

Formal Recommendation
From: National Organic Standards Board (NOSB)
To: the National Organic Program (NOP)

Date: April 30, 2021

Subject: CACS Human Capital Management Strategy for Recruitment and Talent Management

NOSB Chair: Steve Ela

The NOSB hereby recommends to the NOP the following:

Rulemaking Action:

Guidance Statement: X

Other:

Statement of the Recommendation:

The NOSB recommends the NOP further explore and support the recruitment and retention of qualified organic inspectors and reviewers through the following avenues: By encouraging consistency in contracting and employment practices by certifiers, the NOP can help recognize the professionalism of inspectors and their standing in the industry. This may also include fostering opportunities for inspectors to access pooled insurance purchase opportunities, reduce the amount of constant travel, build a consistent mentorship program so inspectors can flow from training to working, and encourage certifiers to set standard pay rates so that inspectors compensation increases commensurate with their experience.

Rationale Supporting Recommendation (including consistency with OFPA and Organic Regulations):

The organic industry is consistently growing and with every new operation comes the need for an annual organic inspection. Due to the annual inspection requirement in OFPA, to keep pace with organic industry growth, the recruitment and retention of an organic inspector and reviewer workforce is essential.

NOSB Vote:

Motion to accept the proposal on Human Capital: Strategies for Recruitment and Talent Management - Organic Inspectors and Reviewers

Motion by: Nate Powell-Palm

Seconded by: Mindee Jeffery

Yes: 14 No: 0 Abstain: 0 Absent: 0 Recuse: 0

Motion Passed

National Organic Standards Board
Compliance, Accreditation & Certification Subcommittee Proposal
Human Capital: Strategy for Recruitment and Talent Management - Organic Inspectors and Reviewers
January 12, 2021

Background

In order to advance dialogue on the qualifications and training of organic inspection and reviewers, the National Organic Program (NOP) issued a July 31, 2020 Memorandum to the National Organic Standards Board regarding Human Capital Strategy for Organic Inspectors and Reviewers. Subsequently, the NOSB posted a Fall 2020 Discussion Document on Human Capital Strategy for Organic Inspectors and Reviewers to invite public comments and suggestions on this topic.

Discussion

During the Fall 2020 NOSB meeting, the board received valuable feedback from the International Organic Inspectors Association (IOIA), certifiers, inspectors, reviewers, and other stakeholders on strategies for recruiting and maintaining competent highly trained inspector and reviewer teams. It was universally acknowledged by IOIA, certifiers, and experienced inspectors that there is a decreasing number of qualified individuals who desire to be organic inspectors and reviewers, leading to a potential crisis in the inspection/reviewer pool of qualified individuals. After the Fall 2020 meeting, the CACS subcommittee reached out to IOIA, several certifiers, and to individual inspectors and reviewers to obtain further clarification about their perceptions of decreasing numbers of qualified inspectors from the organic certification industry and suggestions for addressing the expressed concerns. Effort was made to contact both large scale and small-scale certifiers, and experienced and new inspectors and/or reviewers.

Contact was made with currently employed and contract inspectors as well as some who had recently left organic inspection work. All were asked the following:

1. What made you choose to become an organic inspector and/or reviewer; and
2. To those who have left the profession, why did you leave, or are contemplating leaving the profession?

The answers were aggregated to protect the identity of those who answered the questions.

I. The Challenge

Several reasons for the decline in inspectors/reviewers were identified as:

- **Constant Travel Time**
 - Younger beginning inspectors stated that the constant travel to be successful inspectors is their number one reason for leaving, or contemplating leaving active inspection work. They stated that the valuable time lost with their young children is not worth the money gained from the inspection work. One inspector stated that to make a “living” at doing organic inspections, there must be a commitment to traveling a minimum of 60% of their time, leaving little time for family and friends.
 - Older, more experienced inspectors stated that the wear and tear on their bodies from the constant travel is beginning to be too much to tolerate. Older inspectors are moving to doing more reviews or higher paid consultant positions.

