



# **PUBLIC COMMENT**

**NOSB PROPOSAL**

**April 2021 Meeting**

**DOCKET #: AMS-NOP-20-0089**



April 1, 2021

Ms. Michelle Arsenault, Advisory Committee Specialist  
National Organic Standards Board  
USDA-AMS-NOP 1400 Independence Ave. SW  
Room 2642-S, Mail Stop 0268  
Washington, DC 20250-0268  
Re: Docket #: AMS-NOP-20-0089

Re: Compliance, Accreditation, & Certification Subcommittee (CACCS) Proposal, *“Human Capital: Strategy for Recruitment and Talent Management - Organic Inspectors and Reviewers”*.

Dear Ms. Arsenault:

IOIA appreciates the efforts the NOP and NOSB has made in bringing the Human Capital topic to the forefront of the organic industry.

As the leading worldwide training and networking organization for organic inspectors, IOIA has conducted thousands of virtual and on-site training programs since 1993 and trained hundreds of organic inspectors every year. Though a United-States based nonprofit 501(c)(3), IOIA operates globally with nearly 250 inspector members in over a dozen countries. Our basic inspection training courses are considered the industry standard for entry-level inspectors. In 2020, we trained 867 participants in 28 unique courses and 60 separate events.

To capture the authentic voice of inspectors, IOIA sent out a survey to inspector members, individual supporting members (most of whom have taken IOIA basic training(s) but not yet completed many inspections), and those on the Local Inspector Network list created during the Covid 19 pandemic. In total there were 53 responses. Though the majority were IOIA independent contractor inspector members, a small percentage of staff inspectors and non-IOIA members also participated. IOIA recognizes that our comment will heavily reflect the viewpoints of independent contractors, which is one of the reasons that we are advocating for a larger, more thorough State of the Industry study. Experience ranged from brand new trainees who hadn't yet conducted an inspection to an inspector with over 40 years of experience. Statistics and graphs from this survey are included within our comments.

In our comments, we first respond to the stakeholder questions and then comment on each of the identified human capital challenges. We have attached **Appendix A- NOSB IOIA US Basic Training Chart 2017-2019** to support our comments.

### **Questions for Stakeholders**

1. *What have you experienced or witnessed that contributes to the shortage of organic inspectors/reviewers?*

Based on historical feedback from inspectors and the survey conducted for this comment, the most significant reasons for a shortage of inspectors are ranked as follows.

**Inadequate Compensation** due to the rate of pay, the ability to get enough work, lack of benefits, and/or the seasonality of the job.

**Travel** and time spent away from home, family/friends, and in isolation.

**Lack of support and investment from certifiers/industry** as a general sentiment and/or as specific issues such as lack of support in finding a mentor/onboarding, lack of longer-term mentorship, and inadequate communication from certifiers. Several commenters described the high hurdle to get started. The cost of fully and adequately training and mentoring an inspector appears to be higher than what the market will actually bear, based on our experience. There are very few opportunities for funding support, and the lag time to recoup investment in training is too long and unreliable.

2. *What are some additional strategies that can be employed to increase the numbers of organic inspectors and reviewers?*

Based on historical feedback from inspectors and the survey conducted for this comment, the most notable strategies to increase the number and improve the quality of inspectors through recruitment and/or retention are ranked as follows.

**Increased Compensation** from higher pay rates, year round and/or reliable income. Pay scale and pay increases should be based on competence, experience, qualifications, and quality of inspections and reports. There should be uniformity within the industry for measuring these parameters. Inspectors should be paid for their travel time, travel expenses, time spent preparing for the inspection, time spent writing the report, and trainings required by certifiers.

**Training and Apprenticeship Programs** that are affordable and accessible. Mentorship/Apprenticeship Programs are needed to provide experience and hands on training. These programs must be practical, affordable, and accessible across the entire geographic region, including areas outside the US where NOP-accredited certifiers operate. It is critical for the industry to onboard fully-qualified inspectors more efficiently.

**Outreach** at agricultural schools and in farm communities also polled well in the survey. IOIA agrees that partnering with universities offers several benefits and should be explored. It is important that graduates of organic agriculture related programs are aware of inspection as a potential career. However, based on the attached IOIA data (see **Appendix A-NOSB IOIA US Basic Training Chart 2017-2019**), significant numbers of potential inspectors are currently being trained in diverse geographical regions. IOIA agrees that more could and should be done to attract a broader diversity of inspectors and to attract more inspectors from outside the organic community. However, the primary problem is not that we are training too few participants. It is that too few are successfully becoming inspectors. The survey supported this finding with a significant number of participants with IOIA basic training stating that they were unable to obtain work because they had not been mentored by an experienced inspector. One participant stated that they reached out to 25 certification agencies with only one response.

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*

**IOIA urges NOP funding for (a),(b),(c) and offers the following additional considerations relevant to inspector shortages.**

- **Feasibility studies for Apprenticeship and Credentialing Programs.**

Credentialing and Apprenticeship programs have been developed in the past by the IOIA and certifiers. Resources are needed to implement financially viable programs to ensure their programs' long term sustainability and accessibility.

  - **Credentialing program** – IOIA appreciates and supports that Strengthening Organic Integrity has embraced the requirement for qualified staff for the scale and scope of each operation. Creating universal, standardized, measurable metrics for determining the qualifications of an inspector to ensure that inspectors are assigned to inspections commensurate with their qualifications is critical to organic integrity. IOIA is asking the NOP to release funds to explore the option of a credentialing program as an option to meet this new requirement.
  - **Apprenticeship program** – On-boarding inspectors has been identified as a key bottleneck, due to lack of widely available, consistent, and quality mentorship.

- **Support for pilot programs with universities or colleges** that create access to a broader funding support (i.e., Pell grants, GI bill) would lower the barriers to entry-level training. There is broad industry support and very positive response in the IOIA survey to engaging with institutions of higher learning. Start-up funding from NOP could help make this happen. Modules or lessons on organic inspecting as a career could be created. The survey responses indicated that 65.31% had been involved in organic production or processing, and another 44.9% said they came into the career because another inspector suggested it. Just 6% said they learned about inspecting through a higher education program. These modules could be incorporated by colleges/universities into organic agriculture, horticulture, and food processing courses. Lessons on the organic regulations could also be developed with these institutions, using a variety of sources including the Organic Integrity Learning Center. IOIA strongly supports such initiatives; however, also strongly believes that basic inspection training must be taught by highly experienced inspectors. Inspector trainers must be proven educators experienced in both regulations and inspection; and rigorous apprenticeship or field training opportunities must be available.
  
