



United States Department of Agriculture

Agricultural Marketing Service
National Organic Program

IOWA DEPARTMENT OF AGRICULTURE AND LAND STEWARDSHIP

502 East 9th Street, Des Moines, Iowa, 50319, U.S.A.

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

7 CFR Part 205

as an Accredited Certifying Agent

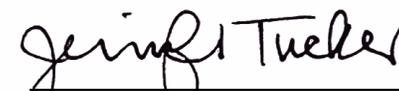
for the scope of

Crops, Handling, Livestock, Wild Crops Operations

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Certificate No: **USDA-0-24**
Effective Date: **04/29/2022**
Expiration Date: **04/29/2027**
Issue Date: **01/18/2024**


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CERTIFICATE OF ACCREDITATION





National Organic Program
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NATIONAL ORGANIC PROGRAM: AUDIT & CORRECTIVE ACTION REPORT

GENERAL INFORMATION

- **Certifier Name** Iowa Department of Agriculture and Land Stewardship (IDALS)
- **Physical Address** 502 East 9th Street, Des Moines, Iowa 50319
- **Audit Type** Renewal Assessment
- **Auditors & Audit Dates** Stephen Nix & Alison Howard, 03/28/2022 to 04/01/2022
- **Audit Identifier** NOP-17-22

CERTIFIER OVERVIEW

Iowa Department of Agriculture and Land Stewardship (IDALS) is a state government agency certification program with headquarters located in Des Moines, Iowa. IDALS was originally accredited by the USDA National Organic Program (NOP) on April 29, 2002 to certify crops, wild crops, livestock, and handling operations. All key certification activities are conducted at the Des Moines office.

The NOP conducted an on-site Renewal Assessment of IDALS for compliance to the USDA organic regulations covering certification activities from May 23, 2020 to April 1, 2022. 2022. Audit activities included three on-site witness audits. Witness audits consisted of the annual inspections of a certified handling operation, a certified crop operation, and a certified crop and livestock operation.

IDALS certifies 317 operations to the following scopes: Crops (252), Livestock (48), Wild Crops (0), and Handling/Processing (53). IDALS certifies organic operations located within Colorado, Iowa, Kansas, Minnesota, Missouri, Nebraska, South Dakota, and Wisconsin.

IDALS consists of three full-time staff, two part-time staff, including the Program Director, and utilizes approximately 10 independent inspectors to assist with inspection activities.

NOP DETERMINATION:

NOP reviewed the audit results to determine whether the IDALS 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 the corrective actions were not effectively implemented. 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.

Noncompliances from Prior Assessments

AIA-1625-20 - Cleared.

AIA-1629-20 - Cleared.

AIA-1630-20 - Cleared.

AIA-1632-20 - Cleared.

AIA-2236-20 - Cleared.

AIA-2247-20 - Cleared.

AIA-2250-20 - Cleared.

AIA-2251-20 - Cleared.

AIA-2252-20 - Cleared.

AIA-1627-20 - Accepted. 7 C.F.R. §205.404(b)(1) states, “The certifying agent must issue a certificate of organic operation which specifies the: Name and address of the certified operation;”

Comments: *IDALS organic certificates do not fully comply with the requirements of the USDA regulations and NOP 2603 Organic Certificates. The auditor’s review of certification files found that certificates do not contain the physical address of the certified operation, an issue date, and the statement, “Certified to the USDA organic regulations, 7 CFR Part 205.”*

Corrective Action: IDALS updated policy 4.7 “Issuing the Certificate of Organic Operations” in its Iowa Organic Certification Program (IOCP) Policy Handbook to requires IDALS’ organic certificates to contain the operations physical address (if different from the operation’s mailing address), the issue date and the statement “Certified to the USDA organic regulations, 7 CFR Part 205.” IDALS submitted compliant templates for organic certificates and is currently using the templates for issuing organic certificates.

Verification of Corrective Action: The auditors reviewed eight organic certificates and verified IDALS includes the operation’s physical address (if different from the operation’s mailing address) and the issue date on the certificate. However, five organic certificates did not correctly include the statement, “Certified to the USDA organic regulations, 7 CFR Part 205.”

2023 Corrective Action: Starting on January 1, 2023, for the 2023 certification year, the IDALS Organic Program began issuing organic certificates directly from the National Organic Program’s Organic Integrity Database (OID). This format will ensure that all issued organic certificates contain the correct statement, “Certified to the USDA organic regulations, 7 CFR Part 205.” The Iowa Organic Certification Program (IOCP) Policy Handbook Section

4: Certification, 4.7 Issuing the Certificate of Organic Operations has been updated to reflect this change in how to issue organic certificates. IDALS submitted a sample certificate. The IDALS Organic Program had a meeting with applicable staff to discuss this noncompliance and corrective action requirements.

AIA-1631-20 - Accepted. 7 C.F.R. §205.501(a)(7) states, “A private or governmental entity accredited as a certifying agent under this subpart must: have an annual program review of its certification activities conducted by the certifying agent's staff, an outside auditor, or a consultant who has expertise to conduct such reviews and implement measures to correct any noncompliances with the Act and the regulations in this part that are identified in the evaluation.”

Comments: *IDALS program review reports do not meet the requirements of NOP 2025 Internal Program Review Requirements. The auditor’s review of IDALS’ 2019 and 2020 program review reports found that they did not include an assessment of prior findings and implemented corrective actions of prior program reviews.*

Corrective Action: IDALS updated section 10.1 “Internal Audit” in its Iowa Organic Certification Program (IOCP) Policy Handbook to require the internal auditor to assess prior findings and implementation of corrective actions from prior program reviews. The new policy implementation was communicated to staff at a staff meeting September 21, 2020, and IDALS plans to conduct its 2021 internal audit accordance with the updated policy.

Verification of Corrective Action: The auditors reviewed IDALS’ 2021 IOCP internal audit summary report and found the report does not assess prior findings and implemented corrective actions of prior program reviews.

