

# Program Notice

FGIS-PN-23-04

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## UNIFORM REPORTING OF SAMPLE NOT AVAILABLE FOR SIMS AND STEP

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## 1. PURPOSE

This notice provides guidance and instructions for official service providers (OSP), supervising Federal Grain Inspection Service (FGIS) Field Offices (FO), and Board of Appeals and Review (BAR) for reporting the status of Sample Not Available (SNA) file samples and separations selected under the Sample Inspection and Monitoring System (SIMS) and Subjective Testing and Evaluation Process (STEP) to promote consistent and uniform data reporting across the official inspection system.

## 2. BACKGROUND

SIMS is an automated information system which documents the results of monitoring (supervision) inspections and a tool designed to help managers promptly detect developing problems. SIMS collects information (comparative inspection results) that describe current inspection performance. The results are automatically processed and then subjected to standard statistical tests that can signal a real or potential grading problem. SIMS provides a representative historical database of inspection information for use in standards/CUSUM tolerance analysis, economic impact analysis, and other special studies.

STEP is a critical foundation process used to ensure that the FGIS Quality Assurance Specialist's (QAS) or Agency Quality Assurance Specialist's (AQAS) line on interpretive factors conforms with the BAR's line. The objective of STEP is to control and minimize interpretive variability encountered with subjective factor determinations in all graded commodities (grain, rice, and pulses). STEP functions like onsite monitoring/over-the-shoulder supervision and involves the BAR reviewing and adjusting the QAS' or AQAS' factor separations and when required, returning the adjusted separations to the OSP or supervising FO for review. This allows inspectors to properly adjust their lines and improve inspection accuracy.

In 2007, the FGIS released and implemented the Quality Assurance and Control (QAC) module within its portfolio of online business applications (FGISonline). FGIS official service providers use this module to enter data, access results, and track inspector performance and ability, with immediate statistical information to measure the performance of the official grain inspection system. In QAC, users are required to identify any situation where system selected inspections and/or file samples are not available for SIMS and STEP monitoring purposes.

Currently, national SIMS and STEP SNA (supervision conducted by FGIS) are reported to the FGIS Quality Assurance and Compliance Division (QACD) via e-mail to [FGISQACD@usda.gov](mailto:FGISQACD@usda.gov) and then a QACD team member identifies the selected record (QACD ID) as SNA and documents and saves the reason provided by the OSP or supervising FO in the SIMS or STEP Remarks section of QAC. Local SIMS SNA (supervision conducted by OSP) are identified by an authorized OSP representative within QAC using the same process.

QACD uses the SIMS and STEP SNA data to evaluate an OSPs level of participation and compliance with these mandatory programs.

## 3. POLICY

OSPs, supervising FOs, and BAR must report all SIMS and STEP SNA in accordance with the following procedures.

#### **4. PROCEDURES**

National SIMS and STEP SNA must be reported by the OSP, the supervising FO, or the BAR using the following requirements and an e-mail notification including the following information must be sent to [FGISQACD@usda.gov](mailto:FGISQACD@usda.gov). OSPs must report SNA as soon as possible but no later than five business days of the SIMS or STEP selection notification.

Supervising FOs or BAR must notify QACD as soon as possible but no later than five business days of sample receipt or from when the issue was identified. Local SIMS SNA must be reported by the OSP in QAC within five business days of the SIMS selection notification.

##### National SIMS SNA Notification E-mail

- (1) The subject line of the e-mail must include:
  - (a) SNA (National SIMS) and OSP or supervising FO Name.
- (2) The body of the e-mail must include:
  - (a) the QACD ID number;
  - (b) the approved SNA short code defining the specific reason why the sample is not available for SIMS;
  - (c) the name and contact information of the person submitting the national SIMS SNA to QACD.

##### STEP SNA Notification E-mail

- (1) The subject line of the e-mail must include:
  - (a) SNA (STEP) and OSP name, supervising FO name, or BAR as applicable.
- (2) The body of the e-mail must include:
  - (a) the QACD ID number;
  - (b) the approved SNA short code defining the specific reason why the sample is not available for STEP.
  - (c) The name and contact information of the person providing the STEP SNA to QACD.