- **A State of the Industry Study** that captures and publishes the data for a large percentage of inspectors and reviewers. IOIA conducted a short survey in the preparation of this comment and found the resulting information invaluable. Polling a larger and more diverse demographic of both current and former inspectors and reviewers would create an even more accurate and useful picture of the Human Capital resource in our industry. How many inspectors/reviewers are there? What is their demographic (years of experience, etc.)? How many are staff? How many are contractors? How much are inspectors/reviewers making? How many inspections/reviews do they do per year? How does compensation and travel compare to other similar-sector inspectors/auditors? How long do inspectors/reviewers usually “last”? Why do they leave? What are the comparative differences in the profile(s) of those who remain inspecting/reviewing longer than inspectors who leave the profession early in their career? What characteristics do inspectors/reviewer remaining longer in the profession share? The study could include in-depth interviews of career inspectors and reviewers. The study should include staff as well as independent contractors. Conducting surveys in the off season (December-March) and providing small stipends for those with more in depth involvement in the study would increase their ability to take part. Funding can also provide for a paid project manager or facilitator, compilation of data, and report preparation. Bringing in the perspectives of those who were trained but are not actively pursuing inspecting, those who left the career or industry, and more staff inspectors would be helpful.

- **Reduce duplicate annual training and increase consistency:** Industry norms require inspectors to attend many hours of certifier update training, often with no compensation for those hours. These trainings can be repetitive and inconsistent if a contractor works for multiple certifiers. Much could be done to coordinate update training among certifiers so that one inspector does not sit through several days of similar in-house certifier training. NOP could work with ACA and IOIA to provide guidance and funding for certifiers to reduce the barriers to working for multiple agencies. An inspector who works for multiple agencies adds to efficiency for certifiers and reduces travel for the inspector. Currently the burden of duplicative update training reduces interest among inspectors in working for multiple agencies.

## Challenges Identified in the Proposal

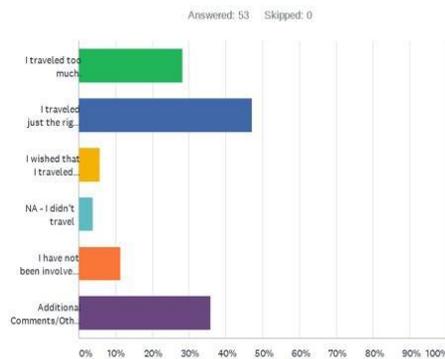
### Travel

IOIA acknowledges that travel will be a part of the job for most inspectors and agrees that this is likely one of the primary reasons that we lose inspectors.

#### Key Survey Takeaways

- Less than half (~47%) of the inspectors surveyed “traveled just the right amount”. However, almost 6% wished they traveled more and significantly less than half (28.3%) noted they traveled too much. Statistics and comments suggest that positive attitude and the ability to manage the amount of travel (often with inspecting part time) significantly influence the perspective and impact of travel.

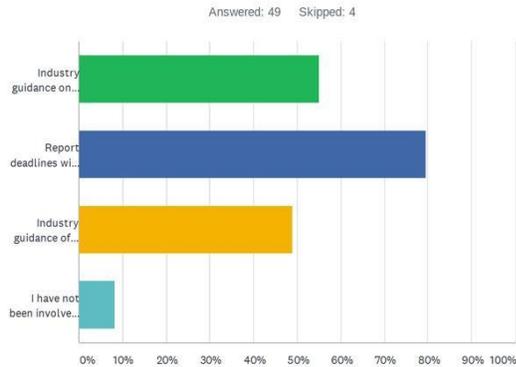
Q12 Prior to the Pandemic, what was the impact of travel on your quality of life?



ANSWER CHOICES	RESPONSES
I traveled too much.	28.30% 15
I traveled just the right amount.	47.17% 25
I wished that I traveled more.	5.66% 3
NA - I didn't travel	3.77% 2
I have not been involved in the industry long enough to answer	11.32% 6
Additional Comments/Other (please specify)	35.85% 19
Total Respondents: 53	

- 79.59% of inspectors surveyed supported “Report deadlines with enough flexibility to allow for efficient grouping of inspections.”

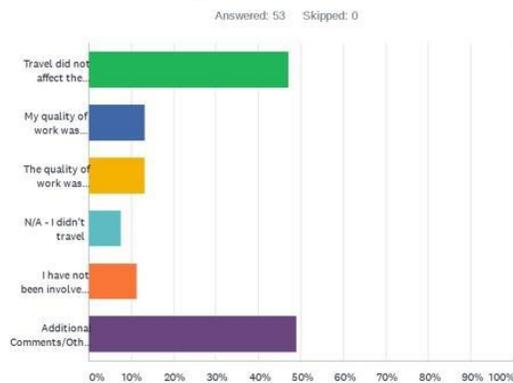
Q13 Which of the following guidelines do you support?



ANSWER CHOICES	RESPONSES
Industry guidance on realistic numbers of inspections/hours/days of travel.	55.10% 27
Report deadlines with enough flexibility to allow for efficient grouping of inspections.	79.59% 39
Industry guidance of paid rest days, report writing days while on the road.	48.98% 24
I have not been involved in the industry long enough to answer	8.16% 4
Total Respondents: 49	

- The major reason cited in the survey for so much travel was “live in an area without many certified operations”. Of note, less than half (47.17%) did not find that travel impacted the quality of their work. However, 13.21% chose options of work being impacted negatively by fatigue, and 13.21% from not having time to write reports until too long after the inspection.

Q11 Prior to the Pandemic, what was the impact of travel on the quality of your inspections?



ANSWER CHOICES	RESPONSES
Travel did not affect the quality of my work	47.17% 25
My quality of work was negatively affected because I scheduled too many inspections in a trip resulting in physical and/or mental fatigue.	13.21% 7
The quality of work was negatively affected because I did not have time while traveling to write reports and information was lost or forgotten	13.21% 7
N/A - I didn't travel	7.55% 4
I have not been involved in the industry long enough to answer	11.32% 6
Additional Comments/Other (please specify)	49.00% 26
Total Respondents: 53	

## IOIA's input on the Travel challenges

- **High Turn-over:** Though practices may be implemented to reduce loss of inspectors, it may be more realistic to anticipate a higher turnover than normal for inspectors. IOIA sees the greatest loss in losing an inspector as losing that experience, which can be a key component to increasing the quality of inspections.
  - **Solution:** Create more standardized metrics for determining the qualifications of an inspector, such as credentialing, to minimize the negative effect of high turnover and loss of experience that often affects quality. Use those metrics to make sure that inspectors are assigned to inspections commensurate with their qualifications. Though this action does not increase the number of qualified inspectors, it does mitigate the negative effects of high turnover and the resulting loss of experience.
  - **Solution:** To maintain a high standard of inspection quality, a primary focus of training should be on-site mentorship for both new inspectors and as continuing education.
  
- **Excessive Travel:** The travel generally required to be an organic inspector can be emotionally, physically, and financially grueling for an inspector.
  - **Solutions:** Though it is not likely that travel can be eliminated, there are ways in which travel can be reduced and/or the quality of inspections and quality of life improved.
    - Pay inspectors enough that they do not feel the need to schedule an excessive number of inspections into a short period of time. Packing too many inspections in too short of a time impacts report quality.
    - Since travel time is often paid at a significantly lower rate than inspections, or not at all, the more an inspector travels, the less money is made. This is a paradox to the typical workplace expectations, where travel is rewarded financially. We support a payment structure where “travel” is fairly compensated, not just the time spent physically moving from one point to another.
    - Continue hybrid (on-site/remote combinations) inspections to allow certain aspects of the inspections to be done remotely. If the inspector and operator are comfortable with the technology, some aspects of inspection can be done remotely with equal or better quality than on-site.
    - Industry guidance on how much travel/days on the road with flexibility for individual styles. Care would be needed to create a model that decreased exhaustion while increasing efficiency, quality, and ability to earn an adequate income. It is important to note that many inspectors highly value their ability to create their own scheduling system that works for them and their situation.
    - Assign review work to provide a break in constant travel, more consistent year round work, and improve the quality of inspection and review work. Many inspectors cite their work as a reviewer as essential training in how

to write quality reports. Conversely, reviewers often cite their time spent as an inspector or on shadow inspections as equally valuable.

