



United States Department of Agriculture

Agricultural Marketing Service
National Organic Program

CERTIFICATE OF ACCREDITATION

ONECERT

2124 Y Street Suite 208, Lincoln, Nebraska, 68503, U.S.A.

meets all the requirements prescribed in the USDA National Organic Program Regulations

7 CFR Part 205

as an Accredited Certifying Agent

for the scope of

Crops, Handling, Livestock, Wild Crops Operations

This certificate is receivable by all officers of all courts of the United States as prima facie evidence of the truth of the statements therein contained. This certificate does not excuse failure to comply with any of the regulatory laws enforced by the U.S. Department of Agriculture .

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Certificate No: [USDA-3-24](#)
Effective Date: [04/22/2023](#)
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Issue Date: [02/12/2024](#)

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National Organic Program



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National Organic Program
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Room 2642-South, STOP 0268
Washington, DC 20250-0268

NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

- **Certifier Name** OneCert, (ONE)
- **Physical Address** 2124 Y Street Suite 208, Lincoln, Nebraska 68503, U.S.A.
- **Audit Type** Renewal Audit
- **Auditor(s) & Audit Dates** Steven Cabral, Alison Howard, 04/24/2023 to 04/28/2023
- **Audit Identifier** NOP-236-23

CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted an onsite Renewal Audit of OneCert's (ONE) USDA organic certification program covering the period November 24, 2021, to April 28, 2023. The purpose of the audit was to verify ONE's compliance with the Organic Foods Production Act of 1990 (OFPA), the USDA organic regulations (7 CFR Part 205), and the NOP Handbook. Audit activities included a review of certification activities, interviews with ONE personnel, a records audit, two on-site witness audits and one on-site review audit. The review audit was conducted at a crops/livestock operation in Minnesota. The two witness audits were both annual on-site inspections. One was a wild crops operation in Kentucky, and one was a handling/processing operation in Nebraska.

ONE is an incorporated company initially accredited on April 22, 2003. ONE is accredited to the crops, wild crops, livestock, and handling scopes. ONE's office is in Lincoln, Nebraska. ONE certifies 459 operations and offers certification services in throughout the US and Mexico. Certification activities are performed by fourteen employees.

NOP DETERMINATION:

NOP reviewed the audit results to determine whether ONE's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from findings identified during the audit.

Any noncompliance labeled as “**Cleared**” indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as “**Accepted**” indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next onsite audit. Any noncompliance labeled as “**Outstanding**” indicates the corrective actions were not effectively implemented.

Noncompliances from Prior Assessments

AIA-280-22 - Cleared.

AIA-8842-21 - Cleared.

AIA-8845-21 - Cleared.

AIA-8848-21 - Cleared.

AIA-8850-21 - Cleared.

AIA-8851-21 - Cleared.

AIA-8853-21 - Cleared.

AIA-8847-21 - Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;”

Comments: *ONE does not consistently carry out the provisions of the Act and regulations. The auditors’ review of certification files identified the following issues:*

- 1. ONE issued an organic certificate that included livestock and livestock products approved to the US/Canada Equivalency Arrangement. The operation did not request US/Canada Equivalency and did not meet the requirements of that arrangement. Neither certification staff nor the inspector identified the discrepancy.*
- 2. ONE issued an organic certificate with 100% organic labeling status for products that did not meet the 100% organic claim.*

Corrective Action: ONE submitted a corrected organic certificate for one operation – the other operation surrendered its organic certification in December 2021. ONE updated its Secondary Review Forms to include steps for verifying product categories (i.e. 100% organic, organic, made with organic) and operations’ US-Canada Organic Equivalency Arrangement (USCOEA) status. ONE informed its handler and producers reviewers on June 3, 2022 of the updates to the form.

Verification of Corrective Action: The auditors reviewed certification files, Secondary Review Forms and organic certificates and found that ONE issued an organic certificate with a COR attestation statement to an operation who did not request verification against the requirements of the USCOEA. The auditors reviewed organic certificates, labels and product profiles and verified that ONE is issuing organic certificates with the correct product labeling claims.

2023 Corrective Action: ONE updated their Initial Application on August 9, 2023 which indicates to clients that crops and wild crop scopes are reviewed for USCOEA compliances as a default and Handling and Livestock operations must request to be reviewed for USCOEA compliance. ONE revised the Annual Update Form (AUF) for Producers, controlled and implemented on December 6, 2023 and also revised the AUF for Handlers, controlled and implemented on December 20, 2023. Both forms match the Initial Application. ONE revised the Crops Inspection Report on August 9, 2023 which indicates to inspectors to verify that that the operation meets the requirements of

USCOEA. ONE updated their Instructions for Certification Letters for Reviewers on August 8, 2023 which reminds reviewers to ensure the proper compliance to USCOEA is entered into the database. ONE trained reviewed staff on this topic on August 9, 2023.

AIA-8852-21 - Accepted. 7 C.F.R. §205.501(a)(6) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services.”

Comments: *ONE did not conduct inspector field evaluations for all inspectors in 2019 and 2020 and has not implemented an alternate proposal for inspector field evaluations per the requirements of NOP 2027 Personnel Performance Evaluations.*

Corrective Action: ONE submitted its Field Evaluation Tracker which shows that that field evaluations were completed for all ONE inspectors in 2021. ONE submitted an alternative Inspector Field Evaluation Policy to NOP for approval which uses a risk-based approach for determining the frequency of field evaluations.

Verification of Corrective Action: The auditors reviewed ONE’s Field Evaluation Tracker and the annual risk assessment for each inspector and found that one inspector who was due to receive a field evaluation in 2022 according to ONE’s approved alternative policy did not receive a field evaluation that year.

2023 Corrective Action: ONE completed the outstanding field evaluation on December 7, 2023. ONE intends to have all field evaluations completed by the middle of November to avoid evaluations that do not comply with their Inspector Field Evaluation Policy in the future.

