assess the records, words and physical evidence presented by an applicant for certification. • Farm inspectors require, at minimum, an associate degree in a relevant area of study, and six months of experience in an agricultural or inspecting capacity. Relevant job/life experience may be substituted for education on a year for year basis. • Handling inspectors require a four-year degree in a relevant area of study, and one year of experience in a related field. Up to two years of job/life experience may be substituted for the required education. Training. Inspectors must complete an Independent Organic Inspectors Association (IOIA) training and apprentice inspections in the appropriate category of work, or demonstrate equivalent and pertinent training and report writing experience. • Farm inspectors must have completed and passed Independent Organic Inspectors Association (IOIA) basic farm inspection training. Inspectors who are inspecting livestock operations must have completed IOIA livestock inspection training. An inspector with significant education or experience in the animal sciences may petition for exemption from the additional livestock training requirement, provided they do at least one apprentice livestock inspection under an IOIA-accredited livestock inspector. • Handling/Processing Inspectors must have completed and passed the Independent Organic Inspectors Association (IOIA) basic processing training and apprentice inspection(s).
- [REDACTED] is more concerned with experience, past work history and life experiences
- a. 3 years experience in the industry within the scope requested for approval, or fewer with b. A scope specific 2-year degree from an accredited university
- IOIA training required
- We look for IOIA training and other experience
- We prefer Food Science and/or Agriculture/livestock degrees. We accept other degrees with proper training and education in organics with specific in the field experience. We will accept certain Life Experience to take place of formal education i.e. growing up and working on the farm.
- We prefer college background in Ag or animal Science or Nutrition, or some other related field but experience with organic ag, livestock or processing is always sought.
- We believe that inspectors can grow into new scopes. We do not require a degree in the field because they may expertise from another source.
- Completion of an IOIA course scope Experience in the scope being inspected
- Agronomic, Industrial, Food Engineers and preferably have experience in crops and organic management
- Agricultural Engineer, Agroecologist Engineer, Industrial in food Engineer, Forest Engineer, Bachelor's degree in biology, Engineer in Animal Husbandry or any of the disciplines or branches of technical level related.
- Depending on experience/training, we will onboard new inspectors as seasonal "staff" inspectors, train them with an experienced staff inspector on several inspections, and then shadow them on an inspection. After reviewing the shadower's audit and reviewing their inspection report, we will either continue with training, suggest an IOIA course or webinar, or move them into the inspection scheduling rotation.
- A Bachelor's degree involving major study in agriculture or other allied field is required. However, additional qualifying experience beyond two years can substitute, year for year, for education.
- AGRICULTURAL ENGINEERS, VET
- college degree
- Specific and applicable experience may be substituted for education under certain circumstances.
- We prefer college degree in sciences but if they have life experience or other experience we count that as well.
- Mostly the main requirement will be college degree (bachelors, masters) in agriculture or food production. In special cases we consider experience of inspector in sector.
- Degrees in almost any science (agriculture, biology, chemistry, natural resources, plant, animal) qualify an inspector without experience.
- Degree in agronomy or plant sciences strongly preferred. Experience in crop production or handling, as well as IOIA inspector training required.
- If inspectors are in pursuit of inspecting other scopes other than organics for our CB, then education requirements differ.

Q12 Please describe your requirements for experience of new organic inspectors. You can select more than one option.

Answered: 40 Skipped: 5



ANSWER CHOICES	RESPONSES	
We require at least one year of hands-on work experience relevant to the scope for new inspectors.	20.00%	8
We require at least two years of hands-on work experience relevant to the scope for new inspectors.	15.00%	6
We have no specific experience requirements for new inspectors.	7.50%	3
Experience requirements for new inspectors vary by scope.	37.50%	15
Requirements for work experience vary depending on education and training of the inspector.	67.50%	27
Total Respondents: 40		

Q13 Please use this space to elaborate upon experience requirements for new inspectors.

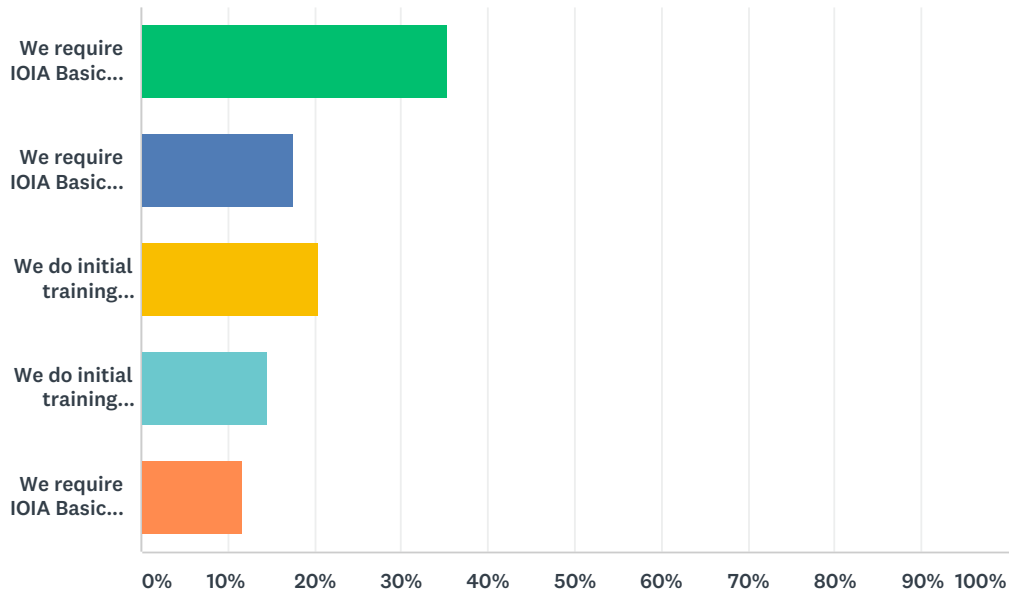
Answered: 22 Skipped: 23

- While we do not have specific work experience requirements, farming, livestock and food processing experience is necessary to be hired as a contract inspector with our agency. Work experience is weighted along with education and training to make hiring decisions.
- We hold the line on at least two years of experience for new inspectors, but we are somewhat flexible in what type of experience we will count. For example, the question above says "hands on", but we will accept directly relevant academic experience as part of the 2 years minimum. By "relevant" we mean that courses or a degree general sciences does not count on its own, but that specifically agriculture, food science, and/or livestock courses and degree programs do count. For instance, the Crop Science degree from Cal Poly, SLO. Once an organic inspector is established in crops, we do not necessarily require 2 years of prior experience for them to move into handling or livestock. However the reverse is not true; we require 2 years of ag experience to inspect farms, regardless of handler or livestock inspection experience. This is because agriculture and farming is a fundamentally deeper more varied and complex system...especially compared to food handling and processing, which is by and large an industrial craft. Also we differentiate farming as being at the core and heart of organic, with critical sustainability implications, such as with natural resources, the environment, and sustainability implications. Therefore an inspector needs a reasonably solid background in agriculture before they should be sent out to interview and assess farmers. Of course, an inspector needs to understand the processing/handling operations they will visit, but we believe that can be achieved outside of 'years of experience'. We consider livestock intermediate, and are also selective about people moving into livestock who do not have sufficient experience + education about those systems; and also we differentiate between more complex livestock systems, such as dairy, vs. simpler, such as most poultry operations. So we will let some inspectors do simpler livestock, but not dairy, unless they have real dairy knowledge and experience.
- company training, IOIA training, shadow inspections, etc
- An inspection as an observer and an observed inspection
- More experience is preferred, but if an aspiring inspector can make a positive impression on me then s/he can play the game.
- New inspectors are trained over a period of time with current inspectors until proficient.
- Same as above
- Experience requirements include but are not limited to work experience within the relevant scope or a similar area. Inspection experience in an area that required similar KSA and ATD to complete satisfactorily.
- IOIA training is very important
- Contract inspectors come to us with so many varying resumes that it is nearly impossible to be black and white in my response. Which is why three boxes checked. I have worked with a wide range of skills, experience and educated inspectors. There doesn't seem to be one formulae that works for all....yet.
- We prefer experienced inspectors but are willing to work with new inspectors that we deem qualified, or who seem to have potential. We do require new inspectors to do our annual inspector training.
- Experience in crop inspections according to the standards with which we certify and products, management / processing inspections in large and small plants, in those that use many ingredients or a single ingredient, experience in inspections of producer groups, systems management of internal control etc.
- Minimum experience of one year of professional service in their disciplines or branches.
- Required Qualifications: Two years of professional level experience in farm management, food processing, food distribution, input manufacturing, or organic certification. Preferred/Desired Qualifications: Knowledge of or course work in soil management for diverse cropping systems, organic and conventional pest controls, post harvest technology, food science and/or processing technology, chemistry, labeling regulation, and/or food distribution systems.
- 2-4 years working experience required depending on education of the inspector
- Combination of education or experience and inspector training
- We look at education, job experience, and life experience.
- As described above, the work experience in the field depends on inspectors education. All inspectors receive a full training by us, part of the training is on site practical inspections.
- We provide experience for new inspectors as long as they meet educational requirements.
- We have a checklist that must be completed by new organic inspectors prior to approval. The Checklist consists of Requirements as previously marked.
- [2 respondents referred to Question 11 above.]

Summary - Training requirements vary and depend on scope, level of complexity, and the inspector's background.

