

Accreditation Recommendations -- 1994

NATIONAL ORGANIC STANDARDS BOARD FINAL RECOMMENDATION STANDARDS AND PROCEDURES GOVERNING THE ACCREDITATION OF ORGANIC CERTIFICATION ORGANIZATIONS

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INTRODUCTION

This document includes the NOSB Draft Recommendations in the following areas of accreditation of organic certification organizations:

- I. The purposes of accreditation
- II. Three basic criteria, and standards based on statutory requirements and purposes
 - A. Competence (Expertise)
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NOTE: Additional sections concerning:

1. Control of the use of the certifier's mark or symbol;

2. Control of the USDA shield by the certifying agency;

3. Cost of certification; and

4. Suspension or termination of accreditation will be developed by the Accreditation Committee for subsequent inclusion into the Final Board Recommendations.

Part I. The Purposes of Accreditation

The Organic Foods Production Act of 1990, or Title XXI, Organic Certification, was enacted by Congress as part of the 1990 Farm Bill (Food Agriculture, Conservation and Trade Act)

The purposes of the OFPA are:

(1) To establish national standards governing the marketing of certain agricultural products as organically produced products

(2) To assure consumers that organically produced products meet a consistent standard; and

(3) To facilitate interstate commerce in fresh and processed food that is organically produced.

To achieve these goals, OFPA requires the USDA to establish a mandatory national organic certification program, and the accreditation process is a crucial component of this national program.

Accreditation has two basic purposes:

First, accreditation will assure the public that organic certification agents and organizations, both public and private, will carry out certification activities consistent with OFPA and the certification requirements of the national organic certification program. Section 6514 of the OFPA states:

"The Secretary [of Agriculture] shall establish and implement a program to accredit a governing state official, and any private person, that meets the requirements of this section as a certifying agent for the purpose of certifying a farm or handling operation as a certified organic farm or handling operation."

Second, the accreditation program provides a role for state government and the private sector in the national organic certification process. The accreditation process encourages the utilization of existing organic certification organizations as certifying agents and allows private certification organizations to coexist with state certification agents on a level playing field.

To understand how the accreditation program fits into the organic certification scheme, it is helpful to view the national organic certification program as a whole. The national organic certification program has four fundamental components:

1. USDA Administrative and Enforcement Authority. The Secretary of Agriculture has ultimate authority and responsibility to administer and enforce the national organic certification program and OFPA statutory requirements. The Secretary has delegated this authority to the Agricultural Marketing Service (AMS), which is a USDA agency. The Secretary is also authorized to delegate administrative and enforcement authority to states with a USDA-approved state organic certification program.

2. USDA-Approved State Programs. The Secretary of Agriculture is authorized to approve state organic certification programs that are consistent with the requirements of the national certification program. States with USDA-approved state certification programs may assume administrative responsibilities under the implementation of the national organic certification program within that state. OFPA allows states to include additional standards and/or requirements in the state organic certification program, if those standards and requirements have been approved by the USDA, are consistent with the purposes of OFPA, and do not have a discriminatory impact in the organic marketplace. Approved state organic certification programs are subject to the authority of the Secretary of Agriculture.

3. The USDA Accreditation Program. OFPA requires the Secretary of Agriculture (USDA) to implement the national organic certification program through accredited certifying agents. Accredited certifying agents will be responsible for determining whether organic producers and/or handlers are in compliance with OFPA standards and requirements. State officials and private organizations can apply to the USDA for accreditation as certifying agents. The USDA will administer the accreditation program and make all determinations regarding approval of accreditation applications and/or revocation of a certifying agent's accreditation status. State and private applicants for accreditation will be evaluated under the same basic accreditation criteria and procedures. Once accredited, state and private certifying agents will be functionally equivalent.

In addition, guidelines will be established for the accreditation of agencies conducting certification services in foreign countries. For a product bearing the seal of a U.S.-based certifying agency to be imported into the United States, the agency indicated shall meet the following requirements:

a. The agent shall be accredited to certify the production and handling of organic products within the United States.

b. The agent shall be able to demonstrate that oversight of the procedures utilized to certify the production and handling of the imported product has been provided by a USDA-recognized governmental or non-governmental authority.

c. The agent shall be able to demonstrate that only those imports produced and/or handled in compliance with the U.S. Organic Food Production Act have been certified.

d. The agent shall be able to demonstrate the application of U.S. OFPA inspection requirements to the certification of a farm or handling operation located within a foreign country.

e. The agent shall be able to demonstrate adequate documentation of the organic integrity of the imported product from farm through U.S. Customs clearance.

f. Copies of all records pertinent to the certification of each imported product shall be maintained at the U.S. agency office.

It is recognized that some private certifying agents have established programs to address specific philosophies and/or regional considerations, and may wish to include requirements for the awarding of the certifying agent's seal that are supplemental to the standards promulgated in the OFPA. Such requirements shall not be in conflict with the National Organic Standards. Supplemental requirements shall not preclude the certification to OFPA standards of producers and handlers who do not seek to utilize the private agent's seal.

4. The National Organic Standards Board (NOSB). The NOSB serves as an advisory board to the Secretary of Agriculture. The role of the NOSB is to recommend organic standards and provide public input to help the Secretary shape the policies and regulations that will govern the national organic certification program.

It is important to distinguish between the process of accreditation of certifying agents and the process of approval of State organic certification programs. The outcome of the accreditation process is authorization of a certifying agent, be it a state or a private person, to certify an organic farm or handling operation. The outcome of the approval process is authorization of a state to (1) administer the certification program in that state; and (2) enact additional standards. "Approval" of a state organic certification program does not constitute "accreditation" of the state as a certifying agent. Consequently, a state with a USDA-approved state organic certification program must also independently apply to the USDA for accreditation in order to carry out certification activities.

OFPA authorizes the Secretary to appoint a Peer Review Panel to assist the Secretary in the accreditation process. The purpose of the Peer Review Panel is to represent and utilize the expertise existing in the organic community. The Peer Review Panel shall be comprised of individuals with experience in the production and handling of organic food and familiarity with organic certification methods and procedures.

The Peer Review Panel is a critical component of the Accreditation Program because it utilizes the expertise of the private sector and preserves a role for the private organic industry in the National Organic Certification Program. Sec. 6516 (a) of the OFPA states:

Peer Review

In determining whether to approve an application for Accreditation submitted under Section 6514 of this title, the Secretary shall consider a report concerning such applicant that shall be prepared by a peer review panel established under subsection (b) of this section.