- Certifiers should universally provide compensation for both travel time and travel expenses (hotel, mileage, meals, etc.). Encourage and compensate inspectors to stay in a 3 star hotel in safe locations that allow for safe travel. Meals should be at the GFS rate and mileage at the federal rate.
- Implement policies that allow for efficient trips. This includes assigning work far enough in advance that the inspection can be scheduled efficiently and having report deadlines that allow for adequate time to complete.
- For extended trips, include compensation for time to write reports.
- The Cooperative model may be a way to increase local work for inspectors and decrease travel. It reduces the barriers of on-boarding for a new certification agency when there is only the prospect of a minimal amount of work.
- Expect a significant percentage of inspectors to be part time as this allows travel at a manageable level. Almost 40% of the survey participants do not consider themselves to be full time inspectors (see graphs in Compensation section). The survey identified a key group of satisfied part-time inspectors - the second or third career inspectors. This group does not have the same income need from inspection and finds part-time work a great way to use their life-skills and limit travel to their comfort level. We must not forget this demographic when we focus on how to recruit and train inspectors.

## Professionalism

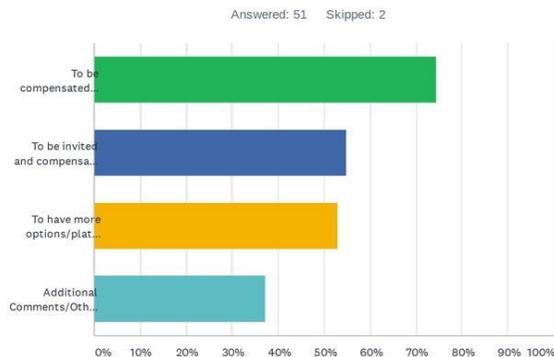
People invest in the things that they value. Inspectors are the gatekeepers of the industry and without quality inspectors, you can't have a good certification process or agency.

### Key Survey Takeaways

- Significantly, less than half of the inspectors have had negative experiences regarding being treated unprofessionally and with disrespect from certified operations, certifiers, or the industry at large (34.62%, 32.69%, 15.38% respectively). However, only 40.38% responded that they feel as if they are always treated with respect and professionalism. Two specific examples of disrespect were: (1) short notice cancellations without compensation, especially for independent contractors and (2) difficult interactions with certification staff that didn't have adequate knowledge of the operation, industry or regulations.

- 74.51% of inspectors responded that being compensated based on experience and quality of inspections would improve the inspection profession. More opportunities for inspector/certifier sharing and working groups were noted positively. Over half the participants polled that being invited and compensated to contribute to certifier policy and forums and/or to have more options/platforms to contribute would increase professionalism. Examples of positive activities that enhance a respectful relationship include the collaborative work of IOIA and ACA.

Q15 Would any of the following improve the inspection profession?



ANSWER CHOICES	RESPONSES
To be compensated based on experience and quality of inspections	74.51% 38
To be invited and compensated to contribute to the process of creating certifier policy and forms	54.90% 28
To have more options/platforms to be able to contribute inspector opinions to the industry.	52.94% 27
Additional Comments/Other (please specify)	37.25% 19
Total Respondents: 51	

- Only 24.49% of inspectors supported a listserv as a means of inspector/certifier communication. Certifiers may feel unable to make constructive criticism for fear of losing needed inspectors. Inspectors often fear retaliation in lost work if they are too vocal. A paid moderator/facilitator and/or chat room manager might help support meaningful and civil exchange in a non-confrontational manner that would allow for the collegial presentation of ideas and expressions of perception in a neutral setting.

### IOIA's input on the challenges

- Respect and value:** Inspectors can feel disregarded as entry level, low rank positions, and less valued than reviewers and other certification staff. Some inspectors feel that certifiers take them for granted and have relatively high expectations with little to no investment to support inspectors. In some instances, negative views of inspectors have become a cultural norm and inspectors are seen as scapegoats. Several inspectors have commented that they see recent improvement, especially since inspectors have received an invitation to the annual NOP training, the collaborative work on Contingency Plans for Verifying Compliance when On-site Inspections are not Possible with ACA, and the initiation of the Human Capital discussion.

- **Solution:** Continue to change the culture. Work within the industry (ACA, OTA, individual certifiers) to reinforce that inspectors and reviewers are the foundation of the industry.
  - **Solution:** Make inspectors partners. Share internal policies with inspectors and invite inspectors to contribute. Be intentional about asking inspectors for input on policies and forms and compensate independent contractors for their contributions.
  - **Solution:** Fully support inspectors when a client acts inappropriately. Our survey results showed the converse was a consistent source of frustration and resentment.
- **Time and Income:** It takes most inspectors years before they are able to obtain enough consistent work to be financially stable with a reasonable income. In addition, many inspectors are asked or required to give their time with no compensation. Inefficient report forms and unrealistic deadlines surrounding scheduling inspections and submitting reports were consistently reported as aspects that make inspections and travel inefficient. Many inspectors are unable to bill for much of this time. Inspectors are rarely able to collect any compensation when inspections are canceled on short notice. Many certifiers require a significant time investment for their training without payment. An apprenticeship is generally required before an inspector will be hired, but the industry expects experienced inspectors to dedicate a significant amount of time to train others, often with little to no compensation. People looking for a professional career tend to embrace stability and financial security and do not expect to work for free.
    - **Solution:** Pay rates should be sustainable for all inspectors and commensurate with experience and quality of inspections.
    - **Solution:** A viable career path as an inspector should be clear. IOIA strongly believes there are unique benefits to staff, independent contractor, and a co-op structure, and that each option presents different benefits and obstacles. All of these options should be explored and encouraged as sustainable career choices.
    - **Solution:** An apprenticeship program in which mentors are paid to focus on hands-on, real world aspects of inspecting is critical to the industry. Not only would this include on-site training, but offer support in how to dress, schedule, implement basic accounting, and technology tips and tricks. Such a program would set an inspector up for a higher level of success, improving their representation of agencies and the integrity of the organic industry as a whole.
    - **Solution:** Normalizing a more integrated role that includes both inspecting and review work has the potential to drastically improve the quality of work done by both inspector and reviewer as well as providing more stability for inspectors.
    - **Solution:** Training on general industry guidelines and changes should be standardized and certificates for those trainings submitted to agencies as a substitute for repetitive and sometimes inconsistent trainings conducted by individual certifiers. Participating in trainings on certifier specific policy and paperwork should be paid at the same rate as inspections.

