



United States Department of Agriculture

Agricultural
Marketing
Service

Federal Grain Inspection
Service

Field Management
Division

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TO: FGIS POLICY BULLETIN BOARD

FROM: John Giler, Acting Director
Field Management Division

SUBJECT: CuSum "Average" Grade Interpretation

ORIGINATING OFFICE: Policies and Procedures Branch

1. PURPOSE

This memorandum provides guidelines for the application of "average" grade requests in load order documents.

2. BACKGROUND

The CuSum loading plan represents an online acceptance sampling plan that provides continuous quality information throughout the loading history. Applicants for inspection may request minimum, maximum, or absolute (no subplot to exceed) limits on grading factors and official criteria factors. The loading plan also provides the applicant the option of specifying "average" quality on individual, or all grading factors encompassing the grade determination.

"Average" grade applies to grade factors, moisture, and official criteria factors, but does not apply to odor and condition. It also does not apply to aflatoxin test results that are above the FDA action limit of 20 ppb. Aflatoxin results above 20 ppb may not be averaged with results at or below 20 ppb.

When "average" quality is specified for a particular factor(s) it is the responsibility of the shipper to maintain the overall quality of the lot. If the overall average of the lot exceeds the specified average the applicant has the option of requesting a review inspection of the entire lot, or accepting Option1 certification of the grain on board.

Material portions can not occur on individual subplot factors that are declared "average" in quality. However, material portions may still occur for odor or condition, factors that have minimum/maximum, or absolute limits, or aflatoxin that exceeds FDAaction limits.

3. PROCEDURES FOR SETTING UP THE LOG

When the load order grade specifies the lot inspection and certification is to be based on an “average” quality, set up the inspection log for “average” quality on the specified factors. Include information on the log that provides information which factor(s) are determined on the basis of “average” quality. Do not enter any starting values or breakpoints for the factor(s) that are “average” quality.

4. INTERPRETING A LOAD ORDER

a. “Average”.

If a load order stipulates U.S. No. 2 YSB (average), we would interpret that as a request for an average of all grading factors.

b. “Average” Select Factors.

If the load order stated U.S. No. 2 YSB, maximum 1.5 Foreign Material (fm), all other factors “average”, we would interpret the request as CuSum applied to fm only, and “average” for Test Weight (tw), Moisture, Damaged Kernels Total, Heat Damage, and Splits.

c. Example.

EXAMPLE LOAD ORDER

U.S. No. Two (2) or Better Yellow Soybeans (Average):

Average 13.5% moisture max.

Average minimum tw 55.0 lbs.

All other factors U.S. No. 1 Yellow Soybeans, except tw

No subplot to exceed 1% heat damage & 5% damage

FGIS RESPONSIBILITY

- Set up a log with the applicable grade factor limits for U.S. No. 2 Yellow Soybeans with a moisture content of 13.5%.
- Indicate on the log that the grading factors are based on “average” quality.
- Do not complete starting value or breakpoint blocks on log.

SHIPPERS RESPONSIBILITY

- Maintain a final grade average of U.S. No. 2 or Better Yellow Soybeans with 13.5% or less moisture.
- Meet stipulation that all factors are U.S. No. 1, except for test weight; and
- Do not allow any sublots to be loaded that exceed 1% heat damage or 5% damage.

5. FILING INSTRUCTIONS

File a copy of this memo with the Grain Inspection Handbook, Book III, Chapter 2, Certification of Shiplots, Unit Trains, and Lash Barges. Field office managers must ensure that a copy of this memo is provided to official agencies that use the CuSum loading plan for shiplots, unit trains, and Lash Barges.

6. QUESTIONS

Direct any questions concerning the interpretation of “average” quality load orders and the application of the CuSum loading plan to [AMS - FGIS Policies Procedures Market Analysis Branch](#).