## **APPROVED SNA SHORT CODES AND DEFINITIONS**

OSPs, supervising FOs, and BAR must use the approved SNA short codes below when submitting national SIMS and STEP SNA information to QACD or when entering Local SIMS SNA information in QAC. The approved SNA short code must be entered into the SIMS or STEP Remarks section each respective QACD ID.

**OSPs must use the following approved short codes and their definitions when reporting SIMS SNA (1 through 15).**

<b>OSP Approved SNA Short Code SIMS</b>	<b>DEFINITION</b>
1 Mishandled OSP	The file sample was spilled, dumped prior to retention requirement, commingled, misplaced, etc., by the OSP performing the original inspection.
2 REX	The file sample was called for reinspection or retest.
3 APPEAL	The file sample was called for Federal Appeal or Board Appeal.
4 VOID	The selection was made from a voided certificate.
5 Average Grade RAIL	The selection was made from a certificate which represents a mathematical average of more than one individually graded rail car.
6 Average Grade CONTAINER	The selection was made from a certificate which represents a mathematical average of more than one individually graded container.
7 Combined Lot	The selection was made from a combined lot certificate and represents multiple lots, previously certified as individual lots.
8 Divided Lot	The selection was made from a divided lot certificate and represents a portion of a lot, originally certified as a larger lot.
9 Mycotoxin/Other SUBMIT	The OSP was required to grind or use the entire file sample for Mycotoxin or other required laboratory testing. (Submitted Samples Only)
10 No File Sample OCIS	The selection was made from an official commercial inspection service (OCIS) certificate and the approved agreement does not require the retention of file samples.

OSP Approved SNA Short Code SIMS	DEFINITION
11 QAS/AQAS Local	The inspector who officially graded the requested sample, selected as a LOCAL SIMS, was the FGIS Quality Assurance Specialist or Agency Quality Assurance Specialist (AQAS - supervision inspector). No other OSP personnel are available or authorized to perform the supervision. (Local SIMS only)
12 SIMS Request Missed/Overlooked	The SIMS request was missed or overlooked by the OSP performing the original inspection and the file sample is no longer available for submission.
13 SIMS Not Delivered	The SIMS sample was shipped by the OSP performing the original inspection but was not delivered to the supervising FO by the courier. The OSP must provide supporting evidence to substantiate any claims of undelivered SIMS (i.e., shipping/delivery records)
14 Corrected Cert (Late SIMS Request)	The SIMS was selected on the basis of a corrected certificate which was issued after the file sample retention period had expired and the file sample is no longer available for submission.
15 Other OSP (See SIMS Remarks)	The reason for the SNA was not identified in reasons 1 through 14. I have clearly provided and described the reason for the SNA which must be documented in the SIMS REMARKS section of the QACD ID.

**Supervising FOs must use the following approved short codes and their definitions when reporting SIMS SNA (16 through 24).**

Supervising FO Approved SNA Short Code SIMS	DEFINITION
16 Mishandled FO	The file sample was spilled, dumped prior to retention requirement, commingled, misplaced, etc., by the supervising FO prior to performing the supervision.
17 Mishandled SHIPPING	The file sample was mishandled during the shipping process and was received by the Supervising Field Office in an unusable condition.
18 Wrong Sample Shipped	The file sample submitted to the Supervising Field Office was for a different lot and/or identification than requested by the QAC system.