The NOSB interprets this statutory provision, which requires the Secretary to consider a peer review panel report when determining whether to approve an application for Accreditation, to be a mandatory requirement. The NOSB recommends that the Peer Review Panel be incorporated into the USDA Accreditation Program as a mandatory requirement through the rule making process.

Part II: Criteria for Accreditation

The accreditation process is designed to reach judgments regarding a certifying agent's degree of compliance with three essential program attributes -- competence, transparency, and independence, each of which is grounded in OFPA statutory provisions. These attributes reflect key goals all certifying agents should strive toward; the degree to which certifying agent programs, policies, and activities are found to be consistent with these goals will be among the most heavily weighted factors taken into account by the Peer Review Panel in reaching accreditation status recommendations.

A. Competence: (Expertise)

1. COMPETENCY OF THE CERTIFYING AGENT

The Committee reviewed the steps in the certification process with respect to the content of each step in terms of the output of the Certifying Agent; the input received from applicant producers, handlers, inspectors and others, and the process involved; the competencies required to perform each step of the certification process; and indices of competence.

a. Steps in the Certification Process

The Committee identified seven (7) steps in the certification process. These are:

- (1) Promulgation of the Application for Certification and Certification Standards;
- (2) Submission of the completed Application and Affidavit, including the Organic Plan, by a producer or handler;
- (3) Initial review of the Application by the Certifying Agent;
- (4) On-site inspection of the farm or handling operation by an inspector;
- (5) Administrative review and certification determination by the Certifying Agent;
- (6) Annual recertification and reinspection and submission of an affidavit by the producer or handler; and
- (7) Procedures relating to the handling of complaints and appeals of adverse determination by the certifying agency.

Each of these steps requires input, process and output, with the corresponding competencies.

- (1) Promulgation of the Application for Certification and Certification Standards:

The output of this step of the certification process includes the Application Form and Certification Standards, the Organic Plan requirements for each particular kind of operation seeking certification, a fee schedule, and, by identifying the competence areas of the certifying agent, the specific kinds of operations for which the Certifying Agent declares expertise.

The competencies required are:

* knowledge of the Organic regulations, as evidenced by the requirements outlined in the Application Form and Certification Standards and the Certifying Agent's Organic Plan requirements;

* knowledge of the specific kinds of operations for which the Certifying Agent declares expertise (e.g., for a vegetable processing operation: Current Good Manufacturing Practice for processing operations, low-acid food canning regulations), as evidenced by appropriate training of inspectors and reviewers of applications (e.g., see Title 21, Code of Federal Regulations, Section 113.10 and Title 9, Code of Federal Regulations, Section 381.310);

* knowledge of operationally specific standards, handbooks and manuals; and

* financial competence, as evidenced by a published fee schedule and current financial statements, such as an independently audited annual financial statement or similar financial report.

(2) Submission of the completed Application and Affidavit, including the Organic Plan, by a producer or handler:

The output of this step in the certification process is a completed Application and an Organic Plan. The competencies required of the Certifying Agent relate to the confidentiality of certain information submitted by the producer or handler and generated by the Certifying Agent and to the record keeping system and procedures of the Certifying Agent required to satisfy the record keeping requirements of the OFPA.

(3) Initial review of the Application by the Certifying Agent:

This step in the certification process involves a general evaluation of the Application and Organic Plan against the organic regulations and the specific requirements and standards for the type of operation requesting certification, and requires sufficient expertise to make valid judgments. Many of the competencies required in step 1, above, are required here. In addition, the Certifying Agent must have competence in systematically recognizing potential conflicts of interest and avoiding actual conflicts of interest, as evidenced by specific written policies and procedures.

The output of this step in the certification process is to determine eligibility and provide specific instructions to an inspector who physically performs the next step in the process. The Certifying Agent must be knowledgeable of the organic regulations and the specific type of operation being reviewed by the reviewers within the Certifying Agent, in order to identify both general and specific areas for inspection. The Certifying Agent must have policies and procedures to maintain confidentiality of its internally generated initial recommendation.

The Certifying Agent must be competent in training its Application reviewers to achieve individual competence in the organic regulations, organic plan content, and specific standards and good operating practices for specific types of operations.

(4) On-site inspection of the farm or handling operation by an inspector:

The Certifying Agent must have the competence to evaluate the credentials, ability and affiliations of inspectors, in order to select inspectors competent to inspect the type of operation requesting certification, without conflict of interest. The Certifying Agent must show competence in its supervision of inspectors, with regard to inspector performance standards, reporting requirements and ethical behavior. Specifically, the Certifying Agent must have a general inspection protocol and specific criteria for assessing risks to organic integrity, especially adherence to the Organic Handling Plan and contamination with synthetic pesticides and other synthetic substances, and for testing food and soil and water for residues of pesticides and other synthetic substances as appropriate.

The competency required of the inspector, as an agent of the Certifying Agent and thus of the Secretary, includes technical knowledge of the type of operation in addition to knowledge of the organic regulations.

The output of this step in the certification process is the inspection report. The Certifying Agent, specifically the members of its review panel, must be competent in evaluating the inspection report as it pertains to the type of operation requesting certification.

The Certifying Agent is responsible for maintaining as confidential information proprietary information gathered by the Inspector. The Certifying Agent must demonstrate satisfactory oversight of inspectors' conduct with respect to protection of confidential information. This is evidenced by a signed affidavit.

(5) Administrative review and certification determination by the Certifying Agent:

This step in the certification process consists of reviewing the Application, the Initial Recommendation and the Inspection Report, and deciding whether the operation will be certified or not. The competencies required for this process are the same as those required for step 3 and step 4. The output of this step is the certification decision. The record keeping and confidentiality competencies of step 2 are again essential here. The final reviewers should have competence in determining compliance with organic standards and regulations and in interpreting inspectors' reports.

A written procedure with objective decision criteria is an indicator of competency in this step. This can also be verified at the time of field evaluation.

(6) Annual recertification and reinspection and submission of an affidavit by the producer or handler:

The OFPA requires annual inspection and recertification of organic producers and handlers. The Organic Plan will require evaluation of progress toward certain goals agreed upon by the Certifying Agent and the producer or handler. Record keeping competency of the Certifying Agent is essential, as evidenced by the ability to locate prior years' Organic Plans for the producer or handler requesting recertification. A system for "automatic" follow-up that will assure pesticide testing of soil or food when justified by the prior history of an operation is an index of record keeping competency.

