

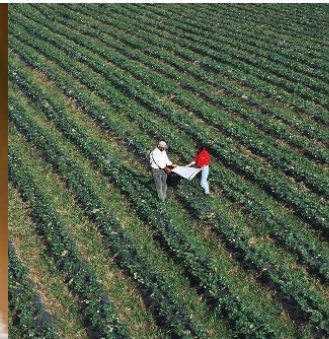


Audit Reminders

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National Organic Program





Audit Reminders

- Updated NOP 2000 (version 9),
Instruction – Accreditation Policies and
Procedures.
- What are Review Audits?
- Inspector Verification Activities
- Accreditation Renewals



Updated NOP 2000 – What you need to know



Cessation of Certification Activities (Section 16.7):

- *AIA will work closely with certifiers before the date of suspension, revocation, or surrender.*
- *Ensure certified operations have:*
 - ✓ *found new certifiers, or*
 - ✓ *in the process of surrendering their certification*
- *Certified operations that do not respond, will be issued notices of noncompliance, followed by adverse actions.*

NOP 2000 – What you need to know



Complaints (Section 18):

- *Complaints regarding NOP AIA Accreditation Activities and Certifiers*
- *Procedures for filing a formal complaint*
- *Complainant will be informed of complaint status within 10 days*
- *AIA will address the complaint and provide written notification to the complainant*



What are Review Audits?

What are Review Audits?



- *An audit activity typically conducted during a certifier's on-site mid-term or renewal assessment.*
- *Not a witness audit*
- *Broadly scoped visit by the NOP auditor to a certified operation.*
- *Primary focus is to assess the certifier's oversight activities of the operation*

What are Review Audits? cont....



- *The NOP auditor will assess the operation's OSP, inspection report, and other relevant certification documents.*
- *Interview the operator (or personnel) and document observations at the operation's site(s).*
- *NOP auditors may use Review Audits to investigate issues identified during or before the on-site assessment audit.*

What are Review Audits? cont....



- *A certifier representative may attend as an observer*
- *NOP 2005-6 – Review Audit report*



Inspector Verification Activities



§ 205.403 (c)(1) Verification of Information. The on-site inspection of an operation must verify...the operations compliance or capability to comply with the Act and the regulation in this part...

The NOP expects verification activities to include:

- ✓ Trace-back sampling*
- ✓ Mass Balance (in/out) calculation(s)*



Trace-back sampling

- ✓ *Following a specific piece of financial information back to its originating document by following its audit trail*
- ✓ *Usually an inspector would start with a sales invoice or actual product (eg. retail labeled)*
- ✓ *Linking documents by lot number or other mechanism*
- ✓ *Document trail reveals the handling of the product and record keeping system of the operation*



Mass Balance (in/out) calculation(s)

- ✓ *Accounting for material entering and leaving an operation*
- ✓ *Assessing the yield for a farm(harvested product/acreage)*
- ✓ *Assessing the use of a purchased ingredient in a final product compared to the volume sold of the product*
- ✓ *Calculated over a period of time*



NOP Auditors are finding that:

- ✓ *The traceback and mass balance activities are not being conducted and documented consistently*
- ✓ *When the activities are conducted, they may not be thoroughly documented in the inspection report (check box)*
- ✓ *Documentation to verify the activities*

Inspector Verification Activities



Solutions:

- ✓ *Provide inspectors with instructions and guidelines for conducting verification activities.*
- ✓ *Provide inspectors with templates to record these verification activities and results.*
- ✓ *Provide training to certification staff and inspectors.*



Resources:

- *Training – including IOIA courses (<http://www.ioia.net/>)*
- *Accredited Certifiers Association 2015 presentation*



Accreditation Renewals

Accreditation Renewals



- How do I know when I need to submit my renewal application?
 - You will receive an email notification from NOP with instructions to submit your renewal application.
 - Annex 1 (NOP Accreditation Renewal Checklist)

