Directive

9180.37

February 27, 2006

VISUAL INSPECTIONS

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1. PURPOSE

This directive establishes procedures for performing "visual inspections" on select analytical factors analyzed on domestic shipments of grain, rice, and graded commodities.

2. REPLACEMENT HIGHLIGHTS

This directive is revised to correct an error in the text regarding program limitations.

3. BACKGROUND

In May, 2002, the Grain Inspection Advisory Committee asked the Agricultural Marketing Service (AMS) to evaluate the efficiency and effectiveness of our current Quality Assurance/Quality Control (QA/QC) and oversight programs. To comply with the Grain Inspection Advisory Committee request, AMS contracted a third party to examine the QA/QC and oversight programs to determine if AMS's methods and structures are effective, efficient, and appropriate.

One of the recommendations made in the report focused on the implementation of alternate picking procedures, such as reduced sample size or throw samples, under defined circumstances. Current procedures for "picking" grain samples for damaged kernels ensures an accurate quantification of damage. However, there are times when the customer may value timeliness of results over accuracy in estimating the amount of damage.

AMS has determined, after a successful field test of this procedure, to establish guidelines to implement a visual inspection process.

4. PROGRAM LIMITATIONS

Visual inspection is permitted for non-export shipments, and is limited to:

- a. Visual/subjective factors (e.g., damage, subclass). This does not include technician factors (e.g., shrunken and broken kernels), objective factors (e.g., moisture), or official criteria factors (e.g., stress cracks in corn).
- b. Factors not required to be shown on the certificate by the regulations under the United States Grain Standards Act (USGSA) and Agricultural Marketing Act of 1946 (AMA). This does not include cargo shipments (ships and barges) or grade determining factors. Refer to section 800.162 of the USGSA Regulations and to section 868.72 of the AMA Regulations.
- c. Factors that do not affect the sale price of the shipment.
- d. Lots that are inspected and certified as single lots (e.g., individual trucklots, submitted samples). Multiple carriers certified as a combined lot, lots loaded under the CuSum loading plan, and other lots loaded where averaging of quality factor results is required are not available for visual inspection.

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5. PROGRAM CONTROLS

- a. To participate in the visual inspection program the inspection office must:
 - (1) Develop Standard Operating Procedures (SOP) that outline the scope of the program, define responsibilities of official inspection personnel, and include an internal quality control process.
 - (2) Inform the applicant for service when the visual analysis is used.
 - (3) Forward the SOP to the supervising field office for review and subsequent approval before performing visual inspection analysis.
 - (4) Identify the factor(s) that were visually inspected on the work records. For example, if visual analysis was performed for the factor damaged kernels, the pan ticket must be marked with a signifier, such as the letter V for visual analysis, in the damaged kernels factor block, under the visual analysis result.

b. Field offices will:

- (1) Monitor the visual observation results based on QA/QC samples.
- (2) Provide the Official Agency Manager and Agency Quality Assurance Specialist with specific feedback concerning the accuracy of visual inspection analysis.
- c. Failure to follow the locally established SOP will result in the disapproval of the visual inspection procedure at the inspection location.

6. CERTIFICATION OF RESULTS

Visual inspection results are reported on the inspection certificate without any special notation as to the method of determination.

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