



1400 Independence Avenue, SW.
Room 2642-South, STOP 0268
Washington, DC 20250-0268

July 31, 2020

MEMORANDUM TO THE NATIONAL ORGANIC STANDARDS BOARD

FROM: Jennifer Tucker, Ph.D.
Deputy Administrator
National Organic Program

SUBJECT: Request for Discussion and Recommendations: Human Capital Strategy for Organic Inspectors and Reviewers

The National Organic Program (NOP) requests that the National Organic Standards Board (NOSB) facilitate a public discussion and provide recommendations related to a Human Capital Strategy for Organic Inspectors and Reviewers.

Human capital refers to the skills, knowledge, and experience held by an individual or population, and is generally considered one of the most important intangible assets that contributes value to an organization or community. As a public-private partnership, organic certification is a shared responsibility across the organic community, making the effective management of human capital an essential element of success in protecting the USDA organic seal.

Organic stakeholders, including certifiers and organic farms and businesses, have raised the problem of a known shortage in well-qualified organic inspectors and reviewers. With the increasing size and complexity of organic supply chains, engaging in near-term and long-term efforts to develop, recruit, and retain a strong community of well-trained and well-qualified inspectors and reviewers is essential for organic integrity.

We are initiating this work agenda item to facilitate discussions about this topic across the organic community in a public and open way. We are not currently seeking recommendations for Instructions, Guidance, or Rulemaking. Instead, we seek to create a forum for community-driven or NOP-facilitated solutions that will address this shared challenge across multiple stakeholders. To that end, the attached document captures key topics to help start and shape this discussion, based on previous activities; informal communication with the Compliance, Accreditation, Certification Subcommittee (CACS); and communication with organic stakeholders.

We thank you in advance for your work, and we look forward to the discussion and your recommendations.

USDA Agricultural Marketing Service (AMS) | National Organic Program (NOP)

Human Capital Strategy for Inspectors and Reviewers

Human capital refers to the skills, knowledge, and experience held by an individual or population, and is generally considered one of the most important intangible assets that contributes value to an organization or community. As a public-private partnership, organic certification is a shared responsibility across the organic community, making the effective management of human capital an essential element of success in protecting the USDA organic seal.

Organic certifiers and businesses have raised the problem of a known shortage in well-qualified organic inspectors and reviewers. This is a critical problem, because these professionals often have the most direct connection with the operations and records of organic farms and businesses. This problem has been caused by several factors, including a rapidly expanding industry, the need for specialized skills, and competition for well-qualified individuals both inside the organic community and with other industries.

With the increasing size and complexity of organic supply chains, engaging in near-term and long-term efforts to develop, recruit, and retain a strong community of well-trained and well-qualified inspectors and reviewers is essential for organic integrity.

This paper discusses the different elements of human capital management, focusing specifically on organic inspectors and reviewers.

Background

The Organic Foods Production Act states that to be accredited as a certifying agent, the certifier must have sufficient expertise in organic farming and handling techniques as determined by the Secretary. The USDA organic regulations state that certifying agents and their inspection and certification personnel must have sufficient expertise in organic production and handling techniques to fully comply with and implement the USDA organic regulations (7 CFR 205.501(a) General requirements for accreditation).

Certifiers meet these requirements by hiring, training, and retaining both staff and contracted inspectors and reviewers. The choice to use in-house or contract personnel is up to certifiers, however, personnel must collectively meet the requirements of the Act and USDA organic regulations. Certifiers do this by hiring or contracting with already qualified personnel and/or training new personnel on a regular basis.

The topic of inspector and reviewer qualifications and training has been of interest to the National Organic Program (NOP) and the organic community for several years. In February 2018, the Accredited Certifiers Association (ACA) published a document [Guidance on Organic Inspector Qualifications](#). In Spring 2018, the National Organic Standards Board (NOSB) completed a [proposal \(see file pages 9-50\)](#) and passed a [recommendation](#) related to Inspector

Qualifications Training. The NOSB's proposal included work previously done by the International Organic Inspectors Association (IOIA) for the NOP in 2011.

In May 2019, the NOP launched the [Organic Integrity Learning Center](#), which offers free online training in a formal Learning Management System. The Learning Center was designed to support the professional development and continuing education of all professionals working to protect organic integrity including certifiers, inspectors, reviewers and compliance specialists. As of July 2020, more than 2,000 people have Learning Center accounts.