- **Partnership:** Professionals want to be involved in an industry where quality, reputation, and integrity are esteemed and valued. Ensuring that qualified and knowledgeable inspectors and reviewers, capable of conducting inspections and reviews based on scale, scope, and complexity, will foster more respect and professionalism within the industry.
  - **Solution:** Create universal, standardized, measurable metrics for determining the qualifications of an inspector, such as credentialing, to ensure that inspectors are assigned to inspections commensurate with their qualifications.
  - **Solution:** Strengthening Organic Integrity has embraced the requirement for qualified staff. Successful implementation will give the NOP the capability to more thoroughly evaluate the content of inspector’s reports especially with regards to traceback and mass balance audits.
  - **Solution:** Certifiers can provide detailed feedback for both areas where inspectors excel and for specific areas of improvement. Targeted training can be assigned as corrective actions for areas that need remediation.

## Compensation

Income was overwhelmingly the most mentioned challenge to recruitment and retention of quality certification staff with a consistent negative effect threaded through all areas. IOIA agrees with ACA comments in their support for making organic certification affordable for all farm sizes while maintaining that a key component to organic certification is qualified staff. IOIA also feels strongly that the reduction in cost share available for certification creates pressure on inspectors and certifiers to under-report actual time and cost.

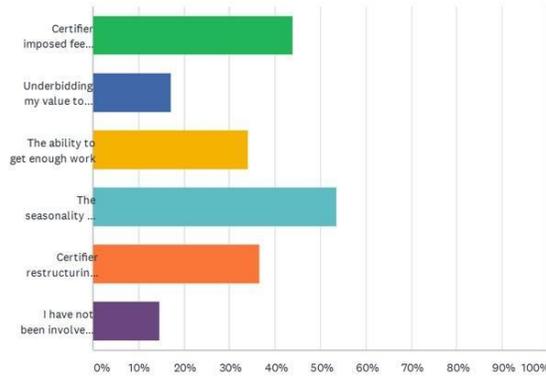
Based on historical feedback from inspectors and the survey conducted for this comment, the most strategic change to increase the number of inspectors and improve longevity is to increase compensation. Several inspectors noted that a predictable pay scale based on quality and experience would improve working conditions. Providing adequate quantities of work with payment commensurate with qualifications, competence, and experience would both incentivize organic inspections as a new career choice and increase retention of experienced inspectors.

### Key Survey Takeaways

- The survey showed that only 24% of inspectors felt that “Certifiers are very reasonable and easy to work with for fair payment”.
- “Seasonality of the Work” polled highest with 53% of inspectors noting that seasonality negatively affected annual income.
- “Certifier imposed fee schedules” was rated at 43.9% as impacting annual income negatively.

Q17 Have any of the following situations negatively affected your annual inspection income?

Answered: 41 Skipped: 12

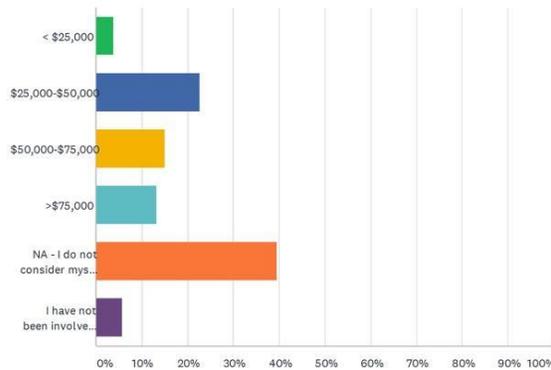


ANSWER CHOICES	RESPONSES
Certifier imposed fee structure	43.90% 18
Underbidding my value to obtain work	17.07% 7
The ability to get enough work	34.15% 14
The seasonality of the work (in a normal, non pandemic year)	53.66% 22
Certifier restructuring their inspector contracting/hiring process	36.59% 15
I have not been involved in the industry long enough to answer	14.63% 6
Total Respondents: 41	

- The \$25,000-\$50,000 income bracket polled the highest for annual income of a full time inspector with nearly 50% making less than \$50,000 a year. It should be noted as well that almost 25% of full time inspectors make over \$75,000 a year.

Q20 What is your annual net income for full time work? (after expenses and before taxes)

Answered: 53 Skipped: 0



ANSWER CHOICES	RESPONSES
< \$25,000	3.77% 2
\$25,000-\$50,000	22.64% 12
\$50,000-\$75,000	15.09% 8
>\$75,000	13.21% 7
NA - I do not consider myself a full-time inspector	39.62% 21
I have not been involved in the industry long enough to answer	5.66% 3
TOTAL	53

## IOIA's input on the challenges

- **General Income:** Compensation was noted as the most influential factor in the high turnover of inspectors. It often takes years for new inspectors to achieve a sustainable income level. Alternatively, some fee structures allow for cheaper and less qualified inspectors to outbid more qualified inspectors resulting in degradation of the value of organic certification.
  - **Solution:** The industry should have a “floor” for compensation. We recommend that the NOP release guidelines. We also recommend the industry wide continuation of these conversations in exploring these valuable questions through sharing our perspectives, working groups, and best practice documents.
  - **Solution:** Explore what other similar inspection/auditor positions pay for similar types of certification such as Gluten Free, GFSI, Animal Welfare, etc.
  
- **Seasonality:** Seasonality of work is a significant obstacle in obtaining a sustainable annual income for many inspectors. The “feast or famine” nature of the job also creates burn out by the end of the growing season or with the job in general.
  - Solution:** Farm focused certification agencies can offer handling inspections during the non-growing season if possible.
  - Solution:** Unannounced inspections for outdoor access, documentation, etc. can be offered in the winter/off-season.
  - Solution:** Review work can be offered during the winter/off-season.
  - Solution:** Compensation for input during the winter when policies and paperwork are being updated by the certification agency.
  
- **Pay scale:** More qualified and competent inspectors often are receiving the same or lower pay rates as less experienced inspectors. Many inspectors have to fight for increases in pay and/or lose work to less qualified inspectors. Many cite that they cannot pay adequately for continuing education.
  - **Solution:** Inspectors should be compensated based on the overall quality of their work.
  - **Solution:** The scale and complexity of inspections should be assigned to inspectors with the appropriate qualifications and pay should reflect those qualifications.
  
- **Faster, cheaper:** Often, small operations are subsidizing large operations when remunerating inspectors. For example, a 40 cow dairy often has a comparable pay out, and sometimes inspection time, as an international broker or multi-product, multi-ingredient complex processor. Expected inspection duration is often outdated and anecdotal and more dependent on the operation's expectations from previous inspections and reducing travel costs, than on the quality of the inspection. Pressure on both inspectors and certifiers to provide cheap inspections is often prioritized over a quality inspection.