2023 Corrective Action: IDALS reviewed the requirements of the internal audit with the internal auditor. The internal audits that IDALS conducted in 2022 and 2023 did assess applicable findings and implementation of the corrective actions from prior program reviews. The Iowa Organic Certification Program (IOCP) Policy Handbook has been updated to clarify that the internal audit must assess prior findings and implemented corrective actions of prior internal audits. The internal auditor will document any findings, as well as implemented corrective actions from prior internal audit under “Exceptions Noted” in the Internal Audit Review Summary Report.

Noncompliances Identified during the Current Assessment and Corrective Actions

AIA-1079-22 - Accepted. 7 C.F.R. §205.403(c)(2) states, “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;”

Comments: *During the witness audits of crops, livestock, and handling operations, the auditors observed that the inspector did not fully verify the accuracy of the operations’ organic system plans (OSP) and did not identify inaccurate or missing information as an issue of concern. Examples of information the inspector did not identify as missing from the OSPs include:*

- 1. Rebuttal accepted.**
- 2. An OSP for a crops operation did not include post-harvest handling practices.*

3. *An OSP for a crops and livestock operation did not include soil fertility and nutrient management practices as well as seeds and planting stock practices.*
4. *An OSP for a handling operation and one for a crops and livestock operation did not contain current product profiles, labels, input materials including sanitizers, and certified products.*

Corrective Action:

1. **Rebuttal accepted.**
2. IDALS reviewed the noncompliance with staff regarding post-harvest handling practices, including rinsing of crops, to ensure this is included in the OSP of producers. IDALS updated its Pre-Inspection Review Form to include a question about post-harvest handling. IDALS notified its staff that any kind of post-harvest processing, including rinsing, must be documented in the OSP. IDALS conducted annual inspector training on April 13, 2023 and provided updated procedures and templates to all inspectors.
3. IDALS reviewed the noncompliance regarding livestock operations with outdoor access areas and proper verification. After the audit in 2022, IDALS created the Outdoor Access Form which includes questions regarding soil fertility, nutrient management practices, and seeds/planting stock practices. IDALS also uses the AM Livestock Handout that includes a Livestock Inspection instruction sheet for inspectors verifying outdoor access areas and areas to be addressed at inspection. IDALS conducted annual inspector training on April 13, 2023 and provided updated procedures and templates to all inspectors.
4. IDALS reviewed the crops and livestock operation's OSP and the inspection report and noted the producer had two products on hand that were not on his OSP Materials List. IDALS issued a Minor Issue Letter to the producer, who submitted the labels to IDALS after the inspection and before the post-inspection review was completed. IDALS conducted annual inspector training on April 13, 2023 and provided updated procedures and templates to all inspectors.

IDALS reviewed the handling operation's OSP and the inspection report and noted that the handling operation did not submit an updated Materials List when changes were made. IDALS included this as a minor issue in the Notice of Certification Letter it issued to the operation. In response, the operation submitted the missing products to the IDALS file manager, who reviewed, approved, and added them to the Materials List. IDALS conducted annual inspector training on April 13, 2023 and provided updated procedures and templates to all inspectors.

AIA-1080-22 - Accepted. 7 C.F.R. §205.404(b)(3) states, "The certifying agent must issue a certificate of organic operation which specifies the: Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation."

Comments: *IDALS' organic certificates do not fully comply with requirements of the USDA organic regulations. The auditors reviewed certification files and found that for a livestock operation, which included pasture, IDALS did not issue a certificate of organic operation with a crops scope.*

Corrective Action: IDALS began adding the crop scope to the organic certificates for livestock operations with pasture at the conclusion of the 2022 onsite audit and plans to have

updated certificates issued to all the affected operations by May 2024. IDALS submitted two certificate examples; one for current use, and one to be used after the SOE implementation date. IDALS had a meeting with applicable staff to discuss this noncompliance and corrective action requirements.

AIA-1081-22 - 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: *IDALS does not consistently demonstrate the ability to fully comply with the requirements for accreditation. The auditors reviewed import/export transaction records and found that IDALS’ organic certificates do not correctly display attestation statements for products exported to Canada under the U.S.-Canada Organic Equivalency Arrangement.*

Corrective Action: IDALS created a policy to add the statement “Certified in accordance with the terms of the US-Canada Organic Equivalency Arrangement” for the crops/products that meet the requirements under the Canadian equivalency arrangement. This policy is included in the Iowa Organic Certification Program (IOCP) Policy Handbook, Section 7.2 as is current as of July 24, 2023. IDALS has begun adding the statement, “Certified in accordance with the terms of the US-Canada Organic Equivalency Arrangement” to applicable crops/products entries in the OID. Therefore, this statement will appear on the OID-issued organic certificates. IDALS had a meeting with applicable staff to discuss this noncompliance and corrective action requirements.

AIA-1082-22 - 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: *IDALS does not consistently demonstrate the ability to fully comply with the requirements for accreditation. The auditors reviewed certification files and IDALS’ Iowa Organic Certification Program (IOCP) Administrative Policies and Procedures Manual (2021) and found that the manual does not include policies or procedures for evaluating whether issues identified during file review or at inspections should be classified as minor issues or noncompliances.*

Corrective Action: IDALS revised the IOCP on July 21, 2023 to include policies and procedures on how to evaluate whether issues identified during file review or at inspections should be classified as minor issues or noncompliances. The new policy is 8.11 Determination of Enforcement Actions. IDALS staff will use the policies and procedures as outlined in the revised IOCP and will refer to the Penalty Matrix when evaluating whether issues identified during file review or at inspections should be classified as minor issues or noncompliances. All IDALS file managers were given a copy of NOP 4002 Penalty Matrix to hang in a visible space in their office to easily access it when reviewing files. IDALS had a meeting with applicable staff to discuss this noncompliance and corrective action requirements.

AIA-1084-22 - 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: *IDALS does not carry out the provisions of the Act and USDA organic regulations. The auditors reviewed certification files and IDALS’ IOCP Material Review*

Program Manual (2022) and conducted interviews with certification staff and found that IDALS does not maintain material review records in accordance with its material review policies and procedures as required by § 205.501(a)(9).