(7) Procedures relating to the handling of complaints and appeals of adverse determination by the certifying agency:

The Certifying Agent must have formal procedures that protect the rights of petitioners, to enable producers, handlers, inspectors, and others to submit complaints or to appeal decisions of the Certifying Agent. The Certifying Agent must have competency in enforcing its decisions and adjudicating appeals of its decisions.

The output of the appeal process is a "decision review report." The Certifying Agent must have access to competent legal counsel, to minimize its legal exposure and thus risks to the integrity of the organic program.

An index of competency is the availability of records documenting the results of the appeals process.

2. QUALIFICATIONS OF INSPECTORS

Certifying agents must employ or contract inspectors who have thorough knowledge of, and/or can demonstrate expertise in the following:

(1) General principles of organic food production, for crops, livestock or processing/handling.

(2) All applicable organic food production regulations, including audit and labeling requirements. (Federal, State)

(3) Applicable inspections procedures, forms, and policies.

(4) Specific production, handling, or processing and pest control methods (both organic and conventional), for product to be inspected, i.e.:

Livestock (species)

Processing (type)

Crops (type)

Handling.

(5) Risk assessment for potential contamination and appropriate steps to be taken when contamination is suspected.

(6) Adequate written and oral communication skills.

Required expertise may be acquired by work experience in agriculture (crops/livestock), food processing, or audit-inspection (as applicable), formal education, specific training courses, or past organic inspection experience &/or training. "Sufficiency" of expertise as regards "qualified inspectors" must be determined in relation to the types of operations an inspector is assigned to inspect. (A processing inspector, familiar only with fruit and vegetable processing, may for example, need to seek additional training, reading, or other exposure to familiarize her/himself with another particular type of food processing.)

It is the responsibility of an Accredited Certification organization to determine that an inspector has both the general and specific expertise required to adequately observe and report compliance with and deviations from organic production and handling methods in the operations to which s/he is assigned. It is the responsibility of the inspector to note the need for additional information or expertise if deemed necessary in the course of an inspection, and to decline an assignment for which s/he lacks necessary expertise, or where sufficient information/protocols are not provided by the certification agency.

REFER TO: [TABLE A.1. Competence]

Additional requirements:

7. Accredited Certification organizations must have on file affidavits from all inspectors assuring compliance with statutory requirements regarding confidentiality and conflict of interest.

3. CONTROL OF THE USE OF THE CERTIFIER'S MARK OR SYMBOL

4. CONTROL OF THE USDA SHIELD BY THE CERTIFYING AGENCY

5. COST OF CERTIFICATION

NOTE: An additional section concerning above sections 3, 4, and 5 will be developed by the Accreditation Committee for subsequent inclusion into the Final Board Recommendations.

B. Transparency: Record-keeping

The basis of transparency is documentation, maintenance of records, publication of basic certification information and appropriate access to information by the public, and to records by the Secretary, and the certified party as specified below:

1. PRODUCER/HANDLER RECORDS

Record-keeping required of producers and handlers that must be available to the Secretary, certification agent, and State official:

Information which must be outlined and documented, as appropriate, by the producer or handler and reviewed by the certifier, includes:

- (1) All substances applied to the growing and stored crop, growing medium, growing area, storage area, irrigation or post-harvest wash, or seed, while owned by the producer or handler, with dates, rates, and method of application, and name of applicator. [OFPA Sec. 2112 (d)]
- (2) All substances administered and fed to animals, all medication and drugs, with dates and dosages; and all substances applied in any area where animals, milk or animal products are kept, with dates, rates, and method of application, and name of applicator, while animals are owned by this certified producer or handler.
- (3) All substances applied to food, or applied in any area or container where food is handled while under the ownership of the certified entity who handles the food, with dates, rates, and method of application, and name of applicator. [OFPA Sec. 2112 (d)]
- (4) All substances used in the handling of food or applied in any area or container where food is handled or stored, while under the ownership of the certified entity who handles the food, with dates, rates, and method of application, and name of applicator. [OFPA Sec 2112 (d)]
- (5) Proof of certification of all products handled and all organic ingredients used for each product labelled as organic or "with organic ingredients." (refer to NOSB PHL Committee Labeling Draft.)
- (6) Sufficient records of all inputs, products handled, and date, source, lot number, and quantity; and all sales (whether bulk, raw or processed) with date, source lot number, quantity and recipient/transferee, to enable an auditing or inspecting certifier or investigator to reconstruct a "chain of custody" for all transactions during the period of time in which the certified entity holds title to the product, whether or not the product is physically in the possession of the certificant.

On at least an annual basis, certifying agencies or their inspectors must conduct at least one random product commodity tracking that demonstrates the steps of production or manufacturing prior to the shipment of that product from the premises of that farm or manufacturer.

2. CERTIFIER RECORDS

a. Records required to be kept by certifier, to be submitted to USDA/AMS as part of the Accreditation Application and upon request available to the public [FOIA]:

Because verification of information about practices is crucial to consumer confidence in the organic label, accountability of certifiers is essential. The basic premise that "organic" means "basic information about this food is obtainable," extends logically to verification of the organic claim. Thus, "certified organic" must mean "basic information about this certification claim is obtainable."

For this reason USDA will maintain updated records of each Accredited Certifier's policies and procedures, and will compile a list on quarterly basis of all Accredited Certifiers and certified parties, which can be made available to the public by request. The availability of the list should be published in the Federal Register and food trade periodicals.

- (1) Organization address, phone #, hours
- (2) List of certified parties
 - (a) Producers, handlers, processors
 - (i) Past and present
 - (ii) Current status of each
- (3) Decision documentation procedures
- (4) Decision making structure
- (5) Decision maker identities and affiliations
- (6) Certification review process
 - (a) Certification standards and procedures
 - (b) Review body identities and affiliations
- (7) Inspector selection criteria covering both the competence of inspectors and their assignment.
- (8) Organizational Structure (Articles of Incorporation, By-laws, and organizational chart.)
- (9) Organizational affiliations
 - (a) Major funding sources
 - (b) Major shareholders
- (10) Established standard procedures for document request response
 - (a) Fees for information requested
(expenses, i.e., fax, photocopy, staff time)
 - (b) Reasonable turnaround time for "standard" requests for information.
- (11) Established standard procedures for sampling and laboratory analyses that pertain to certification.[Sec. 2107 (a) (9)]

b. Public Access to Production and Handling Information

One basis premise of transparency is that basic information about organic food and how it was produced and processed is available to the public. That is, accountability in terms of records and public scrutiny is implicit in the use of the term "organic." At the same time, confidential business information of producers and handlers must be protected, while consumer access to information for health related issues must be ensured.

