

## NATIONAL ORGANIC PROGRAM RESPONSE TO PEER REVIEW

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**SUBJECT:** National Organic Program Corrective Actions

### **Background**

The peer review process is a vital component of the 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."](#) In 2016, the U.S. Department of Agriculture (USDA) National Organic Program (NOP) contracted with the American National Standards Institute (ANSI) to conduct a peer review of the NOP.

The Peer Review Panel evaluated NOP's compliance with ISO/IEC 17011 and reviewed the NOP's accreditation procedures and decisions. The Peer Review Panel found that NOP and its staff are in general compliance with ISO/IEC 17011 and the NOP's own policies and procedures.

### **NOP Corrective Actions**

The Peer Review Panel identified opportunities for improvement. The NOP is implementing the following corrective actions to make improvements to the program:

- NOP is improving control of its documents.
  - NOP recognizes the importance and value of records management. NOP is actively improving processes that will make it more consistent in how the team applies its accreditation procedures and checklists in order to avoid inconsistencies. We have made significant progress and will continue to improve. (Oversight of records management is now a defined responsibility assigned to the NOP's Chief of Staff; effective March 1, 2017.)
  - NOP is inventorying where document controls are lacking, and in 2017 will implement a process improvement project for document management and control. (Assigned to Office of the Deputy Administrator; due by September 30, 2017.)
  - In the 2017 audit season, NOP will ensure that all auditors consistently use the correct version of checklists. (Assigned to the Accreditation and International Activities Division; auditor training was conducted on January 12, 2017.)
- NOP will revise out-of-date references to quality standards. *Example:* replace ISO/IEC Guide 65 with ISO/IEC 17065. (Assigned to each NOP Division for review and editing of their document collection; due by March 31, 2017.)

## INFORMATIONAL MEMORANDUM FOR THE SECRETARY

Page 2

- As government employees, NOP staff adhere to strict conflict of interest and ethics laws. These rules and any necessary enforcement steps are detailed in USDA Directives; NOP will add references to these USDA rules in its quality manual.
  - NOP will continue to strictly follow all federal laws related to conflict of interest and ethics – this is part of our oath when we become Federal employees and civil servants.
  - NOP will revise its quality manual to explicitly document these existing requirements. (Assigned to Office of the Deputy Administrator; due by September 30, 2017.)
- NOP will update its procedures to help auditors more clearly document how they perform ingredient and processing aid reviews when auditing certifiers. The review is being done, but NOP needs to document it better. (Assigned to the Accreditation and International Activities Division; an updated Material Review Checklist for auditors was developed January 2, 2017 and shared during auditor training on January 12, 2017.)
- Certifiers need to notify the NOP when changes occur that could impact compliance, so the NOP will provide more examples to certifiers of when this applies. *Example*: Certifier adds a satellite office. (Assigned to the Accreditation and International Activities Division; the annual report checklist is being revised to clarify the compliance information (as reflected in the certifier's Terms of Accreditation) that certifiers need to submit; due by April 30, 2017.)

### **Next Steps**

The NOP appreciates the constructive feedback from ANSI. Throughout 2017, the NOP will continue to refine its records management practices, improve accreditation processes, and continue to regularly train auditors and certifiers. By further strengthening accreditation procedures, NOP continues to support the organic community and maintain organic integrity for all.