

“The Path to Sound and Sensible Organic Inspections” Overview and Training Guide

The Agricultural Marketing Service, National Organic Program (NOP) is pleased to announce the launch of a new interactive scenario-based training program for organic certifiers and inspectors: [The Path to Sound and Sensible Organic Inspections](#).

Overview

The training follows an organic inspector through an annual inspection with a certified organic farmer. Using a series of “choose your own adventure” scenarios and interactions, the training teaches sound and sensible inspection principles in a practical and engaging way – showing what happens when the inspectors makes the right choices in the course of an inspection, and what happens when a better choice could have been made.

The target audience for this training is USDA-accredited organic certifiers and their organic inspectors.

Training Topics

This training covers a number of real-world situations encountered during typical organic inspections. Scenario-based topics include:

- Conducting an Opening Meeting –Encountering Unexpected Information
- Conducting a Farm Tour
- Finding Discrepancies in the Organic System Plan
- Finding a Problematic Boundary – Asking the Right Questions
- Collecting Samples
- Reviewing Records – Selecting Records
- Conducting Audit Trail Exercises
- Conducting an Exit Interview
- Conducting an Unannounced Inspection

How to Use the Training

Basics: The NOP encourages its organic certifiers to build this training into their continuing education requirements for organic inspectors. It takes approximately 1 hour to complete all the scenarios, and the training can be completed by anyone with a computer and internet connection. Access the training at: <http://willinteractive.com/play/the-path>.

Advanced: While the training is a self-contained program, certifiers can use the training in a group setting or follow-up with training participants completing the training independently.

Here are examples of possible training designs:

| Training Set-Up | Training Approach or Exercise |
|--|---|
| <p>Group Training. Convene a small group of participants for the training (e.g., a group of inspectors or a group of certification staff).</p> | <p>Facilitated Discussion. Play the training program on a screen with the group, watching each scenario together. As options appear on screen, facilitate a brief discussion about which option is the correct one, and what will likely happen. Also discuss which options are incorrect and why. Watch the subsequent scenes to confirm the group’s response. Note discrepancies between what the group said and what the video shows.</p> <p>For the “bad path” segments, discuss the possible consequences of having approached it incorrectly – what might have been missed? At the end of the training, watch the scenes that show the cost of those choices to assess how well the group anticipated the outcomes.</p> |
| <p>Individual Inspector Training. Assign the training to individual inspectors and assign Homework Option A or B to verify their completion of the program.</p> | <p>Homework Option A: Provide inspector with a blank inspection report template and instruct them to create an inspection report using information gained from the training. The inspector will need to take notes, identify problems identified during the inspection, and present their work in the form you expect for any inspection. Check their work to confirm that the participant captured all the possible problems seen at the inspection.</p> <p>Homework Option B: For a simpler option that still verifies course completion, instruct participants to create a list of possible findings they would report back to the certifier from the two inspections (full and attempted), based on the full video.</p> |
| <p>Certifier Staff Training. This modification extends the training to address the follow-up steps that certifier staff might take based on the inspector’s report.</p> | <p>Option A: As a group, review the set of information that the inspector provides to the certifier after the inspection (see Appendix A below for a list). Discuss what type of letter or notice, if any, should be sent to the two operators as a follow-up. Discuss the correct regulatory citations, the evidence supporting any noncompliance, and a justification for the type of letter/notice.</p> <p>Option B: Test certifier staff by having them watch the training and then generate a letter or notice to the operation based on the inspection results. There will be two deliverables: one that relates to the full inspection and one that relates to the termination of the unannounced inspection.</p> |

**Appendix A: The Path to Sound and Sensible Organic Inspections
Inspection Issues Worksheet/Key**

Guide to Use: The following list summarizes the issues encountered by the inspector during “The Path to Sound and Sensible Organic Inspections.” The table below can be used in the following ways:

1. The first column can serve as an answer key for the certifier, to assess whether training participants correctly identify all the issues that emerge during both the completed and unannounced inspections.
2. The table below can be used as a worksheet with training participants.
 - Trainees log the issues they see in the training (delete the content in the first column for this option) and then identify the citations and next steps.
 - Trainees are provided the issues list below and must identify any associated regulatory citation and possible next steps the certifier should take.

Instructions for Certifier Training: For each issue, mark the USDA organic regulation citation that may apply (or none if applicable), and your recommendation of what should happen next:

| Issue Area Identified Through Training | Possible Regulatory Citation(s) | What Next? |
|---|---------------------------------|------------|
| <p>Issue 1: During the annual inspection, the inspector learns that the organic operator added production fields without informing the certifier. The Organic System Plan (OSP) has not been updated and a revised plan was not shared in advance of the inspection with the certifier. The farmer provides the inspector with documentation to show that no prohibited substances have been applied to the new fields in the required three-year transition period.</p> | | |
| <p>Issue 2: A field in organic production does not have a buffer between it and an adjoining field that belongs to a neighbor. The organic farmer has informed his neighbor that prohibited substances can't be applied to land in organic production, but in the course of the inspection, it is clear that the neighbor may be applying prohibited substances and that drift is likely to be occurring.</p> | | |

| Issue Area Identified Through Training | Possible Regulatory Citation(s) | What Next? |
|---|---------------------------------|------------|
| <p>Issue 3: An organic field does not have a buffer between it and an adjoining field that belongs to the county. The farmer reports that the county regularly sprays its property for weeds and mosquitos.</p> | | |
| <p>Issue 4: The inspector accepts samples that the farmer collected, rather than collecting the samples herself.</p> | | |
| <p>Issue 5: The farmer is running a split operation and does not have complete records for his organic seed. Planting records don't show a clear link from seed to field.</p> | | |
| <p>Issue 6: An organic operator's planting rate on a given field appears insufficient for the amount of produce harvested. During the inspection, it is found that the farm ran out of organic seed, and non-organic seed was used. It turns out that the non-organic seed was genetically modified.</p> | | |
| <p>Issue 7: An inspector offer suggestions to an organic operator that go beyond technical assistance. The suggestions cross the line into consulting. Further, the suggestions create confusion for the operator about what is really required for compliance.</p> | | |
| <p>Issue 8: An organic operator essentially prevents an inspector from performing an unannounced inspection. The inspector informs the operator that the unannounced inspection must be performed and that failure to comply may jeopardize the operations organic certification.</p> | | |