All purchasing and sales records, relating to ingredients, substances applied, or recipes and other proprietary production information are considered to be confidential business-related information, which must be available to the certifier, but also must be protected from public disclosure under confidentiality provisions of OFPA. [Sec 2116 (g)]

Any other information contained in records which is not required to be disclosed, including financial and business related information, shall be removed before disclosure. [Sec.2116 (g)].

NOTE: An additional section concerning public access will be developed by the Accreditation Committee for subsequent inclusion into the Final Board Recommendations.

c. Records required to be kept by certifier and available upon request to the Secretary or his representative:

The critical determinants of transparency are clear articulation of the policies and procedures governing certification decision-making, as well as open accessibility and clear documentation of the evidentiary basis upon which a particular certification decision is based. Transparency is achieved by having and following clear written standards, procedures and policies; good record-keeping; explaining the roles and responsibilities of officers, staff, inspectors and decision-making bodies; responsiveness to legitimate inquiries and complaints; maintaining an open, accessible, and responsive appeals process; and, by full disclosure and timely resolution of potential conflicts of interest.

Disclosure of the fiscal foundation for a certifying agent's activities is also essential to achieve transparency. Certifying agents should, on an ongoing basis in an annual report or other accessible means, document all sources of funds and revenue, the level and purpose of all expenditures, and the relationship between fee structure, income, other sources of revenue, expenditures, and services rendered.

Verification of certification claims through ongoing independent review is the basis of National Accreditation. Certifiers work must be replicable, documented, and accessible to review, following consistently administered policies and procedures. Field evaluators, under confidentiality agreements, designated by the Secretary, shall have access [Sec. 2116 (c)(2)] upon request to any and all records concerning the certifying agent's activities under this chapter, including:

- (1) Certificant files, including application, organic plan, inspection forms and questionnaires, decision documentation.
- (2) Personnel and policy manuals, organizational chart.
- (3) Full documentation of all appeals, complaints, and trademark or seal violations.
- (4) Fiscal accounting: breakdowns of income and expenditures.
- (5) Inspector, staff and decision maker contracts, including confidentiality agreements and disclosure of affiliations relative to potential conflict of interest. [Sec. 2116 (c)(2);(d); Sec. 2107 (a) (9)]

(6) Laboratory analyses, which must be reported to Secretary if shows any violative residue.

(7) Business records relating to conflict of interest provisions of the National Standards.

d. Records required to be routinely available upon request to certificant at reasonable cost for processing of request:

(1) Inspector contract, as above.

(2) Inspection report.

(3) Names and affiliations of all decision makers.

(4) Results of laboratory analyses.

3. Maintenance, access and transference of records as required under OFPA:

a. Producers and handlers are required to keep records of all substances as required above, for five years.

[Sec. 2112 (d)]

b. Certifiers are required to keep records as above for ten years. [Sec. 2116 (c)(1)]

c. Any certifying agent shall allow access by the Secretary or his representative, or the governing State official, to any and all records concerning the certifying agents activities under this title.

[Sec. 2116 (c) (2)]

d. If any certifying agent is dissolved, suspended or loses Accreditation, all certification records or copies of records concerning certifier activities Accredited under this title shall be transferred to the Secretary immediately upon request, and made available to the governing State official.

Confidentiality of records must be maintained by certifiers even following a dissolution, suspension, or de-accreditation of the certifier. [Sec.2116 (c) (3)]

C. Independence: (freedom from conflict of interest)

Definition: The term "conflict of interest" is defined as the use by an individual of his or her position for personal advantage or to the detriment of the integrity of the Organic Program. Personal advantage includes interest in another organization by the individual or a member of his or her immediate family (household), or receipt or acceptance of economic or non-economic favors, gifts or benefits of more than nominal value accruing to the individual or his or her designee, other than as part of his or her bona fide compensation."

Owners, officers, staff, committee members, board members, employees and contractors of Certifying Agents who have a financial interest in a farm or handling operation certified by the Certifying Agent, or who otherwise stand to gain financially from a certification decision, except for receipt of agreed upon fees for service or for use of a trademark or seal, must be isolated from those certification decisions in which they have an interest. Certifying Agents act as agents of the Secretary under the Organic Program, so an individual employed by a Certifying Agent represents the Secretary in certification activities.

Recommendation: The Committee recommends to the Secretary that a Certifying Agent must have written policies and procedures regarding:

1. the application handling process;
2. disclosure of inspector financial interests and affiliations;
3. the appeal of inspection results;
4. the certification decision making process;
5. disclosure of financial interests and affiliations of members of the decision making body, including conditions of disqualification from decision making; and
6. the appeal of certification decisions

Furthermore, the Committee recommends that the Accreditation Authority itself must have a responsive and accessible complaint, appeal and investigation process.

Part III: Procedures for Accreditation (and Outcomes)

The Accreditation Process has three phases:

- A. Application;
- B. Field Audit and Evaluation; and
- C. Peer Review and Recommendation to Secretary.

A. APPLICATION (Phase I) [see accompanying chart]

1. Submission of Application

To be eligible for review within the first round of accreditation, certifying organizations must submit applications for accreditation within 90 days of the publication of this notice. Certification organizations who submit an application for accreditation within this time frame will be evaluated in the first round of Accreditation and may continue to provide certification services.

Certifying agents will be asked in the application form to request accreditation in specific program categories:

- i. Organic Production: crops, livestock and related on-farm processing.
- ii. Organic Food Processing and Handling.
- iii. International Trade. (Certifiers who certify operations outside the USA who wish approval from the Secretary for import equivalency to US standards.)

To initiate the accreditation process, a certifying agent shall submit to the Secretary of Agriculture or his designee, an application, along with all required memoranda, documentation, and the applicable fee. Appendix B contains the Application Form, Memorandum of Agreement, and a description of required documentation.

The completed application form and accompanying documentation should be sent to:

National Organic Standards Program

USDA/AMS/TMD

P.O. Box 96456

Washington, D.C. 20090-6456

Phone inquiries regarding the status of applications should be directed to: Michael Hankin (202) 205-7806.