Accreditation Renewals



NOP Accreditation Renewal Checklist Annex 1

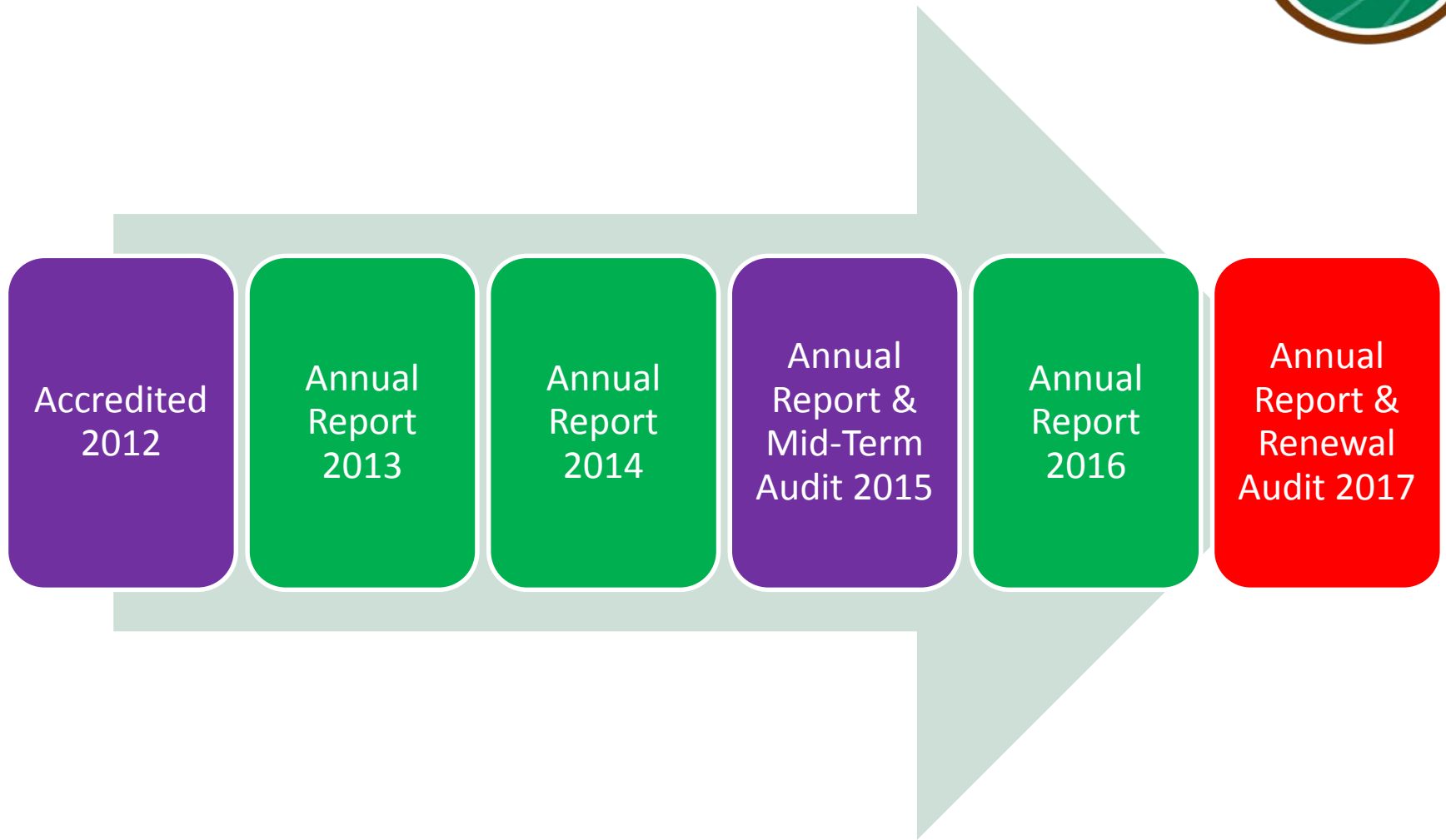
NOP Form ID	NOP Document	Enclosed X	Official Use Only
LPS-109	Application for Service		
TM-10CG	Application for Accreditation (<i>Attachments are covered below in "Certifier Document Title(s)"</i>)		
NOP 2005 Table 8	Personnel Information Worksheet		
NOP 2005 Table 9	Certifier Offices and Locations		
NOP 2005 Section I	Certifier Information		
	A \$500 check made out to "USDA AMS Livestock Program." <i>Submit a copy of the payment with this application to NOP.</i>		
<p>Please complete, sign (if applicable), and submit the above forms along with this checklist to the NOP via email to: AIAinbox@ams.usda.gov The \$500 check payment should be sent to: USDA, AMS Livestock Poultry and Seed Program, QAD P.O. Box 790304, St. Louis, MO 63179-0304</p>			
Certifier Document ID(s)	Certifier Document Title(s)	Enclosed X	Official Use Only
	Current Fee Schedule(s)		
	For a government entity, a copy of the official's authority to conduct certification services under 7 CFR Part 205.		
	For a private entity, documentation showing the entity's status and organizational purpose, such as articles of incorporation and by-laws or ownership or membership provisions, and its date of establishment.		
	Quality Manual		
	Certification Program Manual		
	List of Quality control documents		
N/A	Quality control document templates (Notice of Noncompliance, Organic certificate, Inspection Report, etc...)		
	Current List of certified operations (January 2 nd submission format)		
	Most current Annual Review Report including proposed program changes in response to the results of the annual review		
<p>Submit the Certifier documents by contacting your NOP Accreditation Manager and requesting access to the USDA CloudVault to upload your files. When the review of your application is assigned to a NOP auditor, they will contact you with further details in order to complete the desk and on-site stages of the accreditation assessment.</p>			

Accreditation Renewals



- If you would like to move your onsite renewal audit to 2016, please contact your Accreditation Manager.

Accreditation Timeline



Questions?