Corrective Action: IDALS revised the IOCP Material Review Program Manual on July 24, 2023 to update the method in which material reviews were presented and documented. The changes to the policy and procedures include Section 4.2 Product Review and the addition of a presentation model – the Material Review Team (MRT) Meeting Table. This model allows for IDALS to record all information for the material being reviewed and the Material Review Team’s decision. The MRT includes the name of material, manufacturer/distributor of material, category of material, active user(s), notes, space for supporting documents, including but not limited to, OMRI certificates, SDS forms, etc. and the determined status of the material. In the event a physical meeting of the Material Review Team cannot take place in a reasonable timeline, an electronic eMRT policy was established to allow for “urgent” reviews of materials, when necessary, via email for Material Review Team input and decision. Review decisions are documented in the Product Database and tied to operations by Producer ID. IDALS had a meeting with applicable staff to discuss this noncompliance and corrective action requirements.

AIA-1085-22 - Accepted. 7 C.F.R. §205.501(a)(15)(i) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Submit to the Administrator a copy of: Any notice of denial of certification issued pursuant to §205.405, notification of noncompliance, notification of noncompliance correction, notification of proposed suspension or revocation, and notification of suspension or revocation sent pursuant to §205.662 simultaneously with its issuance;”

Comments: *IDALS does not submit to the NOP a copy of all the notifications listed in § 205.501(a)(15)(i). The auditors reviewed certification files and found that notifications of noncompliance, notifications of proposed suspension, and notifications of suspension are not submitted to the NOP simultaneously with their issuance.*

Corrective Action: IDALS began submitting notifications listed in § 205.501(a)(15)(i) to the NOP to via email to NOPACAAdverseActions@usda.gov following the audit. However, IDALS had a meeting with applicable staff to discuss this noncompliance and corrective action requirements and due to the Strengthening Organic Enforcement Rule, IDALS will no longer be submitting notifications listed in § 205.501(a)(15)(i) to the NOP. IDALS will adhere to the requirement for certifying agents to list operations in the Organic Integrity Database and their corresponding certification status.

AIA-1086-22 - 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: *IDALS does not fully carry out the procedures in **NOP 2613 Responding to Results from Pesticide Residue Testing Instruction**. The auditors reviewed pesticide residue analytical reports and found that for pesticide residues which do not have regulatory tolerances, IDALS does not report pesticide residue detections greater than 0.01 parts per million to the appropriate Federal or State health agency.*

Corrective Action: IDALS updated the Iowa Organic Certification Program (IOCP) Policy Handbook to include a policy to report pesticide residue detections greater than 0.01 parts per million to the appropriate Federal or State health agency. The policy requires that the staff inspector that submits the test notify the appropriate Federal or State agency, upon receipt of the results. In the case where there is no EPA tolerance level or FDA Action Level for the pesticide for the tested commodity, IDALS will immediately report the violation to the appropriate agency, EPA and/or FDA. If the application can be traced back to an application to a field, IDALS will submit the violation, including its location and time, to the EPA. If the violation can't be traced to a direct, intentional application to a field or it is detected in the stream of commerce, IDALS will submit the violation to the closest FDA district office. IDALS had a meeting with applicable staff to discuss this noncompliance and corrective action requirements.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted a desk audit as part of the NOP's assessment of the Iowa Department of Agriculture and Land Stewardship (IDALS) organic program. The NOP reviewed the auditor's report to assess IDALS's compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

GENERAL INFORMATION

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|---|--|
| Applicant Name | Iowa Department of Agriculture and Land Stewardship (IDALS) |
| Physical Address | 502 East 9th Street, Des Moines, Iowa 50319, U.S.A. |
| Mailing Address | 502 East 9th Street, Des Moines, Iowa 50319, U.S.A. |
| Contact & Title | Ms. Katie Hyde, Organic Handler Specialist |
| E-mail Address | katie.hyde@iowaagriculture.gov |
| Phone Number | 515-281-5783 |
| Reviewer & Auditor | Melissa Lahullier, NOP Reviewer; Alison Howard, Auditor |
| Program | USDA National Organic Program (NOP) |
| Review & Audit Date(s) | Corrective actions review: January 12, 2021 NOP assessment review: August 7 – 10, 2020 Onsite audit: May 18 – 22, 2020 |
| Audit Identifier | NOP-23-20 |
| Action Required | No |
| Audit & Review Type | Midterm Assessment |
| Audit Objective | To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of IDALS's certification system. |
| Audit & Determination Criteria | <i>7 CFR Part 205, National Organic Program as amended</i> |
| Audit & Review Scope | IDALS's certification services in carrying out the audit criteria during the period: 07/28/2017 through 02/14/2020. |

IDALS is a state agency accredited on April 29, 2002 by the USDA National Organic Program for Crops, Livestock, Wild Crops and Handling/processing. The IDALS Organic Certification Program certifies 309 operations to the following certification scopes: Crops (248), Livestock (46), Wild Crop (0) and Handlers (43). IDALS' office is in Des Moines, Iowa, and provides certification services in Iowa, Missouri, Kansas, Nebraska, South Dakota, Minnesota, and Wisconsin. Certification services are performed by the Program Manager, three organic certification reviewers, and eight inspectors (one IDALS employee and seven contractors).

NOP DETERMINATION

The NOP reviewed the audit results to determine whether IDAL's corrective actions adequately addressed previous noncompliances. The 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 audit.

Noncompliances from Prior Assessments

AIA-1332-20 – Cleared.

AIA-1333-20 - Cleared.

AIA-1334-20 - Cleared.

Noncompliances Identified during the Current Assessment

AIA-1625-20 -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: *IDALS 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 that when residues are not detected, IDALS is not always informing operations that their product may be sold as organic.*

Corrective Action: IDALS updated their Non-Detect Notice template to inform operations that their product may be sold as organic when residues are not detected. IDALS began using the revised template on September 17, 2020 and submitted a copy of the compliant template along with an example of a letter that had been sent to an IDALS client using the updated template.