In the first round, applications will be reviewed in the order in which they are received. Existing certifying organizations shall be given priority in the processing of applications and field evaluation. Organizations which have not been certifying prior to the beginning date of the application period should not begin doing so until they have completed Phase I of the Accreditation Process.

Until completion of the first round of accreditation reviews in response to all properly completed applications received from currently active certifying organizations, certifying organizations may continue certification activities, or initiate new categories of certification services.

2. Review of Application:

The AMS/NOP Staff shall review applications for completeness and any obvious deficiencies or problems in a certifying agent's policies, programs, procedures, fiscal arrangements, or in regard to conflict of interest. If AMS/NOP staff makes a preliminary determination that the certifier's application indicates that the certifier meets the statutory requirements and the basic criteria of independence, transparency and competence as outlined in this regulation, they shall recommend to the Peer Review Panel that the "Accreditation Applied For" status be granted.

If AMS/NOP staff determines that the certifier's application does not meet the requirements of the OFPA, or if there is a need for further information or clarification of policies and procedures, the applicant will be notified accordingly.

Notification:

Within 60 days of receipt of an application, the AMS Staff shall respond to the applicant regarding whether the application has been found to be complete or deficient. Notification shall explain any deficiencies in the application and its supporting documentation, and explain options for overcoming deficiencies.

New organizations wishing to begin certifying, and those who have been notified of an unsatisfactorily completed application, and have not responded within 60 days of notice, may not provide certification services, and must reapply for Accreditation. Within 60 days of receipt of any additional information submitted to complete an application deemed incomplete, the Accreditation Staff shall inform the applicant of any remaining deficiencies, or acceptance of the application as complete. If the applicant does not respond within 60 days to notice of an incomplete application, they will have to wait for the next annual cycle of application and shall not be allowed to continue or begin certification activities. If the response still does not fulfill the requirements of the application, resubmission may continue, but Phase I must be complete within 12 months of the opening date for applications in that annual cycle, or further certification activity will be prohibited.

Close and thorough review of fully completed applications is intended to optimize certifier's successful field evaluation, to focus field evaluation on most salient areas of certifiers' operations, and to increase efficiency and effectiveness of time spent in field evaluation visits. To this end, the Committee recommends that AMS utilize the existing expertise in Organic Certification Program Evaluation to provide in-service training to AMS/NOP staff who will be reviewing applications.

To facilitate commerce during the first annual cycle of Accreditation, The National Organic Production Program will publish a list of certifiers who have satisfactorily applied for Accreditation, and are in the "pipeline" for field evaluation and peer review. This list will be published six months following the opening of the application process, and subsequently every six months.

Following the determination of "Application Accepted" status, the Peer Review Panel must be consulted on recommended assignment of the field evaluators and priority scheduling of visits. Upon completion of Phase I, and in preparation for the review process carried out in Phase II, AMS/NOP Staff shall provide applicants an explanation of the basic steps in the process and an estimated time-line for completion of various stages in the review and decision-making process.

At this point, for the first round of Accreditation application, AMS shall publish a list of all certifiers who have their applications complete and who are ready for field evaluation.

B. FIELD EVALUATION AND AUDIT OF AGENCY RECORDS (PHASE II)

1. Nature and Purpose of Field Evaluation

The purpose of the field evaluation-audit phase of Accreditation is to verify that each certifying organization is in fact functioning in a manner consistent with the requirements of the OFPA, the Accreditation Program and the policies and procedures outlined in their applications. Basic functions such as record keeping, assignment and activities of inspectors, and the content and uses of the organic plan and audit control will be checked to assure that certification decisions rest upon an acceptable technical foundation. Policies on decision making, conflict of interest protection and confidentiality will be reviewed in the context of actual cases, to determine that they are effectively being followed.

2. Design/ Assignment/ Approval of Evaluation Team

The overall design of the field evaluation will follow the procedures outlined below. Some emphasis on certain program or policy areas may be indicated by the review of the Application, and these will be considered in the assignment and balance of particular evaluator expertise. Questions of procedure or application of policies that remain from the Application review shall be indicated to the assigned evaluators. The size and composition of evaluation review teams will vary depending on the scale and scope of a certifying organization's activities. The proposed composition of Evaluation Teams shall be submitted routinely for comment to the Peer Review Panel, as well as to the certifying agent to be visited. AMS shall take into account the suggestions of the Peer Review Panel, and any concerns raised by certifying agents regarding the ability of an individual review team member to carry out an impartial review. The USDA should seek in its selection to create the most qualified, appropriate and unbiased team possible. Final responsibility for approving Evaluation Teams shall rest with AMS, with a process for appeal. All certifiers have the right to impose confidentiality conditions on any member of the site visit team, except insofar as OFPA requires USDA access to records.

An international organic standards organization that is recognized by the Secretary for purposes of accreditation of certifying agents may perform on-site evaluations in the United States. Any on-site evaluation performed by such entity may, at the discretion of the Secretary, constitute

compliance with the on-site evaluation requirement appearing in the Secretary's domestic accreditation program provided that: (1) All written reports or documents produced or resulting from the on-site evaluation by such organization shall be provided to the Secretary; and (2) Such documents and reports become part of the permanent record of the certifying agent held by the Secretary.

The site visit will routinely be scheduled at the certification agent's headquarters, and possibly at certain other field locations. In cases where a certifying organization carries out its activities through multiple chapters in several locations, AMS/NOP, in consultation with the Peer Review Panel, shall decide how many additional field locations, if any, will be visited and evaluated in order to gain an accurate appraisal of the certifying agent's programs and policies followed across all locations or chapters. The key factor governing whether locations in addition to headquarters will need to be visited, and possibly accredited separately, is the locus of final decision making, permanent record storage, oversight and audit control. If chapters are completely autonomous in making and reviewing the final certification decisions, and are issuing certifications, they should require separate field visits.