- **Solution:** Size and complexity should be a main driver of fee structure. The scale and complexity of inspections should be assigned to inspectors with the appropriate qualifications. We look forward to SOE moving forward and trust the NOP will continue to explore ways in which “qualified, competent inspector” is defined with practical and measurable requirements that create uniformity throughout the industry.
- **Staff/Contractor/Cooperative:** IOIA supports a diversity of staffing options including employed staff, independent contractors, and co-op/business models, and strongly believes that there is room and value for all models in the industry. For example, many inspectors will prioritize the low/no cost benefits included in an employment package for full time inspectors. Other inspectors place a higher value on the flexibility and decreased travel afforded by working with several agencies as an independent contractor or through a co-op.
  - **Solution:** Establish a working group to explore the differences in various employment structures and how to improve each model. Receiving feedback from both certifiers and inspectors will allow for sustainable and realistic improvement. For those agencies that choose to implement new hiring/contracting practices for inspectors, open communication can ensure that qualified and experienced inspectors are supported and retained by the industry. For many inspectors, the staff model can be a real advantage for a viable career path (health insurance, steady income, etc.). The biggest practical counter reality for the staff position is that it increases travel for many to most staff inspectors. On the other hand, schedule management is the single most demanding aspect of being an active independent inspector. Scheduling and travel support could be a very valuable benefit for both staff or co-op models. However, waiting for a 3rd party scheduler might create some inefficiency. There may be efficiencies to being a staff inspector that are non-existent for independent inspectors and vice versa.
- **Efficiency:** IOIA does understand that paying inspectors (and other inspection staff) more means “finding” additional money. Though money may come from the fees from an operation’s certification, increasing efficiency is another way to funnel resources to the higher priority of employee retention.
  - **Solution:** Forms and reporting can play a huge part in how efficient an inspection is. Work with inspectors to create processes and forms that allow for an efficient, yet thorough inspection.
  - **Solution:** Create systems where travel is efficient. Individual certification agencies can provide inspectors with inspections in the same area that can be completed on the same trip. Deadlines for inspections and report submissions that allow independent contractors to bundle inspections from multiple certifiers also reduce time and cost.
  - **Solution:** The Cooperative may be a way to increase local work for inspectors and decrease travel as it reduces the barriers of on-boarding for a new

certification agency when there is only the potential for a minimal amount of work.

- **Solution:** Reduce repetitive industry training.
- **Solution:** Industry wide conversation, including the NOP, on implementing a more risk based approach to certification. How do we continue to implement “sound and sensible” without putting organic integrity and consumer confidence at risk?
- **Solution:** The industry can heavily advocate for restoration of the cost share program.

## Training and Education

Training is foundational to IOIA and we firmly believe that it is essential to conducting quality inspections. IOIA offers both the basic training that most agencies require to begin inspecting as well as continuing education in the form of webinars, on-demand learning, and in-person advanced trainings. During the pandemic, no IOIA in-person trainings have been held.

We were surprised by the statements in the proposal that “Trainings are currently offered by only one recognized entity in the US which generally offers the trainings only twice per year.” and “Most of trainings are conducted in the upper Midwest or on the West coast, adding additional travel expenses for trainings outside of these regions”. As IOIA is the only recognized entity in the US offering regular basic inspector training in all 3 scopes, we would like to set the record straight regarding our basic training program, which is the means by which most new inspectors enter the profession. For almost 2 decades, IOIA has rotated East Coast, West Coast, and Midwest locations annually. East Coast trainings range from Florida to Vermont and everywhere in between. The attached training list shows that IOIA has in the past four years trained 653 participants in an average of 11 entry-level trainings per year in the US alone. Southern locations included Texas, Kentucky, Florida, and Georgia. Those 653 participants do not represent 653 distinct individuals, as many were inspectors who were adding additional scopes. Also, a small percentage of participants are from the industry or regulatory bodies or training as reviewers and do not plan to inspect. Even so, this number represents an estimated 300 new inspectors, many of whom have been unable to get industry support to step up the ladder to start inspecting. In 2020, basic training applications dropped in spite of the greater accessibility of live online training at significantly less expense. There are clearly significant gaps in available data that would inform a comprehensive understanding of the drivers to attracting, training, and retaining qualified organic inspectors. Attracting more and better candidates appears to be an oversimplification that will not resolve the human capital problem.

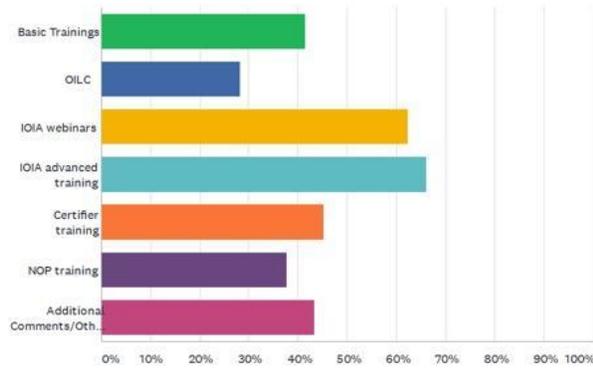
### Appendix A- NOSB IOIA US Basic Training Chart 2017-2019

#### Key Survey Takeaways

- IOIA advanced trainings and webinars ranked highest as the best way to increase the quality of inspection performance.

Q21 What types of training have you found to best increase the quality of your inspection performance?

Answered: 53 Skipped: 0

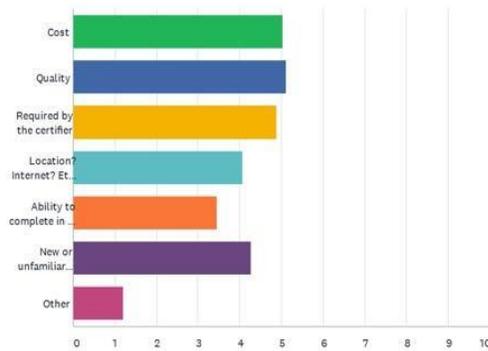


ANSWER CHOICES	RESPONSES
Basic Trainings	41.51% 22
OILC	28.30% 15
IOIA webinars	62.26% 33
IOIA advanced training	66.04% 35
Certifier training	45.28% 24
NOP training	37.74% 20
Additional Comments/Other (please specify)	43.40% 23
Total Respondents: 53	

- Cost and quality ranked highest as the factors that go into deciding to take a specific training.

Q22 What factors go into your decision to take a specific training?

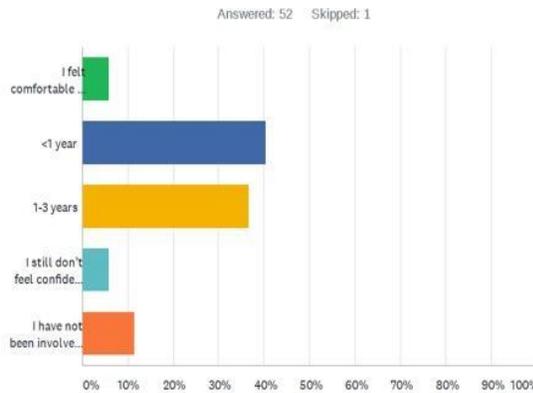
Answered: 52 Skipped: 1



	1	2	3	4	5	6	7	TOTAL	SCORE
Cost	28.89% 13	15.56% 7	15.56% 7	20.00% 9	11.11% 5	6.67% 3	2.22% 1	45	5.02
Quality	27.66% 13	23.40% 11	12.77% 6	14.89% 7	12.77% 6	6.38% 3	2.13% 1	47	5.11
Required by the certifier	23.26% 10	16.28% 7	20.93% 9	18.60% 8	9.30% 4	9.30% 4	2.33% 1	43	4.88
Location? Internet? Etc. - Accessibility	4.55% 2	20.45% 9	18.18% 8	13.64% 6	20.45% 9	20.45% 9	2.27% 1	44	4.05
Ability to complete in my own time	4.55% 2	6.82% 3	15.91% 7	9.09% 4	29.55% 13	34.09% 15	0.00% 0	44	3.45
New or unfamiliar subject matter	14.58% 7	14.58% 7	14.58% 7	20.83% 10	12.50% 6	20.83% 10	2.08% 1	48	4.27
Other	0.00% 0	0.00% 0	3.23% 1	0.00% 0	3.23% 1	0.00% 0	93.55% 29	31	1.19

