



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-16-0049

Re: Certification, Accreditation, & Compliance Subcommittee Discussion Document: Personnel Performance Evaluations of Inspectors

October 25, 2016

Dear Ms. Arsenault and NOSB members,

CCOF (California Certified Organic Farmers) thanks the National Organic Standards Board (NOSB) for the opportunity to comment on the Certification, Accreditation, & Compliance Subcommittee's proposal on changes to inspector evaluations.

CCOF is a nonprofit organization founded in 1973 that advances organic agriculture for a healthy world through organic certification, education, advocacy, and promotion. CCOF is based in Santa Cruz, California, and represents more than 3,000 certified organic members in 42 states and three countries.

I. Challenges posed by annual mandatory in-field Evaluations for all Inspectors

NOP has interpreted §205.501 of the National Organic Standards to mean that all inspectors must receive at least one in-field evaluation every year. This interpretation poses a logistical challenge because some inspectors only perform a few inspections a year and work in remote locations. This means an inspector who performs only 3 inspections a year could still be required to be evaluated during one of those 3 inspections.

CCOF uses 70 inspectors to conduct more than 4,800 inspections annually. The number of inspections performed by each inspector varies but is within the range of 1 to 200 inspections a year. About half of the inspectors perform less than 40 inspections a year. The inspectors who perform less than 40 inspections annually are often servicing remote areas or areas where organic production remains low such as southern regions of the U.S.

The result of requiring in-field evaluations for inspectors performing fewer than 40 evaluations a year will likely be the increased costs of inspections for organic operations in underserved areas of the country. For CCOF members in states like Mississippi, inspection costs will likely rise to cover the cost of an in-field evaluation for a contract inspector in those areas. Therefore, CCOF supports an in-field inspection framework that better serves all operations regardless of location.

II. Recommendation for in-field Evaluations

CCOF supports the following risk-based framework for in-field inspector evaluations:

- A. Require an annual field evaluation for each inspector performing more than 40 inspections annually
- B. Require a field evaluation no less than every 3 years for inspectors who perform less than 40 inspections annually

This framework will accomplish the goal of monitoring and improving organic inspector performance.

III. How CCOF evaluates Inspectors

CCOF sets high performance standards with a rigorous annual evaluation process in place for all employees, including contract inspectors. The evaluation process consists of the following:

1. A senior review evaluates every inspection report.
2. CCOF members fill out inspection surveys after every inspection. CCOF's Certification Operations team reviews these surveys and follows up on any issues raised by clients regarding the quality of the inspection.
3. An annual aggregate performance evaluation of all inspectors. This evaluation is conducted by senior Inspection Operations staff.
4. An annual summation of feedback and a formal decision to continue employing the individual as an inspector or not.

In-field inspector evaluations are crucial to maintaining a high level of inspector service. CCOF has set up a system of witness audits that are conducted by senior Inspection Operations staff or other senior staff with a minimum of two years of experience and first-hand knowledge of the scopes being audited. CCOF has a goal of performing witness audits with 50% of inspectors this year and 75% in 2017.

Additionally, CCOF provides inspectors with the following training and ongoing education:

1. Quarterly contact webinars and annual online trainings for all inspectors.
2. Maintains an inspector listserv to communicate directly on pertinent issues.
3. Requires a minimum of 8 hours continuing education every two years for every inspector.

IV. Response to Questions posed by the Subcommittee:

- A. For certifiers: *To date, what have you observed about the benefits, costs and logistics of meeting this requirement?*

CCOF finds in-field inspector evaluation to be beneficial; however, implementing a program of annual in-field evaluations has been logistically challenging and will cost CCOF \$60,000 annually to enforce.

B. For certifiers: *Have you been able to meet this requirement for inspectors in overseas locations?*

Not applicable.

C. For certifiers: *If given an option to present alternative evaluation plans to the every inspector, every year, what would these look like? If a risk-based approach, how do you define risk?*

As noted above, inspectors who conduct more than 40 inspections per year would be subject to annual in-field evaluation, while those who conduct less than 40 inspections per year would have an in-field evaluation no less than every 3 years.

D. For certifiers and inspectors: *What has been your experience sharing evaluation forms and processes? What have been the challenges associated with this sharing?*

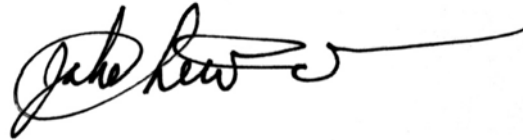
The logistics of sharing inspector evaluations are extremely challenging because no system exists to share evaluations.

Thank you for considering our input. Please contact us if you would like further information or clarifications.

Sincerely,



Cathy Calfo, Executive Director/CEO



Jake Lewin, President, CCOF Certification Services LLC