3. Content of Site Visit

- a. Formal meeting to introduce evaluators and staff, and to review procedures to be followed.
- b. Random sample of certification files pulled for review, with case-file review form to be completed.
- c. Review of written policies and procedures, with questions for staff relative to actual implementation of these. Do staff functions appear to be well defined, understood, and carried out effectively?
- d. Review of decision making process, composition of review panels.
- e. Review of complaints and appeals cases, at discretion of evaluation team.
- f. Review of residue testing procedures and findings.
- g. Review of certifier's production audit systems, if applicable. If certifier does not maintain a transaction-audit system of certified product, what methods do they use to insure that such systems are practiced effectively by their certificants?
- h. Review of inspector qualifications and assignments.
- i. Optional field visits of certificants: (NOSB shall develop further recommendations).
- j. Interviews by phone of parties relevant to certification decisions when warranted.
- k. Completion of Evaluation Scoring Form, including all areas listed above, as well as compliance with OFPA re: conflict of interest, confidentiality, use of seal, reasonable fees, appeals and complaints and investigation/enforcement.
- l. Exit Interview: A summary of the Team's finding shall be presented verbally to the Certification Director at the conclusion of the Team's visit.

4. Access to Records

In carrying out field evaluations, individuals acting on behalf of the Accreditation Program shall be granted the full rights of access to information accorded the Secretary in the statute. Evaluators who are contracted by the USDA for this purpose shall sign non-disclosure agreements assuring protection of confidential information.

Inability or unwillingness to provide requested documentation, records, statements of policy, resumes of staff or members of governing bodies, or financial disclosure forms shall be grounds for denial or suspension of accreditation.

The certifying agent shall be prepared, upon request, to provide copies of selected documents and records to Evaluation Team members, although most basic documents shall already have been provided as part of the application. Such requests may include basic procedures and policy manuals, a limited number of case file records, resumes of personnel, and fiscal records, and any other supporting material which may aid in the evaluation.

5. Evaluation Report

The Evaluation Team's field visit(s) shall be summarized in a written report completed, under all but exceptional circumstances, within 30 calendar days of the visit. An outline of the Team's findings shall have been presented verbally at the conclusion of the Site Visit (Exit Interview, step I. above.) The report must be signed by all members of the review team, any of which are free to add personal observations or additions to the report, which may include objections or differing views relative to certain conclusions or sections of the report. A copy of the field evaluation report, as submitted to AMS, shall be provided to the certifying agent, who shall have 14 days to clarify or correct factual matters addressed in the report, or provide further clarification or documentation of program elements identified in the report as a possible basis for a decision to deny accreditation.

6. Role of Peer Evaluators

A peer evaluator will be selected from each certification group being accredited that wishes to exchange volunteer time for this purpose with other certification groups. Selection must be based on the qualifications outlined in Sec.A2. (below) and who is most familiar with the day to day operations of certification, and qualified to assist in the assessment of other certification program's management. These individuals will comprise an evaluator pool from which the selection of members for each review team can be made to create a balance of expertise and experience which reflects the size and type of program being evaluated. In the case of very small programs it may be determined that only one evaluator is required for the field visit. In composing each review team from the pool of qualified peer evaluators, AMS shall strive to create a balance of expertise in keeping with the size and complexity of the certifying operation. State certification programs shall have their evaluations include a peer-certifier from another state program, as private certifiers shall have their evaluation team include another private certifier. All those in the pool will be required to attend a Training and Orientation session before doing any site visits. Evaluators may be compensated for travel and per diem expenses to attend a training session.

7. Qualifications of Evaluators

Evaluators, both USDA personnel and peer evaluators, assigned to do field audits of Certification Organizations seeking Accreditation under the O.F.P.A. should:

- 1) Have complete familiarity with policies and procedures of Organic Certification program management: application, inspection and decision making, and required record-keeping. Shall have received orientation in risk assessment in relation to certification program management.

2) Have: a) demonstrable expertise in agricultural cropping and livestock systems predominately certified by the certifier to which they are assigned, or

b) demonstrable expertise in food technology and inspection, or

c) have demonstrable experience in quality systems management, audit-inspection, or pesticide-food safety enforcement.

3) Be familiar with all requirements of the O.F.P.A., and ensuing U.S.D.A. regulations.

4) Have demonstrated both written and oral communication skills.

5) Submit three letters of recommendation verifying expertise and relevant experience.

6) Submit notarized affidavits ensuring compliance with all Federal requirements regarding confidentiality and conflict of interest, for each assigned evaluation.

Preference will be given to those with past experience as certification inspectors.

C. PEER REVIEW AND RECOMMENDED OUTCOME (PHASE III)

1. Background commentary

Under the Organic Foods Production Act of 1990, any person or State government can apply to be an agent of the Department of Agriculture for the purpose of certifying a farm or handling operation in accordance with the Act. Only food products produced on a USDA certified farm and handled by a USDA certified organic handling operation can sell or label their food products "organically produced" or "organic." Organic handling operations are defined as operations that receive or otherwise acquire organic agricultural products, and process, package, or store such products. Under the USDA's National Organic Production Program, consumers of food labeled "organic" are guaranteed by the USDA they are purchasing food products raised and handled according to the standards set forth in the Act.

Because the USDA Accredited Organic Certifying Agents are the critical element in legitimizing the organic label claim, to be an accredited certifying agent, an application must be made to the USDA, and verified through on-site field evaluation. both the application and the field assessment then go to a Peer Review Panel appointed to assist the secretary in evaluating the performance of certifiers.

The specification of a Peer Review Panel in the Act, the history of the US organic movement, and the use of quality management systems models (which certification programs resemble and which are required for international trade) argue for a community or stakeholder role in assuring consumers that organic farmers and handlers are meeting the quality standards indicated by the "organic" label.

2. Functions, Responsibilities, and Operation of the Stakeholder-Peer Review Panel may include:

a). advise (oversight) of screening of applications,

b). recommendations for site evaluators and evaluations,

c). reviews the Field Evaluation Report, Application Screening Report, and other documentation. (Might include complaint or appeals information, other evaluation reports, references.)

d). completes Scoring Document

e). recommends to Secretary as to approval (with time frame for re-evaluation, renewal shorter or longer) or denial,

f). oversee fairness of process,

g). make recommendations to NOSB and USDA on how to improve or adjust the program.

This panel will conduct routine operational/ administrative activities by conference calls and by mail. In person meetings to make recommendations will be scheduled to coincide with accreditation cycles. The locations of these meetings will be determined by the panel. Panel members, exclusive of the USDA member, shall serve without compensation. Travel costs will be reimbursed.

3. Qualifications, Composition and Size of the Peer Review Panel

The Secretary shall establish a Peer Review Panel that provides impartiality and representation of all sectors of the organic community. Individuals to be considered must have a history of participation and experience in a certification program/process. Key qualifying components of this experience include serving on a certification committee, advisor to a certification board or program, or as a certification inspector, as well as having expertise in organic farming and handling.