- An identified topic for training is further preparation for conducting tracebacks and audit balances. Just 5.77% said they felt comfortable on their first inspection. Another 40.38% said they attained that competence and confidence in less than one year. Over a third (36.54%) said it took them 1-3 years, and 5.77% said they “still don’t feel confident to do a good mass balance/traceback during an inspection.”

Q9 How long did it take before you felt competent to conduct a good inspection and good audit exercises?



ANSWER CHOICES	RESPONSES
I felt comfortable on my first inspection	5.77% 3
<1 year	40.38% 21
1-3 years	36.54% 19
I still don't feel confident in my ability to do a good mass balance/traceback during an inspection	5.77% 3
I have not been involved in the industry long enough to answer	11.54% 6
TOTAL	52

### IOIA’s input on the challenges

- **Cost of Basic Training:** Many former participants of the basic training offered by IOIA note that the cost of training can be a barrier to entry. Though the financial commitment is comparatively low to other educational paths, there is no funding through grants or the ability to obtain loans.
  - **Solution:** Partnering with universities would allow for those who do not have the ability to pay a lump sum prior to training to obtain low interest loans to complete coursework. Preferably, more than one university would be involved. Efforts should be made toward increasing diversity and BIPOC participation.
  - **Solution:** Creating a career path provides the assurance that any investment will be able to be repaid and/or recuperated. Paying off of loans over time would reduce an existing barrier.
- **Creating more options for trainees:** The needs, circumstances, and experience of each individual trainee varies widely. Some are coming to the organic inspection field with many years of field experience, while others have many of the skill sets that make a

good inspector, but lack the experience in the industry. Many people have noted that they missed on-site training. Others commented that offering more online and on-demand options would increase participation. Catering to these diverse needs will undoubtedly improve industry performance by allowing both new trainees and experienced inspectors to tailor a program to fit their knowledge gaps, learning styles, and scheduling needs.

- **Solution:** Deliver basic training in both in-person and online formats including a format less concentrated into a short time frame of one week.
- **Solution:** Provide more optional trainings to supplement areas where individuals need to focus to reduce specific knowledge gaps. This is particularly important for those inspectors who are expanding scopes, working with different types of operations in the same scope, and those with less experience in the field, but who possess attributes that make a good inspector.
- **Cost of Continuing Education:** Continuing education is a critical cost of doing business for independent contractors.
  - **Solution:** Fee structures should reflect the built in costs of doing business, acknowledging and rewarding the training needed to obtain adequate qualifications to inspect more diverse and complex operations.
  - **Solution:** The OILC offers several classes free of charge, although many experienced inspectors have commented that more advanced and in-depth trainings are critical to their knowledge base and professional growth.
- **Mentor accessibility:** Participating in an apprenticeship has historically been one of the challenges of entering into the inspection field. Experienced inspectors are often expected to invest a considerable amount of time into field training of other inspectors with no compensation. Inspectors who are newly trained often find it difficult to find a mentor.
  - **Solution:** Structured apprenticeships improve the quality of inspections and should be part of both the initial training as well as provide opportunities to demonstrate qualifications and competencies for operations of increased scale and complexity. Industry buy-in for investment into inspectors by providing funding for a paid mentorship program through grants and/or access to low interest loans is critical to meeting this need. Mentorship should be available in more than one format (one-on-one, etc.) and over extended periods of time (minimum one year relationship between apprentice and mentor.) Qualifications of the mentor are critical and must include significant inspection experience, educational expertise, and positive certifier recommendation(s).
  - **Solution:** Mentors should be able to apply their mentorship time towards meeting continuing education hours.
  - **Solution:** The industry should require and support the establishment of more formalized apprenticeship programs that pair well compensated, experienced inspectors with new inspectors for a period of time (6 months - 1 year) and

involve the mentor inspector observing the mentee inspectors on multiple inspections for each scope of inspection involved.

- **Solution:** The regular use of 'team' inspections for large operations allows for the lead auditor to draw upon other qualified inspectors to participate in executing the work and ensure quality-driven and thorough results.
  
- **Annual training:** Each certification agency requires independent contractors to participate in their own individual training. This is often required to be completed without compensation. Current trainings are repetitive, yet different enough to highlight inconsistencies within the industry.
  - **Solution:** Inspectors and certification staff should have the option of learning and reviewing the same course material for changes and updates to the NOP. This will increase consistency within the industry and reduce repetition for inspectors who work for multiple agencies. It could also increase efficiencies for certifiers. With more collaboration on the common areas of update training for all certifiers, the time spent on certifier-specific training could be reduced dramatically. When training is required by certification agencies, independent contractors should be compensated for their time. This type of training could be developed collaboratively by the certifiers, NOP, and IOIA.

## Insurance cost

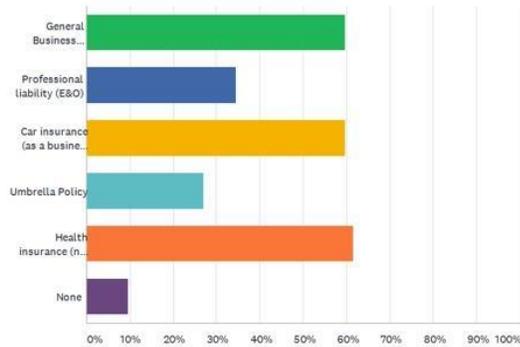
Insurance has long been a point of distress for many inspectors with concerns around affordability of insurance of all kinds. The stress of finding insurance that actually covers such a niche job across a national or international level has been exacerbated with recent concerns over an increase in "hold harmless" clauses in many contracts.

### Key Survey Takeaways

- Over half of the inspectors polled paid for General business liability, Business car insurance, and Health Insurance

Q25 What insurances do you pay for?

