



October 4, 2018

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National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW.,
Room 2642-S., Mail Stop 0268
Washington, DC 20250-0268

Submitted via www.regulations.gov

RE: Document #AMS-NOP-18-0029.

NOSB CACS Subcommittee Proposal on Training and Oversight of Inspector and Certification Reviewer Personnel

Dear NOSB Members:

Thank you for the opportunity to provide comments on the proposal for Training and Oversight of Inspector and Certification Reviewer Personnel. MOSA certifies approximately 2125 organic operations throughout the United States. MOSA's Certification and Inspection Departments include 24 full time staff, and we annually contract with 47 independent contract organic inspectors.

Inspector Training and Oversight

MOSA supports the goal of improving and standardizing inspectors' qualifications, experience and skills baseline. The role of the organic inspector is integral to the organic certification process.

MOSA staff and contract Inspectors go through an extensive annual training, monitoring and evaluation process. Over 80% of our inspections are conducted by contract inspectors. MOSA's standard baseline requirements for new inspectors include completing basic IOIA training in each scope (crops, livestock, processing) and an apprenticeship of three to five shadowed inspections. While the suggestion of requiring ISO accreditation for IOIA and ACA may increase standardization for inspector training, we have concerns that additional accreditation costs would make an already expensive training program unaffordable and unattainable for many qualified potential inspectors.

Our assessment of potential candidates for inspection work considers their education, background in farming or food processing, auditing experience, interpersonal and writing skills, and technical capabilities. Additional training deemed necessary is assigned by MOSA through in-person training, webinars, written guidance, and additional resources. Additional USDA resources, such as the Learning Management System, are a welcome adjunct to our ongoing

training procedures. Prescriptive minimal education requirements may prohibit our ability to consider qualified inspectors with equally-valuable equivalent aptitude and knowledge gained through other training, education, or life experience. A standardized system of tracking inspector qualifications, if undertaken, should consider confidentiality. However, this system could create a competitive marketplace that incentivizes increased education and training by individual inspectors.

Throughout the inspection season, MOSA continually evaluates and provides feedback to both staff and contract inspectors. The Inspection Manager monitors and spot-checks work by each inspector and provides detailed personal feedback to the inspector on his or her work. MOSA Certification staff provide feedback on each inspection conducted. MOSA sends a survey to each of our clients after the inspection asking for feedback on the inspector's work at the farm or facility. This individualized feedback throughout the inspection season provides a specific real-time response to each inspector's work, notifying inspectors of positive attributes of their work and areas for improvement.

In 2017, the National Organic Program approved our risk-based peer evaluation program. Peer evaluation is an important tool to assess the quality of individual inspectors. In our system, peer (field) evaluations are required for new inspectors for their first three years inspecting for MOSA. Experienced inspectors are evaluated every three years. In addition, peer evaluations may be used as a tool to address any individual inspector's work requiring remedial support. MOSA utilizes the results of these peer evaluations as a part of the annual inspector evaluation process. We recommend that this type of risk-based peer evaluation be considered as part of the NOP's standardization process.

MOSA's staff and contract inspectors receives a detailed written annual evaluation, including an assessment of meeting established deadlines, quality of work during the inspection season based upon reviewer/client feedback, and areas identified for improvement. Annual evaluations also include meeting with each inspector to review the annual evaluation and set goals. We have found that this annual evaluation process has significantly improved quality and consistency in our inspector pool.

MOSA is concerned that prescriptive inspector requirements will limit our ability to balance and benefit from the varying qualifications, education and experience of individual candidates for inspection work. Overly prescriptive education requirements may disqualify a candidate that has extensive farming or food processing background or work experience. Allowing certification agencies the flexibility of making hiring decisions based on a balance of factors allows us to increase the quality and beneficial diversity of the inspector pool.

The ACA Guidance on Organic Inspector Qualifications is a sound template for appropriate education, experience, training and skills for inspectors. This guidance document, developed by numerous certification agencies, including MOSA, provides best practices for appropriate measures and assessment criteria for prospective and experienced inspectors. We think this guidance document is sufficient for developing standardization within the organic inspector community.

Certification Reviewer Personnel Qualifications

We support the general concept of ensuring adequate qualifications and training for certification review staff across the organic industry. Sound review work is an essential component of the organic certification process, and the importance of qualified and adequately trained review personnel cannot be overstated. However, at this time it does not appear that specific and widespread concerns with the quality of certification review work have been clearly identified. Identification and evaluation of key quality issues is a necessary precursor to establishing specific training and testing requirements for review staff, and/or additional certifier accreditation requirements for training program oversight.

We think we have thorough and sound processes for hiring, training, and monitoring the work of our review staff. We are confident in our hiring team's ability to evaluate new applicants and select candidates whose qualifications seem to meet the job's prerequisites. Because of the complexity of certification work, and the diverse skill set needed, we need flexibility to select qualified candidates from a variety of backgrounds. This enables us to build a strong, well-rounded review team.

Upon hiring at MOSA, new review staff participate in a lengthy one-on-one mentorship in each scope of certification to ensure adequate preparation for independent review work. We hold biannual review-related department trainings, annual materials review and inspection training, frequent trainings on a variety of industry topics throughout the year, and provide staff with the opportunity to attend external trainings as needed or required. We maintain a comprehensive training resource library that is accessible for in-office and remote staff, and utilize a number of communication tools to enable cross-departmental collaboration. We provide ongoing support for review staff through team and cohort structures within our department. Even after reviewers are fully trained, all certification work continues to be peer reviewed to ensure accuracy and consistency. Feedback is accepted on a continual basis and reviewed during regular check-ins and/or during a thorough annual performance evaluation.

While MOSA recognizes value of consistency in qualifications and training in certification review staff, we think additional exploration is necessary to determine whether widespread deficits in certification review work exist, and how any gaps can be addressed in a meaningful way. One way to begin this assessment is through the NOP accreditation process for certification agencies. NOP audits should not only verify compliance and/or deficits within individual certification review programs, but also identify broad inconsistencies among certifiers. In the absence of a thorough assessment of issues specifically related to the certification review process, prescriptive NOP requirements for reviewers and certifiers have the potential to create a burden that outweighs the benefits.

We have a final general concern regarding the very limited comment period for this meeting. There were only 16 business days to read and analyze all documents and to write our feedback. This shortchanges our best collaborative thinking. It's a disservice to all organic stakeholders, including the NOSB, and is disrespectful of this public, democratic process. We hope that USDA will hear this ongoing concern, and will get meeting materials published for comment earlier. We'd note that the NOSB Policy Manual sets pre-meeting timeframes for posting, and requires

at least 30 days for public comment. For best engagement and useful input, a reasonable comment period is closer to 60 days.

Thank you for your work on these issues.

Respectfully submitted,

The MOSA Inspection & Certification Teams