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Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standard Board
USDA–AMS–NOP 1400 Independence Ave. SW.,
Room 2642-S, Mail Stop 0268
Washington, DC 20250–0268

Re: Docket Number: AMS-NOP-20-0041
Compliance, Accreditation, & Certification Subcommittee (CACs): Human Capital
Management Discussion Document

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Compliance, Accreditation, & Certification Subcommittee (CACs) on the most recent discussion document on Human Capital Management. The Accredited Certifiers Association (ACA) is a 501(c)(3) nonprofit educational organization created to benefit the organic certifier community and the organic industry. The ACA strives to ensure consistent implementation of the USDA Organic Regulations through collaboration and education of accredited certification agencies. We are committed to upholding organic integrity and maintaining stakeholder trust to facilitate the growth of the organic industry. Our organization is made up of 63 USDA NOP accredited certifying agencies worldwide, which includes all 47 accredited certifiers headquartered in the United States. We are the frontline decision-makers for the effective implementation of the National Organic Program.

We appreciate the Compliance, Accreditation, & Certification Subcommittee's work on the discussion on human capital management. This issue is central to the growing success of the organic industry and upholding integrity and consumer trust in the seal. In our comments, we seek to answer the questions for each section of the Office of Personnel Management's Human Capital Framework which include Strategic Workforce Planning, Talent Management: Pipeline Development, Talent Management: Recruitment and Matching, Performance Management and Evaluation, and Professional Support and Educational Infrastructure.

Strategic Workforce planning:

1. *What is going well and reflects strengths with respect to human capital in the organic community? What weaknesses create risks for certifiers and the market? Where do opportunities lie? What are the threats if human capital is not strategically managed?*

The ACA sees the collaboration with the IOIA and NOP as a positive impact to the development of inspectors and staff through partnership, education, training, and networking. IOIA does an excellent job providing training and meeting the needs for their membership. The ACA and NOP have also opened up their training for independent inspectors to attend. Nevertheless, a weakness that creates risk is the fact that not all inspectors are directly associated with the ACA and IOIA and do not have access to this support.

Opportunities lie in encouraging the future generation to pursue careers in the organic industry and professionalizing inspecting as a career; specifically, engaging with high schools, FFA & 4-H programs. We also recognize that the Organic Learning Center has been a great addition to provide training to staff and contracted employees.

The industry is threatened by losing qualified organic inspectors and an ever-widening shortage because of an aging workforce amongst the organic inspector community and new inspectors not having the needed skill sets. Also, the lack of competitive pay and fair compensation is an issue in recruiting and retaining qualified personnel to fill those needs. For instance, lower cost inspections affect the quality of the inspection performed when inspectors feel rushed to complete inspections in order to make a living wage. We acknowledge that quality inspections and review work are essential to uphold organic integrity and deter and detect fraud.

2. *What are the pre-competitive problems related to human capital that many or all certifiers face? For example, what challenges do many certifiers share in identifying, attracting, developing, and retaining talent? What are the largest gaps in the current talent pool? What are the future risks that could be planned for today?*

One pre-competitive problem is that contracted independent organic inspectors are driving down their own pay to get work and remain competitive. Also, some

certifiers put out bids for inspections and chose the lowest cost. As a result, organic inspectors are underbidding each other.

One challenge is that certifiers have difficulty recruiting new inspectors. The industry needs mentorship programs to develop and train new inspectors. Currently, it is difficult for inspectors to gain the necessary experience. Moreover, we benefit from fresh eyes and qualified individuals entering the industry. However, bringing in someone completely new to organic certification requires an expensive investment for certifiers. The risk certifier's take is making this investment for contracted staff which may go and work for another company. Furthermore, it takes at least a year of training for new staff which does not generate revenue for the certification agency. Certifiers see this challenge for both inspection and certification review departments.

The largest gaps in the talent pool are in certain regions where there are not a lot of staff or inspectors available to hire or contract with, such as in the Southeast US.

A future risk is an inspector shortage with more inspectors leaving the industry than those entering prepared to fill those roles. This is a risk for reviewers as well just not to the extent as for inspectors. It takes a unique individual to pursue a full-time career as an inspector and burnout is high. This could be exacerbated by a post COVID world with added travel restrictions and location gaps. Also, there is a seasonal aspect of inspection work in some regions. Inspections are required to occur onsite "at a time when land, facilities, and activities that demonstrate the operation's compliance with or capability to comply with the applicable provisions of subpart C of this part can be observed" (205.403(2)), which creates employment gaps for some inspectors who wish to stay regionally based and do not have inspection work in the off-season. Thus, the industry may lose inspectors due to lack of year-round work available. Also, with the new Strengthening Organic Enforcement Proposed rule, the need for additional inspectors and staff reviewers is going to increase with the requirement of new operations being certified. This is an imperative time to discuss these future challenges and prepare for the impact these changes will have on human capital in the organic industry.