Q14 Please select the most appropriate response:

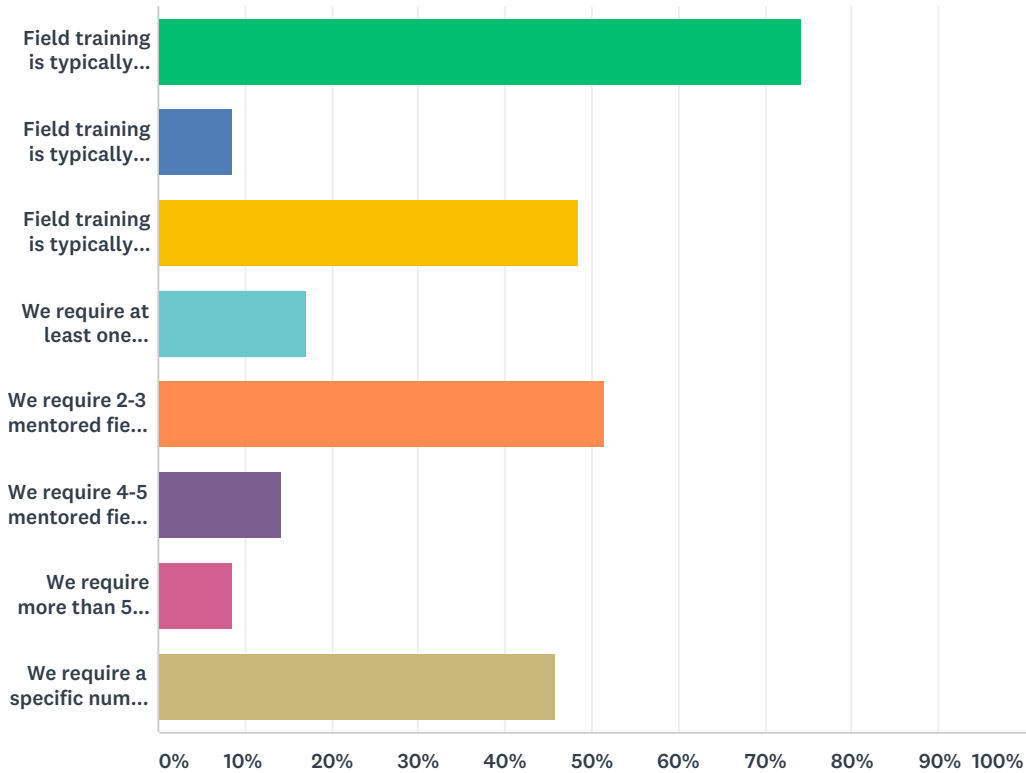
Answered: 34 Skipped: 11



ANSWER CHOICES	RESPONSES	
We require IOIA Basic Training for all inspectors.	35.29%	12
We require IOIA Basic Training for all contract inspectors, but we often train staff inspectors in-house.	17.65%	6
We do initial training (something similar to IOIA Basic) in-house for some or all contract inspectors, which includes a field trip and exam.	20.59%	7
We do initial training in-house (something similar to IOIA Basic) but which does not include an exam.	14.71%	5
We require IOIA Basic Training for all contract inspectors new to our agency unless they have been trained for inspection by a different agency.	11.76%	4
TOTAL		34

Q15 Please tell us about your requirements for mentored field training -- that is, real-life inspections where an experienced inspector is present onsite with the trainee and evaluates the trainee's report. Select all that apply.

Answered: 35 Skipped: 10



ANSWER CHOICES	RESPONSES	
Field training is typically done by staff at our organization.	74.29%	26
Field training is typically done by IOIA.	8.57%	3
Field training is typically done by experienced contract inspectors.	48.57%	17
We require at least one mentored field training inspection for new inspectors.	17.14%	6
We require 2-3 mentored field training inspections for new inspectors.	51.43%	18
We require 4-5 mentored field training inspections for new inspectors.	14.29%	5
We require more than 5 mentored inspections for new inspectors.	8.57%	3
We require a specific number of monitored reports in addition to the field training.	45.71%	16
Total Respondents: 35		

Q16 Please explain any specific policies you have in place regarding requirements for field trainers. (For example, the trainer must have conducted x inspections within the scope.)

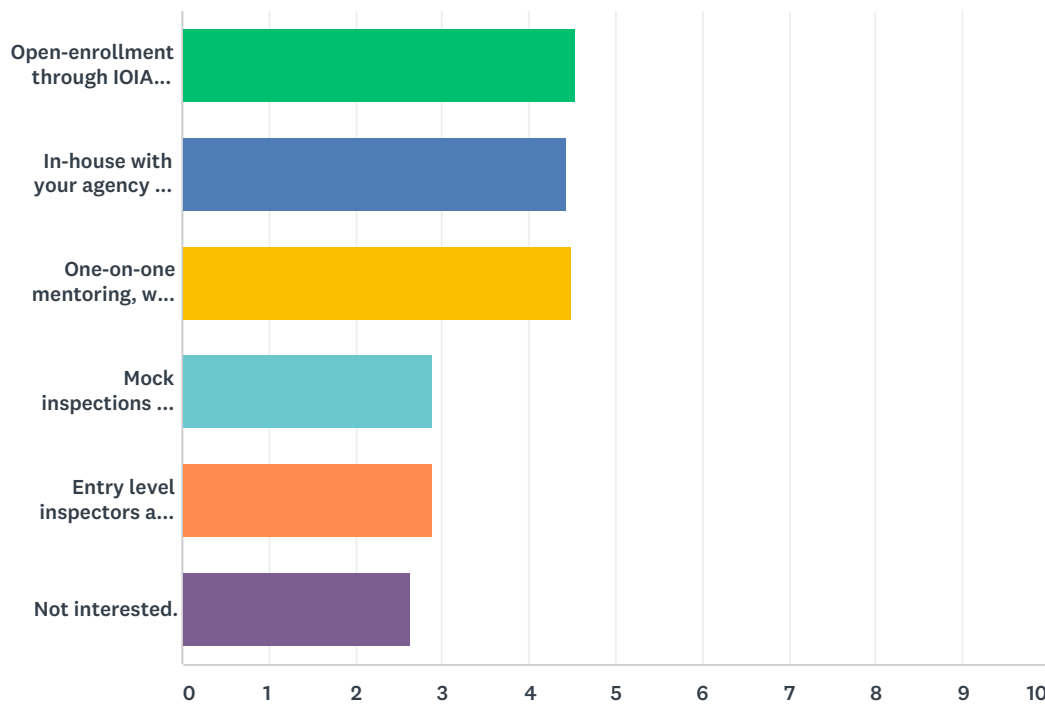
Answered: 25 Skipped: 20

- Our "field training" is just a potential inspector shadowing our mentor inspectors. Then we do a full evaluation before we sign a contract. We then require an IOIA course (not webinar) before resigning contract for the next year.
- Field trainers need to have significant experience in the scope that they are training new inspectors. Typically, that means at least 20 inspections, but could be adjusted based on the quality of inspection work from the field trainer.
- We only use mentor inspectors who are veterans, for instance at least 3 years experience and over 100 inspections completed. Frequently and typically the mentor inspectors have considerably more experience than that.
- field trainings are determined by the level of education/training of new inspector. Field Evals are done by veteran inspectors who complete an eval after each field inspection
- Qualified inspector by category
- The field trainers must demonstrate experience in inspections for at least 2 standards, and they must be willing to travel long distances and walk to the places where the inspection is carried out and that is where they have to train the inspectors.
- We have no specific policy on qualifications for mentors/field trainers. We encourage, but do not require, a new inspector to observe multiple inspectors.
- No specific requirements set forth. Must be a known, qualified, experienced, and talented inspector. Or if the mentor is not from our organization, they must provide documentation of their own qualifications--these are accepted on a case-by-case basis.
- At least one inspection mentored in each scope.
- A field trainer must have been an inspector for multiple years and have considerable knowledge of the scope they are training for.
- We typically don't hire newly trained inspectors. We expect them to have some experience and we evaluate inspection reports before hiring.
- Mentor Inspectors and Educational Inspectors must be interviewed, shadowed, and evaluated to specific criteria.
- IOIA accreditation
- No specific requirement other than having a lot of experience.
- Trainers must be proficient within the scope of their operation as determined through our written and field evaluation processes.
- We don't have a policy for this. In practice, our inspector supervisor has lots of experience in all scopes.
- The field trainers must be inspectors certified by [REDACTED]
- We only hire contract inspectors who have been trained and who have previously worked for another certifier. Contract inspectors receive a half day of training at the beginning of the season to inform them of WSDA guidance and instruction. New staff inspectors observe and conduct co-inspections with peers and supervisor leads, but are only evaluated (witness inspection), by a scope lead. New inspectors observe two inspections, conduct two co-inspections, and then receive two witness inspections per scope. The scope lead supervises inspectors and reports to the certification coordinator.
- NO SPECIFIC REQUIREMENT IN THE TRAINING PROCEDURE BUT OBVIOUSLY WE TAKE EXPERIENCED INSPECTORS
- the trainer must have conducted x inspections within the scope
- New inspectors must at least observe 3 inspections per scope and be observed on at least 3 inspections per scope before doing an inspection alone.
- Experienced trainer within the scope
- Inspectors should demonstrate at least 1 observed inspection. Usually, the number of observed inspections will be 2. It applies to all new scopes.
- Field trainer must have conducted at least 15 inspections within the scope and attended both basic and advanced IOIA training specific to the scope
- [One respondent marked the question "N/A."]

Summary - Most respondents did not indicate a specific amount of experience that was required for field trainers.

Q17 Please rank the following formats for IOIA field training, where 1 is the greatest degree of support/interest.

