



CCOF

Organic Certification

Education & Outreach

Political Advocacy

Promotion

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

Docket: AMS-NOP-16-0100-0001

Re: Certification, Accreditation & Compliance Subcommittee (CACs) Proposal: Personnel Performance Evaluations of Inspectors

March 30, 2017

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Certification, Accreditation & Compliance Subcommittee's proposal "Personnel Performance Evaluations of Inspectors."

CCOF is a nonprofit organization governed by the people who grow and make our food. Founded in California more than 40 years ago, today our roots span the breadth of North America. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

In-field evaluations are valuable and should be done according to a risk-based assessment of the inspector. CCOF has performed in-field evaluations for three years. CCOF completes about 5,200 inspections annually with about 70 inspectors who each perform an average of 40 inspections. As of February 14, 2017, 43 evaluations had been completed or were in progress. CCOF will complete evaluations by June 1, 2017.

Attached are comments addressing each of the proposal's five recommendations. Also attached for reference is CCOF's most recent Field Evaluation Proposal submitted to the NOP. Please do not hesitate to contact me for further information.

Sincerely,

A handwritten signature in black ink that reads "Kelly Damewood".

Kelly Damewood
Director of Policy and Government Affairs

cc: Cathy Calfo, Executive Director/CEO
Jake Lewin, President, CCOF Certification Services, LLC

CCOF Comments on Certification, Accreditation & Compliance Subcommittee's Proposal: Personnel Performance Evaluations of Inspectors (NOP 2027)

1. *All ACAs attend annual NOP trainings, and those trainings must include clear direction as to inspector qualifications, continuing education, annual evaluations, and periodic in-field witness audits. If the ACA is unable to attend, it is the ACA's responsibility to review all training materials.*

CCOF regularly attends NOP trainings. Attendance in such trainings is valuable and creates consistency between certifiers.

2. *All ACAs must include in their annual contracts with inspectors the number of hours of required continuing education, annual evaluation criteria, periodic in-field witness audits, and provide a written annual evaluation sent to the inspector with suggestion for improvement.*

CCOF requires at least 16 hours of continuing education every two years from all inspectors. Continuing education is critical in ensuring that inspectors maintain and grow their knowledge base.

However, NOSB recommendations on this issue should not impact certifiers' ability to set contract terms and conditions. It would not be appropriate to require annual contracts or dictate the terms because each certifier must determine their own employment terms and contracts.

3. *All ACAs must maintain in their files detailed procedures for how annual personnel evaluations of staff and contract inspectors are conducted and include a justification for the frequency of in-field inspections for each inspector.*

CCOF agrees that procedures and documentation should be maintained. CCOF's in-field evaluations are readily available, understandable, and auditable. Attached is CCOF's current proposed field evaluation process submitted to NOP.

4. *All inspectors must receive a personnel evaluation annually, but an in-field witness audit need only be conducted every three years, or more frequently where concerns have been raised about the individual inspector's work or for a novice inspector.*

CCOF supports requiring in-field evaluations every three years and allowing for more frequent evaluations under certain circumstances. However, the cause for more frequent evaluations should not be limited to situations where concerns have been raised or for novice inspectors. Rather, frequency of evaluations should be risk-based and at the certifier's discretion. For instance, the frequency of evaluation could relate to the average number of inspections performed annually and the number of inspections expected in the coming year. CCOF's risk-based approach for determining frequency of evaluations is as follows:

Tier 1: More than 75 inspections, field evaluation at least annually.

Tier 2: 25-74 inspections, field evaluation at least every 2 years.

Tier 3: 1-24 inspections, field evaluation at least every 3 years.

At any time, an inspector's tier may be elevated based on the need for additional oversight or training.

This system ensures that an in-field evaluation occurs for every 75 inspections performed by an inspector on average or at least every three years if the inspector performs few inspections. CCOF expects to perform 35-50 in-field evaluations annually with the benefit of focusing our resources on evaluating higher risk inspectors.

5. *Witness audits should be conducted, preferably by certifier staff, but alternatively, by senior peer inspectors, provided that they have been properly trained in witness audits and are not placed in the position of "evaluating" a peer who is not in their employ.*

NOSB should clarify the line, "... are not placed in the position of 'evaluating' a peer who is not in their employ." CCOF's field evaluations are performed by inspection supervisors, senior regional review personnel, or specialized subject matter experts who can provide inspectors with valuable training, such as natural resource and biodiversity conservation training.

Any individual qualified to evaluate an inspector is evaluating a peer. Any inspector who is not comfortable evaluating other inspectors is not required to perform in-field evaluations. Therefore, peers evaluating peers is not an issue that NOSB needs to address in its recommendations.

Background

CCOF utilizes about 70 inspectors performing between 1 to 200 inspections each. The median number of inspections performed annually is 40. CCOF performs a total of about 5200 inspections annually.

CCOF requires training and experience and typically observes individuals who are new to inspection to the field prior to authorizing them for ongoing inspection work. CCOF closely monitors inspector qualifications and scope and inspection types, among other elements, that inspectors are authorized to perform.

Annual and Ongoing Evaluations

CCOF closely monitors inspector performance and provides reviews on a per assignment basis by experienced certification reviewers. CCOF also performs an annual reassessment review of all inspectors, communicates areas for improvement, and makes ongoing retention/authorization decisions. CCOF clients are asked to rate inspectors and CCOF performance after every inspection, which is used in the context of annual reviews. CCOF also requires at least 16 hours of continuing education every 2 years from all inspectors.

Field Evaluations Status

CCOF has performed field evaluations for the last three years. After notification by NOP in Spring of 2017 that previously submitted plans were not accepted, we moved to ensure that all inspectors would be field evaluated within a 12-month period by June 1, 2017. As of February 14, 43 evaluations have been performed or are in progress. We are 2/3 complete and will have performed at least one field evaluation of each active inspector by June 1. Some CCOF inspectors have received multiple field evaluations since the initial NOP directive was issued.

Ongoing Proposal-Risk Based Approach

CCOF will assess all inspectors on January 1 of each year and assign each active inspector a tier. Active inspectors will be defined as inspectors who performed at least one inspection in the last year and are reasonably expected to complete at least one in current year.

Tiers will be based on the average number of inspections performed annually and the number expected in the coming year. CCOF may choose to elevate an individual's tier based on the need for additional training or oversight. By February 1 of each year CCOF will identify and create the field evaluation orders in our system to be performed that calendar year.

Tier 1: >75 inspections, field evaluation at least annually.

Tier 2: 25-74 inspections, field evaluation at least every 2 years.

Tier 3: 1-24 inspections, field evaluation at least every 3 years.

Using this system CCOF will perform a field evaluation on average for every 75 inspections performed by each inspector and at least every 3 calendar years for any inspector that performs very few inspections. Inspectors that function at half to full time will receive an evaluation every calendar year. Inspectors that work steadily but under half time will receive a field evaluation every other year, and occasional inspectors a minimum every three years. CCOF will generally perform the evaluations directly but may choose to utilize other certifiers or recognized third parties as appropriate. Field evaluations will typically be performed by inspection supervisors, senior regional review personnel or specialized subject matter experts (such as Wild Farm Alliance when focusing on Natural Resource guidance implementation). We expect to perform about 35-50 field evaluations annually under this system.

Each inspector's tier and field evaluation status will be readily available, understandable and auditable.