3. *What forums exist or could be created to facilitate strategic workforce planning between and among certifiers, to better understand and plan for existing and future human capital demands?*

The ACA and IOIA are two forums that could collaborate to facilitate this strategic workforce planning. The IOIA currently has a task force dedicated to developing and strengthening a mentorship program for inspectors. However, not all inspectors are members of the IOIA.

4. *How could certifiers conduct a shared Needs Assessment based on industry trends and metrics, to determine the target talent pool and skills that need to be further cultivated in the future?*

ACA and IOIA could release a joint needs assessment survey to gather the data for metrics and evaluation. Or, other industries such as the OTA can assist with providing some of this data. And perhaps the Organic Integrity Database can provide statistics and growth trends in certain areas to inform needs; for example, there was a 20% growth in certified operations in the SE US but only a few inspectors are in that area. Also, it is important to provide inspectors a voice to share their opinion. A way to do this would be to target small sub groups or develop workshop sessions to get this input.

Talent Management: Pipeline Development

1. *What are possible goals and opportunities for building long-term relationships with academic programs, in either specialized approaches (supporting the development of an organic agriculture specialty track) or multi-disciplinary tracks (cross-Department training in agriculture, law/investigations, and business)? How could these conversations be initiated or expanded?*

A starting point would be for certifiers located near Universities (especially land-grant Universities) to reach out to those departments to develop relationships. Or, a staff person who attended a University and maintained that relationship with their advisor could assist with that connection. Working with the Universities to participate in career fairs or utilizing college job boards are also other options. Finally, the ACA could be a great organization to bridge these relationships with Universities around the nation.

2. *What are possible options for developing Apprentice Programs for career changers who need specialized experience in organic before being ready for inspector or reviewer roles?*

The IOIA is working on developing and strengthening an apprentice program for inspectors. One issue is connecting those needing mentorships to those willing to do it; having a way for inspectors to be able to find each other and connect. With more virtual audits happening there is an opportunity for shadowing inspectors as an entry-level training. Keeping training local or virtual where possible can also help reduce the cost. Another option is looking to other auditing positions and cross-training those inspectors for organic certification. If relationships were strengthened between Universities, it could be possible for Universities to offer specialized classes in organic certification and even degree programs in that field. Or, working with universities to develop a specific trade school or online program to fast track individuals into the field of organic certification without the need for a 4-year college degree. Because of the new environment we face due to COVID, trade school options and online programs are becoming more appealing to this generation of students. All of these options could target regions with inspector shortages to grow in those areas. Finally, certifiers with sister companies with education and outreach that offer apprenticeship programs can help with recruitment of new staff for their agency.

3. *What other sectors may include the types of professionals that might have backgrounds and qualifications that provide a strong foundation for a move to organic agriculture? How could the community identify and reach out to those possible communities in creative ways?*

Other fields that may have the backgrounds and qualifications to provide a strong foundation include forensic sciences, law (especially agricultural law), accounting/auditing, environmental studies, and chemistry (especially for the processing/handling scope). Recruiting in these sectors can happen through job fairs at universities, by partnering with associations that work with these specializations, utilizing LinkedIn, or posting to college job boards. The issue, however, is the salary pay difference for these degree specializations and a career in organic certification. If certifiers are able to recruit people from these fields, train and mentor them, to result in them moving on to higher paid positions outside of the industry, it is a risk that certifiers take. Another option would be to recruit directly from the industry; for instance, QA managers, clients, or farm managers.

4. *How can these candidate pipelines be developed in a way that maximizes diversity and inclusion, so that those working in the organic community represent the diversity of the public we serve?*

Specifically partnering with historically black land-grant agricultural universities to create programs. Creating trade school options or online programs would also help because obtaining a college degree or attending a University can be a barrier. Offering paid internships can draw new graduates from different socio-economic backgrounds that cannot afford unpaid internships. These programs could be coupled with IOIA for mentorship so new individuals entering the industry are trained and ready to start their careers. Furthermore, making training available in multiple languages, especially Spanish for clients, staff, and inspectors would maximize diversity and inclusion. Again, these efforts can be targeted in regions to fulfill those needs.