In January 2020, the ACA, which has offered annual face-to-face training for certifier staff for several years, partnered with IOIA to broaden its training days to include inspectors. This expansion reflects the vital role that both staff and contract inspectors play in organic certification. The NOP also emphasized the broader importance of human capital in organic certification during its training days with ACA in both Texas in January 2020 and Nurnberg, Germany in February 2020.

Finally, the Strengthening Organic Enforcement [proposed rule](#), posted in July 2020, includes proposals to establish specific qualification and training requirements for certifying agent personnel, including inspectors and certification reviewers. Requiring that personnel meet minimum education and experience qualifications and requiring continuing education will ensure quality and consistency of certification activities performed by certifying agents.

To date, much of the work on this topic has focused on the qualifications and training of organic inspectors and reviewers. This paper continues and expands that dialogue, by summarizing a broader set of human capital dimensions that are needed to develop, support, and retain a robust and well-supported pipeline of these professionals over time. The goal is to initiate a broader discussion on these topics across the organic community.

Human Capital Dimensions

There are several dimensions involved in human capital planning. These dimensions span many phases of a person's possible interaction with a professional community, from the nurturing of potential future applicant pools through succession planning to prepare the next generation of professionals. The dimensions below are addressed in many human capital models, but particularly draw from the Office of Personnel Management's [Human Capital Framework](#). They include:

- Strategic Workforce Planning
- Talent Management: Pipeline Development
- Talent Management: Recruitment and Matching
- Performance Management and Evaluation
- Professional Support and Educational Infrastructure

For each dimension, this paper offers a brief description, and then poses questions to support discussion across the organic community.

Strategic Workforce Planning

Consistent with the public-private structure of organic certification, human capital management has traditionally been highly decentralized. Certifiers have generally determined their own approach to staffing and skills development, and have generally pursued recruiting, talent development, assignments, and retention independently.

Human capital, however, is emerging as a “precompetitive problem” in the organic industry, that is, a problem that occurs before product or service development, about which organizations may choose to collaborate rather than compete. This paper assumes that organic certification stakeholders would benefit from developing shared approaches for cultivating and supporting human capital, as an insufficient pool of organic professionals hurts organic integrity for all.

Questions for community consideration include:

- What is going well and reflects strengths with respect to human capital in the organic community? What weaknesses create risks for certifiers and the market? Where do opportunities lie? What are the threats if human capital is not strategically managed?
- What are the pre-competitive problems related to human capital that many or all certifiers face? For example, what challenges do many certifiers share in identifying, attracting, developing, and retaining talent? What are the largest gaps in the current talent pool? What are the future risks that could be planned for today?
- What forums exist or could be created to facilitate strategic workforce planning between and among certifiers, to better understand and plan for existing and future human capital demands?
- How could certifiers conduct a shared Needs Assessment based on industry trends and metrics, to determine the target talent pool and skills that need to be further cultivated in the future?

Talent Management: Pipeline Development

Talent Management begins with developing and cultivating pipelines of people who are prepared to enter critical roles in the organic certification community. Investing to build shared sources of talent provides candidates who are then ready to be recruited for specific work opportunities across the community.

Today, expertise is needed not only in organic agriculture, but also in quantitative methods (to conduct traceback and mass balance audits), supply chain dynamics, and forensic accounting and investigative skills. Legal skills are helpful in assessing whether a proposed adverse action will stand up in court, and interpersonal and communication skills are essential for success in organic certification.

People with these talents may be found in specialized academic programs, such as sustainable/organic agriculture, forensic sciences, food/materials science, legal studies, and business/accounting studies. However, there may also be other sources of talent in different industries or sectors, such as other types of food regulatory or inspection programs, or other fields where people have gained experience in conducting investigations of wrongdoing.

