



United States Department of Agriculture

Agricultural Marketing Service

National Organic Program

Iowa Department of Agriculture and Land Stewardship

502 East 9th Street, Des Moines, IA 50319

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, Wild Crops, Livestock and Handling Operations


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

Status of this accreditation may be verified at <http://www.ams.usda.gov>

CERTIFICATE OF ACCREDITATION



Certificate No: **NP7205JZA**
Effective Date: **April 29, 2017**
Expiration Date: **April 29, 2022**


Ruihong Guo, Ph.D.
Acting Deputy Administrator
National Organic Program

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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

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.

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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

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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.

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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

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

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.