Answered: 52 Skipped: 1

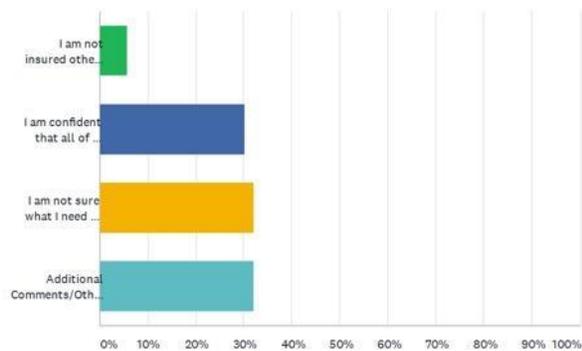


ANSWER CHOICES	RESPONSES
General Business Liability	59.62% 31
Professional liability (E&O)	34.62% 18
Car insurance (as a business policy)	59.62% 31
Umbrella Policy	26.92% 14
Health insurance (not covered by employer)	61.54% 32
None	9.62% 5
Total Respondents: 52	

- Only 30% of inspectors are confident that all of their insurances cover them and are adequate as an independent contractor. Another 32% are “not sure”.

Q27 Do you think that your liability insurance(s) is adequate and that you are covered as an independent contractor?

Answered: 53 Skipped: 0



ANSWER CHOICES	RESPONSES
I am not insured other than car insurance.	5.66% 3
I am confident that all of my insurance(s) are adequate and I am covered as an independent contractor.	30.19% 16
I am not sure what I need to be covered and if I have the correct insurance.	32.08% 17
Additional Comments/Other (please specify)	32.08% 17
TOTAL	53

## **IOIA's input on the challenges**

- Many certifiers do not cover inspectors on their Error and Omissions policies. Many inspectors can't find or can't afford insurance that they are confident will protect them. There is also concern that hold harmless clauses in some certifier contracts may increase the liability for inspectors.
  - **Solution:** Continued industry wide conversations regarding changes that will protect inspectors from liability risk.
- Independent contractors should expect any type of insurance (professional and general liability, health, etc.) to be a cost of doing business.
  - **Solution:** Fee structures should reflect the built in costs of doing business.

## **Inconsistencies - Deviations from Industry/IOIA established Best Management Practices**

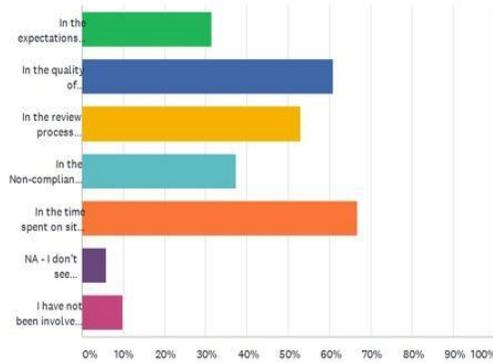
Inconsistencies have been a consistent part of this industry since its onset. Having the freedom and creativity to approach organic certification differently allows certification agencies to accommodate the diverse geographical and cultural differences of those who produce organic food. Simultaneously, too many inconsistencies lead to inefficiencies and frustration, which ultimately limit the affordability of organic food and the ability for small farmers to participate in certification. Consistency in calibrating risk based inspections supported by the NOP may be a viable solution to maintaining a uniformly high standard while increasing efficiency and integrity.

### **Key Survey Takeaways**

- Over half of the inspectors polled see inconsistencies in the quality and time of inspections and in the review process prior to inspections.

Q28 Where do you see inconsistency in organic inspections?

Answered: 51 Skipped: 2

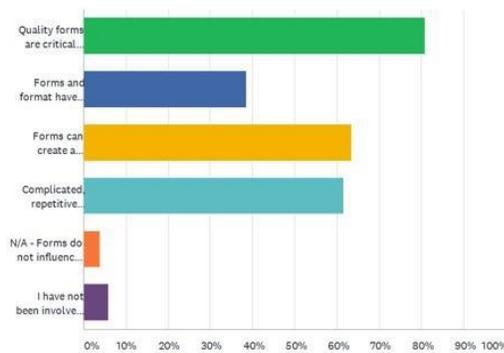


ANSWER CHOICES	RESPONSES	
In the expectations between certifiers on your performance	31.37%	16
In the quality of inspector/inspection conducted from year to year	60.78%	31
In the review process conducted pre-inspection	52.94%	27
In the Non-compliances/conditions issues of concern	37.25%	19
In the time spent on site by different inspectors	66.67%	34
NA - I don't see inconsistencies in the industry	5.88%	3
I have not been involved in the industry long enough to answer	9.80%	5
Total Respondents: 51		

- 80.77% of inspectors noted that forms are critical to conducting a thorough, sound, and sensible inspection. Over 60% of inspectors noted that forms can create a situation where more time is spent completing paperwork, while increasing time and cost, than in conducting a quality inspection.

Q29 How do you think certification and inspection forms influence the quality of inspections?

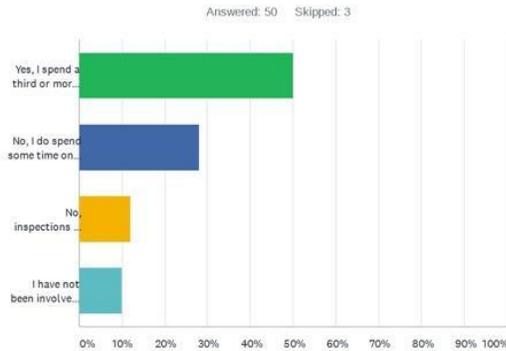
Answered: 52 Skipped: 1



ANSWER CHOICES	RESPONSES	
Quality forms are critical to conducting a thorough, sound, and sensible inspection.	80.77%	42
Forms and format have been a factor in whether I continue to work for a certifier.	38.46%	20
Forms can create a situation where more time is spent completing paperwork, than in conducting a quality inspection.	63.46%	33
Complicated, repetitive forms increase the time and/or cost of an inspection.	61.54%	32
N/A - Forms do not influence the quality of inspections	3.85%	2
I have not been involved in the industry long enough to answer	5.77%	3
Total Respondents: 52		

- 50% of inspectors noted that they spend a third or more of many inspections on details and/or clerical updates instead of spending time on areas critical to organic integrity.

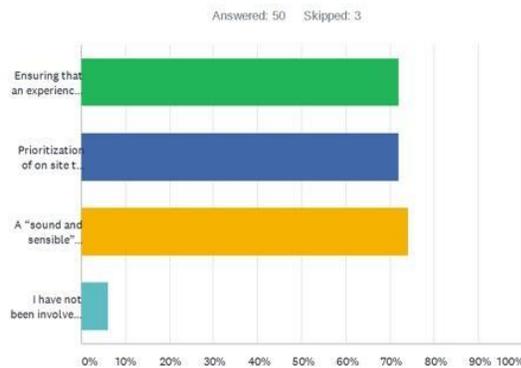
Q31 Have you experienced that time at inspections is spent on minutiae instead of focusing on areas that you see as critical to organic integrity?



ANSWER CHOICES	RESPONSES
Yes, I spend a third or more of many inspections on details and/or clerical updates instead of spending time on areas critical to organic integrity.]	50.00% 25
No, I do spend some time on details, but it does not detract from the quality of the inspection	28.00% 14
No, inspections are completely focused on aspects of the operation that are critical to organic integrity	12.00% 6
I have not been involved in the industry long enough to answer	10.00% 5
TOTAL	50

- Over 70% of inspectors polled noted the following could maintain organic integrity in a risk based inspection approach.
  - Ensuring that an experienced inspector is cycled to a facility for a more thorough inspection at least every 3 years.
  - Prioritization of on-site time and focus to aspects of certification that require an on-site component.
  - A “sound and sensible” approach to low risk operations with a small market footprint.