Noncompliances Identified during the Current Assessment

AIA-4560-23 - Accepted. 7 C.F.R. §205.405(d) states, “A notice of denial of certification must state the reason(s) for denial and the applicant’s right to: Reapply for certification pursuant to §§205.401 and 205.405(e); Request mediation pursuant to §205.663 or, if applicable, pursuant to a State organic program; File an appeal of the denial of certification pursuant to §205.681 or, if applicable, pursuant to a State organic program.”

Comments: *ONE’s notices of denial of certification do not include the reason(s) for denial. The auditor’s review of a notice of denial found that ONE reiterated the reasons for noncompliance but did not specifically state the reason(s) for denial of certification.*

Corrective Action: ONE updated the Denial of Certification template on August 3, 2023 which now requests that reviewers clearly state the reasons for denial. ONE staff responsible for drafting and signing all adverse action notices received trained on this topic on August 8, 2023.

AIA-4561-23 - Accepted. 7 C.F.R. §205.670(g) states, “If test results indicate a specific agricultural product contains pesticide residues or environmental contaminants that exceed the Food and Drug Administration's or the Environmental Protection Agency's regulatory tolerances, the certifying agent must promptly report such data to the Federal health agency whose regulatory tolerance or action level has been exceeded. Test results that exceed federal regulatory tolerances must also be reported to the appropriate State health agency or foreign equivalent.”

Comments: *ONE does not fully carry out the procedures of NOP 2613 Instruction Responding to Results from Pesticide Residue Testing. The auditor’s review of pesticide residue analysis*

reports found ONE did not immediately notify the operation that their product may not be sold as organic and did not notify the proper authority for a pesticide residue detection above 0.01 parts per million (ppm) on a product with no EPA tolerance or FDA action level.

Corrective Action: ONE informed the relevant staff on August 3, 2023 to document the pesticide residue results within one working day of receiving the results on the Residue Testing Log. ONE updated and implemented the Residue Testing Log August 4, 2023 to include a column for recording dates noncompliances were sent as a result of the residue testing and for documenting the additional agency required to be contacted. ONE expanded access of the Residue Testing Log to additional staff for more prompt action. ONE intends to notify clients within 7 days of receiving positive residue test results. In addition, relevant ONE staff completed the Organic Integrity Learning Center (OILC) Course, “Sampling and Testing,” on August 4, 2023; staff who had previously completed this OILC Course completed a re-review of the content on August 8, 2023.

AIA-4562-23 - Accepted. 7 C.F.R. §205.403(c)(1) states, “The onsite inspection of an operation must verify: The operation's compliance or capability to comply with the Act and the regulations in this part;”

Comments: *ONE does not verify an operation's compliance with the USDA organic regulations. The auditors review of certification files found ONE's inspectors do not conduct sufficient mass balance and traceability exercises to verify compliance. In one case, a ONE inspector conducted a traceability audit that did not contain the necessary elements to link each transaction or step of the process. In another case, a ONE inspector conducted a mass balance exercise that did not incorporate beginning or ending inventory of the certified product(s).*

Corrective Action: ONE revised the Inspection Reports for all scopes on August 9, 2023 to include Traceability and Mass Balance exercise tables that must be completed by the inspector; the inspector is required to obtain permission to use alternative templates. ONE reminded inspectors at its May 2023 Inspector Training to complete audits at inspection. ONE sent an email to all inspectors on August 9, 2023 to remind them about documenting audits to verify compliance.

AIA-4564-23 - Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;”

Comments: *ONE does not carry out the provisions of the Act and regulations. The auditor's review of certification files found in one instance the inspector did not follow instructions on the Exit Interview form to cite the USDA regulations for each issue of concern.*

Corrective Action: ONE implemented additional procedures for the inspector to review the inspection report for completeness prior to submission. ONE's database now prompts inspectors to complete an “IR Completeness” step and an “IR Evaluation” step. ONE retrained relevant staff on August 7, 2023 of this requirement. ONE also sent an email to all inspectors on August 9, 2023 to remind them about citing USDA regulations for each issue of concern.

AIA-4565-23 - Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;”

Comments: *ONE does not carry out the provisions of the Act and regulations. The auditors review of certification files found the following:*

- 1. ONE did not require a ruminant livestock operation to provide dry matter intake calculations for all classes of animals per §205.237(c)(1).*
- 2. ONE did not require a ruminant livestock operation to provide a grazing season feed ration per §205.237(d).*
- 3. ONE did not issue a Notice of Noncompliance to a ruminant livestock operation when the operation's corrective actions revealed that it had confined livestock for approximately 81 days during the grazing season, which is a violation of §205.240.*

Corrective Action: ONE implemented the following corrective actions:

- ONE revised its Livestock Initial Review Form on August 9, 2023 to add a section prompting reviewers to verify DMI calculations are complete and on file for all classes of animals and that the operation has the ability to comply with DMI requirements for all classes of animals. ONE also revised its Livestock Secondary Review Form on August 9, 2023 to add a section to prompt the reviewers to verify DMI calculations are complete and on file for all classes of animals and that the operation is in compliance with DMI requirements for all classes of animals. ONE conducted training for livestock scope inspectors in May 2023 on this topic.
- ONE revised its Grazing Log instructions to request operations include all dates when livestock are grazing, even if outside of the standard grazing season. ONE also revised its Initial Review Form to prompt reviewers to review the grazing season to ensure it is appropriate for the geographical region, ensure the grazing log and OSP correspond, that the grazing season feed ration is listed in the OSP for all classes of animals, and that the organic system plan (OSP) adequately describes the reasons for a non-continuous grazing season. ONE update its Secondary Review Form to prompt reviewers to verify that the grazing records, DMI sheets and OSP correspond and that grazing season records are adequately described in the OSP. ONE conducted training for Livestock scope inspectors in May 2023 on this topic.
- ONE revised its Initial Review Form to prompt reviewers to review that the OSP adequately describes the reason for confinement and that the reason is compliant. ONE also revised the Secondary Review Form to prompt reviewers to verify confinement is compliant. ONE conducted training for Livestock scope inspectors in May 2023 on this topic.

NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

- **Certifier Name** OneCert, ONE
- **Physical Address** 1021 D Street, Lincoln, Nebraska 68502, U.S.A.
- **Audit Type** Mid-term Assessment
- **Auditor(s) & Audit Dates** Patricia Bursten, Alicia Hudson, Jessica Walden, Joshua Lindau, 11/17/2021 to 11/23/2021
- **Audit Identifier** NOP-52-21

CERTIFIER OVERVIEW

The National Organic Program (NOP) conducted a desk audit as part of its assessment of OneCert's (ONE) USDA organic certification program. The NOP assessed ONE's conformance to the USDA organic regulations, during the period May 14, 2018 to November 17, 2021. The NOP also conducted two review audits and one witness audit from October 26-27, 2021. The witness audit was an announced annual inspection of a trader operation; the review audits were conducted at a producer and a handling operation.

ONE is a private, for-profit corporation based in Lincoln, Nebraska. ONE was first accredited by the USDA National Organic Program (NOP) on April 22, 2003 for the scopes of Crops, Wild Crops, Livestock, and Handling/Processing. As of May 17, 2021, ONE has 470 certified operations including 172 crops, 12 wild crops, 19 livestock, and 297 handling certification scopes. ONE is currently certifying operations in the U.S., Mexico, India, Nepal, Thailand, and Samoa.

ONE's fulltime staff includes the CEO, Certification Manager, Certification Specialists (8), IT (1), Bookkeeper (1), and administrative assistant (1). ONE contracts inspection services with 19 inspectors.

NOP DETERMINATION:

NOP reviewed the audit results to determine whether ONE's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the audit.

Any noncompliance labeled as “**Cleared,**” indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as “**Outstanding**” indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance. Any noncompliance labeled as “**Accepted**” indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next audit.

Noncompliances from Prior Assessments

AIA-3454-20 - Cleared.

AIA-3455-20 - Cleared.

AIA-3456-20 - Cleared.

AIA-4030-20 - Cleared.

AIA-7051-21 - Cleared.

Noncompliances Identified during the Current Assessment and Corrective Actions

AIA-8842-21 - Accepted. 7 C.F.R. §205.501(a)(16) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Charge applicants for certification and certified production and handling operations only those fees and charges for certification activities that it has filed with the Administrator;”

Comments: *ONE charged operations certification fees that were not filed with the NOP. The auditors’ review of the most current fee schedule identified that ONE submitted its fee schedule to the NOP on April 21, 2020 although it was effective on January 17, 2020.*

Corrective Action: ONE submitted its most recent fee schedule to NOP on January 11, 2022 and updated its Quality System Manual to state that ONE will submit an updated fee schedule to the NOP each time changes are made.

AIA-8845-21 - Accepted. 7 C.F.R. §205.403(a)(1) states, “A certifying agent must conduct an initial on-site inspection of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested. An on-site inspection shall be conducted annually thereafter for each certified operation that produces or handles organic products for the purpose of determining whether to approve the request for certification or whether the certification of the operation should continue.”

Comments: *ONE did not conduct an annual inspection of all its certified operations in 2020. The auditors’ review of ONE’s 2020 inspection list and interviews with certification staff found that ONE did not conduct annual inspections of 40 of its 526 certified operations in 2020.*

Corrective Action: ONE updated its due dates for operations to submit their annual updates. ONE moved up its due date for producers to submit their annual updates to March 15, 2022 and plans to move the date up further in 2023, to March 1, 2023. For handlers, ONE is undertaking a 2-year transition to move all handler annual update due dates to the first 6 months of the year. ONE plans to have the handler transition complete in 2023. ONE informed inspectors at its 2022 Inspector Training that all inspection assignments need to be completed within the calendar year.

AIA-8847-21 - Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;”

Comments: *ONE does not consistently carry out the provisions of the Act and regulations. The auditors’ review of certification files identified the following issues:*

1. *ONE issued an organic certificate that included livestock and livestock products approved to the US/Canada Equivalency Arrangement. The operation did not request US/Canada Equivalency and did not meet the requirements of that arrangement. Neither certification staff nor the inspector identified the discrepancy.*
2. *ONE issued an organic certificate with 100% organic labeling status for products that did not meet the 100% organic claim.*

Corrective Action: ONE submitted a corrected organic certificate for one operation – the other operation surrendered its organic certification in December 2021. ONE updated its Secondary Review Forms to include steps for verifying product categories (ie. 100% organic, organic, made with organic) and operations’ US-Canada Organic Equivalency Arrangement (USCOEA) status. ONE informed its handler and producers reviewers on June 3, 2022 of the updates to the form.

AIA-8848-21 - Accepted. 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

Comments: *ONE does not fully implement international organic trade arrangement policies and procedures, as outlined in the NOP’s **International Trade Policies resources**. The auditors’ review of ONE’s import/export procedures and documents identified the following issues:*

1. *ONE’s Quality System Manual is not updated to reflect the current requirements for import and export of organic products.*
2. *TM-11 export certificates issued by ONE do not consistently include the required attestation statement for export under the US – Japan Equivalency Arrangement.*

Corrective Action: ONE updated its Quality System Manual to match current trade arrangement information on the NOP website. In addition, ONE created a new TM-11 template specifically for Japan that includes the required attestation in the remarks section.

AIA-8850-21 - Accepted. 7 C.F.R. §205.501(a)(2) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Demonstrate the ability to fully comply with the requirements for accreditation set forth in this subpart.”