Supervising FO Approved SNA Short Code SIMS	DEFINITION
19 Another Analysis Requested	The OSP was required to use the file sample for other requested services which weren't included in the original request. This is only permitted in instances where the Supervising Field Office has approved in writing use of the file sample for these purposes, and both the applicant and buyer have waived their rights to reinspection, appeal, and board appeal in writing, in order to complete the analysis.
20 Out of Condition	The condition of the received file sample has "materially" changed since the original inspection was performed due to high moisture or other circumstances.
21 SIMS Jurisdiction	This was a LOCAL SIMS selection and mistakenly sent to the supervising FO instead of the OSP performing the supervision as required.
22 Returned to Applicant	The file sample was returned to the applicant prior to completing the required retention period. This is only permitted in instances where the supervising FO has approved in writing use of the file sample for these purposes, and both the applicant and buyer have waived their rights to reinspection, appeal, and board appeal in writing.
23 Not Supervised	The file sample was submitted to and received by the supervising FO but was not supervised due to unforeseen circumstances (i.e., government shutdown) or other workload issues per the approval of the FOM.
24 Other FO (See SIMS Remarks)	The reason for the SNA was not identified in reasons 16 through 23. I have clearly provided and described the reason for the SNA which must be documented in the SIMS REMARKS section of the QACD ID.

OSPs must use the following approved short codes and their definitions when reporting STEP SNA (25 through 28).

<b>OSP Approved SNA Short Code STEP</b>	<b>DEFINITION</b>
25 Mishandled OSP	The separation was spilled, dumped prior to selection, commingled, misplaced, etc., by the OSP prior to shipping to the BAR for analysis.
26 STEP Request Missed/Overlooked	The STEP request in QAC was missed or overlooked by the OSP performing the original inspection and the separation is no longer available for submission.
27 STEP Not Delivered	The STEP separation was shipped by the OSP but was not delivered to the BAR by the courier. The OSP must provide supporting evidence to substantiate any claims of undelivered STEP (i.e., shipping/delivery records).
28 Other OSP (See STEP Remarks)	The reason for the SNA was not identified in reasons 25 through 27. I have provided and clearly described the reason for the SNA which must be documented in the STEP REMARKS section of the QACD ID.

Supervising FOs must use the following approved short codes and their definitions when reporting STEP SNA (29 through 32).

<b>Supervising FO Approved SNA Short Code STEP</b>	<b>DEFINITIONS</b>
29 Mishandled FO	The separation was spilled, dumped prior to selection, commingled, misplaced, etc., by the supervising FO prior to shipping to the BAR for analysis.
30 STEP Request Missed/Overlooked	The STEP request in QAC was missed or overlooked by the supervising FO and the separation is no longer available for submission.
31 STEP Not Delivered	The STEP separation was shipped by the supervising FO but was not delivered to the BAR by the courier. The supervising FO must provide supporting evidence to substantiate any claims of undelivered STEP (i.e., shipping/delivery records).
32 Other FO (See STEP Remarks)	The reason for the SNA was not identified in reasons 29 through 31. I have provided and clearly described the reason for the SNA which must be documented in the STEP REMARKS section of the QACD ID.

The BAR must use the following approved short codes and their definitions when reporting STEP SNA (33 through 38).

<b>BAR Approved SNA Short Codes STEP</b>	<b>DEFINITIONS</b>
33 Mishandled BAR	The separation was spilled, dumped prior to completion, commingled, misplaced etc., by the BAR prior to completing the analysis.
34 Mishandled SHIPPING	The separation was spilled, dumped prior to completion, commingled, misplaced etc., by the BAR prior to completing the analysis.
35 Wrong Sample Shipped	The separation submitted to the BAR was for a different lot and/or identification than requested by the QAC system.
36 Out of Condition	The condition of the separation submitted to the BAR has “materially” changed since the SIMS supervision was performed due to high moisture or other circumstances.
37 Not Supervised	The separation was submitted to and received by the BAR but was not supervised due to unforeseen circumstances (i.e., government shutdown) or other workload issues per the instruction and approval of the BAR Chairman.
38 Other BAR (See STEP Remarks)	The reason for the SNA was not identified in reasons 33 through 37. I have clearly provided and described the reason for the SNA which must be documented in the STEP REMARKS section of the QACD ID.

## 5. FILING INSTRUCTIONS

File a copy of this program notice with the FGIS Quality Handbook. The handbook will be revised at a later date.

## 6. QUESTIONS

Direct any questions regarding this program notice to the AMS - FGIS Quality Assurance and Compliance Division by e-mail to: [FGISQACD@usda.gov](mailto:FGISQACD@usda.gov)