The nine Peer Review Panel members should represent five key sectors of the organic community, as follows:

1. certified organic farmer - 3
2. certified organic handler/processor - 2 total (1 each)
3. organic certification agents - 2 total (1 each from a state and a private agent)
4. a consumer/public interest group representative - 2
5. USDA representative - 1
6. NOSB representative (ex-officio) - 1.

Each of the four geographical regions (as defined under the USDA-Sustainable Agriculture Research and Education program) should have at least two voting members on the Panel.

All Peer Review Panel member must have required experience and should be trained on all aspects of the USA/NOPP Organic Accreditation Program.

Conclusion: A Peer Review Panel with member representation from the entire organic community, working in conjunction with the Secretary of Agriculture embodies a democratic quality management system consistent with certification review practices used historically in the United States. It will further the ongoing involvement of grassroots organizations and consumers in a productive, efficient and effective partnership with USDA.

Such a quality system for organic certifying agent accreditation offers consumers, regulators, and trading partners the assurance that "organic" food will consistently meet US national "organic" standards.

Note: In keeping with international guidelines for standard setting organizations, no individual acting as a Peer Evaluator or member of an Accreditation Field Evaluation Team shall also participate on the Review Panel. Members of the Review Panel may be asked to assist in the Application Screening/Review process, prior to Field Evaluation. Essentially, evaluation must be an independent and discrete function.

PART IV. OTHER PROCEDURES

A. Determination of Indemnification process and costs

"Indemnification" means that the private certifiers must extend their General Liability Insurance to add a clause naming the Secretary of the U.S.D.A. as an "additional insured." Typical cost for this estimated at 2-5% of premium cost. (Indemnification is not a "surety bond" procedure.)

B. Administrative Appeals and Complaints Process

A fair and effective appeals system is essential to the success and integrity of the "National Organic Production Program" and to the accreditation process. Independence and objectivity being of prime importance, the NOSB makes the following recommendations to the Secretary:

1. Any person adversely affected by a National Organic Production Program action or decision must be given the opportunity to appeal that determination. The Secretary must, in all cases, have final decision making authority in the administrative review process.
2. In the interest of fairness, the National Organic Accreditation Program appeals must be conducted by independent hearing officers who are not responsible for the implementation and administration of the National Organic Production Program. Because AMS is responsible for this program, the use of hearing officers who are employed or under the authority or control of AMS, presents a problem of conflict of interest. To protect the integrity of the appeals process, and to ensure fairness of these determinations, this board recommends that an independent USDA Appeals Division be utilized or established to conduct the appeals review process, and to make final appeals decisions. This board further recommends that the National Organic Production Program appeals be administered by the National Appeals Division that is being proposed in the current USDA reorganization plan as called for in HR 3171, Sec.4. This recommendation is not meant to imply the establishment of a separate USDA Appeals Division solely for organics, but to strongly recommend the necessity for an independent review process and for organics to be included in the new USDA independent appeal division.
3. To ensure an "expedited" appeals process [OFPA, Sec 6520 (a)] and because food products are seasonal and some are highly perishable, organic farmers, handlers, processors and certifiers must be given the opportunity to correct any adverse decision by the National Organic Accreditation Program so that they can carry out their business activities and avoid undue economic losses due to the inability to market their products.
4. It is essential that all persons adversely affected by the National Organic Accreditation Program be notified, in a timely manner, that they have appeal rights. Therefore, the NOSB recommends mandatory procedures be established that shall require all National Organic Accreditation Program decisions to be made in writing, including written explanation of the basis for the decision and a timely written notice of appeal rights and procedures.

5. To ensure that this appeals system is end-user friendly and that knowledge of appeals rights are readily available and simple to understand, the NOSB recommends that at the accreditation and certification application stages that appeals informational brochures be mandatorily provided to such persons. This informational brochure must include in easy to understand language the following: Their appeals rights, procedures, time lines for due process and all key phone numbers, personnel and addresses necessary to "expedite" these rights, if and when necessary.

6. Furthermore it is the intent of the NOSB to be systematically apprised of the appeals process functioning, on a quarterly basis. This information should include: number of appeals, and outcome, kinds of appeals, and any problems arising from this process that may need new or revised recommendations to USDA for ensuring this independent and expedited appeals process.

C. Costs of Accreditation

Recognizing that there will be substantial start-up costs to implement the USDA Accreditation Program; that revenues from certification fees will be substantially higher after handlers not now certified have applied; and that costs of the first year of accreditation will exceed successive years; and, because the OFPA is a consumer protection law and is intended as well to support and encourage environmentally sound agricultural practices and because additional costs to organic producers will be perceived as disincentives; the Board sees the use of appropriated funds as justified, and therefore recommends that the first round of accreditation be paid for through a direct appropriation of federal funds. Furthermore, the Board recommends that (1) fees charged to certifiers not exceed the ongoing costs of administering Accreditation after the first round and that fees collected be used exclusively for that purpose; and (2) the ongoing program administration costs above the cost of Accreditation be paid for through direct appropriated funds.

D. Suspension or termination of accreditation

NOTE: An additional section concerning this subject will be developed by the Accreditation Committee for subsequent inclusion into the Final Board Recommendations.

Part V. APPENDICES

Contents:

A. Glossary

B. Application

Part 1. Basic Information

Part 2. Memorandum of Agreement

Part 3. Questionnaire: Policies and Procedures

Part 4. Required Documents

C. Other forms

Application screening report

Notification

Field evaluation report

Peer review board scoring document and memo

Indemnification of Secretary (Bond)

APPENDIX A

GLOSSARY (to be developed)

APPENDIX B

APPLICATION FOR ACCREDITATION

Submitted to:

The United States Department of Agriculture for the USDA Organic Certification Accreditation Program

Please fill out all sections and answer all questions. Before answering questions in this application, please study carefully the content of the Federal Register Notice: " Standards and Procedures Governing Accreditation of Organic Certification Organizations."

This application contains four sections:

1. Basic Information
2. Memorandum of Agreement (Statement of Intent)
3. Questionnaire (Program policies and Procedures)
4. Checklist of Required Documentation

Please send the completed application and all accompanying materials to:

National Organic Standards Program
USDA/AMS/TMD
Room 2510 - S
P.O. Box 96456
Washington, D.C. 20090-6456

Phone inquiries regarding the status of applications should be directed to: Michael Hankin (202) 205-7806.

