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## Inspector Retention Working Group Report

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## **Executive Summary**

Inspectors play a pivotal role in organic certification. They embody the human element of certification, often providing operators with their only face-to-face interaction with the certifier. Inspection work is dynamic, challenging, and can be highly rewarding, particularly for individuals dedicated to the principles of organic agriculture. A highly qualified inspection workforce is needed to support organic integrity and promote confidence in organic certification.

The ever-increasing complexity of organic supply chains and significant growth in the organic industry continue to drive demand for organic certification and the need for organic inspectors. From the Spring 2021 National Organic Standards Board (NOSB) Recommendation: “It was universally acknowledged by IOIA, certifiers, and experienced inspectors that there is a decreasing number of qualified individuals who desire to be organic inspectors and reviewers, leading to a potential crisis in the inspection/reviewer pool of qualified individuals.” This crisis is not just about training and onboarding new inspectors to replace those who retire or change careers; this is about the loss of experience when inspectors are not retained. This is an urgent human capital concern for the organic sector and is a pre-competitive problem for organic certifiers.

Certifiers and inspectors collaboratively identified root causes of inspector attrition and barriers to new inspectors entering the workforce and to retaining inspectors. To that end, the International Organic Inspectors Association (IOIA) and Accredited Certifiers Association (ACA) partnered on a joint Inspector Retention Working Group. The working group was composed of 26 staff and contract inspectors, and 20 non-inspector certifier staff, representing the diversity of the organic certification sector. The group focused on six high-level topics identified as key factors in inspector retention:

1. Inspector Business Relationships; Contracts and Insurance
2. Inspector Training and Qualifications
3. Inspector Compensation
4. Inspector Workload and Working Conditions
5. Inspection Quality, Feedback, and Continuous Improvement
6. Certification Systems, Forms, and Administrative Tasks

Historically, the culture of the certifier/inspector business relationship presented a challenge to open communication. The joint working group provided a neutral space, outside of the context of an employer/employee or contract relationship, to begin bridging this communication gap.

This environment supported inspectors and certifiers in having open and honest conversations and learning from one another. A summary of the findings of each discussion topic is presented in **Sections 1 through 6**.

Though both certifiers and inspectors acknowledged many of the same causes of inspector attrition, they often had widely different perspectives on the root causes of the issues which were eye-opening for many participants. These conversations ultimately led to a deeper collective understanding of the challenges faced by each stakeholder and provided a baseline from which the group could find consensus and make recommendations for practical solutions. These are presented in the **Recommended Best Practices for Inspector Retention**.

While this working group made strides to open the lines of communication and support successful collaboration between inspectors and certifiers, this is only a first step. Sustained collective action, led by IOIA and ACA, can continue to drive improvement and innovation in organic certification as the industry continues to grow and evolve. The working group developed a set of recommendations in several areas where further work is needed and should be prioritized, which are outlined in the **Recommendations for Future Work**.

## **Vision for the Future of Organic Inspections and Certifier/Inspector Relationships**

During the first topic and discussion, the working group participants were asked to share their vision for the future of organic inspection and the relationships between certifiers and inspectors. The following vision statement is a summary of these shared sentiments and provided the common foundation upon which the working group could have productive and respectful conversations about these complex and nuanced topics.

### **We envision a future where:**

1. Organic inspecting is a viable career with an affordable cost of entry that provides a sustainable work/life balance, competitive compensation, flexibility to meet individual needs and preferences, and accessible opportunity for professional growth and development.
2. Certifiers, staff inspectors and contract inspectors establish and build relationships based on trust, understanding, and mutual respect for the important role that each party plays in the organic certification process.
3. Relationships are strengthened through organized cooperative work between certifiers and inspectors to overcome shared obstacles facing the organic certification sector.
  - a. Certifiers, IOIA, and ACA are united in their commitment to addressing pre-

- competitive problems to support the organic industry. These organizations work together to drive consistency and efficiency in organic certification and advocate for policies and practices that support the retention of inspectors and certification staff.
- b. Collaborative IOIA/ACA working groups actively address certification and inspection challenges. Through open and honest conversations, the working groups discussed pain points, shared perspectives, and common experiences, to identify the root causes of complex issues, work to find consensus, and develop recommendations for action.
4. Certifiers and inspectors embrace innovation within certification that will continue to support and improve inspector retention as the industry evolves.