Questions for community consideration include:

- What are possible goals and opportunities for building long-term relationships with academic programs, in either specialized approaches (supporting the development of an organic agriculture specialty track) or multi-disciplinary tracks (cross-Department training in agriculture, law/investigations, and business)? How could these conversations be initiated or expanded?
- What are possible options for developing Apprentice Programs for career changers who need specialized experience in organic before being ready for inspector or reviewer roles?
- What other sectors may include the types of professionals that might have backgrounds and qualifications that provide a strong foundation for a move to organic agriculture? How could the community identify and reach out to those possible communities in creative ways?
- How can these candidate pipelines be developed in a way that maximizes diversity and inclusion, so that those working in the organic community represent the diversity of the public we serve?

Talent Management: Recruitment and Matching

The decentralization of the organic certification public-private partnership creates a complex networked organic certification community, making it difficult to gain an overarching perspective on the placement of human capital and possible systemic gaps. How can the community best ensure that there is an adequate number of appropriately skilled inspectors and reviewers at the right times in the right places? This includes recruiting and developing inspectors who understand local agricultural dynamics and patterns, as well as the local language.

In other cases, there may be well-qualified inspectors in an area, but no systematic ways to connect them with certifiers who need their services. These difficulties in connecting resources with needs can apply both for certifiers recruiting in-house talent and certifiers seeking contract staff.

Questions for community consideration include:

- What are possible needs and opportunities for a shared job board to advertise either employment or contract opportunities across the organic certification community?

- A recent ACA and IOIA working group raised the possibility of developing an inspector registry, to better share the profiles of inspectors who wish to share their qualifications and availabilities. What would be the benefits and risks of such a system? How could such a system work, and how could it be implemented?
- What are some other approaches for connecting organic certification talent with existing needs?
- What steps could the organic community take to foster a diverse candidate pool that represents the public over time?

Performance Management and Evaluation

Once onboard, performance management becomes an important aspect of human capital management. Elements of this dimension include regular [performance evaluations](#) and feedback from both management and customers; performance-based compensation and rewards; and ongoing skills development. Evaluation also relates to the metrics and analytics that provide feedback to the community about its human capital investments.

Questions for community consideration include:

- What changes are needed to ensure that well-qualified and highly experienced inspectors and reviewers are appropriately rewarded for their professional qualifications and achievements? How should the organic industry best reflect the need and value-added of a robust and complete organic inspection process, with a highly qualified and well-compensated inspector?
- Some inspectors have noted that recent high-profile enforcement actions have increased their concerns about the possible legal risks involved in conducting inspections and reporting on possibly fraudulent or noncompliant activities at high-risk operations. What are ways that the community can address this concern?
- Some certifiers have asked for a systematic mechanism to share information about both high-performing and poor-performing inspectors with the NOP and with other certifiers. What mechanisms might allow for this, while protecting privacy and due process?
- What avenues might be possible for elevating strong performers that are able to serve multiple certifiers (e.g., contract staff)? How can high performers be identified for advanced development opportunities to support both retention and succession planning?
- How do/will we know there are sufficient well-qualified inspectors and reviewers to serve the organic community as it evolves?
- What other system-level performance measures will tell us that our collective human capital strategies are working to protect organic integrity?

Professional Support and Educational Infrastructure

The ACA and IOIA are important organizations connecting certifiers and inspectors for specific purposes, such as knowledge sharing, training, and networking. However, there is no umbrella organization that supports group benefits for the sector, such as health insurance or liability

insurance. Part of a robust support infrastructure also includes diverse opportunities for specialized and ongoing education, training, and development.

A robust and effective infrastructure supports community development, the ongoing professionalization of the field, and the retention of highly qualified individuals.

Questions for community consideration include:

- What services are most needed by independent inspectors or reviewers in the organic community that are not currently provided by an existing entity?
- What might some options for providing these services be? What type of organization(s) may be able to help?
- In addition to current resources, what other continuous learning and training and development opportunities are needed to support and retain well-qualified organic inspectors and reviewers?
- How could academic institutions, particularly those with specialized programs in organic and/or sustainable agriculture, be engaged in providing ongoing educational resources and/or community support for organic inspectors and reviewers?
- How could the community overall support the retention of well-qualified professionals in the organic community, even if they move between organizations?

Next Steps

The goal of this paper is to initiate a dialogue within the organic community about the broad set of human capital dimensions that may support the ongoing development of a robust and well-supported pipeline of organic professionals over time. We welcome the ongoing discussion of these issues and related recommendations from the National Organic Standards Board and broader community.