Talent Management: Recruitment and Matching

1. *What are possible needs and opportunities for a shared job board to advertise either employment or contract opportunities across the organic certification community?*

The ACA currently allows its certifier members to post job openings on the listserv, but this is only accessible to the membership. Certifiers can use LinkedIn and college job boards and IOIA also has a job board on their website. The issue is there is no one place for jobs to be posted. Also, there is the issue of removing these job postings from others sites, especially ones managed by other organizations. It would be very beneficial if the NOP could create an interactive job board for certifiers to advertise their open positions where the main contact at each certifier can login to create and update those posts. A link to that job board could be shared with other organizations and universities.

2. *A recent ACA and IOIA working group raised the possibility of developing an inspector registry, to better share the profiles of inspectors who wish to share their qualifications and availabilities. What would be the benefits and risks of such a system? How could such a system work, and how could it be implemented?*

The ACA thinks this could be a great idea. Currently, we do not know how many inspectors there are and certifiers felt the IOIA local inspector network was very helpful and informative during the pandemic. One concern we have is on who

would be doing the vetting process and what that would involve. This registration would need to be open to the public in general so that all inspectors are included and it is not based on membership fees. Furthermore, the information on this registry would have to be available in a way that would protect confidentiality. For instance, if staff inspectors are listed in this registry then their information will need to be protected for the agency they work for. Nevertheless, this could be a great way for inspectors to include their training and evaluations and identify those willing to mentor in their area.

3. *What are some other approaches for connecting organic certification talent with existing needs?*

As mentioned previously, collaborating with universities, creating trade schools or online programs, advertising on job boards, and recruiting directly from the industry; again, focusing in areas with higher needs.

4. *What steps could the organic community take to foster a diverse candidate pool that represents the public over time?*

As mentioned previously, partnering with historically black land-grant agricultural universities, creating trade schools or online programs, offering paid internships, and making training available in multiple languages; again, targeting these efforts in regions to fulfill those needs.

Performance Management and Evaluation

1. *What changes are needed to ensure that well-qualified and highly experienced inspectors and reviewers are appropriately rewarded for their professional qualifications and achievements? How should the organic industry best reflect the need and value-added of a robust and complete organic inspection process, with a highly qualified and well-compensated inspector?*

Inspectors benefit from consistent and timely feedback from certifiers after each inspection, especially for contracted inspectors who are not in the office. However, cost is the most important issue. Inspectors need to be paid fairly and valued accurately. However, certifiers generally seek the lowest cost inspectors to reduce the cost of certification for operations, especially small farmers. Reducing cost share is only going to exacerbate this problem. Right now, many inspectors feel rushed to complete inspections because of the low cost. Since the time to complete inspections is reduced it affects the quality of those inspections.

On the other hand, inspectors may not always invoice accurately and bill for the hours actually worked. The pay rate for inspectors should correlate to the experience, training, qualifications, and quality of the work provided. For instance, certifiers could increase the pay based on the number of training hours completed or LMS courses taken. Yet this is negated by the rising costs to small farmers, and the reduction in cost share, which affects certifiers ability to pay staff and inspectors competitive wages.

2. *Some inspectors have noted that recent high-profile enforcement actions have increased their concerns about the possible legal risks involved in conducting inspections and reporting on possibly fraudulent or noncompliant activities at high-risk operations. What are ways that the community can address this concern?*

Some but not all certifiers require liability insurance, but the cost is a barrier for many inspectors to obtain this. Perhaps organizations such as the IOIA could obtain umbrella coverage for their members.

3. *Some certifiers have asked for a systematic mechanism to share information about both high-performing and poor-performing inspectors with the NOP and with other certifiers. What mechanisms might allow for this, while protecting privacy and due process?*

The ACA discussed the idea of an inspector registry. The only concern we have is with categorizing inspectors as high-performing and poor-performing. If certifiers were to review or rate inspectors this could lead to inspectors being unnecessarily blacklisted. Instead, being able to share training and evaluations among certifiers would be more appropriate. It is crucial to make sure that those who have access to shared resources are certifiers only and private information is kept confidential.