AIA-1627-20 – Accepted. 7 C.F.R. §205.404(b)(1) states, "The certifying agent must issue a certificate of organic operation which specifies the: Name and address of the certified operation;"

Comments: *IDALS organic certificates do not fully comply with the requirements of the USDA regulations and NOP 2603 Organic Certificates. The auditor's review of certification files found that certificates do not contain the physical address of the certified operation, an issue date, and the statement, "Certified to the USDA organic regulations, 7 CFR Part 205."*

Corrective Action: IDALS updated policy 4.7 "Issuing the Certificate of Organic Operations" in its Iowa Organic Certification Program (IOCP) Policy Handbook to requires IDALS' organic certificates to contain the operations physical address (if different from the operation's mailing address), the issue date and the statement "Certified to the USDA organic regulations, 7 CFR

Part 205.” IDALS submitted compliant templates for organic certificates and is currently using the templates for issuing organic certificates.

AIA-1629-20 – 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: *IDALS does not consistently demonstrate the ability to fully comply with the requirements for accreditation. The auditor’s review of IDALS’ Policies and Procedures Handbook found that the Export section of the Handbook does not include a policy/procedure for producers exporting to Korea and Switzerland. Additionally, IDALS processed a NAQS Import Certificate of Organic Processed Foods for export to Korea on 2/20/2020 using an obsolete version of the form.*

Corrective Action: IDALS updated their Iowa Organic Certification Program (IOCP) Policy Handbook to include procedures for producers exporting products to Switzerland and Korea. IDALS also issued a correct version of the NAQS Import Certificate of Organic Process Foods form. IDALS plan to keep up to date with the requirements for international arrangements by monitoring email updates from the NOP, utilizing the NOP Blackboard Learning Center and attending any webinars or other meetings put on by the NOP regarding international information.

AIA-1630-20 – Accepted. 7 C.F.R. §205.662(e)(1) states, "If the certified operation fails to correct the noncompliance, to resolve the issue through rebuttal or mediation, or to file an appeal of the proposed suspension or revocation of certification, the certifying agent or State organic program's governing State official shall send the certified operation a written notification of suspension or revocation."

Comments: *IDALS does not consistently issue Notices of Suspension when its certified operations fail to correct noncompliances, resolve the issue through rebuttal or mediation, or file an appeal of the proposed suspension of certification. The auditor’s review of certification files found that IDALS accepted an operation’s request to surrender certification as a resolution to a Notice of Proposed Suspension. In response to the surrender request, IDALS issued the operation a Notice of Noncompliance Resolution.*

Corrective Action: IDALS updated section 4.10 “Failure to Continue Certification – Processor & Producer” in its Iowa Organic Certification Program (IOCP) Policy Handbook to state that an operation surrendering its certification after receiving a Notice of Proposed Suspension shall not be issued a Notice of Resolution. IDALS discussed the policy revision with staff at a staff meeting on September 21, 2020.

AIA-1631-20 – Accepted. 7 C.F.R. §205.501(a)(7) states, “A private or governmental entity accredited as a certifying agent under this subpart must: have an annual program review of its certification activities conducted by the certifying agent's staff, an outside auditor, or a consultant who has expertise to conduct such reviews and implement measures to correct any noncompliances with the Act and the regulations in this part that are identified in the evaluation.”

Comments: *IDALS program review reports do not meet the requirements of NOP 2025 Internal Program Review Requirements. The auditor’s review of IDALS’ 2019 and 2020 program review reports found that they did not include an assessment of prior findings and implemented corrective actions of prior program reviews.*

Corrective Action: IDALS updated section 10.1 “Internal Audit” in its Iowa Organic Certification Program (IOCP) Policy Handbook to require the internal auditor to assess prior findings and implementation of corrective actions from prior program reviews. The new policy implementation was communicated to staff at a staff meeting September 21, 2020 and IDALS plans to conduct its 2021 internal audit accordance with the updated policy.

AIA-1632-20 – Accepted. 7 C.F.R. §205.403(d) states, “The inspector must conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any issues of concern.”

Comments: *IDALS’ inspectors do not conduct exit interviews at unannounced inspections. The auditor’s interviews with staff found that exit interviews were being conducted at announced inspections, but not at unannounced inspections.*

Corrective Action: IDALS currently has only one inspector conducting unannounced inspections. The IDALS Program Manager met with staff to review section 2.5 “Unannounced Inspection” in the Iowa Organic Certification Program (IOCP) Policy Handbook and its implementation. Following IDALS 2020 Midterm Assessment, IDALS immediately began conducting exit interviews at unannounced inspections and has created and implemented “Exit Interview Form – Unannounced Inspections (Form I417IN-OC20)” for recording the exit interview.

AIA-2236-20 – Accepted. 7 C.F.R. §205.404(b)(1) – (4) states, “The certifying agent must issue a certificate of organic operation which specifies the: Name and address of the certified operation; Effective date of certification; Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation; and Name, address, and telephone number of the certifying agent.;

Comments: *IDALS’s process for issuing organic certificates does not fully comply with the USDA organic regulations and the requirements of NOP 2603 Instruction Organic Certificates. The auditor’s review of certification files found that IDALS is not issuing updated organic certificates at least annually. IDALS only issues operations an updated Product Addendum page when new items become certified, and not the full organic certificate at least annually. The Product Addendum is a part of IDALS’ organic certificate, as it does not contain all the required elements of an organic certificate.*

Corrective Action: IDALS' full organic certificate is composed of two documents - the organic certificate and the product addendum. IDALS updated its product addendum template to include the certificate issue date, anniversary date and effective date as well as the addendum issue date. IDALS will issue the full organic certificate annually, and issue only an updated addendum when a new product is added or removed. IDALS began using the updated product addendum template on October 9, 2020.

AIA-2250-20 – Accepted. 7 C.F.R. §205.403(a)(2)(ii) states, “The Administrator or State organic program's governing State official may require that additional inspections be performed by the certifying agent for the purpose of determining compliance with the Act and the regulations in this part.”