Comments: *ONE does not consistently demonstrate the ability to fully comply with the requirements for accreditation. ONE’s inspection report and Organic System Plan (OSP) templates do not require enough information to determine an operation’s compliance with the USDA organic regulations. The auditors’ review of certification files identified the following issues related to templates:*

1. *The OSP and inspection report templates do not require operations to provide enough detail*

to demonstrate whether physical alterations are performed in a “manner that minimizes pain and stress” as required by §205.238(a)(5).

- 2. The OSP and inspection report templates do not require operations to provide enough detail to demonstrate how the amount of DL-Methionine fed per ton of feed over the life of poultry flocks is calculated in accordance with the National List of Allowed and Prohibited Substances, §205.603(d)(1).*

Corrective Action: ONE updated its Livestock OSP and Livestock inspection report template to include questions about physical alterations and the use of DL-Methionine in feed for poultry. ONE also updated its Initial Compliance Review form to include checkboxes related to methionine verification and submitted a new supplemental methionine calculation sheet that will be completed as part of an operation’s OSP. ONE conducted training for Livestock inspectors and reviewers on verifying compliance with requirements for DL-Methionine in poultry feed and the performance of physical alterations.

AIA-8851-21 - Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;”

Comments: *ONE is not carrying out the provisions of §205.403(c)(2): “The on-site inspection of an operation must verify: That the information, including the organic production or handling system plan, provided in accordance with §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation;” The auditors’ review of certification files identified that ONE inspectors do not always conduct and record mass balance exercises during inspections of applicants for certification.*

Corrective Action: ONE updated its inspection report templates to include reminders to inspectors about traceability exercise requirements and updated its Inspection Report Evaluation form to ask the evaluator to confirm whether traceability audits were completed. ONE review staff have been asked to notify management of any inspection reports missing traceability exercises so that they can be completed before a certification decision is made. ONE reviewed the requirements for conducting traceability audits with staff during its 2022 Inspector Training.

AIA-8852-21 - Accepted. 7 C.F.R. §205.501(a)(6) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services.”

Comments: *ONE did not conduct inspector field evaluations for all inspectors in 2019 and 2020 and has not implemented an alternate proposal for inspector field evaluations per the requirements of NOP 2027 Personnel Performance Evaluations.*

Corrective Action: ONE submitted its Field Evaluation Tracker which shows that that field evaluations were completed for all ONE inspectors in 2021. ONE submitted an alternative

Inspector Field Evaluation Policy to NOP for approval which uses a risk-based approach for determining the frequency of field evaluations.

AIA-8853-21 - Accepted. 7 C.F.R. §205.406(c) states, “If the certifying agent has reason to believe, based on the on-site inspection and a review of the information specified in §205.404, that a certified operation is not complying with the requirements of the Act and the regulations in this part, the certifying agent shall provide a written notification of noncompliance to the operation in accordance with §205.662.”

Comments: *ONE does not consistently issue its certified operations a notification of noncompliance, even though the review of the inspection report finds that the operation does not comply with the USDA organic regulations. During a review audit at a handling operation, the auditors identified that ONE did not issue a notification of noncompliance after the operation’s last inspection even though issues of concern identified by the inspector were noncompliances.*

Corrective Action: ONE instructed its staff to issue a noncompliance when an operation corrects a violation identified during the inspection prior to the certification decision determination. ONE updated its Secondary Review Form to prompt the reviewer to draft either a Notice of Noncompliance or a Notice of Noncompliance & Resolution (if the noncompliance is resolved prior to the review) for findings identified in the exit interview.

AIA-280-22 - Accepted. 7 C.F.R. §205.501(a)(3) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Carry out the provisions of the Act and the regulations in this part, including the provisions of §§205.402 through 205.406 and §205.670;”

Comments: *ONE does not consistently carry out the provisions of the Act and regulations. The auditors’ review of certification files identified that ONE’s certification process does not always include verification of processing aids to ensure compliance with the National List annotations.*

Corrective Action: ONE conducted training for staff and inspectors in June 2022 which explained that processing aids must be included in ingredient lists and that appropriate documentation must be on file to verify any National List annotations. ONE also required its review staff to complete or re-review the portions of the Input Material Review course in the Organic Integrity Learning Center that are applicable to the scopes they are responsible for reviewing.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

An onsite renewal assessment of the OneCert, Inc. (ONE) organic program was conducted on May 14-16, 2018. The National Organic Program (NOP) reviewed the auditor's report and corrective actions to assess ONE's compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

GENERAL INFORMATION

Applicant Name	OneCert, Inc. (ONE)
Physical Address	1021 D Street, Lincoln, Nebraska 68502
Mailing Address	1021 D Street, Lincoln, Nebraska 68502
Contact & Title	Sam Welsch, President
E-mail Address	sam@onecert.com
Phone Number	402-420-6080
Reviewers & Auditors	Bridget McElroy and Penny Zuck, NOP Reviewers; Patty Heckart and Jason Lopez, Onsite Auditors.
Program	USDA National Organic Program (NOP)
Review & Audit Dates	Corrective Action Review: December 12, 2018 NOP Assessment Review: September 27, 2018 Onsite Audit: May 14-16, 2018
Audit Identifier	NOP-5-18
Action Required	None
Audit & Review Type	Renewal Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of ONE's certification system.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	ONE's certification services in carrying out the audit criteria during the period: May 2015 through May 2018.

OneCert, Inc (ONE) is a private, for-profit corporation based in Lincoln, NE. ONE was first accredited by the USDA National Organic Program (NOP) on April 22, 2003 for the scopes of Crops, Wild Crops, Livestock, and Handling/Processing.