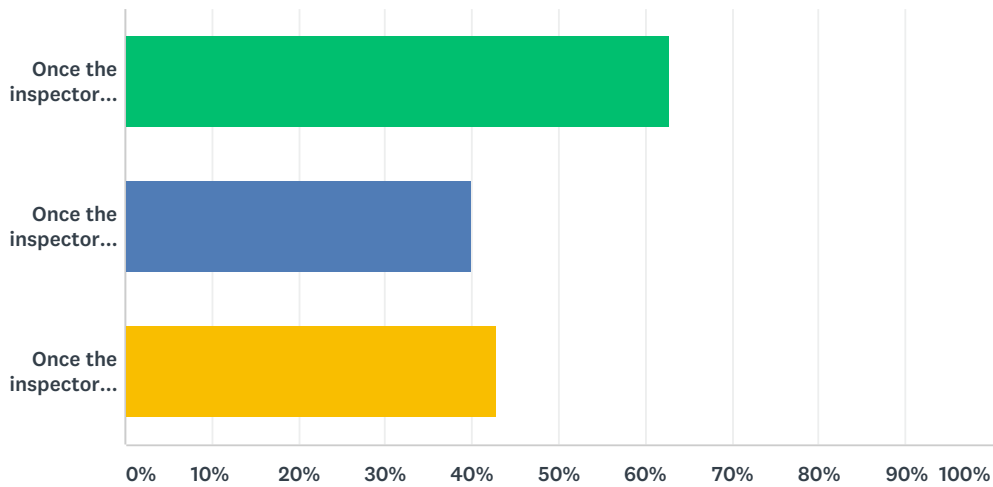
Answered: 29 Skipped: 16



	1	2	3	4	5	6	TOTAL	SCORE
Open-enrollment through IOIA, working with certifiers as cosponsors to provide the field trip/inspections. Forms used may include IOIA standardized forms.	35.00% 7	25.00% 5	15.00% 3	10.00% 2	15.00% 3	0.00% 0	20	4.55
In-house with your agency and IOIA working together, and using your forms. Certifier may provide one or more Field Trainers. Real inspections.	23.81% 5	33.33% 7	23.81% 5	0.00% 0	19.05% 4	0.00% 0	21	4.43
One-on-one mentoring, with IOIA facilitating the pairing. Real inspections.	22.22% 4	27.78% 5	33.33% 6	11.11% 2	5.56% 1	0.00% 0	18	4.50
Mock inspections at one site used repeatedly as host training sites. Not real inspections.	10.53% 2	0.00% 0	15.79% 3	31.58% 6	26.32% 5	15.79% 3	19	2.89
Entry level inspectors are assigned to an inspection company (1 or more experienced inspectors) through arrangement with IOIA.	11.11% 2	5.56% 1	5.56% 1	33.33% 6	27.78% 5	16.67% 3	18	2.89
Not interested.	26.32% 5	0.00% 0	5.26% 1	5.26% 1	5.26% 1	57.89% 11	19	2.63

Q18 Tell us about your process for monitoring the early reports of new inspectors. You can select more than one response.

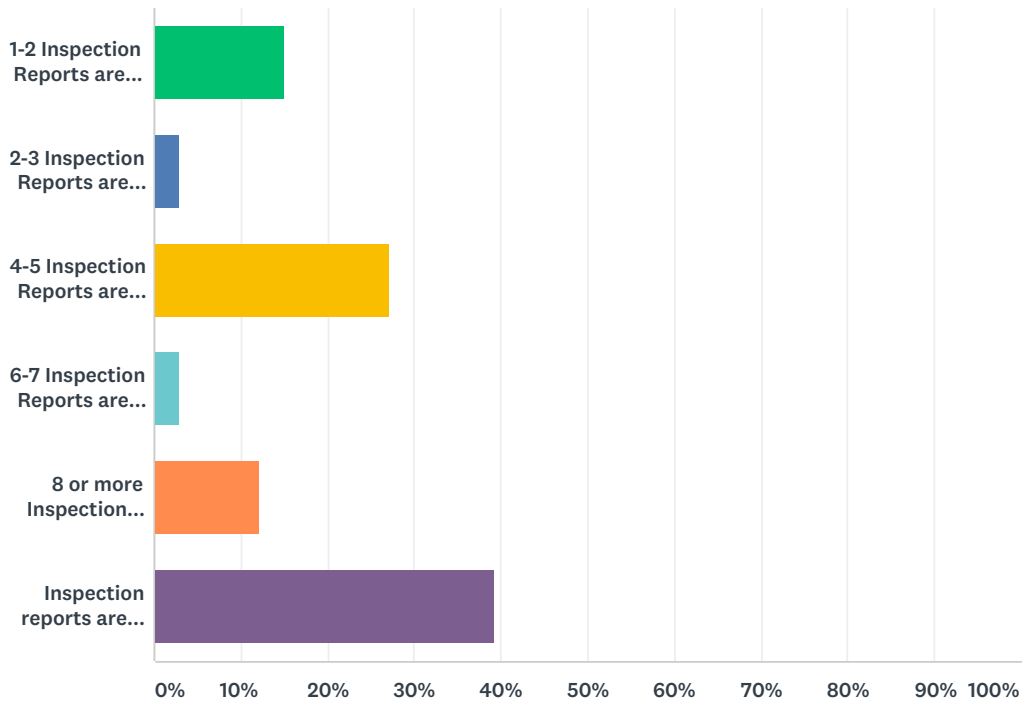
Answered: 35 Skipped: 10



ANSWER CHOICES	RESPONSES
Once the inspector completes field training, a supervisor within the inspection department monitors a specific number of initial reports, providing timely feedback.	62.86% 22
Once the inspector completes field training, a designated review staff provides feedback on a specific number of initial reports, providing timely feedback.	40.00% 14
Once the inspector completes field training, reports are monitored in the same fashion as those of experienced inspections.	42.86% 15
Total Respondents: 35	

Q19 If a supervisor or experienced review staff is designated to provide timely feedback to new inspectors, how many Inspection Reports are monitored in this way? (Note, this is not asking about regular feedback that is provided on all Inspection Reports. It is asking about feedback directed specifically toward new inspectors.)

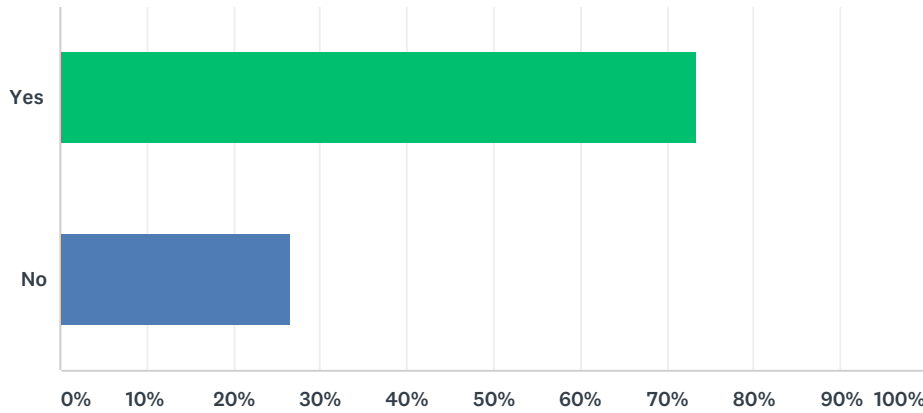
Answered: 33 Skipped: 12



ANSWER CHOICES	RESPONSES	
1-2 Inspection Reports are monitored in this way.	15.15%	5
2-3 Inspection Reports are monitored in this way.	3.03%	1
4-5 Inspection Reports are monitored in this way.	27.27%	9
6-7 Inspection Reports are monitored in this way.	3.03%	1
8 or more Inspection Reports are monitored in this way.	12.12%	4
Inspection reports are monitored in this way but not a specific number. It depends on the inspector.	39.39%	13
TOTAL		33

Q20 Do you have a mechanism in place to ensure that meaningful reviewer feedback is provided to first-year inspectors early in the season?

Answered: 34 Skipped: 11



ANSWER CHOICES	RESPONSES	
Yes	73.53%	25
No	26.47%	9
TOTAL		34

Q21 Please describe any additional training you require for new inspectors (HACCP, Lead Auditor training, PCQI, FSMA, FSVP, or others).

Answered: 17 Skipped: 28

- Lead auditor training
- FSMA, Lead Auditor training and HACCP
- HACCP
- HACCP
- none. we want them to focus on qualified standard before adding anything additional.
- We don't require additional training, but we welcome inspectors who have continuing education relevant to inspecting. We offered advanced training this spring on soil testing and recognizing herbicide damage in fields to crops.
- [REDACTED] basic training. [REDACTED] inspectors accreditation training.
- New inspectors receive the introduction and advanced levels of the state Investigator Training course. All new staff inspectors are sent to IOIA trainings if not previously taken prior to employment.
- NONE FOR NOP
- HACCP, Lead Auditor training
- HACCP, Lead Auditor training
- no specific training requirements
- Staff inspectors also conduct other on farm inspections - GAP audits, Produce Safety Rule inspections, etc. so have extensive training and experience to conduct those as well
- [5 respondents marked the question as "none" or "N/A."]

Summary - HACCP training is the most commonly cited additional requirement.

Q22 Please provide any additional comments related to your requirements for initial inspector training.