## Recommended Best Practices for Inspector Retention

The Inspector Retention Working Group collected diverse perspectives from certifiers and inspectors, defined the most pressing concerns with organic inspection work, and created a list of actionable best practices to support inspector retention.

### Inspector and Certifier Business Relationships

1. Certifiers and inspectors should consider the pros/cons of the various inspector business models (contract inspector, staff inspector, inspector co-op) listed in **Section 1** and consider which model/combination of models best meets their needs.
  - a. Both inspectors and certifiers should regularly reassess their business relationships as their needs and goals evolve and as the opportunities and challenges to each model change over time.
  - b. Certifiers should review the “cons” list for the inspector business model(s) used by their agency and evaluate what actions they can take to mitigate these concerns.
2. Certifiers should prioritize developing relationships with their contract inspectors, to get to know their needs and preferences and accommodate those when possible.
  - a. Both when establishing their business relationship and at least annually thereafter, certifiers and contract inspectors should have frank and open discussions about compensation, travel preferences, workload capacity, and seasonality, to align their needs as much as possible.
  - b. Contract inspectors need to advocate for themselves and should feel comfortable setting boundaries on their commitments for their well-being and to meet quality expectations.
  - c. Certifiers may provide a suggested fee schedule based on qualifications and experience to contract inspectors. Government agencies with contractors may have additional limitations.
3. Certifiers should create regular opportunities to build and sustain connections with and between inspectors, invite their feedback, and offer compensation for this time. In particular, these should provide the chance to discuss current hot topics, request input on proposed changes to policies or forms that will impact inspectors, provide updates on implemented changes, and facilitate peer-to-peer learning and sharing. Examples include:
  - a. A virtual or in-person “town-hall” style meeting
  - b. An email listserv for inspection-specific topics

- c. Certifier staff providing weekly office hours for virtual drop-in support
- d. Regular inspection team check-ins
4. Contract inspectors and certifiers should evaluate their contracts for indemnification clauses that could nullify an inspector's insurance coverage, request input from insurance companies and legal counsel on any questionable language, and work together to reword/remove these sections as necessary to protect inspectors.
5. Certifiers should consider adding independent contractors to their insurance policies, especially Professional Liability/Error and Omissions.

### **Inspector Training and Qualifications**

1. Inspector mentorship is critical to building inspection capacity and is valuable work. Mentors must be adequately compensated for mentorship work.
2. Certifiers should cross-train non-inspector certification staff and staff/contract inspectors, to expand understanding of each other's roles in the certification process and how each role's work impacts the work of the other.
3. Certifiers should consistently implement the [ACA Guidance on Inspector Qualifications](#) to inform inspector job descriptions and performance evaluation criteria.
4. The ACA and IOIA should collaborate on annual and/or ongoing training that drives efficiency and consistency of inspector training and reduces redundant training requirements. A list of desired training topics identified during this working group can be found in **Section 2**.
5. The ACA, IOIA, and individual certifiers should offer continuing education units (CEUs) for their technical training to provide inspectors with credible evidence of completion.
6. Certifiers should accept inspector training CEUs or certificates of completion from the ACA, IOIA, or the USDA Organic Integrity Learning Center in place of certifier-specific training and should consider accepting CEUs from other certifiers.
7. ACA and IOIA should further develop mentor competencies produced for the NOP-funded Human Capital project led by IOIA. The mentor competencies should be universally adopted and consistently implemented by certifiers and inspectors.
8. ACA and IOIA should consider a compensation scheme for apprentice inspectors during their apprenticeship.