- **Professionalism**

- Inspectors stated that the organic inspection industry is not viewed as being “professional.” Some inspectors stated that there is a vast difference in how they are treated when doing organic inspections as opposed to doing other related types of inspections, e.g. food safety inspections, non-GMO ID inspections, and gluten-free inspections. This feeling is not only conveyed to the inspectors by the inspected entities, but some also express that the certifiers of other standards are much more respectful than organic certifiers.
- That same feeling of non-professionalism is evident in the amount of pay the inspector receives for doing organic inspections versus doing the other types of inspections. One inspector recently left the organic inspection industry to exclusively do food safety audits. She stated that she can make double and sometimes triple the money for the same amount of work for food safety audits. Another inspector/reviewer is leaving organic inspection/review work to become a reviewer for a gluten-free certifier. She stated that the work is much simpler with less headaches than doing organic reviews, while receiving significantly more pay.
- Inspectors feel they are not valued as part of the certification team. This feeling was expressed by contract inspectors, but not so often heard from employee inspectors. Contract inspectors stated a feeling of poor communication and feedback from the certifiers and reviewers.
- A positive note was shared by one inspector who stated that it is not mandatory for an otherwise qualified inspector to enter the industry with a college degree. The requirement of a college degree by some is a limiting factor as there are plenty of individuals with “common sense” and agricultural background who can be easily trained to complete crops and/or livestock organic inspections.
 - This inspector further noted however, that threats to professionalism exist when inspectors with a lack of specific skill sets are allowed and sometimes encouraged by a certifier needing a particular inspection completed, to start conducting complex multi-ingredient processing operations without the real knowledge needed to assess critical contamination or commingling issues. Threats to human capital exist when the same individuals with poor skill sets are allowed to continue conducting the inspections for which they have no real training or understanding of the industry, thus bringing down the credibility to the organic industry as a whole and to other inspectors operating at a higher level of certification.

- **Compensation for Experience**

- There is little to no difference in pay for an inspector that has many years of inspector experience than what is paid to a new beginning inspector. Experienced inspectors sometimes receive the same pay that they received ten-fifteen years ago. If an experienced inspector tries to increase their hourly rate, they find that their inspection numbers are negatively affected as the newer inspectors are assigned or awarded the inspections at a lower hourly rate.
- Inspectors noted going through a bid process requiring them to pre-determine rates of pay and travel expenses on a contract basis. One inspector said, “I feel that I consistently have to underbid my own worth as I know that I am bidding against other less experienced inspectors who are more willing to take a lessor rate of pay.”

- **Continuing Education**
 - There is no reimbursement available to new and beginning inspectors who make the effort to increase their organic inspection knowledge. To become an organic inspector, it costs a significant amount of money for the initial training and credentialing to make the first call to a certifier. Trainings are currently offered by only one recognized entity in the US which generally offers the trainings only twice per year. Trainings are not guaranteed if the classes are not filled. Most of trainings are conducted in the upper Midwest or on the West coast, adding additional travel expenses for trainees outside of these regions. After completing training, the potential new inspector is expected to go through an apprenticeship period under an experienced inspector prior to being hired.
 - Some certifiers of other standards offset the costs for the inspector who will also conduct organic inspections, but in doing so, they require a commitment from the inspector to work for them for a set amount of time.
 - One inspector noted that after they completed a 5-day per scope training with the organic training entity, they had a good understanding the NOP regulations, but still felt unprepared for the critical thinking and risk assessment skills needed to accurately perform inspections independently.
 - Experienced contract inspectors are expected to continue their organic certification education, again at their own expenses. In contrast, professional individuals in other fields have the Continuing Education Units (CEU)'s paid by their employer so that their knowledge is current. This concern was not cited by employee inspector/reviewers as their certifier employer will often pay for them to take continued training classes.
 - Many expressed the need for a strong one-on-one field mentorship program whereby experienced inspectors share their years of inspection expertise to beginning inspectors. Other inspectors acknowledged the need for mentoring new inspectors but stated that they were unwilling to become mentors because of the number of hours required to provide the one-on-one, uncompensated mentorship.
- **Cost of Insurances (Personal and Family Medical, Vehicle and Professional Liability, and Errors and Omissions)**
 - The cost of personal and family medical insurance, increased vehicle and professional liability insurance, and the cost of errors and omissions insurance is often prohibitive to new and experienced inspectors. One inspector interviewed stated that the cost for errors and omissions insurance is over \$1000 annually. Another stated that they were required to obtain a \$1 million car insurance policy when the agency they work for learned the number of miles required to be driven to conduct organic inspections. The cost of medical insurance is terribly expensive when buying it without a group plan. The cost of offering an employee benefits package for new inspector employees prevents many certifiers from adding new inspector employees to their staff.
- **Lack of Consistency between expectations of certifiers**
 - Some respondents noted there is a real weakness generated in the inspection field when each certifier creates its own versions of an inspection report. The diversity in report requirements is astounding. Some certifiers require the inspector to merely check yes or no boxes, others require detailed reporting on observations and paper documentation to be obtained while on site, and others require a hybrid between the two formats in reporting. Some certifiers require photos taken at the location, but most do not. As a result, inspectors are required to learn each type of inspection reporting details for each certifier.