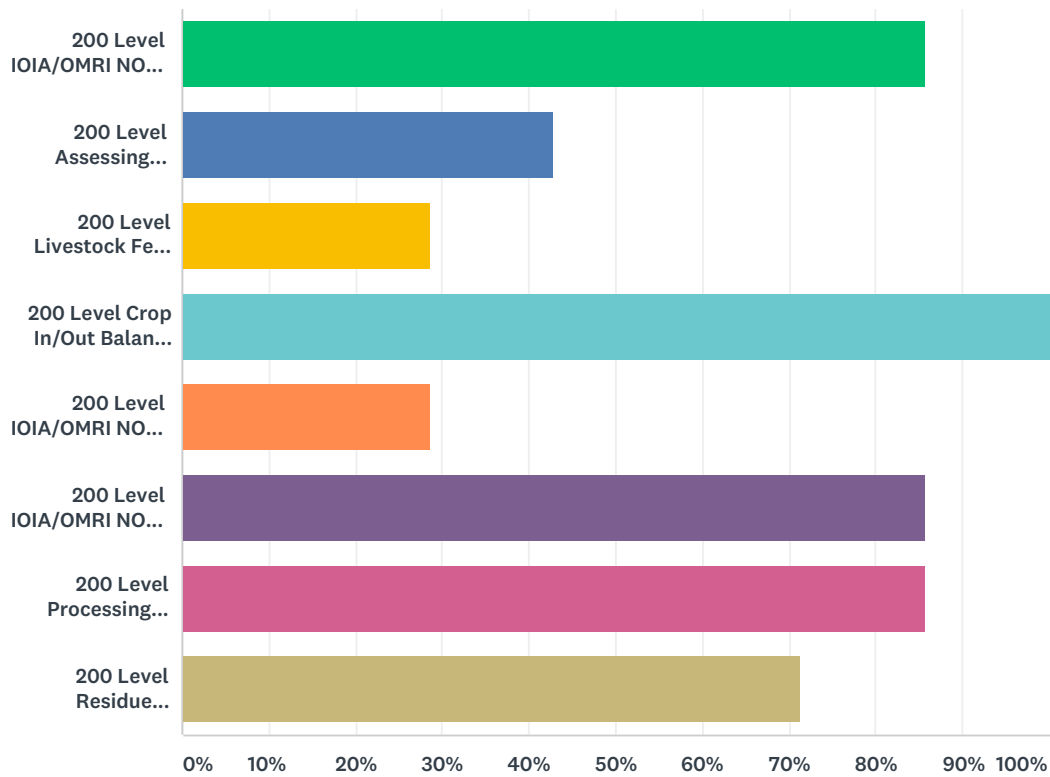
Answered: 13 Skipped: 32

- Our agency trains new inspectors on our forms, database and requirements for inspection report writing. We recognize that all certification agencies have slightly different requirements and it's important to differentiate our requirements from other agencies.
- We have a staff person who is responsible for recruiting, selecting, on-boarding, and training new inspectors. That person creates a customized training program based on the incoming inspector's experience. So, even experienced inspectors will need some training about how the specific unique procedures and expectations of our agency. New inspectors will need a whole lot more, including a field apprenticeship. In all cases, new inspectors get one on one time with this highly knowledgeable staff person, who counsels, trains, and guides them to successfully on-board as a contract inspector with our organization. Incidentally this staff person has extensive inspection experience prior to working full time on staff.
- The modality now of contract inspectors, is that we do not receive new without experience, all those who now apply and are accepted if they approve are those who have experience and training.
- Professional development training: writing, public speaking, customer service, email communication, conflict of interest and confidentiality trainings
- It is a building process and can take a couple of years.
- Organic Inspector Qualification Procedure Inspectors must be approved before they are engaged to perform work for #####, whether as an independent contractor, an employee, or on a volunteer basis. The Supervisor is responsible for the initial evaluation and approval of inspector qualifications, and for annual updates for all active inspectors. An Inspector Information Form (IIF) shall be completed by the Supervisor for each inspector candidate to document the receipt of proof of education, experience and training, and to document completion of annual evaluations. • An IIF must be completed before contracting with a new inspector; annual updates should be completed before the first inspection of the calendar year. • The IIF will ask if the following have been submitted: o Resume o Copies of all training certificates / documentation of continuing education o Completed ##### Inspector Job Description contracts (producer or handler or both) In addition, the ##### must have writing samples to evaluate. If apprentice inspections have been completed and an inspection report generated by the inspector candidate, that report can be used. Inspection reports / inspection narratives completed for other accredited certification agents can be used. It is understood if sensitive operation information is redacted from these reports. For other types of writing samples, the inspector candidate should consult with the ##### Organic Certification Supervisor. ##### Independent Organic Inspectors must complete a new Job Description contract on an annual basis.
- we do require their attendance to a [REDACTED] workshop before hiring (unless is an experienced inspector)
- We communicate policies through completion of an inspector agreement, and also by personal communication.
- They must read and complete 7 modules that incorporate certain agency specific training and/or training that is not received anywhere else that we can find. i.e. Accounting Practices, Cost Effectiveness
- We reduced the number of contract inspectors this year and upped the number of staff inspections done. We'd prefer to work with fewer inspectors and groom the new inspectors whose work we like who will hopefully pick up more work for us in coming years.
- It is necessary that the inspectors approve the two [REDACTED] trainings with a qualification of 80 %.
- Our inspectors receive also training in other standards, such as EU organic regulation requirements, Armenian legislation requirements, private standards such as BioSuisse or KRAV.
- [One respondent marked the question as "N/A."]

Summary - Additional training requirements vary; testing is not commonly referenced.

Q23 Which of the following IOIA webinars do you require for inspectors, based on the scope of the inspector?

Answered: 7 Skipped: 38



ANSWER CHOICES	RESPONSES	
200 Level IOIA/OMRI NOP Crop Input Materials	85.71%	6
200 Level Assessing Biodiversity & Natural Resources on the Farm	42.86%	3
200 Level Livestock Feed Audits, Grazing and Non Grazing Season	28.57%	2
200 Level Crop In/Out Balances & Traceability	100.00%	7
200 Level IOIA/OMRI NOP Livestock Input Materials	28.57%	2
200 Level IOIA/OMRI NOP Processing Input Materials	85.71%	6
200 Level Processing In/Out Balances, Traceability & Recipe Verification	85.71%	6
200 Level Residue Sampling & Responding to Test Results	71.43%	5
Total Respondents: 7		

Q24 Please use this space to list any additional IOIA webinars or advanced trainings you require for inspectors. If you require any additional trainings (including those listed in Question 23), please describe the points at which the trainings become required.

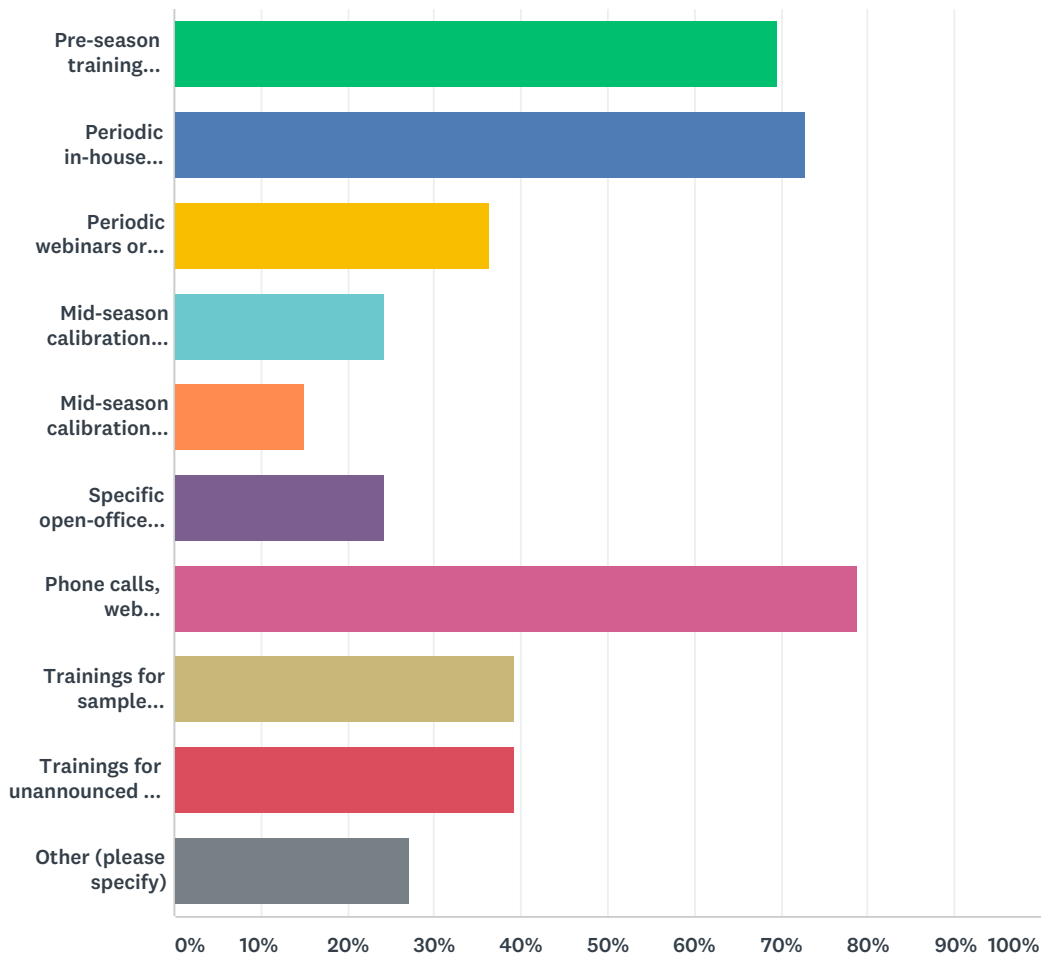
Answered: 16 Skipped: 29

- Our agency does not require any of these additional IOIA webinars. However, we do have internal trainings for most of these concepts.
- We required continuing education, and track that for each inspector. We recommend and encourage IOIA webinars as an excellent continuing education source.
- Flow and traceability internal control systems use of inputs in soils, plants and processing Interpretation of some articles of international standards Use of supplies, results of samples, etc.
- We do not require anything beyond the basic IOIA trainings.
- Trainings become required when consist errors occur in audit performance or when auditors take on additional demands in workload
- Additional training is targeted during two annual staff meetings. Committed inspectors are encouraged to attend webinars Staff are also specifically encouraged to take specific webinars
- none at this time
- We don't require any webinars currently
- We do not require any specific training for a specific inspector, but we do require inspectors to continue their education in their relevant scopes, and we often suggest training based on the inspectors strengths and weaknesses.
- We don't require these but encourage inspectors to take classes that are appropriate. Each year we ask inspectors to submit any training docs they've done in the past year.
- None are required. They are accessed on an as needed basis.
- [REDACTED] does not requiere any IOIA's training. All the trainings to inspectors are performed by [REDACTED]
- We look for continuing education of our inspectors to be happening on a yearly basis in a variety of related topics.
- IOIA webinars are required during the inspector's first year of employment as they become available and when the inspector's schedules allows for continuing education. It usually takes a couple years before an inspector has been able to participate in all webinars specific to their scope and position.
- We don't require them but we have a few inspectors attend the advanced webinars. It is just so expensive we can't do more.
- We require all inspectors to have continuous learning so eventually they take all of the IOIA courses offered.

Summary - Some require ongoing training for all inspectors; some only require it on an as-needed basis.

Q25 What types of training events does your organization provide for inspectors throughout the year? Select all that apply.

Answered: 33 Skipped: 12



ANSWER CHOICES	RESPONSES	
Pre-season training consisting of updates to policies and procedures	69.70%	23
Periodic in-house updates for staff inspectors throughout the season	72.73%	24
Periodic webinars or in-person training for contract inspectors throughout the season	36.36%	12
Mid-season calibration trainings (webinars or in person) for staff inspectors	24.24%	8
Mid-season calibration trainings (webinars or in person) for contract inspectors	15.15%	5
Specific open-office hours for staff and contract inspectors	24.24%	8
Phone calls, web conferencing, or specialized email communications to individuals throughout the season	78.79%	26
Trainings for sample collection	39.39%	13
Trainings for unannounced or surveillance inspections	39.39%	13
Other (please specify)	27.27%	9

Total Respondents: 33

Q26 If you require a specific amount of continuing education for inspectors each year, please describe those requirements here.