Comments: *IDALS does not conduct unannounced inspections of its certified operations according*

to the requirements of NOP 2609 Unannounced Inspections. The auditor's review of IDALS' Unannounced Inspection Policy found that IDALS contacts operations by phone no more than 4 hours prior to beginning the unannounced inspection. NOP 2609 Unannounced Inspections only allows prior notification to be given to an operation in special cases where extenuating circumstances make it impossible to conduct an unannounced inspection without giving the operation prior notification.

Corrective Action: IDALS updated section 2.5 “Unannounced Inspection” in their Iowa Organic Certification Program (IOCP) Policy Handbook to state that an unannounced inspection cannot include prior notice to the operation except where extenuating circumstances make it impossible to conduct an unannounced inspection of the operation without prior notification. The policy was revised on June 26, 2020 and implemented for the first unannounced inspection that occurred after that date. IDALS' Program Manager reviewed the new policy with the IDALS inspector responsible for conducting unannounced inspections.

AIA-2251-20 – 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: *IDALS does not consistently issue its certified operations a Notice of Noncompliance even though the review of the inspection report indicates that the operation does not comply with the USDA organic regulations. The auditor's review of certification files found instances where IDALS did not provide operations with a written notification of noncompliance for noncompliant practices identified during the operations' onsite inspections. The noncompliant practices were relayed to the operations as “Continuous Improvement Points” in the Notification of Certification Letter.*

Corrective Action: IDALS plans to conduct training on how to apply the NOP's Penalty Matrix and when to classify findings as minor noncompliances or major noncompliances on July 7, 2021.

AIA-2252-20 – Accepted. 7 C.F.R. §205.662(a)(3) states, “When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation. Such notification shall provide: the date by which the certified operation must rebut or correct each noncompliance and submit supporting documentation of each such correction when correction is possible.”

Comments: *IDALS' Notices of Noncompliance do not consistently include the operation's right to rebut the noncompliance. The auditor's review found two Notices of Noncompliance that did not inform the operation of its right to rebut the noncompliance.*

Corrective Action: IDALS updated section 8.1 “Issuing Notices of Noncompliance” in their Iowa Organic Certification Program (IOCP) Policy Handbook to state that Notices of Noncompliances must include a statement informing the operator that he or she has the right to rebut the noncompliance and the procedure for doing so. IDALS' held a staff meeting September 21, 2020 to review the updated policy and submitted a compliant Notice of Noncompliance that included the operation's right to rebut the noncompliance to demonstrate the corrective action had been implemented.

AIA-2247-20 - Accepted. 7 C.F.R. §205.403(c)(2) states, “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;”

Comments: *IDALS’ inspectors do not fully verify an operation’s compliance with the USDA organic regulations under §205.236, §205.239 and §205.240. The auditor’s review of certification files found that inspectors are not verifying a livestock operation’s compliance with pasture practices for each type and class of animal with actual DMI from grazing, actual days grazed, confinement, and grazing season for the geographical region. Additionally, inspectors are not fully verifying compliance with origin of livestock requirements during the review of record-keeping, including livestock purchase/sales records.*

Corrective Action: IDALS conducted training for inspectors on April 7, 2021 on how to verify compliance with the pasture practices requirements as well as origin of livestock requirements. The training also covered new forms that IDALS has implemented, such as the IDALS’ Organic Dry Matter Intake Calculator form, the IDALS’ Organic Animal Movement Log and the IDALS Organic Livestock Feeding Record form. IDALS provided a copy of the training agenda and the training presentation. Additionally, IDALS updated its inspection report template to include additional questions for the inspector to verify about pasture management.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

An onsite renewal assessment of Iowa Department of Agriculture and Land Stewardship (IDALS) organic program was conducted on July 24, 2017. The National Organic Program (NOP) reviewed the auditor's report to assess IDALS' compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

GENERAL INFORMATION

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|---|--|
| Applicant Name | Iowa Department of Agriculture and Land Stewardship (IDALS) |
| Physical Address | 502 East 9 th Street, Des Moines IA 50319 |
| Mailing Address | 502 East 9 th Street, Des Moines IA 50319 |
| Contact & Title | Maury Wills, Bureau Chief, Ag. Diversification & Mkt. Dev. Bureau |
| E-mail Address | Maury.Wills@Iowaagriculture.gov |
| Phone Number | 515-281-5783 |
| Reviewer & Auditors | Rebecca Claypool, NOP Reviewer; Jason Lopez and Lars Crail, On-site Auditors. |
| Program | USDA National Organic Program (NOP) |
| Review & Audit Dates | Corrective action: December 20, 2017 NOP assessment review: August 17, 2017 Onsite audit: July 24-28, 2017 |
| Audit Identifier | NP7205JZA |
| Action Required | No |
| Audit & Review Type | Renewal Assessment |
| Audit Objective | To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of IDALS's certification |
| Audit & Determination Criteria | <i>7 CFR Part 205, National Organic Program as amended</i> |
| Audit & Review Scope | IDALS's certification services in carrying out the audit criteria during the period: June 27, 2014 through July 24-28, 2017 |

The National Organic Program (NOP) conducted an accreditation renewal onsite audit of the Iowa Department of Agriculture and Land Stewardship (IDALS) on July 24-28, 2017.

IDALS is a state agency accredited on April 29, 2002 to the USDA National Organic Program for crops, livestock, handling, and wild crops. The IDALS Organic Certification Program certifies 390 operations to the following certification scopes: crops (330), livestock (53), and handlers (53). IDALS' office is located in Des Moines, Iowa, and provides certification services in the States of Iowa, Wisconsin, Minnesota, South Dakota, Nebraska, Missouri, and Kansas. As of January 2017, IDALS will no longer accept certification applications from outside Iowa.

Certification services are performed by the program director, three organic certification specialists, one administrative personnel, one staff inspector, and contract inspectors.

NOP auditors conducted two witness audits of an annual crops/livestock operation inspection and a handling operation inspection. The two operations produce berries, commodity grains, pasture and hay. The livestock operation was a cow-calf beef cattle operation. The handling operation was a multi-ingredient feed processing facility.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether IDALS'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. 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.

NP4174NNA.NC1 – Cleared

NP4174NNA.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.

NP7205JZA.NC1 – Rebuttal Accepted.