II. Proposed Strategies

The CACS Subcommittee asked stakeholders for proposed strategies to alleviate the potential crisis of a shortage of organic inspectors and reviewers. Some responses follow:

- Develop working groups between organic industry leaders, such as the Accredited Certifiers Association, IOIA, Organic Trade Association and other trade associations. These working groups could develop collaborative strategies to increase the trained inspector pool.
- Collaborate with secondary education and other governmental entities to provide organic inspector training and apprenticeship programs. Tracks could be generated within colleges offering organic and sustainable agriculture to highlight inspection careers. An inspector track could offer classes in organic laws and regulations and how to interpret these in practical settings, instruct on process controls and mass balance, agronomic inputs, and stocking rates, and a host of other skills and knowledge essential to the trade.
- Funding for inspector training potentially could be tapped from the federal Workforce Innovation and Opportunity Act (WIOA) to provide the trainings to displaced workers, discharged veterans, and other socially disadvantaged individuals.
- Make use of virtual organic trainings using ZOOM and/or other web-based platforms to teach the basics of organic inspections. Some noted that this is an effective way to teach the basic regulations and theory but questioned the lack of hands-on experience gained from shadowing experienced inspectors in the field to develop the “inspector eye” for determining organic compliance.
- One-on-one mentoring programs are essential for developing a well-trained inspector. Some suggested that additional funding from NOP or industry leaders could be sourced to reimburse the mentor for the time spent mentoring new inspectors to develop the necessary skills needed to become successful inspectors.
- Several commented that the organic industry needs a greater awareness of the value of experienced inspectors. If/when the organic industry understands the value of the organic inspector to organic integrity throughout the supply chain, the industry might be willing to provide a wage reflective of organic inspectors’ essential role in the trade. This would alleviate much of the expressed frustrations from so many inspectors: lack of respect from industry and certifiers, compensation comparable to what they receive from other inspection work, ability to obtain quality insurances, etc. Perhaps this education could be coordinated by industry groups such as the Organic Trade Association (OTA), National Organic Program (NOP), National Organic Coalition (NOC), Organic Consumers Association (OCA), Accredited Certifying Association (ACA), and others.

Questions for Stakeholders

1. What have you experienced or witnessed that contributes to the shortage of organic inspectors/reviewers?
2. What are some additional strategies that can be employed to increase the numbers of organic inspectors and reviewers?
3. Are there appropriate ways for the National Organic Program to assist with the financial burdens of?:
 - a. Initial cost of becoming a trained organic inspector.
 - b. Costs of continuing education for existing experienced inspectors, and
 - c. Compensation for organizations and/or experienced inspectors to provide qualified one-on-one mentorships to beginning inspector/reviewers.

Vote in Subcommittee:

Motion to accept the proposal on Human Capital: Strategies for Recruitment and Talent Management-
Organic Inspectors and Reviewers

Motion by: Sue Baird

Seconded by: Kyla Smith

Yes: 6 No: 0 Abstain: 0 Absent: 1 Recuse: 0

Approved by Nate Powell-Palm, Subcommittee Chair, to transmit to NOSB January 12, 2021