Answered: 16 Skipped: 29

- 12 hours of prof development annually
- At this point, we do not require continuing education for inspectors. However, most of our inspectors take it upon themselves to maintain and increase their knowledge of the organic industry and attend additional training updating their resume.
- Minimum 8 hours per year.
- 2 hours every 2 years
- writing reports
- At this time, we collect information regarding continuing education, but it is not required.
- we require 1 training per month or 20 credit hours
- Must attend all in house trainings
- must attend some type of event that furthers their training, understanding and abilities.
- None required at this time.
- 5 hours per year or 15 hours every 3 years. We specifically search for the 15hr/3yr and don't mind if it occurs at once.
- If an inspector wanted to add a scope, we'd require proof of expertise/additional training
- An annual updating training
- 12 hours minimum
- [REDACTED] permanent staff is attending different training and seminars after those staff members assign a training for inspectors in person or via skype calls.
- Minimum of 15 hours per year continuing education

Summary - Requirements for continuing education reported range from 0 - 15 hours year year.

Q27 Use this space to describe any further requirements you have related to continuing education.

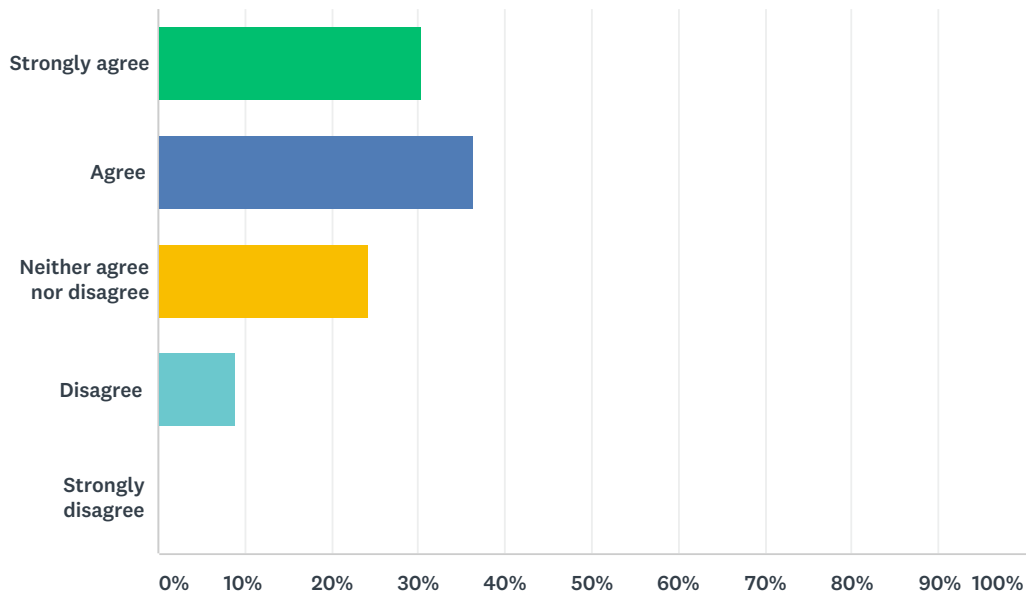
Answered: 7 Skipped: 38

- scope of inspections
- Continuing education is encouraged
- We provide it but also encourage it occur regularly.
- As needed and appropriate
- An annual updating training
- We require all inspectors to conduct inspections with a peer inspector, attend field days in their primary territories, and to attend grower workshops/conferences specific to the primary production occurring in their territories.
- [One respondent marked the question as "N/A."]

Summary - Continuing education in various forms is encouraged.

Q28 Agree or disagree: A standardized curriculum should be required for initial training of all new inspectors.

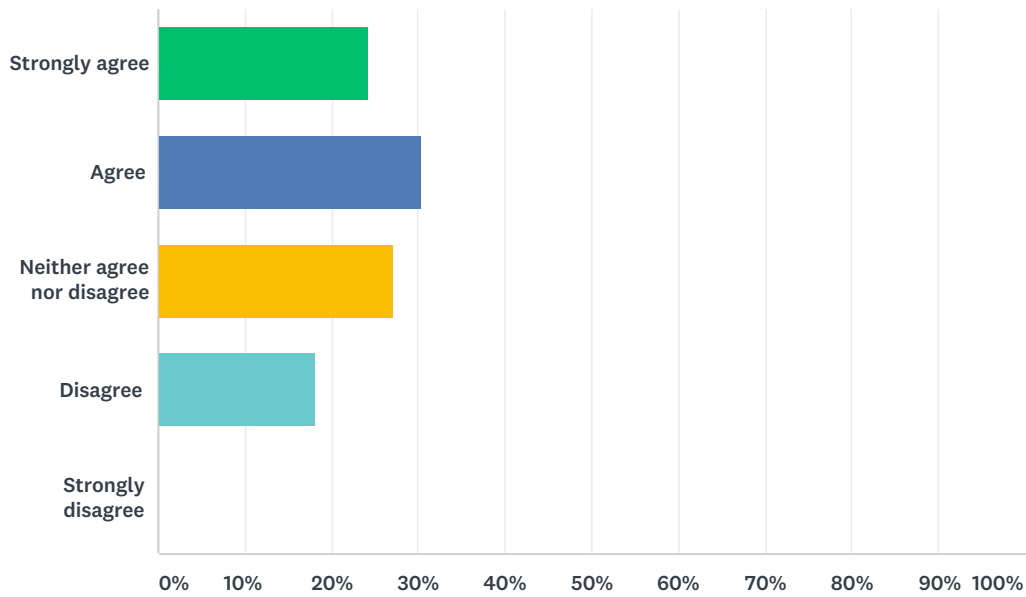
Answered: 33 Skipped: 12



ANSWER CHOICES	RESPONSES	
Strongly agree	30.30%	10
Agree	36.36%	12
Neither agree nor disagree	24.24%	8
Disagree	9.09%	3
Strongly disagree	0.00%	0
TOTAL		33

Q29 Agree or disagree: Standardized advanced trainings should be required for complex inspections.

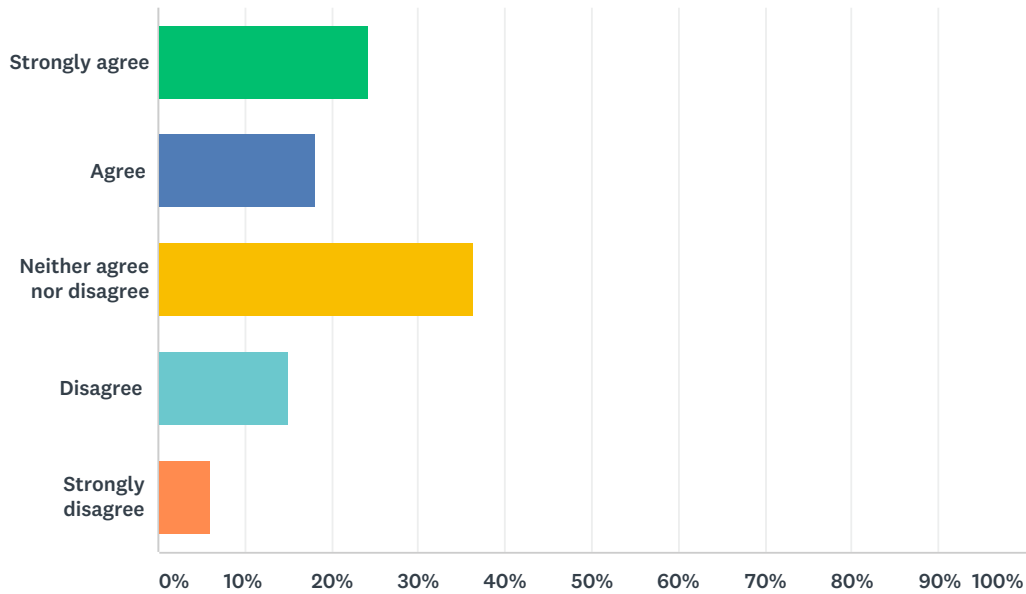
Answered: 33 Skipped: 12



ANSWER CHOICES	RESPONSES	
Strongly agree	24.24%	8
Agree	30.30%	10
Neither agree nor disagree	27.27%	9
Disagree	18.18%	6
Strongly disagree	0.00%	0
TOTAL		33

Q30 Agree or disagree: Inspector licensing or certification would be useful in ensuring quality inspections and consistent training for all inspectors.

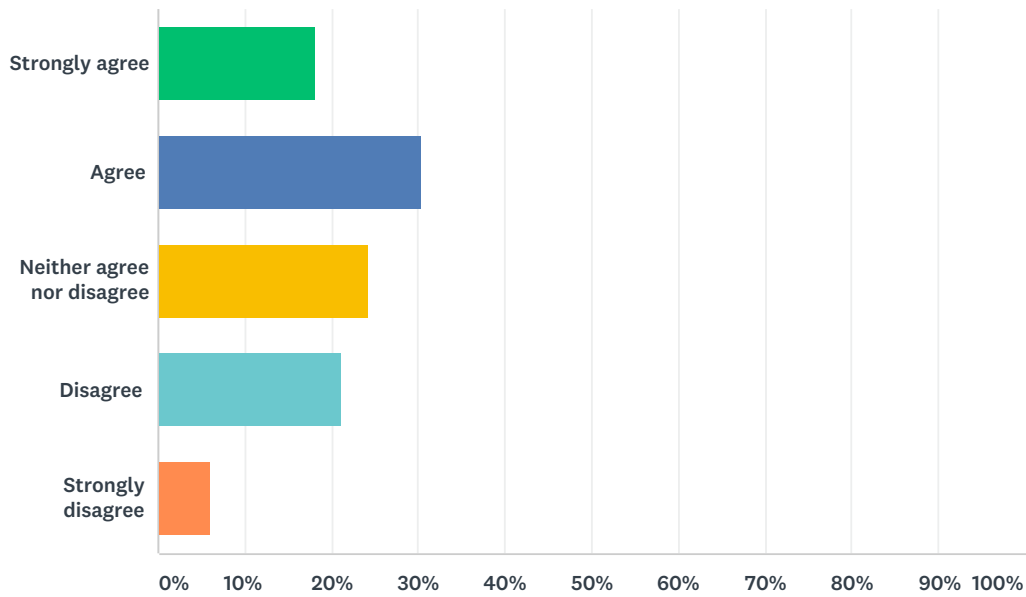
Answered: 33 Skipped: 12



ANSWER CHOICES	RESPONSES	
Strongly agree	24.24%	8
Agree	18.18%	6
Neither agree nor disagree	36.36%	12
Disagree	15.15%	5
Strongly disagree	6.06%	2
TOTAL		33

Q31 Agree or disagree: New inspectors should be required to pass a standardized test beyond IOIA Basic Training before beginning work.