As of May 14, 2018, ONE has 494 certified operations including 222 crops, 12 wild crops, 15 livestock, and 250 handling certification scopes issued. Certified operations included 16 grower groups. ONE is currently certifying operations in the U.S., China, Ethiopia, Hong Kong, Mexico, Mozambique, Nepal, Oman, Samoa, Singapore, Thailand, Uganda, UAE, and Vietnam.

ONE's full time staff includes the CEO, Certification Manager, Certification Specialists (9), IT (1), and administrative assistant (1). OneCert contracts inspection services with 19 inspectors.

As part of the NOP's on-site audit, three witness audits were conducted on May 10, 11 and June 5. The witness audits were announced annual inspections of a wild crops operation, a handling/processing operation, and a crop/livestock operation.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether ONE's corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit.

Non-compliances from Prior Assessments

Any noncompliance labeled as "**Cleared**," indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as "**Accepted**" indicates acceptance of the corrective actions and verification of corrective action implementation will be conducted during the next onsite audit.

NP5126MMA.NC1 – Cleared

NP5126MMA.NC2 – Cleared

NP5126MMA.NC3 – Cleared

NP5126MMA.NC4 – Cleared

NP5126MMA.NC5 – Cleared

Non-compliances Identified during the Current Assessment and Corrective Actions

Any noncompliance labeled as "**Accepted**," indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

NOP-5-18.NC1 – Accepted. 7 C.F.R. §205.403(d) states, "*Exit interview.* ... The inspector must also address the need for any additional information as well as any issues of concern."

Comments: *During a witness audit exit interview, the auditor observed that ONE's inspector identified and discussed issues of concern with the operator, but did not reference the applicable USDA organic regulations.*

Corrective Actions: ONE's Inspection Report Evaluation template was revised to include a question asking if references to the regulation are included with issues of concern. ONE's Field evaluation template was updated to list citations of the regulations as an essential part of the Exit Interview. ONE's Inspector Instructions was revised to include this requirement. ONE sent out an email to all staff and contract inspectors on November 13, 2018 to remind them of this

requirement and inform them of the revisions to the Inspection Instructions and Inspection Report Evaluations.

NOP-5-18.NC2 – Accepted. 7 C.F.R. §205.504 (a)(3) states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques...A description of the qualifications, including experience, training, and education in agriculture, organic production, and organic handling,”

Comments: *The auditor’s review of ONE’s training records found that the records did not demonstrate training completed by staff members whose resumes reflected minimal to no organic experience.*

Corrective Actions: ONE has implemented a new training program for all new review staff, including those hired earlier this year. The training includes an overview of the NOP and the Organic Certification process and is followed up with a one-on-one session with a senior review staff person. The training also reviews the regulations in depth with scope specific training. Individual training logs are kept for new employees to record each supervised activity, and training milestones for all ONE staff are now being recorded in a master spreadsheet. ONE’s training outline and milestones log were submitted to the NOP.

NOP-5-18.NC3 – Accepted. 7 C.F.R. §205.501 (a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must:... Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 2603 “*Organic Certificates*” Section 3.1 (1) states, (Organic certificates must include the following) Certified operation’s legal name and address, including a physical address if the mailing or legal address is not the physical location of the operation.” In addition, Section 3.2 states, “Certifying agents must identify only one “person” (typically a farm or business as defined in 7 CFR § 205.2) on the organic certificate.”

Comments: *The auditor’s review of organic certificates issued by ONE found the following:*

- *The organic certificate for the livestock/crop witness audit operation included a mailing address, but no physical address.*
- *One organic certificate incorrectly identified multiple “persons”. The certificate listed the company that managed multiple grower groups, along with the name of each grower group.*

Corrective Actions: ONE revised the NOP Certificate and Certification Letter templates. Both templates pull the mailing address and physical location from the database. ONE’s internal instructions for drafting certificates state there can only be one legal entity on the certificate and to include the mailing address and physical location, if applicable.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted a mid-term assessment of OneCert, Inc. An onsite audit was conducted, and the audit report reviewed to determine OneCert’s capability to continue operating as a USDA accredited certifier. This report provides the results of the mid-term assessment and review of OneCert’s corrective actions.

GENERAL INFORMATION

Applicant Name	OneCert, Inc.
Physical Address	2219 C Street, Lincoln, NE 68502
Mailing Address	2219 C Street, Lincoln, NE 68502
Contact & Title	Sam Welsch, President/CEO
E-mail Address	sam@onecert.com
Phone Number	402-420-6080
Reviewer & Auditors	Penny Zuck, NOP Reviewer Miguel A. Caceres, Lead QAD Auditor Renee Mann, NOP AIA Division, Assistant Director Alan W. Kohles, QAD Auditor – Livestock Witness Audit Patricia Heckart, QAD Auditor – Handler Witness Audit
Program	USDA National Organic Program (NOP)
Review & Audit Date(s)	Corrective Action review: November 13, 2015 NOP assessment review: August 20, 2015 Onsite audit: May 11-13, 2015 Livestock Witness Audit: May 6, 2015 Handler Witness Audit: July 8, 2015
Audit Identifier	NP5126MMA
Action Required	None
Audit & Review Type	Mid-Term Assessment
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of OneCert’s certification system.
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	OneCert’s certification services in carrying out the audit criteria during the period: August 2013 – May 2015

OneCert, Inc. (OneCert) is a corporation in Lincoln, NE. OneCert was accredited as a certifying agent on April 22, 2003, to the USDA National Organic Program (NOP) for crops, wild crops, livestock, and handling operations. OneCert is currently certifying operations to the NOP

standard in the U.S., Ethiopia, Hong Kong, India, Macau, Mexico, Nepal, Samoa, Singapore, Thailand, Uganda, United Arab Emirates, and Vietnam. At the time of the assessment OneCert certified 354 operations to the NOP consisting of 173 crops, 7 wild crops, 13 livestock, and 182 handling operations. The certified operations included 91 grocery stores and 7 grower groups.