## Inspector Compensation

1. Certifiers should be flexible and accommodate contract inspector fee schedule structures to meet the needs of both the certifier and individual inspectors.
2. Certifiers should establish policies to provide paid travel time and appropriate expense reimbursement that support inspector safety, health, and well-being while traveling. Such policies should include coverage for reasonable modes of travel, decent accommodations, and healthy meals, and should be reviewed/adjusted to account for increased expenses annually, if not more often.
3. Certifiers and inspectors should establish fee schedules to provide fair and adequate compensation for unexpectedly lengthy, challenging, high-risk, or highly complex inspections.
  - a. If a certifier uses flat-rate fee schedules based on a set rate or scope of work, a safety net should be built-in for lengthy inspections. Examples include:
    - i. A hybrid fee schedule that combines a flat daily base rate with an hourly charge beyond the standard. E.g., \$X/inspection day (max 8 hours) and an additional \$Y/hour when the day exceeds 8 hours.
    - ii. A flat daily base rate that increases incrementally. E.g., If an inspection takes 1-2 hours over the standard number of hours, an additional  $\frac{1}{4}$  of the daily rate is charged; for 2-4 hours extra, an additional  $\frac{1}{2}$  of the daily rate is charged; etc. This incremental approach is generally easier for the inspector to track and can simplify inspection budgeting for certifiers.
  - b. Establish a bonus pay agreement for unusually complex, high-risk, or difficult work, and for expedited inspections.
  - c. Provide additional paid time for inspection preparation, e.g., meeting with certification staff to strategize for the inspection.
  - d. Conduct team inspections with two inspectors for particularly complex or high-risk operations when appropriate and feasible.
4. All inspectors should practice accurate tracking and billing for the time spent on an inspection—including pre-inspection review, inspection time, report writing, and submission—and certifiers should support and encourage this practice. Accurate and complete tracking ensures adequate compensation for inspectors and accurately represents inspection costs to certifiers and clients. Time tracking is recommended for inspectors using a flat rate fee schedule, so they can get an accurate picture of their hourly rate for each inspection.

- a. Some examples of time-tracking apps used by inspectors include Toggl, Time Squared, and Timesheet; some inspectors report using a stopwatch as an offline option.
5. Contract inspectors should include a cancellation fee in their fee schedule for circumstances when the operator cancels an inspection on short notice (e.g., <1 week in advance and/or if nonrefundable travel arrangements have been made).
6. Regular increases in inspector compensation that provide cost of living adjustments, reward high-quality performance, and reflect increased expectations, are key to supporting inspector retention.
  - a. Contract inspectors should consider their needs and the value of their work each year and feel empowered to raise their rates and/or negotiate with certifiers accordingly.
  - b. Certifiers should establish policies for regular market comparison and review of pay rates for staff and contract inspectors and consider proactively encouraging contract inspectors to increase rates.
7. Certifiers should identify opportunities to offer contract inspectors more year-round work when viable. This could include cross-training inspectors to perform review work or special projects, compensation for providing requested input and feedback to the certifier, or examining inspection scheduling practices to spread out the annual inspection workload when possible.
8. Certifiers should consider opportunities to provide high-quality inspectors with recognition and appreciation in a personal manner (e.g., gift cards, holiday bonuses, highly desirable assignments, etc.).
9. Certifiers with staff inspectors in high-cost-of-living areas should actively compare staff inspector compensation with similar professions in the same area and communicate openly with staff inspectors about their pay and performance.

### **Inspector Workload and Working Conditions**

1. Certifiers must acknowledge that extensive travel is a leading contributor to inspector burnout. Certifiers should review the list of strategies to support inspectors in **Section 4** and establish policies and practices to enable efficient, comfortable, and sustainable inspection travel and support inspector well-being.
2. Certifiers should identify one or more staff persons to support contract inspectors if they need immediate assistance while on inspection (e.g., safety concern or major compliance surprise at inspection, complications with travel, etc.).

3. Certifiers should establish travel expectations (% travel time/year) for staff inspector positions. This should be included in the job description, highlighted in job postings, and addressed during the interview process, so new staff inspectors are fully aware of the travel requirements of the position.
4. Certifiers should provide annual inspection assignments with normal deadlines (non-rush or expedited) as far in advance as possible (ideally at least 2-3 months before the desired inspection date) to allow inspectors to schedule around their personal lives and plan multi-inspection travel efficiently. Certifiers and inspectors should discuss and agree upon a general number and scope of inspections in similar geographic areas before the start of the inspection season.
5. Staff and contract inspectors should review the list of strategies for managing workload sustainability in Section 4 and implement those which work for them.