4. *What avenues might be possible for elevating strong performers that are able to serve multiple certifiers (e.g., contract staff)? How can high performers be identified for advanced development opportunities to support both retention and succession planning?*

Certifiers would benefit from a mechanism to share evaluations of inspectors with other certifiers. Certifiers can also make a point to identify top performers and provide awards, certificates, or other forms of recognition that the inspector can use for their resume (i.e. "inspector of the year"). IOIA can also assist with

identifying high-performing inspectors in their newsletter or by other means. Again, the pay rate for inspectors should correlate to the experience, training, qualifications, and quality of the work provided. Thus, certifiers could increase the pay based on the number of training hours completed or LMS courses taken. This will help support retention.

5. *How do/will we know there are sufficient well-qualified inspectors and reviewers to serve the organic community as it evolves?*

At this time there isn't enough data on this to know.

6. *What other system-level performance measures will tell us that our collective human capital strategies are working to protect organic integrity?*

One metric to measure the effectiveness of our collective human capital strategies is the reduction in complaints. Also, data on the average number of years an inspector remains an organic inspector is increasing; although, data is needed on how many inspectors are currently working. Furthermore, evaluating data on the number of inspectors and certification reviewers correlated with the number of certified operations (i.e. the inspector to operation ratio per scope).

Professional Support and Educational Infrastructure

1. *What services are most needed by independent inspectors or reviewers in the organic community that are not currently provided by an existing entity?*

Health and liability insurance are a need for contracted inspectors and reviewers. This may be available through the farm bureau. However, cost can be a barrier and looking for ways to reduce those costs is needed; such as organizations able to offer umbrella coverage. Also, contract Inspectors could benefit from basic business management training such as taxes and scheduling effectiveness and efficiencies.

2. *What might some options for providing these services be? What type of organization(s) may be able to help?*

Organizations such as the IOIA or the farm bureau may be able to help with the insurance needs. And other organizations such as local extension services or local small business associations may be able to help with business management.

3. *In addition to current resources, what other continuous learning and training and development opportunities are needed to support and retain well-qualified organic inspectors and reviewers?*

The ACA and IOIA could collaborate to create training programs for new staff reviewers and inspectors that can be available to anyone and accepted by certifiers to relieve the administrative burden for certifiers training their own staff and contractors. This curriculum training can also be developed for the NOP Organic Learning Center. Also, certifiers can collaborate with local extension programs to offer training for organic farmers, inspectors, and the community at large. One way to help retain inspectors is to offer peer to peer connection opportunities especially for independent inspectors who lack the benefit of being part of a team.

4. *How could academic institutions, particularly those with specialized programs in organic and/or sustainable agriculture, be engaged in providing ongoing educational resources and/or community support for organic inspectors and reviewers?*

Many land-grant universities have extension programs which could be a great way to engage the community, which would also benefit consumer awareness and confidence in the organic seal. Additionally, relationships can be developed between the certifiers to provide education open to farmers, inspectors, and certification staff. The ACA can take more of a role to reach out to universities with these programs to promote organic certification as a career option.

Another important piece is to focus on our youth and educate and encourage the future generation to pursue careers in agriculture and the organic industry. For instance, presenting at high schools and collaborating with FFA & 4-H programs. Partnering with Agriculture Education and Communication programs at Universities to elevate the focus on teaching organic agriculture in schools. And finally, addressing the need for government intervention where many schools are losing agriculture programs because of lack of funding.

5. *How could the community overall support the retention of well-qualified professionals in the organic community, even if they move between organizations?*

Offering competitive pay rates, allowing room for growth within agencies, addressing issues that cause burnout such as staffing needs, improved systems

for efficiencies, and overall company structure. People that enter this industry do so because they are passionate about organic agriculture and see the positive impact it has on the environment and people. We need to ensure that our professionals can support their families and earn decent salaries in order to retain them.

The ACA would like to thank the NOP and NOSB for addressing the issue of human capital and the work that went into developing these thoughtful questions. We appreciate being able to offer comments on this important subject. This is a great opportunity and time to begin these conversations. With that being said, we would like to emphasize that the organic industry needs additional financial support to address these human capital issues. The NOP should be funded in a more appropriate fashion through governmental policy and fiscal allocations. Otherwise, the cost of paying, training, or monitoring inspectors will fall on certifiers which will increase the cost of certification to farmers and ultimately increase the price of food for consumers. Related to this, reducing cost share programs is detrimental to the industry at a time when more funding is needed. The ACA looks forward to future discussions on this topic and ways we can participate in strategic planning to develop solutions.

Sincerely,



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