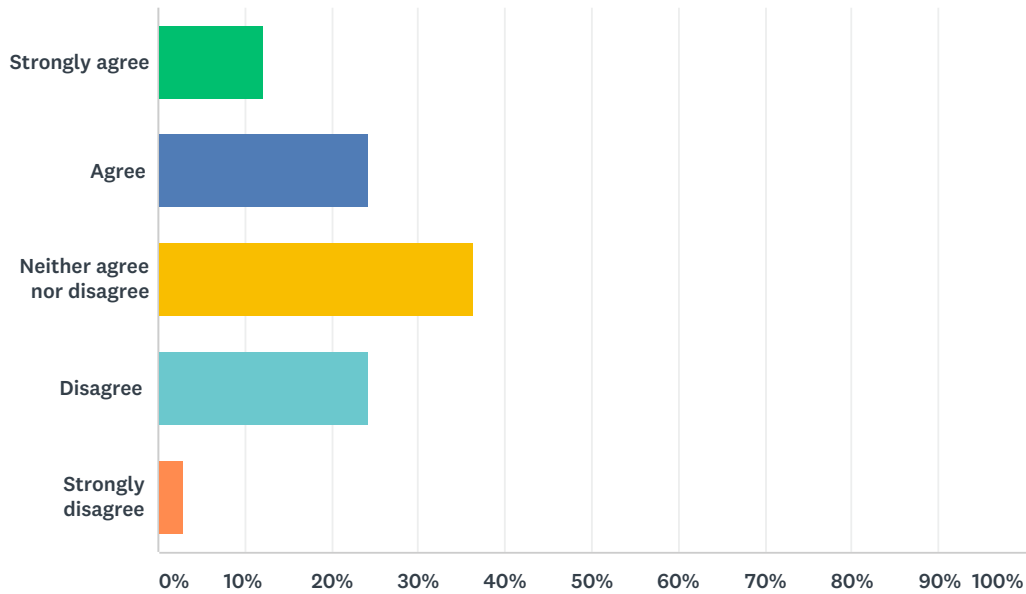
Answered: 33 Skipped: 12



ANSWER CHOICES	RESPONSES	
Strongly agree	18.18%	6
Agree	30.30%	10
Neither agree nor disagree	24.24%	8
Disagree	21.21%	7
Strongly disagree	6.06%	2
TOTAL		33

Q32 Agree or disagree: Organic inspectors should be required to pass a standardized test periodically (perhaps every 2-3 years) in order to continue work.

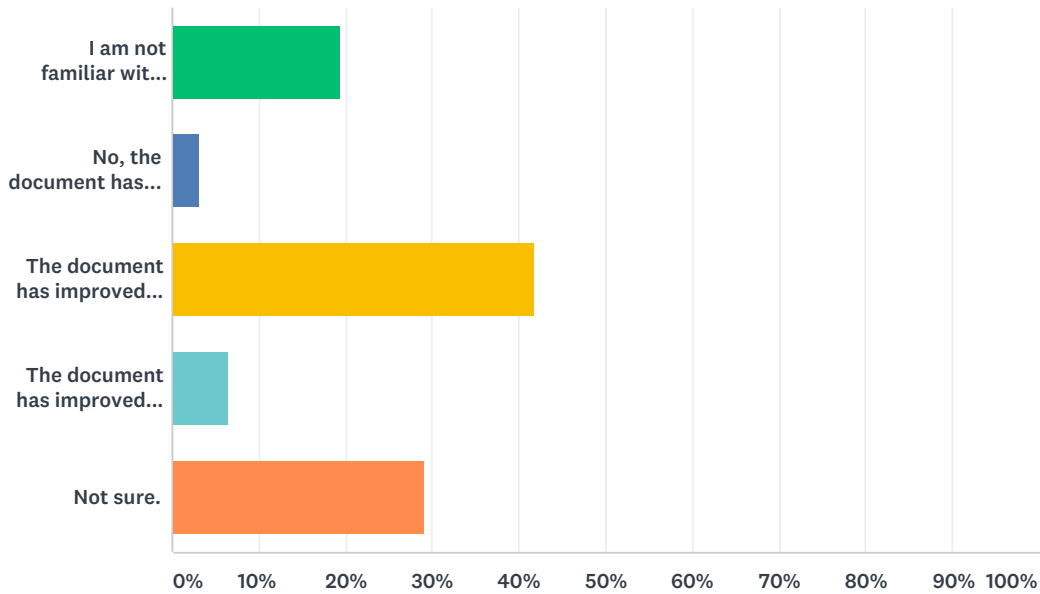
Answered: 33 Skipped: 12



ANSWER CHOICES	RESPONSES	
Strongly agree	12.12%	4
Agree	24.24%	8
Neither agree nor disagree	36.36%	12
Disagree	24.24%	8
Strongly disagree	3.03%	1
TOTAL		33

Q33 Has your organization found the ACA Guidance on Organic Inspector Qualifications to be useful in bringing about consistency inspector training and qualifications? Select the answer that works best.

Answered: 31 Skipped: 14



ANSWER CHOICES	RESPONSES	
I am not familiar with the ACA Guidance on Organic Inspector Qualifications.	19.35%	6
No, the document has not been useful to our organization or to the organic certification community.	3.23%	1
The document has improved consistency in our internal decision making. Not sure about industry-wide adoption.	41.94%	13
The document has improved consistency in inspector qualifications within the industry.	6.45%	2
Not sure.	29.03%	9
TOTAL		31

Q34 Describe any specific training or qualifications that should apply to field trainers (mentors to new inspectors).

Answered: 11 Skipped: 34

- At least 2 years experience doing inspections, IOIA training, have been evaluated positively by a certifier.
- A field trainer, or "mentor" as we call them, should an experienced inspector, that is, with at least 3 years experience and over 100 inspections. They should be willing to share their knowledge and mentor the learning of a new inspector. We do not support a requirement for a specific training or qualifications aside from already being an accomplished and high quality inspector.
- Q30. Agree that it would be useful, uncertain of practicality - concerned that depending on how such a system is structure that we may lose valuable part-time inspectors. Would like to consider alternative ways to meet the same end.
- field evaluations should be required
- They should have extensive knowledge, experienced, maturity, be able to teach, and be teachable themselves.
- They should conduct quality inspections and write clear reports.
- We only use folks accredited by IOIA - but I'm not even sure if that program is still going. Moving forward we are unlikely to ask any of our inspectors to take on the role of mentoring.
- understand the standards,
- Solid experience and academic background, very patient person and able to have serious conversations w/ the student about aptitude.
- Experience is key. At least 5 years inspecting.
- 2 or more years of experience.

Some but not all respondents reported a specific number of years or number of inspections performed.

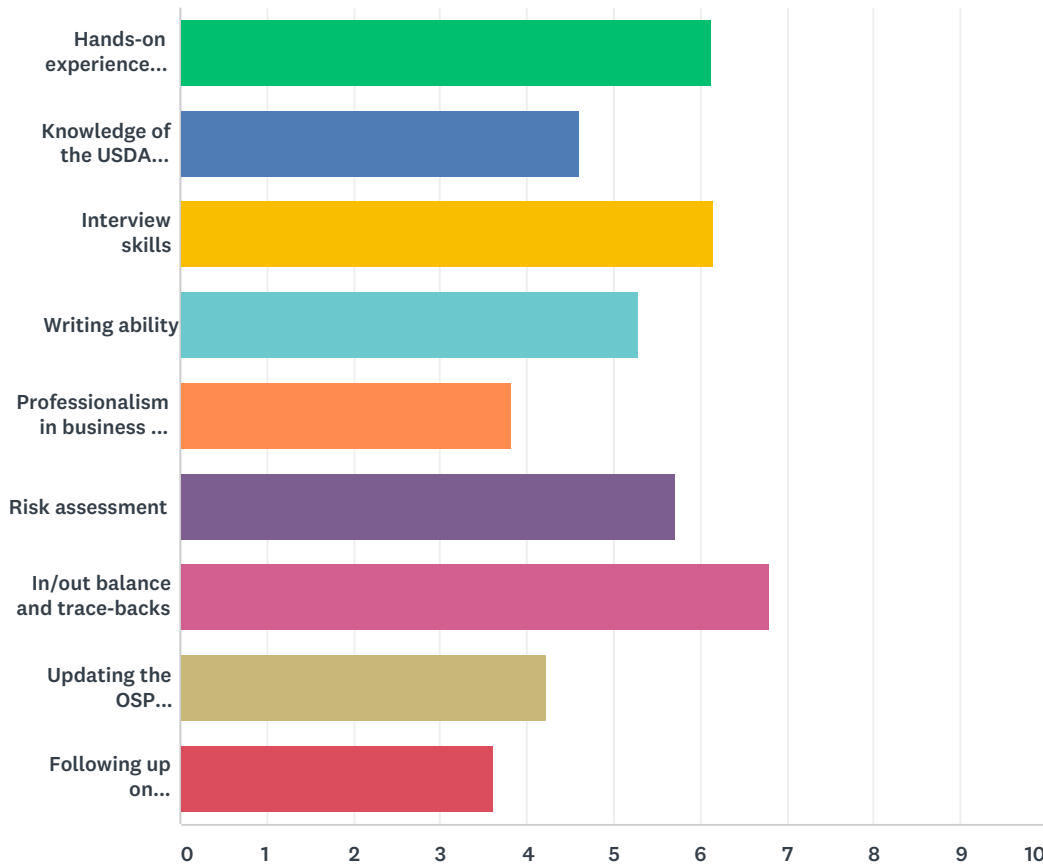
Q35 If you have personally attended an IOIA Basic Training and noted something that is missing, please describe improvements that could be made.