### **Inspection Quality, Evaluations, and Feedback**

1. Certifiers must ensure requirements and expectations for inspection work are discussed in advance and provided in writing to all inspectors. Changes to expectations must be clearly communicated in a timely way to both inspectors and certification staff. Inspectors should feel empowered to ask proactive questions and get clarity on expectations.
2. Certifiers must establish inspector evaluation and feedback mechanisms that support inspectors in improving performance over time and are not merely in place to meet accreditation requirements.
  - a. Certifiers should identify ways to provide inspection-specific feedback that addresses critical issues promptly, including direct feedback after the final review of each inspection report if possible.
  - b. If collecting inspection feedback from clients, certifiers should request it directly from the client and assess the feedback in the context of the inspector's findings and the reviewer's evaluation of the inspection.
  - c. Field evaluations should be conducted by experienced inspectors with the intent of evaluating inspector performance and providing constructive feedback.
3. Certifiers must acknowledge that the quality of work performed by certification review staff has a direct impact on inspection quality and efficiency.
  - a. Certifiers should review the list of most impactful certifier actions for inspector efficiency in **Section 5**, evaluate their practices in these areas and act on opportunities for improvement.

- b. Certifiers should implement a mechanism for inspectors to provide feedback on certification reviewer work, particularly as it relates to supporting an efficient, high-quality inspection.

### **Certification Systems, Forms, and Administrative Tasks**

1. Certifiers using online database platforms with inspector portals need to consider inspectors as key users. Investing in the inspection experience is critical to address practices and policies that cause inefficiencies in the field.
  - a. Database workflows, data management, and file organization systems should be designed with consideration for ease and efficiency of use by inspectors.
  - b. Certifiers must train inspectors to effectively use the inspector portal.
  - c. Certifiers should actively invite inspector feedback on their user experience and address identified opportunities for improvement.
  - d. Certifiers should offer an efficient, easy-to-use offline option that allows inspectors to conduct inspections and complete inspection reports when no internet connection is available.
2. Certification staff and inspectors must acknowledge that they are partners in the efficient and effective client file and OSP management. Each certifier and inspector will have their preferences for exactly how this is done, but in general:
  - a. To the best of their ability, certifiers should implement file management practices that organize client OSPs and other records, so they are reasonably complete and current before the inspection. Reviewers should regularly remove/retire obsolete, outdated, or redundant information from the active file, and ensure that document file names are descriptive of the contents.
  - b. Certifiers should provide a copy of the OSP to operators for review when completing their annual renewal application, so they accurately capture changes to their systems which need to be evaluated at inspection.
  - c. Inspectors should identify outdated or obsolete information discovered at inspection, collect current information if available to submit, and provide an itemized list of OSP changes as part of the inspection report.
3. Certifiers can support high-quality and efficient inspections through the following actions:
  - a. Complete an initial review of the file each year before the inspection to ensure it is organized, the annual update has been received, the OSP is reasonably

complete, and outdated/redundant information has been removed from the active file.

- b. Contact the client to collect missing information in advance of the inspection whenever possible.
  - c. Provide a short, clear list of special instructions for the inspector and any internal decision documentation that would help inform their work, including points of focus and missing information or documentation to collect.
  - d. Communicate to the operator and share with the inspector a summary of the findings and corrective actions from the previous year's final review, an inspection preparation checklist, and general guidance about what to expect at the next inspection.
4. Certifiers should provide inspectors with relevant client information submitted to the certifier between the inspection assignment and the date of inspection. This avoids duplicate requests for information which frustrate the client and reflect poorly on the certifier or inspector.
5. Certifiers should regularly evaluate and update their OSP forms and inspection report outlines as needed to:
- a. Ensure documents are written in accessible, plain language;
  - b. Identify and remove redundant questions; and
  - c. Identify opportunities for streamlining information gathering and verification, such as aligning the design and flow of the OSP and the inspection report outline.

## Background

The organic sector is experiencing an acute shortage of well-qualified and trained inspectors. In recent years, there has been a significant exit of experienced inspectors from the organic sector and a dearth of new inspectors entering the industry. This attrition in the inspector workforce, combined with significant growth in the organic industry and demand for certification, has led to certifiers reevaluating their capacity to complete annual inspections, expand, or grow. In some cases, certifiers have resorted to using inexperienced inspectors or inspectors with a history of poor performance.

A lack of well-qualified inspectors and an imbalance in the number of entry-level vs. experienced inspectors creates problems for every organic stakeholder and is a threat to organic integrity.

