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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

RE: Docket: AMS-NOP-16-0049

CAC Subcommittee: Personnel Performance Evaluations of Inspectors (NOP 2027)

Dear Ms. Arsenault:

Oregon Tilth would like to thank the CAC Subcommittee for their work discussing the NOP 2027 Personnel Performance Evaluations Instruction Document and how it impacts certification agents and inspectors. The subcommittee's work to discuss and consider further recommendations and alternatives is much appreciated. We feel that the subcommittee's work in identifying the issues, discussing them, and proposing recommendations is worthwhile for the organic trade as a whole.

Oregon Tilth is highly supportive of regular in-field evaluations of inspectors. The inspectors play a critical and pivotal role in the certification process, and in-field evaluations help to ensure that inspectors are thorough in their work and preserving integrity. In addition, it assists us in making sure that inspectors are representing our organization well in the field. While we are highly supportive of the in-field evaluations, we believe that there are options to improve and invest in this NOP policy document to further strengthen it and allow certifiers flexibility in developing plans to evaluate inspectors that work for them.

To further support the conversation, Oregon Tilth is providing feedback and comments to the questions posed in the discussion document:

Benefits, Costs and Logistics

The implementation of in-field evaluation of inspectors has proven to be beneficial to our program. It has allowed us to identify areas where further training is needed, have a more open dialogue with inspectors about their performance in the field and understand challenges they face in conducting inspections for us. It has been particularly helpful for us to identify areas of continuous improvement for inspectors and ourselves.

Performing in-field evaluations is costly and logistically challenging. The costs are difficult to plan and budget for due to inflation, regional areas, and evaluator availability. It is challenging to schedule

inspections during certain times of the year, let alone adding in another person to the schedule only increases the logistical challenge. Oregon Tilth works with over 60 inspectors internationally with costs for in-field evaluations ranging from \$400 - \$2000 per evaluation. Annually, this equates to over \$30,000 on average spent completing in-field evaluations. This year, the increase in organic production has forced us to bring on a number of new inspectors to work with. With the changes in the landscape and growth, certifiers need to be able to bring on trained inspectors as needed in regions local to the operations with flexibility in completing in-field evaluations outside of a budget or calendar year.

Alternative Evaluation Plans, Risk-Based Approach

Oregon Tilth recommends an alternative plan with a risk-based approach that would address concerns and benefit all. In our proposal, all inspectors would be evaluated in the field at a minimum once every 2-3 years, with inspectors designated as high risk being evaluated more often. Risk would be assessed against a few factors: previous evaluation scores, number of years inspecting and complaints or concerns expressed. High risk inspectors would be evaluated in the field every year until their risk assessment indicates that they can be removed from the high risk group.

Rotating field evaluations to every other year would decrease annual costs to perform field evaluations, allowing us to invest more money in general inspector training and professional development. It would also reduce the amount of time spent scheduling and coordinating evaluations and allow more time to be spent proactively training and improving inspections in general. We feel that a risk-based approach is both sound and sensible.

Sharing Evaluation Data

OTCO has coordinated with a few other ACAs to develop a system for exchanging evaluations for inspectors who work for multiple agencies; this has been a positive experience. Most ACAs are willing to exchange evaluations across the board without any additional costs while others want to split the cost. This has been extremely helpful for OTCO in reaching the more geographically challenged inspectors while being mindful of our budget. Some of the challenges identified with sharing evaluations with other ACA's have been figuring out which inspectors we have in common, determining a process that all agencies agree upon regarding inspector permissions and logistics and acceptance of the differences in the evaluation forms themselves.

Security of Client Files

OTCO shares client files with IOIA Peer Evaluators only. Per the contract, IOIA has agreed to maintain confidentiality agreements and conflicts of interest with evaluators. Furthermore, they developed a Letter of Authorization to be signed by the client explaining these Contract Agreements and giving OTCO permission to share the client's file with the designated evaluator. We require that all inspectors and third parties that have access to confidential client information treat it with the correct protocol; signed agreements and assurance for security. The OTCO Inspector Agreement signed by contractors, the Confidentiality and NDA signed by the Evaluators for IOIA and the Contract between IOIA and OTCO is the mechanism.

In summary we would like to thank the CAC for taking the time to further discuss this important issue. We are assured that the NOSB and NOP find inspectors work to be key in the certification scheme and uphold the highest level of integrity in all inspectors work. We agree that the role of inspectors is critical, however we feel that there are alternative ways to invest time and money to ensure that inspectors are always performing at their best. We are supportive and encourage the CAC to continue this work and evaluation.

Respectfully submitted,
Oregon Tilth

Oregon Tilth is a leading certifier, educator and advocate for organic agriculture and products since 1974. Our mission to make our food system and agriculture biologically sound and socially equitable requires us to find practical ways to tackle big challenges. We advance this mission to balance the needs of people and planet through focus on core areas of certification, conservation, public health, policy and the marketplace.