Q33 What processes do you think could maintain integrity in a risk based inspection approach?



ANSWER CHOICES	RESPONSES
Ensuring that an experienced inspector is cycled to a facility for a more thorough inspection at least every 3 year.	72.00% 36
Prioritization of on site time and focus to aspects of certification that require an on-site component.	72.00% 36
A "sound and sensible" approach to low risk operations with a small market footprint.	74.00% 37
I have not been involved in the industry long enough to answer	6.00% 3
Total Respondents: 50	

## IOIA's input on the challenges

- **Public/Private Partnership and affordability:** The public/private partnership creates an interesting aspect to the certification process. "Cheaper, better, faster" is a common mantra in the private sector, but cheaper and faster does not usually mean better in terms of ensuring compliance to the increasingly complex federal regulations. However, it is also critical that we keep organic certification affordable, especially as the cost share program decreases.
  - **Solution:** Continue pre-competitive collaboration on ideas and strategies to continue to increase quality and efficiency within the organic industry.
  - **Solution:** Making inspections more risk based may be a way to keep certification affordable. Creating universal approaches will create consistency among certifiers on where to prioritize time and resources, while still keeping costs attainable.
  - **Solution:** We must be reminded that "better" in the case of federal regulations does not mean "easier". It takes industry wide investment in inspectors and inspection process so that inspections are performed to the high expectations of quality that produces better verification and enforcement of organic regulations.
  - **Solution:** Learn from other verification models. In some food safety schemes, such as FSSC22000, the inspector is assigned a client for a three year term. During which time, that lead inspector will prepare an inspection plan that covers all risk areas and critical control points. This model allows for adjusting the inspection durations so that the entirety of the operation is fully inspected in the three year period with critical focus annually and ancillary area focus over the three year period. In other words, everything doesn't need to be reviewed every

year although certainly critical aspects must be inspected every year. A similar assignment style for organic inspections may allow for some job security for independent contractors and staff alike.

- **File Review:** Many inspectors note that there are inconsistencies in pre-inspection file review. Many times, the file and/or OSP is incomplete. Valuable time is spent collecting information instead of verifying information. Other times the pre and/or post inspection review is completed by personnel that do not have experience or qualifications in the type of operation being certified, increasing mistakes and frustration from the operations.
  - **Solution:** Conduct thorough reviews and structure the certification so that on-site inspection time is focused on things that can only be verified on-site. This keeps travel costs, which are often a major expense of inspections, lower.
  - **Solution:** IOIA supports the NOP's effort to strengthen review work through both SOE and the current Human Capital discussion.
  
- **Inspection expectations:** Expectations in quality of inspections vary widely between both inspectors and certifiers. For example, inspection times for the same operation can vary widely, and that is often reflected in quality and thoroughness of the inspection and report. NOP shadows and inspector field evaluations consistently take double the time as actual inspections.
  - **Solution:** The NOP can offer guidance on the standard expectation of both what a good inspector looks like and what a good inspection looks like. The ACA Guidance document on Inspector Qualifications was a great start. It was created by a working group of ACA and IOIA with input from the NOP.
  
- **Forms:** Certifier forms and report formats are extremely different. Though this in and of itself does not create inconsistency, forms greatly affect the efficiency and often the quality of an inspection.
  - **Solution:** Create a more balanced relationship between certification agencies and inspectors. Invite inspectors to contribute to the development of policies, procedures, and forms, especially the creation of inspection reports and audit templates. Compensate them for their time.
  
- **Input materials:** One-third of the inspectors said they'd had to make a determination on an input as an inspector.
  - **Solution:** NOP instruction to certifiers clarifying the roles in review and input of input materials.

The organic industry needs to come together and work together on reasonable and practical Human Capital solutions. With the current growth in the organic market, the expected increase in the number of inspections as an outcome of a Final Rule on Strengthening Organic Enforcement, and impacts of the Covid pandemic, we are facing an imminent shortage of well-qualified organic inspectors. No single solution will solve the challenges we face. NOP framing of and funding for this work is essential. Thank you again for your work on this critical issue.

Sincerely,

A handwritten signature in black ink that reads "Margaret Scoles". The signature is written in a cursive, flowing style.

Margaret Scoles, on behalf of the IOIA Board of Directors  
Executive Director

## IOIA Basic Training Summary 2017-2020

2017 Training	Date	Type	Cosponsor	Participants
Florida	Feb	Crop (2 sections)	QCS	31
Iowa	April	Crop	IA Organic Assoc	22
California	Sept	Crop	CCOF	17
California	Oct	Crop	CCOF	17
California	Jan	Process	QAI	19
Florida	Feb	Process	QCS	16
California	Oct	Process	CCOF	18
New Jersey	Nov	Process	NJ Dept of Ag	18
Iowa	May	Livestock	IA Organic Assoc	15
<b>TOTAL</b>				<b>173</b>

2018 Training	Date	Type	Cosponsor	Participants
Pennsylvania	April	Crop	PCO	17
Pennsylvania	April	Crop	PCO	18
Oregon	May	Crop	OR Dept of Ag	13
Utah	June	Crop	UDAF	18
Vermont	Sept	Crop		18
Minnesota	Oct	Crop		19
California	Feb	Process	QAI	14
Georgia	Mar	Process	G CIA	17
Oregon	May	Process	OR Dept of Ag	7
Utah	July	Process	UDAF	18
Minnesota	Nov	Process		18
Pennsylvania	April	Livestock	PCO	19
Vermont	Sept	Livestock		12
Vermont	Sept	Livestock		18
<b>TOTAL</b>				<b>226</b>

2019 Training	Date	Type	Cosponsor	Participants
Texas	April	Crop		17
California	June	Crop		20
Iowa	Aug	Crop		13
Kentucky	Oct	Crop	KY Dept of Ag	9
Indiana	Nov	Crop	Ecocert ICO	11
Texas	April	Process		10
California	April	Process	QAI	15
Kentucky	Oct	Process	KY Dept of Ag	16
Indiana	Nov	Process	Ecocert ICO	8
California	June	Livestock		12
Iowa	Aug	Livestock		14
<b>TOTAL</b>				<b>145</b>

2020 Training	Date	Type	Cosponsor	Participants
N/A - Live Online training	April	Crop		8
N/A - Live Online training	May	Crop		10
N/A - Live Online training	June	Crop		7
N/A - Live Online training	June	Process		9
N/A - Live Online training	Sept	Crop		6
N/A - Live Online training	Oct	Crop		7
N/A - Live Online training	Dec	Crop		11
N/A - Live Online training	June	Crop		12
N/A - Live Online training	July	Process		10
N/A - Live Online training	Oct	Process		9
N/A - Live Online training	May	Livestock		12
N/A - Live Online training	July	Livestock		8
<b>TOTAL</b>				<b>109</b>

<b>TOTAL BASIC TRAINING PARTICIPANTS 2017-2020 IN USA</b>	<b>653</b>
---	------------