OneCert operates a branch office in India that is registered (Registration of Companies Act – 1956) as a Private Limited Registered Company in the State of Rajasthan. The official name in India is OneCert Asia Agri Certification Private Limited, but it is referenced as OneCert Asia in OneCert’s Quality Manual and program documentation. OneCert Asia is accredited by the Agricultural and Processed Food Products Export Development Authority (APEDA), Ministry of Commerce & Industry, Government of India, for the National Programme for Organic Production (NPOP-India).

The senior executive for OneCert is Sam Welsch. OneCert Asia is headed by CEO Sandeep Bhargava and Sam Welsch is the Managing Director. The OneCert Asia (OCA), branch office conducts NOP reviews and inspections for operations located outside of India with final review and certification decisions conducted by OneCert for all certified operations outside of India. OneCert maintains the records on personnel qualifications, training, confidentiality, conflict of interest, and other required personnel records.

OneCert staff consists of the President/CEO, an Administrative Specialist, and 7 Certification Specialists. OneCert also uses 2 contracted Inspector/Reviewers, and 9 contracted Inspectors. The list of personnel provided by OneCert for the OCA branch office consisted of the CEO, a Quality Manager, 6 Inspector/Reviewers, 2 Senior Inspector/Reviewers, a contracted Inspector/Reviewer, a Senior Food Inspector/Reviewer, and 2 Inspectors. In addition to providing certification activities under the USDA organic regulations; OneCert is also accredited as a certifying agent to Global Organic Textile Standards (GOTS) and the EU Equivalent Standard (OneCert International Organic Standards).

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether OneCert’s corrective actions adequately addressed previous noncompliances. NOP also reviewed any corrective actions submitted as a result of noncompliances issued from Findings identified during the onsite audit.

Non-compliances from Prior Assessments

Any noncompliance labeled as “**Cleared**,” indicates that the corrective actions for the noncompliance are determined to be implemented and working effectively. Any noncompliance labeled as “**Outstanding**” indicates that either the auditor could not verify implementation of the corrective actions or that records reviewed and audit observations did not demonstrate compliance.

NP3204BBA.NC1 – Cleared

NP3204BBA.NC2 – Cleared

Non-compliances Identified during the Current Assessment

Any noncompliance labeled as “**Accepted**,” indicates that the corrective actions for the noncompliance are accepted by the NOP and will be verified for implementation and effectiveness during the next onsite audit.

NP5126MMA.NC1 – Accepted. 7 CFR §205.402(a) states, “Upon acceptance of an application for certification, a certifying agent must: (1) Review the application to ensure completeness pursuant to §205.401; 7 CFR §205.401 states, “A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information: (a) An organic production or handling system plan, as required in §205.200”; and §205.201(a) states, “An organic production or handling system plan must include: (3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented.”

Comments: *OneCert does not require information describing the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed for crop operations. This information was not submitted by the applicants and was missing in the three crop Organic System Plans reviewed during the assessment.*

Corrective Action: OneCert revised the Crops Organic System Plan by adding a section where clients are asked to describe monitoring practices. The revised OSP was submitted to NOP. For existing clients, OneCert plans to obtain this information during the annual renewal process.

NP5126MMA.NC2 – Accepted. 7 CFR §205.404(a) states, “Within a reasonable time after completion of the initial on-site inspection, a certifying agent must... review the on-site inspection report. The certifying agent... shall grant certification. The certification may include requirements for the correction of minor noncompliances within a specified time period as a condition of continued certification.

Comments: *In one grower group file, the inspector noted on the exit interview form that the operation lacked records of internal audits and allowed one operation to process products outside of the grower group. The certifier did not notify the client of these issues after the completion of the inspection. It should be noted that the certifier included the first issue (i.e. need for records) in a letter to the grower group’s sister operation. However, there is no record that the inspected grower group was informed of either finding. The inspector identified the issues, but there was no follow-up by the certifier, OneCert.*

Corrective Action: OneCert notified the grower group’s sister operation of these issues. OneCert confirmed all internal inspections were conducted and documented by the grower group. OneCert confirmed the grower group is no longer using an off-site cleaning facility. In order to improve notifications to each grower group, OneCert has implemented a tracking system for minor issues and noncompliances found at inspections, using a “priority” flagging system in its database. The system will better enable notification to clients of minor issues and noncompliances. OneCert submitted screenshots of several portions of the database to

demonstrate how issues are noted and flagged as priority for follow-up. OneCert submitted the Priority Criteria matrix, which is used by staff to determine what should be flagged in the database system.

NP5126MMA.NC3 – Accepted. 7 CFR §205.501(a)(21) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary. NOP Policy Memo 11-10, Certification of Grower Groups, states “accredited certifying agents should use the National Organic Standards Board (NOSB) recommendations of October 2002 and November 2008 as the current policies.” The 2002 recommendation states the following condition must be met for a grower group: “Participation in the group is limited to producers who sell all of their organic production through the group.”

Comments: *The certifier’s Grower Group inspection report, question 83, asks if growers within the grower group “sell organic production separate from the [crop grower group]” and asks if this is approved by the grower group. However, the NOSB recommendation does not allow grower group members to sell organic products outside of the group.*

Corrective Action: OneCert has submitted a revised grower group inspection report with the following three questions added: 1) *Are individual producers within the GG selling organic products separate from the GG?* 2) *If Yes to Question 1, are those products sold as conventional? (not labeled or represented as organic)* 3) *If No to Question 2, are sanctions imposed as defined in the ICS Manual for this violation?*

NP5126MMA.NC4 – Accepted. 7 CFR §205.504(b)(2) states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques; its ability to fully comply with and implement the organic certification program established in §§205.100 and 205.101, §§205.201 through 205.203, §§205.300 through 205.303, §§205.400 through 205.406, and §§205.661 and 205.662; and its ability to comply with the requirements for accreditation set forth in §205.501: A copy of the procedures to be used for reviewing and investigating certified operation compliance with the Act and the regulations in this part and the reporting of violations of the Act and the regulations in this part to the Administrator.”