NP7205JZA.NC2 – Accepted. 7 C.F.R. §205.504(b)(1) states “A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates;”

Comments: The *IDALS quality manual does not have a procedure on mediation activities. Mediation is offered as a method of resolution to a notice of proposed suspension but no further information is available to IDALS personnel on this process or possible results of mediation.*

Corrective Action: IDALS updated their Administrative Policies and Procedures Handbook to include a mediation policy in section 8.9(a). The policy requires mediation requests be submitted in writing and successful mediation will result in a Settlement Agreement. IDALS instructed their staff on the implementation of the policy, and submitted the revised policy to the NOP.

NP7205JZA.NC3 – Accepted. 7 C.F.R. §205.662(a) states, “When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation.”

Comments: *IDALS issued a noncompliance notification for failure of an operation to submit its annual update. The noncompliance notification was issued eight months after the anniversary date and should have been issued shortly after the deadline.*

Corrective Action: IDALS updated their Administrative Policies and Procedures Handbook section 4.10 to state that handlers and producers, that do not submit an annual update, will be issued a notice of noncompliance 30 days after the renewal due dates, February 15th and April 15th, respectively. IDALS staff were involved in the development of the policy and are aware of the new procedure. IDALS submitted the updated Administrative Policies and Procedures Handbook.

NP7205JZA.NC4 – Accepted. 7 C.F.R. §205.662(c) states, “When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent or State organic program’s governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.”

Comments: *IDALS issued a notification of suspension four months after the proposed suspension effective date. IDALS should have issued the suspension shortly after the deadline to request mediation or file an appeal.*

Corrective Action: IDALS updated their Administrative Policies and Procedures Handbook section 8.3 Noncompliance Control Numbering to include a tracking system for noncompliances. Each noncompliance is given a unique control number and entered into the log. Reviewers are responsible for tracking their notices and updating the log. IDALS submitted and updated Administrative Policies and Procedures Handbook and staff meeting notes documenting the development and implementation of the new numbering system and tracking log.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

An onsite renewal assessment of Iowa Department of Agriculture and Land Stewardship (IDALS) organic program was conducted on July 24, 2017. The National Organic Program (NOP) reviewed the auditor's report to assess IDALS' compliance to the USDA organic regulations. This report provides the results of NOP's assessment.

GENERAL INFORMATION

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|---|--|
| Applicant Name | Iowa Department of Agriculture and Land Stewardship (IDALS) |
| Physical Address | 502 East 9 th Street, Des Moines IA 50319 |
| Mailing Address | 502 East 9 th Street, Des Moines IA 50319 |
| Contact & Title | Maury Wills, Bureau Chief, Ag. Diversification & Mkt. Dev. Bureau |
| E-mail Address | Maury.Wills@Iowaagriculture.gov |
| Phone Number | 515-281-5783 |
| Reviewer & Auditors | Rebecca Claypool, NOP Reviewer; Jason Lopez and Lars Crail, On-site Auditors. |
| Program | USDA National Organic Program (NOP) |
| Review & Audit Dates | Corrective action: December 20, 2017 NOP assessment review: August 17, 2017 Onsite audit: July 24-28, 2017 |
| Audit Identifier | NP7205JZA |
| Action Required | No |
| Audit & Review Type | Renewal Assessment |
| Audit Objective | To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of IDALS's certification |
| Audit & Determination Criteria | <i>7 CFR Part 205, National Organic Program as amended</i> |
| Audit & Review Scope | IDALS's certification services in carrying out the audit criteria during the period: June 27, 2014 through July 24-28, 2017 |

The National Organic Program (NOP) conducted an accreditation renewal onsite audit of the Iowa Department of Agriculture and Land Stewardship (IDALS) on July 24-28, 2017.

IDALS is a state agency accredited on April 29, 2002 to the USDA National Organic Program for crops, livestock, handling, and wild crops. The IDALS Organic Certification Program certifies 390 operations to the following certification scopes: crops (330), livestock (53), and handlers (53). IDALS' office is located in Des Moines, Iowa, and provides certification services in the States of Iowa, Wisconsin, Minnesota, South Dakota, Nebraska, Missouri, and Kansas. As of January 2017, IDALS will no longer accept certification applications from outside Iowa.

Certification services are performed by the program director, three organic certification specialists, one administrative personnel, one staff inspector, and contract inspectors.

NOP auditors conducted two witness audits of an annual crops/livestock operation inspection and a handling operation inspection. The two operations produce berries, commodity grains, pasture and hay. The livestock operation was a cow-calf beef cattle operation. The handling operation was a multi-ingredient feed processing facility.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether IDALS'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. 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.

NP4174NNA.NC1 – Cleared

NP4174NNA.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.

NP7205JZA.NC1 – Rebuttal Accepted.

NP7205JZA.NC2 – Accepted. 7 C.F.R. §205.504(b)(1) states “A copy of the procedures to be used to evaluate certification applicants, make certification decisions, and issue certification certificates;”

Comments: *The IDALS quality manual does not have a procedure on mediation activities. Mediation is offered as a method of resolution to a notice of proposed suspension but no further information is available to IDALS personnel on this process or possible results of mediation.*

Corrective Action: IDALS updated their Administrative Policies and Procedures Handbook to include a mediation policy in section 8.9(a). The policy requires mediation requests be submitted in writing and successful mediation will result in a Settlement Agreement. IDALS instructed their staff on the implementation of the policy, and submitted the revised policy to the NOP.

NP7205JZA.NC3 – Accepted. 7 C.F.R. §205.662(a) states, “When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any noncompliance with the Act or regulations in this part, a written notification of noncompliance shall be sent to the certified operation.”

Comments: *IDALS issued a noncompliance notification for failure of an operation to submit its annual update. The noncompliance notification was issued eight months after the anniversary date and should have been issued shortly after the deadline.*

Corrective Action: IDALS updated their Administrative Policies and Procedures Handbook section 4.10 to state that handlers and producers, that do not submit an annual update, will be issued a notice of noncompliance 30 days after the renewal due dates, February 15th and April 15th, respectively. IDALS staff were involved in the development of the policy and are aware of the new procedure. IDALS submitted the updated Administrative Policies and Procedures Handbook.