Application for Accreditation

Part 1. Basic Information

1. Name of Organization; contact person for inquiries regarding this application; phone/fax numbers; headquarters address

2. Organization Type: state or private.

2.A. Describe your legal status. Do you have chapters/field offices -- what do they do, what policies and procedures do they follow, and how do services offered differ across chapters/offices and headquarters?

2.B. Please describe the relationship of your governing body to the body which makes certification decisions.

3. How long have you offered organic certification services? Please describe briefly the history of your organization or program.

4. Please list the name, title, address, and phone/fax of your organizations chief staff officer, chairperson or head of your board or governing body, and the individual responsible for fiscal management.

(Attachment)

5. PLEASE CHECK THE CATEGORIES OF CERTIFICATION FOR WHICH YOU ARE APPLYING FOR ACCREDITATION, and list the current number of certificate holders and/or licensees and estimated annual sales of certified product:

Number Volume of certificants

_____ Crops and/or livestock

_____ Processing and handling

_____ Foreign certifications of certificants who import to US

6. If conducting certifications of the production and/or handling of organic products imported into the United States, please complete the following sections (a.-e.) below:

a. List the foreign countries within which you presently conduct certification services, and indicate those from which products are imported into the U.S.

b. List those countries other than the United States to which products bearing the seal of your agency are exported.

c. Explain cases where the application of agency policies, procedures, and standards differ from those applied within the United States.

d. Describe the measures controlling the issuance of certificates to producers and/or handlers in foreign countries that are implemented by your agency. Please cite how these measures differ from those employed to ensure the integrity of products produced and/or handled within the U.S.

e. List the records pertaining to the certification of producers and/or handlers located in foreign countries that are accessible and on file at the U.S. agency office.

7. Geographic area(s) of current certification activity (states and other countries.)

8. Areas of certification competence (specific types of producers and or handlers for which you have specific standards and inspector expertise.)

Part 2. MEMORANDUM OF AGREEMENT

NAME OF CERTIFYING AGENT _____

The following signatories, being duly authorized to represent the above referenced organic certification agency, hereby confirm, according to the best of their knowledge, full and ongoing compliance with requirements of the Organic Food Production Act, 1990, National Organic Production Standards, and Standards and Procedures Governing the Accreditation of Organic Certification and the accuracy of information provided in this Accreditation Application. Further, said signatories hereby assume full responsibility for submitting or providing access to the Secretary, or his designee, to supporting documentation as may be required. [§ 2116(d), (e) & (i): "Agreement;" "Private certifying agent agreement;" & "Administrator"]

Further it is agreed that the private entity signatories shall hold the Secretary harmless for any failure on the part of said agent to carry out the provisions of the OFPA 1990.

Signed: Date:

(Name, title)

Notary Public

Name:

Number:

Date:

Place:

Part 3. QUESTIONNAIRE

Description of Program Policies and Procedures

Please answer all questions in the space provided, summarizing information, policies, and procedures described in more detail in your attachments.

VERY IMPORTANT -- After your summary response to each question, please provide clear and explicit directions regarding where the full explanation/documentation is located in the various attachments.

ORGANIC PRODUCTION STANDARDS

The purpose of this section is to provide information needed to evaluate the basic equivalency of your procedures with the OFPA provisions governing the content and use of organic plans.

I. Do you require a three-year history of management without prohibited substances for all farms certified? yes__ no__

2. Do you have provisions and policies to insure that organic integrity is maintained in "mixed" (organic/conventional) operations? yes___ no___

3. Do you require annual on-site inspection? yes___ no___

4. Do you have a published list of approved/prohibited inputs? yes___ no___

5. Do you have standards for:

organic farm and handling plans yes___ no___

soil fertility management yes___ no___

manure management yes___ no___

seeds and transplants yes___ no___

wild crops yes___ no___

livestock yes___ no___

6. Do you have standards for organic food processing and handling? yes___ no___

7. Will your standards, fiscal policies or practices prohibit your organization from recognizing certifications by other organizations accredited under the OFPA? yes___ no___

POLICIES AND PROCEDURES

Seal or Trademark

1. Please describe your trademark or seal, and the policies governing its use.

2. What are the financial consequences, if any, and policies governing use of your seal or trademark? (By "consequences", we mean any obligation to exchange funds, or incur a financial obligation of any sort).

Staff

1. Describe your policy regarding inspector qualifications, training, and assignments. What do you ask inspectors to do? How are they paid? Who selects and assigns them to specific cases?

2. Describe your policies to guard against conflict of interest among inspectors, staff, officers, committee members and clients.

3. Does your organization perform consulting or advisory services?

Are these agricultural, marketing or legal services?

If so, do you have written procedures with respect to the separation of certifying functions and consulting functions? How do you insulate the certifying function?

By procedure

By organizational function

Confidentiality and Access to Records

1. Describe the policies and procedures you have used, or will use to assure confidentiality of records on individual clients.
2. Describe how you handle requests for information on a client from another certifying organization, from a member of the public, from a prospective buyer.

Finances

Explain how your program is financed, with references to an attachment which provides an accounting for your last fiscal year. (i.e., audited annual report, financial statement, IRS report, State govt audit)

Appeals and Complaints

1. Describe your appeals processes and policies.

Policy Changes

1. Describe the process you use, and who makes decisions relative to changes in:
 - + Standards
 - + Program management
 - + Decision-making authority
 - + Job descriptions
 - + Fiscal matters+ Actions recognized by applicant as essential to attain accreditation

Part 4. Additional Documentation Required

1. Criteria for certification (Standards) (What you send to a potential client who seeks information on the services you offer.)*
2. Minimum information required from producers or processors regarding growing or handling practices (Application/Organic Plan Questionnaire) and methods for verifying that information.
3. Procedures for inspection, including frequency instructions given to inspectors, and what Inspection Report must cover.*
4. Qualifications of and training requirements for all inspectors.*
5. List of key staff. officers, shareholders, committees, approved inspectors and persons with decision making authority, for chapters as well as main office.*
6. Program and personnel policy manual, including decision making procedures.
7. Articles of incorporation or state law/charter.

8. Organizational chart.
9. Latest annual report or its equivalent.
10. Procedures for soil and tissue sampling and analysis.
11. List of currently certified clients.*

***Changes or updates in * items must be revised and reported annually to USDA.**

APPENDIX C

OTHER FORMS (to be designed)