Comments: *The OneCert procedures for conducting investigations and follow-up activities on complaints are contained in the OneCert general certification procedures. The requirement is addressed by describing the process but does not include the actual procedures to be taken; such as documentation inspections, follow-up activities, etc...*

Corrective Action: OneCert added to the complaints section of the Certification Procedures to include how complaints will be handled and documented including the use of a Complaint and Feedback Tracker for documenting actions and communications specific to the complaint. In addition, two staff persons were appointed to maintain the Complaint and Feedback Tracker to make sure each new complaint is assigned and resolved.

NP5126MMA.NC5 – Accepted. 7 CFR §205.670(d) states, “A certifying agent must, on an annual basis, sample and test from a minimum of five percent of the operations it certifies, rounded to the nearest whole number.”

Comments: *The OneCert list of certified operations submitted on January 2, 2014 included 299 certified operations. Based on the number of certified operations there should have been 15 certified operations which had samples pulled and tested. However, in 2014 OneCert only collected and tested 13 samples on 13 different certified operations.*

Corrective Action: OneCert has developed a document of internal procedures relating to residue sampling. It tracks all the relevant steps in the process from determining the number of samples required to notifying the client of test results. It also assigns responsibility for each task. An inspection planning committee has been created to oversee all aspects of inspection planning including residue sampling. A staff member has been designated within that committee to monitor the tracking table and work with staff and inspectors to ensure the correct number of samples are submitted for testing. OneCert reported 355 certified operations to the NOP on January 2, 2015. It has been determined the number of samples required for 2015 is 18. As of September 23, 2015 OneCert has already submitted and received results for 16 samples and at least two additional samples were planned to be collected in October 2015. OneCert submitted the written internal procedure that is being followed by staff and a screenshot from the database showing the residue samples that have been pulled and tested so far this year.

ASSESSMENT INFORMATION

Applicant Name:	OneCert, Inc.
Est. Number:	N/A
Physical Address:	2219 C Street, Lincoln, NE 68502
Mailing Address:	same
Contact & Title:	Sam Welsch, President/CEO
E-mail Address:	sam@onecert.com
Phone Number:	402-420-6080
Auditor(s):	Robert Pooler, Accreditation Manager
Program:	USDA National Organic Program (NOP)
Audit Date(s):	On site audit: July 23, August 6, and 12-15, 2013. Corrective action review: January 13, 2014
Audit Identifier:	NP3204BBA
Action Required:	no
Audit Type:	Corrective Action review
Audit Objective:	To verify review and approve corrective actions addressing the non-compliances identified during the Renewal Assessment.
Audit Criteria:	7 CFR Part 205, National Organic Program; as amended.
Audit Scope:	OneCert, Inc. quality manual including personnel, processes, procedures, facilities and, related records and documents.
Location(s) Audited:	Desk

GENERAL INFORMATION

OneCert, Inc. was accredited as a certifying agent on April 22, 2003, to the USDA National Organic Program (NOP) for crops, wild crops, livestock, and handling operations. OneCert, Inc. is currently certifying operations to the NOP regulations in the U.S., China, India, Macau, Mexico, Nepal, Samoa, Singapore, Thailand, and Vietnam. The OneCert, Inc. client list as of August 13, 2013, had 274 certified operations (302 certifications) including 154 crop, 9 wild crop, 13 livestock, and 146 handling operations certified to the NOP regulations. The certified operations included 3 grower groups with 2 in Vietnam and 1 in Nepal. OneCert, Inc. is also accredited as a certifying agent to Global Organic Textile Standards (GOTS), JAS, and the EU Equivalent Standard (OneCert International Organic Standards).

OneCert, Inc. in Lincoln, NE was registered as a trade name in the State of Nebraska on February 6, 2003, and was incorporated on December 20, 2004. OneCert, Inc. operates a Branch office in India that is registered (Registration of Companies Act – 1956) as a Private Limited Registered Company in the State of Rajasthan. The official name in India is OneCert Asia Agri Certification Private Limited, but it is referenced as OneCert Asia in OneCert, Inc.'s quality manual and program documentation. A reference to OneCert applies to all operations. A reference to OneCert, Inc. applies to the headquarters operation in Lincoln, NE. A reference to OneCert Asia applies to the India operation.

OneCert Asia is headed by CEO Sandeep Bhargava and Sam Welsch is the Managing Director. OneCert, Inc. uses OneCert Asia staff as reviewers and inspectors; however, the final review and certification decision is made by OneCert, Inc. for all certified operations outside of India. OneCert, Inc. maintains the records on personnel qualifications, training, confidentiality, conflict of interest, etc., and conducts annual performance evaluations for OneCert Asia staff acting as reviewers or inspectors for OneCert, Inc.

OneCert Asia is accredited by the Agricultural and Processed Food Products Export Development Authority (APEDA), Ministry of Commerce & Industry, Government of India, for the National Programme for Organic Production (NPOP-India). The USDA determined that India's government conformity assessment program is sufficient to ensure conformity to the technical standards of USDA's National Organic Program (NOP) and has a formal recognition agreement with India allowing certifying organizations accredited by APEDA to NPOP-India to certify operations to the NOP. OneCert Asia's accreditation with APEDA allows them to certify to the NOP within India under the USDA recognition agreement. OneCert Asia is not allowed to certify operations to the NOP outside of India; therefore, these operations must be certified by OneCert, Inc.

