

NATIONAL ORGANIC PROGRAM RESPONSE TO 2017 PEER REVIEW

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SUBJECT: National Organic Program Corrective Actions:
Response to 2017 Peer Review Audit

Background

The peer review process is a vital component of the U.S. Department of Agriculture (USDA) Agricultural Marketing Service National Organic Program's (NOP) commitment to continuous improvement. The peer review process is described in [NOP 1031 "Peer Review of the National Organic Program \(NOP\) Accreditation."](#) For its 2017 peer review, the NOP contracted with the American National Standards Institute (ANSI). The 2017 ANSI Peer Review Panel evaluated NOP's compliance with NOP accreditation procedures and decisions, and with ISO/IEC 17011, a quality standard.

The ANSI auditors analyzed NOP's procedures thoroughly; their depth of review is reflected in the granularity and specificity of the report. As a result, the ANSI findings are very precise and detailed.

Overall, the ANSI auditors found that NOP and its staff are in compliance with NOP's own policies and procedures, and ISO/IEC 17011.

Opportunities for Improvement

The Peer Review Panel identified eight (8) opportunities for NOP to clarify procedures and improve recordkeeping:

Procedures

1. NOP corrective actions are not tracked as described in NOP 1020 (corrective action procedure).
2. NOP needs to ensure timely implementation of corrective actions before the next audit cycle.
3. NOP does not have a procedure for determining the number and location of certifier satellite office audits.
4. NOP assessments of certifiers occur every 2.5 years, not every 1-2 years as recommended in ISO 17011.

Recordkeeping

5. NOP did not complete the "review" section of accreditation application documents.
6. There were some instances of incorrect versions or incomplete records (lack of dates or signatures).

7. NOP accreditation certificates do not contain the certifier's full address and do not indicate the current version of 7 CFR Part 205.
8. There was an isolated instance of a date discrepancy on an accreditation certificate.

NOP Corrective Actions

NOP continues to focus on records management and devote resources to improving processes, updating or retiring procedures and providing training. In response to the eight (8) ANSI findings, the NOP is implementing the following corrective actions:

Procedures

1. **Tracking Corrective Actions:** The NOP corrective action procedures are addressed in the NOP's quality management system, but have not been sufficiently consistent to ensure timely submission and closure by the next audit cycle. NOP has revised its procedures to track and monitor peer review corrective actions. The NOP 1020 Corrective and Preventive Action Procedure has been retired. In the future, NOP will monitor corrective actions using the program's operating plan.
 - Assigned: Office of the Deputy Administrator
 - Due date: March 1, 2018
2. **Timely Implementation of Corrective Actions.** NOP will use the program's operating plan to ensure timely implementation of corrective action from audits. The operating plan will record action items resulting from internal and external audits, and management reviews.
 - Assigned: Office of the Deputy Administrator
 - Due date: March 1, 2018
3. **Certifier Satellite Office Tracking.** NOP is currently launching an accreditation management system called ACCREDIT. This tool, and additional staff, will help accreditation timeline management and satellite office tracking. NOP 2000 Accreditation Policies and Procedures generally addresses audits of certifier satellite offices. Moving forward, NOP will use the ACCREDIT tool to schedule and document the number and geographic location(s) of certifier satellite office audits throughout the five-year accreditation period.
 - Assigned: Accreditation and International Activities Division
 - Due date: March 1, 2018
4. **Assessment Timing:** The current USDA organic regulations and NOP 2000 Accreditation Policies and Procedures require that the accreditation renewal occur every 5 years and that the mid-term evaluation occur every 2.5 years. NOP will explore options for more frequent assessments, but currently lacks the resources to perform onsite assessments every 1-2 years per ISO 17011 recommendations. We are reviewing how we could potentially use the Annual Report process for more frequent follow-ups.
 - Assigned: Accreditation and International Activities Division
 - Due date: March 1, 2018

Recordkeeping

5. **Accreditation Applications.** NOP conducts robust audits of new applicants and accredited certifiers, and continues to refine components for processing applications for

accreditation as its quality system evolves. These changes will be reflected in NOP's templates, forms, and procedures as they are introduced.

- Assigned: Accreditation and International Activities Division
 - Due date: July 1, 2018
6. **Incomplete Records (Dates/Signatures).** To verify 1) that forms were signed as required, and 2) that USDA completed the review section of the application forms, NOP revised the audit process and issued an instruction memo to auditors reminding them about required signatures and which forms were required depending upon the audit type. NOP will also review the revised process and memo during annual auditor training.
- Assigned: Accreditation and International Activities Division
 - Status/due date: Auditor memo issued October 5, 2017; auditor training scheduled for March 6-8, 2018.
7. **Accreditation Certificate.** NOP will revise the accreditation certificate template to reference the current USDA organic regulations and include certifier's complete address.
- Assigned: Accreditation and International Activities Division
 - Completed: December 1, 2017
8. **Accreditation Certificate Date.** NOP will reaffirm its quality assurance procedures for certificates to ensure consistency and minimize errors.
- Assigned: Accreditation and International Activities Division
 - Due date: March 1, 2018

Next Steps

The NOP values the constructive feedback from ANSI. We take continuous improvement seriously, and will continue to evolve our records management practices, refine accreditation processes, and conduct regular training for auditors and certifiers. With a focus on quality accreditation processes, NOP continues to support the organic community and maintain organic integrity for all.