NP7205JZA.NC4 – Accepted. 7 C.F.R. §205.662(c) states, “When rebuttal is unsuccessful or correction of the noncompliance is not completed within the prescribed time period, the certifying agent or State organic program’s governing State official shall send the certified operation a written notification of proposed suspension or revocation of certification of the entire operation or a portion of the operation, as applicable to the noncompliance.”

Comments: *IDALS issued a notification of suspension four months after the proposed suspension effective date. IDALS should have issued the suspension shortly after the deadline to request mediation or file an appeal.*

Corrective Action: IDALS updated their Administrative Policies and Procedures Handbook section 8.3 Noncompliance Control Numbering to include a tracking system for noncompliances. Each noncompliance is given a unique control number and entered into the log. Reviewers are responsible for tracking their notices and updating the log. IDALS submitted and updated Administrative Policies and Procedures Handbook and staff meeting notes documenting the development and implementation of the new numbering system and tracking log.

NATIONAL ORGANIC PROGRAM: CORRECTIVE ACTION REPORT

AUDIT AND REVIEW PROCESS

The U.S. Department of Agriculture, Agricultural Marketing Service, National Organic Program (NOP) conducted an onsite mid-term accreditation assessment of the Iowa Department of Agriculture & Land Stewardship (IDALS) from June 23-27, 2014 in Des Moines, Iowa. The NOP reviewed the auditor's report on July 11, 2014 to determine IDALS' capability to operate as an USDA accredited certifier.

GENERAL INFORMATION

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|---|--|
| Applicant Name | Iowa Department of Agriculture & Land Stewardship (IDALS) |
| Physical Address | 502 East 9th Street, Des Moines, IA 50319 |
| Mailing Address | SAME |
| Contact & Title | Maury Wills, Program Director |
| E-mail Address | Maury.Wills@idals.state.us |
| Phone Number | 515-281-5783 |
| Reviewer(s) & Auditor(s) | Janna Howley, NOP Reviewer; Patricia Heckart and Alan Kohles, Onsite Auditors. |
| Program | USDA National Organic Program (NOP) |
| Audit & Review Date(s) | July 11, 2014: Noncompliances identified. August 20, 2014: Corrective Actions reviewed |
| Audit Identifier | NP4174NNA |
| Action Required | No |
| Audit & Review Type | Mid-Term Assessment |
| Audit Objective | To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of IDALS's certification system. |
| Audit & Determination Criteria | <i>7 CFR Part 205, National Organic Program as amended</i> |
| Audit & Review Scope | IDALS's certification services in carrying out the audit criteria during the period: June 2011 – June 2014 |

Organizational Structure

IDALS is established under Iowa code chapter 159. It is established as the certification body pursuant to Iowa code Sections 190C.4.2. and 190C 13.1. The Agricultural Diversification and Market Development Bureau of IDALS is responsible for the administration of the Organic Certification Program.

IDALS is currently approved as a certifying agent to the USDA National Organic Program (NOP) for the scopes of crops, livestock, and handling/processing. IDALS currently has 348 clients certified to the NOP standard: 313 for crops, 53 for livestock, and 50 for handling.

IDALS certifies clients to the NOP in the United States with certified clients located in Iowa, Kansas, Minnesota, Missouri, Nebraska, South Dakota, and Wisconsin. IDALS does not currently certify any grower groups. All certification activities are conducted out of the main office in Des Moines, IA.

NOP DETERMINATION:

NOP reviewed the onsite audit results to determine whether IDAL'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.

NP9201EEA.NC1 – Cleared

NP1164NNA.NC1 – Cleared

AIA4083BJR.NC1 – Cleared

AIA4083BJR.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.

NP4174NNA.NC1 – Accepted - 7 CFR §205.403 (c)(1-2) states, "The on-site inspection of an operation must verify: (1) the operation's compliance or capability to comply with the Act and the regulations in this part; (2) 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." *Review of retail products available during the review audit found that the operation was using labels that had not been submitted or approved by the ACA and were not included in the OSP. The inspector had not reviewed the labels during the previous inspection. The labels in use were incorrect. There was no "Certified organic by" statement on the labels per §205.303 (b)(2). The operation had submitted a label for the popcorn, which was approved, however, this was not in use nor had its use been verified during an inspection. In addition, the farmer indicated that hay bales were ground by a service that brought equipment in to grind the hay bales on a custom basis. This was not described in the OSP nor did the inspector note this during the previous inspection.*

Corrective Action:

1. Label Review: IDALS conducted a follow-up witness inspection of the contract inspector. The contract inspector failed to review the farm's IDALS-approved labels, and neglected to report that the farm was not using the labels. The IDALS File Reviewer

contacted the farm to inform them that they needed to submit popcorn seed and egg labels for approval. The labels have since been submitted, reviewed and approved. Until more complete training can be provided at the winter training meeting, IDALS met with the inspector to review this aspect of the inspection process in an effort to increase his awareness to review labels used on farm products. IDALS also witnessed an on-farm inspection conducted by this inspector to ensure that he is conducting inspections appropriately. Additional training will be provided to all inspectors during an annual winter training meeting regarding the labeling of farm products for direct sales to consumers.

2. Service not included in OSP: IDALS conducted a follow-up witness inspection of the contract inspector. The inspector failed to report custom hay grinding service that was missing from the operation's OSP. The inspector also neglected to report this to IDALS. The operation has since updated their OSP to include sufficient information related to the custom service. IDALS met with inspector to discuss and emphasize the need to go over details of the OSP and view all aspects of farm practices in an effort to gain a more complete understanding of the farming operation. Additional training will be provided to all inspectors during their annual winter training meeting regarding the verification of any custom services provided to the operation.