AUDIT INFORMATION

During the renewal assessment, the corrective actions for the non-compliances identified during the 2010 Mid-term assessment (NP0238ZZA) were found to be implemented and effective. Therefore, the non-compliance was cleared. On November 13, 2013, NOP sent a Notice of Noncompliance to OneCert, Inc. for two noncompliances identified during the 2013 Renewal assessment. On December 12, 2013, OneCert, Inc. submitted final corrective actions to address the noncompliances.

NP0238ZZA.NC1 – Cleared

FINDINGS

Documents and records reviewed determined that the OneCert, Inc. has adequately addressed noncompliances NP3204BBA.NC1 – 2 identified during the 2013 accreditation renewal assessment. Verification of OneCert, Inc. corrective actions will be determined at the next on-site audit

NP3204BBA.NC1 – NOP § 205.403(c)(2) states, "Verification of information. The on-site inspection of an operation must verify: (2) That the information, including the organic production or handling system plan, provided in accordance with... accurately reflects the practices used or to be used by the applicant for certification or by the certified operation." *The on-site witness inspection of the livestock operation showed (determined) that the livestock producer used some hay as a feed source during the grazing season that was not listed in the DMI (Dry Matter Intake) worksheet. Although the inspector did confirm that the DMD (Dry Matter Demand) requirements were being met, the inspector did not identify any findings or issues of concern during the exit interview that hay was not listed as a feed source on the DMI*

worksheet. **Corrective actions:** OneCert noted that the inspector's report cited the inspectors finding indicating that the ruminant livestock on this operation received more than 30 percent of their DMI for more than 120 days as required by § 205.237(c). OneCert noted that the inspector verified that this regulation provision was being implemented correctly by the operation, but that the inspector failed to discuss the paperwork error with the operation. To correct this noncompliance, OneCert changed program forms to ensure inspectors verify DMI worksheets. OneCert amended its certification procedures to require inspectors to submit a copy of the verified DMI worksheet with the inspection report. OneCert also changed its initial OSP approval review document to specifically review DMI worksheets submitted with an operation's annual update. OneCert provided copies of the amended forms with the DMI worksheet verification. OneCert began implementing these program changes before submitting final corrective actions on this noncompliance on December 12, 2013.

NP3204BBA.NC2 – NOP § 205.403(e)(2) states, "Documents to the inspected operation. (2) A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent." In addition, NOP §205.670(d) states, "A certifying agent must, on an annual basis, sample and test from a minimum of five percent of operations it certifies, rounded to the nearest whole number." *The laboratory results of a test conducted from a sample had not been submitted to the certified operation by OneCert, Inc. In addition, OneCert, Inc. has not revised their inspection and testing procedures to include the required sampling and testing of a minimum of five percent of their certified operations. However, OneCert, Inc. was aware of the new requirement and has selected the certified operations to sample and test and has scheduled inspections that would include the required sampling and testing.* **Corrective actions:** OneCert certification procedures already require staff to send lab results to respective certified operations. OneCert provided a copy of 10/04/13 email communication showing reporting of test results to a certified operation. To address the five percent sampling requirement, OneCert amended its certification procedures to require staff to test at least five percent of client operations annually. OneCert provided a copy of the amended procedures. OneCert began implementing these program changes before submitting final corrective actions on this noncompliance on December 12, 2013.



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AUDIT INFORMATION

Applicant Name:	OneCert, Inc.
Est. Number:	N/A
Physical Address:	427 N 33rd Street, Lincoln, NE 68503
Mailing Address:	427 N 33rd Street, Lincoln, NE 68503
Contact & Title:	Samuel K. Welsch, President, Chief Executive Officer, and Owner
E-mail Address:	sam@onecert.net
Phone Number:	(402) 420-6080
Auditor(s):	Robert L. Pooler, Regional Accreditation Manager
Program:	USDA National Organic Program (NOP)
Audit Date(s):	NOP Review: 02/23/11
Audit Identifier:	NP0238ZZA
Action Required:	No
Audit Type:	Corrective Action Review
Audit Objective:	To verify continuing compliance to the audit criteria.
Audit Criteria:	7 CFR Part 205, National Organic Program; Final Rule, dated December 21, 2000; amended December 13, 2010. Program handbook: Guidance and Instructions for Accredited Certifying Agents & certified Operations, Winter Edition, January 31, 2011.
Audit Scope:	The company's quality manual including personnel, processes, procedures, facilities, and related records.
Location(s) Audited:	Desk Audit

The OneCert, Inc. Mid Term Audit started on August 26, 2010, with the surveillance of the witness inspections, and concluded with the on-site audit conducted September 14 – 17, 2010.

On November 18, 2010, the NOP issued a Notice of Noncompliance to OneCert, Inc. for a noncompliance identified during the Mid Term Audit.

On December 20, 2010, and December 23, 2010, OneCert, Inc. submitted proposed corrective actions to noncompliance NP0238ZZA.NC1 identified during the Mid Term Audit. OneCert, Inc. submitted the following proposed corrective actions:

- Letter containing proposed corrective actions for noncompliance NP0238ZZA.NC1.
- OneCert, Inc. annual reports for 2009 and 2010.

FINDINGS

Documents and records reviewed determined that OneCert, Inc. proposed corrective actions adequately addressed the noncompliance identified during the Mid Term audit (NP0238ZZA).



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NP0238ZZA.NC1 – NOP § 205.510(a)(1-4) states, “An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports...” *OneCert, Inc. did not submit an annual update report to the Administrator in 2009, and the 2010 annual update report due by April 22, 2010 had not been submitted.* **Corrective Action:** The corrective actions adequately address the noncompliance. OneCert, Inc. submitted annual reports for 2009 and 2010, as required by § 205.510(a)(1-5). Updates provided in the annual reports include, but not limited to, changes in administrative procedures, personnel changes, internal performance evaluations, and subcontractor agreements and performance. OneCert, Inc. changed its quality management system to add a 30 day annual report notification to the OneCert, Inc. agency network calendar.