Answered: 9 Skipped: 36

- I have personally attended the Processing IOIA training. At that time, I had significant experience with handler review work. The biggest challenge with IOIA training is that there's not a great opportunity to participate in the mock inspection. With so many people involved in the process, participation is limited.
- During a training event, the daily time required for training (including report writing on ones own) should be limited to 10 hours. Otherwise, for most humans, there is a rapidly diminishing return on the capacity to meaningfully learn.
- I attended too long ago to comment.
- More "virtual inspection" type of exercises for material use, different facility types and processes.
- It's been so long that I feel it would not be fair of me to answer this question.
- The basic crop class is a good foundation. It didn't spend much time on produce, but we tend to hire inspectors with produce backgrounds for those inspections. The basic livestock (no DMI coverage in the calss I took) and processing classes (no recipe coverage) were a little weaker.
- A more dynamic approach would be helpful
- There is such a variety of experience that I feel our inspectors are better trained than others so the courses are not as informative for us.
- have not attended

Q36 What is most lacking in new organic inspectors who have completed basic training and some form of field training? Please rank, where Number 1 is the most lacking.

Answered: 29 Skipped: 16



	1	2	3	4	5	6	7	8	9	TOTAL	SCORE
Hands-on experience within the scope or type of operation	31.82% 7	18.18% 4	4.55% 1	9.09% 2	4.55% 1	0.00% 0	18.18% 4	4.55% 1	9.09% 2	22	6.14
Knowledge of the USDA organic regulations	4.00% 1	16.00% 4	16.00% 4	0.00% 0	8.00% 2	20.00% 5	4.00% 1	20.00% 5	12.00% 3	25	4.60
Interview skills	20.00% 5	16.00% 4	16.00% 4	8.00% 2	12.00% 3	8.00% 2	16.00% 4	4.00% 1	0.00% 0	25	6.16
Writing ability	7.41% 2	0.00% 0	18.52% 5	18.52% 5	29.63% 8	7.41% 2	11.11% 3	3.70% 1	3.70% 1	27	5.30
Professionalism in business and communication	0.00% 0	8.70% 2	0.00% 0	21.74% 5	8.70% 2	17.39% 4	4.35% 1	17.39% 4	21.74% 5	23	3.83
Risk assessment	4.17% 1	29.17% 7	16.67% 4	0.00% 0	20.83% 5	8.33% 2	12.50% 3	0.00% 0	8.33% 2	24	5.71

Organic Inspector Training and Qualifications

SurveyMonkey

In/out balance and trace-backs	40.00% 10	12.00% 3	12.00% 3	12.00% 3	0.00% 0	8.00% 2	8.00% 2	4.00% 1	4.00% 1	25	6.80
Updating the OSP appropriately	0.00% 0	11.11% 3	0.00% 0	22.22% 6	11.11% 3	14.81% 4	7.41% 2	29.63% 8	3.70% 1	27	4.22
Following up on noncompliances and requests from the certifier	0.00% 0	0.00% 0	23.08% 6	7.69% 2	7.69% 2	7.69% 2	11.54% 3	7.69% 2	34.62% 9	26	3.62

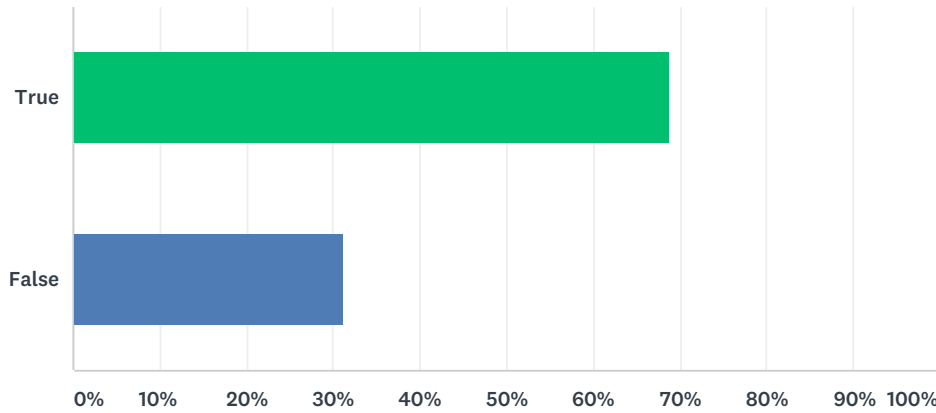
Q37 Please use this space to explain any additional thoughts you have on improving inspector consistency and quality. In an ideal world, how would inspector training occur?

Answered: 11 Skipped: 34

- Ideally, our agency would have more resources to provide more one-on-one training and monitoring for new inspectors and for experienced inspectors that may need additional training. All of the 9 issues noted above could be improved for new inspectors.
 - Basic inspector training must start with the basics: the NOP rule, how certification and inspections operate, and organic standards. From there, inspectors should be encouraged to develop their own style of professional conduct that leaves room for flexibility to respond to the ever varying conditions at hand. Attitude during inspections is important, and can be modeled but not exactly 'taught': respectful at all times, but also in control, and skeptical when necessary, which involves on- the-fly risk-assessment. These are high level skills that will only truly be mastered by experience, but I would hope that the basic training talks about them, and prepares the student to approach the experience with this kind of development in mind.
 - Experience, education + regulatory training + on-site inspection skills training + report writing/auditing training + applied field training.
 - Inspectors would be hired and trained by agencies that can provide in-house training and conduct ongoing quality assurance. These agencies would either be ACAs or agencies that provide contract inspectors to ACAs.
 - It would be great if inspector training could be available "on demand" rather than scheduled webinars.
 - Inspector consistency and quality are important, but the industry should be cautious about creating too many barriers to becoming an organic inspector. Adding too many requirements for inspectors could make it more difficult for certifiers to find and utilize inspectors.
 - 1. Webinar for the basics 2. Then classroom setting to teach more advanced techniques and engage with one another on the basics 3. Field training with educator, 1 for each scope. 4. Then assigned a mentor for field work, 5-10 inspections or 3-6 months. Time & energy a direct correlation on advanced training i.e. dairies/complex handlers.
 - The training should be done by experienced personnel outside to the certification body
 - in ideal inspectors would have a chance to travel to US for IOIA training. Unfortunately, this is not cost effective and most of the inspectors do not speak English. For that reason I would suggest having a delegated inspector each year, receiving a training and bringing back the knowledge in mother language.
 - The above #36 will not work to select. 1-2 2-3 3-2 4-2 5-5 6-5 7-5 8-5 8-4 9-8
 - Basic classroom training to become familiar with the Rule, organic system plans, organic farming practices followed by an organic inspection (such as the IOIA basic crops course). The only recommendation I would make on the basic IOIA courses is the inspection would still count as part of the exam but a follow up session the next day (after the exam is submitted) would be useful to go over what was missed, interpreted incorrectly, etc. so new inspectors have more feedback and benefit from the feedback for the whole group. Once the formal training is over, mentoring inspections are the best method of gaining the experience necessary to successfully conduct inspections
- Some favor training in-house; some favor external training.

Q38 True or False: Review staff offer feedback on every Inspection Report.

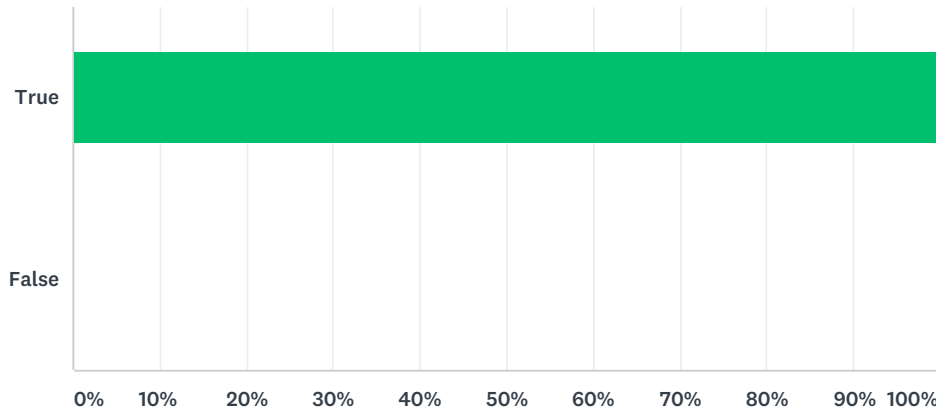
Answered: 32 Skipped: 13



ANSWER CHOICES	RESPONSES	
True	68.75%	22
False	31.25%	10
TOTAL		32

Q39 True or False: Each inspector receives an overall performance evaluation each year.

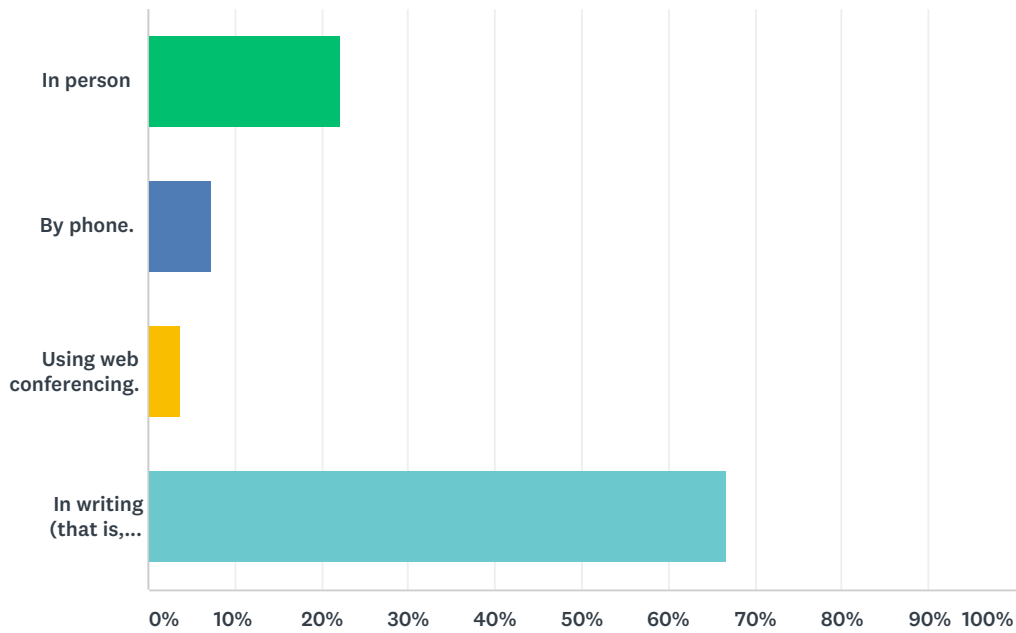
Answered: 32 Skipped: 13



ANSWER CHOICES	RESPONSES	
True	100.00%	32
False	0.00%	0
TOTAL		32

Q40 Annual performance evaluations for contract inspectors are typically conducted:

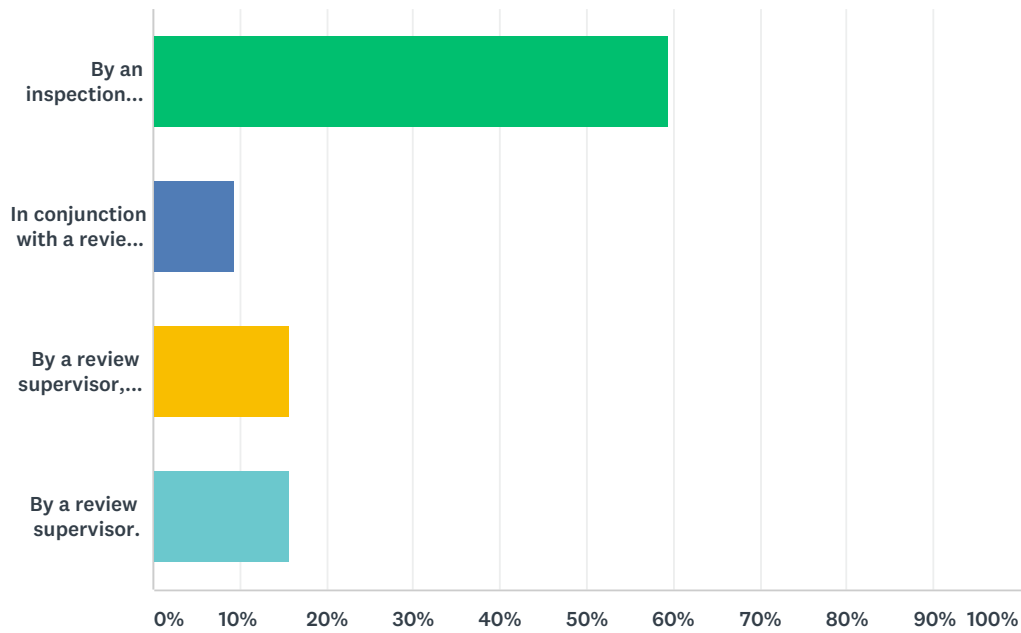
Answered: 27 Skipped: 18



ANSWER CHOICES	RESPONSES	
In person	22.22%	6
By phone.	7.41%	2
Using web conferencing.	3.70%	1
In writing (that is, without any face-to-face or voice-to-voice contact).	66.67%	18
TOTAL		27

Q41 Annual performance evaluations for staff inspectors are typically conducted:

Answered: 32 Skipped: 13



ANSWER CHOICES	RESPONSES	
By an inspection supervisor.	59.38%	19
In conjunction with a review supervisor in cases where duties are split between inspection and review.	9.38%	3
By a review supervisor, with feedback from an inspection supervisor, in cases where duties are split between inspection and review.	15.63%	5
By a review supervisor.	15.63%	5
TOTAL		32

Q42 Please describe your NOP-approved plan for FIELD evaluation of inspectors.

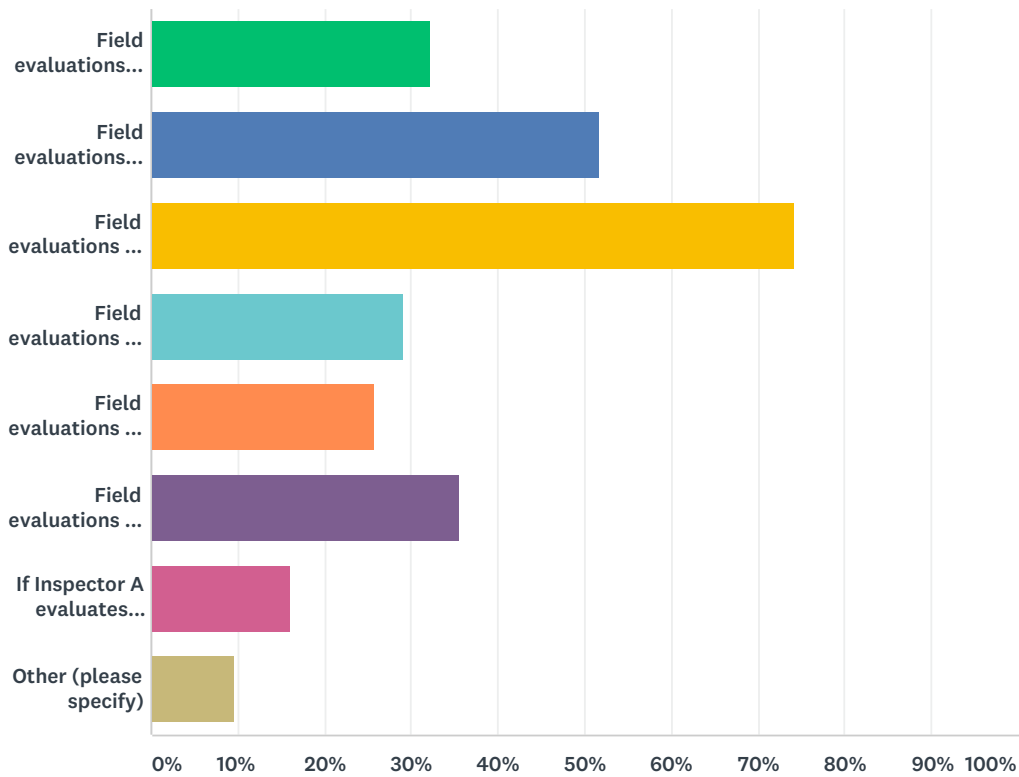
Answered: 20 Skipped: 25

- For question #40, contract inspectors receive a written review along with a phone or in-person meeting to discuss the annual review. Field evaluations for brand new inspectors occur for the first three years of inspecting. After that, they are evaluated every three years. Experienced inspectors are evaluated every three years. For new inspectors that have sufficient experience, our agency conducts a field evaluation for the first year and then every three years after that. In cases in which contract inspectors need remedial support, our agency uses the field evaluation as an option for improvement, no matter their years of experience.
- We group inspectors into three Tiers based on the number of annual inspections they complete. Tier 1: >75 insp/year; Tier 2: 25-74; Tier 3: <25. Tier 1 has field evaluation annually, Tier 2 every other year, tier 3 every 3rd year. Most of our field evaluations are done by our inspection supervisors (staff). About 20% are completed by veteran high quality contract inspectors, either directly arranged by us, or through IOIA's field evaluation program. Very occasionally we will trade field evaluations directly with other ACAs. We use a field evaluation checklist report that we have developed and continually improve. After the field evaluation report is completed by the evaluator, it is reviewed by an inspection supervisor. The inspector is required to read the report and to specifically acknowledge all findings of sub-par performance and/or opportunities for improvement.
- Q40. With follow-up by phone or web conference for all poor performing inspectors and any inspector who requests it. Would meet in person if requested. Risk-based criteria. All high risk inspectors must receive field evaluation (may be conducted by us, sourced from another certifier or purchased from IOIA.) 30% of low risk inspector pool evaluated every year. Low risk inspectors must be evaluated in the field a minimum of every three years.
- Every inspector, every year, with a detailed evaluation form and verbal feed back.
- Basically a risk-based approach. New inspectors required, those doing more than 100 inspections required, required for new scope, and at least one field eval every 3 years for every inspector.
- Field Evaluations The ##### Organic Certification Program will perform annual field evaluations of their independent organic inspectors per NOP Instruction NOP 2027.
- [REDACTED] designates 10% of inspector pool to be field evaluated by IOIA staff
- Inspector Type Yearly Timeframe Timing New inspector 2x/2 years 3 mo. of onboarding & 1x more thereafter
New - Experienced 1x/3 years 1- w/in 3 months of onboarding Existing performing more than 50/year 3x/3 years As appropriate
appropriate Existing performing less than 49/year 1x/3 years As appropriate
- Risk based, minimum of every three years.
- Our staff uses an inspector field evaluation form and shadows the inspector.
- Based on Risk Assessment: high volume of work, low average evaluation scores, pattern of complaints, one to occur every three years for all inspectors, and new inspectors.
- We are working on this- we still are under the every- inspector every-year plan.
- Yearly evaluation of all staff and contract inspectors.
- All of the staff inspectors are evaluated annually by an experienced inspector
- Annual Witness audit performed and review of inspection report from that inspection, as well as an overall inspector evaluation form.
- At least one field evaluation is conducted of staff and contract inspectors. Additional evaluations scheduled as necessary.
- We have a form the evaluate fills out when they watch an inspection.
- Inspectors receive annual evaluation on field by observed inspections.
- All inspectors are field evaluated at least annually
- each inspector is assigned a grade, based on the average scores assigned to each inspection report. field evaluations are conducted every year, every other year, or every three years based on the score.

Summary - A variety of plans are reported as being approved.

Q43 Please describe qualifications for who can conduct field evaluations. Select all that are true.

Answered: 31 Skipped: 14



ANSWER CHOICES	RESPONSES	
Field evaluations must be conducted by a supervisor within the inspection department.	32.26%	10
Field evaluations must be conducted by someone who performs or has performed inspections.	51.61%	16
Field evaluations can be performed by experienced inspectors on staff.	74.19%	23
Field evaluations can be performed by an experienced contract inspector.	29.03%	9
Field evaluations can be performed by any inspector who is qualified to perform the inspection in question.	25.81%	8
Field evaluations can be performed by an IOIA Peer Evaluation Program evaluator.	35.48%	11
If Inspector A evaluates Inspector B, Inspector B cannot evaluate Inspector A.	16.13%	5
Other (please specify)	9.68%	3
Total Respondents: 31		