NP4174NNA.NC2 – Accepted - 7CFR §205.403 (e)(1) states, “At the time of the inspection, the inspector shall provide the operation's authorized representative with a receipt for any samples taken by the inspector.” *IDALS personnel collected samples for testing during 2013. A form was completed in each case that indicated what was collected, where and by whom. This form was signed by the operator. However, no receipt was left with the operators for the samples taken.*

Corrective Action: IDALS has made their Sampling Form in triplicate. Inspectors will leave a copy of the completed form with the operator as a receipt of the sample taken. Use of the new form began on July 22, 2014.

AUDIT INFORMATION

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| ACA Name: | Iowa Department of Agriculture & Land Stewardship (IDALS) |
| Est. Number: | N/A |
| Physical Address: | 502 East 9 th Street, Des Moines, IA 50319 |
| Mailing Address: | Same |
| Contact & Title: | Maury Wills, Organic Program Director |
| E-mail Address: | Maury.wills@idals.state.ia.us |
| Phone Number: | 515-281-5783 |
| Auditor(s): | Jonathan D. Melvin, Regional Accreditation Manager (RAM)-Central Region |
| Program: | USDA National Organic Program (NOP) |
| NOP Audit Date(s): | September 9th to October 26, 2011 |
| Audit Identifier: | NP1164NNA |
| Action Required: | No |
| Audit Type: | Corrective Action Audit pertaining to the Surveillance – Accreditation Renewal Audit |
| Audit Objective: | To verify continuing compliance to the requirements of the audit criteria. |
| Audit Criteria: | 7 CFR Part 205, National Organic Program, Final Rule, December 21, 2000. |
| Audit Scope: | The company's quality manual including personnel, processes, procedures and related records. |
| Location(s) Audited: | Desk |

IDALS's first rounds of corrective actions were received by the NOP for review on September 9, 2011. On September 12, 2011, the submitted corrective actions were reviewed and found to be inadequate. A request for additional information from IDALS was sent and these corrective actions were received by the due date of September 16, 2011.

FINDINGS

The corrective actions submitted and reviewed were shown to be "Submitted and Accepted" for the one outstanding non-compliance and one new non-compliance identified during the Surveillance-Reaccreditation Renewal Audit. These corrective actions will be reviewed for implementation at the next on-site audit.

NP9201EEA.NC1 – Submitted and Accepted. NOP §205.406 (b) Continuation of certification states, "Following the receipt of the information specified in paragraph (a) of this section, the certifying agent shall within a reasonable time arrange and conduct an on-site inspection of the certified operation pursuant to §205.403." *Records indicate that the time from initial application or renewal application to final certification does not meet this requirement. Records show that in at least one certification of a livestock/crop operation where application was received on March 14, 2008; the initial review was performed on October 03, 2008; the inspection was performed on November 14, 2008; the inspection report was submitted on November 26, 2008; the final review was performed on April 28, 2009; and the*

final decision on certification was performed on April 28, 2009. Additionally, ten other files were evaluated for the times from renewal request to final certification. The following time-lines were identified: a) 3 files – 8 months; and b) 7 files – 14-23 months. The findings do not represent a reasonable time to achieve continuation of certification. **Corrective Action:** IDALS has identified files that have not been serviced in a timely manner in 2009 and are determining the reason for delay. Letters of Non-compliance and Proposed Suspension will be issued to clients who have not submitted requested materials by the stated date and hopefully this will urge clients to submit required materials so that inspections may proceed in a timely manner. Otherwise a Notice of Suspension will be issued when authorized by the NOP Compliance Team. Additionally, IDALS plans to improve the system for monitoring the status of each file by either enhancing or replacing the existing database. IDALS will work with department staff that is qualified to assess and develop such a database program for tracking file activities. Organic Program staff will be trained on this system and various monitoring and response functions will be delegated to specific staff members. **Verification of Corrective Action:** Review of client files indicate that in seven of nineteen files, the certification decision was made more than six months after the renewal information was received from the client. IDALS requested additional information from clients after inspections were made which slowed the process for recertification. Letters of non-compliance and proposed suspension were issued for clients who did not submit the requested materials in the time frame that was set by IDALS, but IDALS staff did not follow up on the timeliness of any further submissions. Hence, the certification decisions were delayed. **Corrective Actions:** IDALS submitted corrective actions indicate that one staff person is monitoring the internal database to make sure that each step of the certification process is being done for each applicant in a timely manner. If files have been overlooked or delayed for some reason, she checks with the staff member who is holding the file to determine what must be done to move it along...staff member identifying the issue is maintaining a tracking system for those specific issues; and that person logs continued contact with the producer or processor in an effort to see the task completed. A full evaluation of effectiveness of these modifications will be completed after the 2011 year. Second improvement in the IDALS system noted by IDALS is that IDALS now contract with an independent organic inspector to conduct farm inspections. This allows IDALS to complete inspections in a timely manner but allows IDALS to reassign the staff person whose time was split because of retirements to file review and inspections to only file reviews. The corrective actions provided have been submitted and accepted.

NP1164NNA.NC1 – Submitted and Accepted. NOP §205.405 (a) Denial of certification states, “When the certifying agent has reason to believe, based on a review of the information specified in §205.402 or §205.404, that an applicant for certification is not able to comply or is not in compliance with the requirements of this part, the certifying agent must provide a written notification of noncompliance to the applicant. When correction of a noncompliance is not possible, a notification of noncompliance and a notification of denial of certification may be combined in one notification.” *Review of certification files revealed that IDALS denied certification to one client who had requested certification for crops. IDALS issued a letter of non-compliance and denial of certification in one notification. The client corrected the non-compliances and submitted a description of the corrective actions to the certifying*



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agent. IDALS reviewed the corrective actions submitted and granted certification. A combined letter of non-compliance and denial of certification can only be issued when correction of the non-compliances is not possible. In this case, IDALS did not follow the procedure as outlined in the NOP Final rule.

Corrective Actions: IDALS submitted corrective actions indicated that the combined Notice of Non-compliance and Denial of Certification issued in error was atypical for the program. A copy of the modified Policy Manual Section 7.8, was submitted which specified procedures related to issuance of a Notice of Non-compliance and Denial when combined in one notification for clarification. In addition, an example of this type of Notice was provided. The corrective actions provided have been submitted and accepted.