- Certifiers are challenged to find sufficient inspectors to meet their current inspection workloads and plan for growth in demand for certification.
- Inconsistent and poor-quality inspections can decrease trust and value in the organic certification process and the USDA Organic seal.
- Some new inspectors are sent into the field unprepared to conduct inspections.
- Current organic inspectors reported heavier workloads and an increase in the frequency of inspecting operations with inadequate prior inspections.
- Remediation means more time on-site, compounded stress, and other factors that contribute to inspector burnout.
- Certified operations complain when inexperienced inspectors try to evaluate systems they do not understand when the next inspector asks for different information or finds issues of concern not previously discussed.
- Some operators know how to take advantage of inexperienced inspectors. Operators may complain when an experienced inspector with a more complete understanding of the regulations and the auditing process follow an inexperienced inspector. The operators may object to additional scrutiny.
- Inconsistent inspections can lead to a false sense of compliance for operators.

Workforce retention in the organic sector has been a focal point for several years. There is sector-wide acknowledgment and concern for inspector retention in the organic industry and support for industry-led solutions to address this as a pre-competitive problem. In July 2020, Deputy Administrator of the National Organic Program (NOP), Dr. Jennifer Tucker, issued a memorandum to the National Organic Standards Board (NOSB) to initiate industry-wide discussion on the need to recruit and retain qualified individuals, including inspectors, in

organic certification. As a result, the NOSB prioritized organic certification human capital on their work agenda, and the NOP has funded several projects focused on developing and supporting human capital in the organic sector.

In response to the Spring 2021 NOSB request for comment for *“Human Capital: Strategy for Recruitment and Talent Management - Organic Inspectors and Reviewers,”* IOIA surveyed inspectors to collect more specific details about their experiences and concerns. In total, 54 inspectors participated, representing both IOIA members and non-members, and full- and part-time staff and contract inspectors. In addition to providing data for IOIA’s NOSB comments, the results of that survey highlighted a need and an opportunity for inspectors and certifiers to come together and address inspector retention collaboratively as partners.

### **Working Group Structure and Process**

In early 2022, IOIA and ACA established a joint working group focused on inspector retention. The working group included a five-person leadership team: two representatives each from IOIA and ACA, and a third-party facilitator. Certifier participants (both inspection and non-inspection staff) represented nonprofit, for-profit, and state agencies of diverse sizes. Contract inspector participant demographics ranged in years of experience, areas of expertise, and geographic location. All working group members were offered compensation in exchange for their participation, either via paid staff time or by receiving a stipend.

The working group focused on six topics identified as contributing factors to inspector retention (listed below). Some topics can be personal, as they relate directly to experiences, relationships, and livelihoods, and may be difficult for some individuals to discuss openly. The working group process was structured to provide a platform for candid, honest, and respectful conversations between inspectors and certifiers and encouraged sharing of individual perspectives and experiences without fear of consequences. For each topic, the leadership team crafted questions and invited member comments on a shared document, then summarized the comments for discussion at bi-weekly virtual meetings. This format allowed for anonymous comments while also encouraging direct engagement between all participants.

### **Working Group Discussion Topics**

This list of topics identified as critical for addressing inspector retention was selected for focus and discussion by the working group. All statistics cited below come from a 2021 IOIA [survey](#).

1. **Inspector Business Models, Contracts, and Insurance:** Currently there are two common business models in the industry: staff and independent contractors. A co-op structure was recently developed as a third model. Goals for this topic include identifying the pros and cons of each model and how each model can be improved for increased inspector

retention. This topic also explored liability risk. Finding adequate insurance is a challenge for contract inspectors and some contracts may make it more difficult for inspectors to protect themselves, even with a valid insurance policy. Discussion regarding this topic explored how certification agencies can make it easier for inspectors to protect themselves from liability risks.

2. **Inspector Qualifications and Training:** As the industry has grown, regulations have changed, supply chains are more complex, and fraud is an increasing threat. Current expectations for qualifications and necessary training have not kept pace. New inspectors generally fund their training and apprenticeship, creating economic and geographic entry barriers. The lack of standardized apprenticeships is another entry barrier. Would-be apprentices have difficulty finding a mentor. Mentoring takes considerable time in training, evaluating, and providing feedback to an apprentice, often for low or no pay for the mentor. New inspectors may be unprepared for their first inspections and deliver lower-quality inspections. Strengthening Organic Enforcement (SOE) is likely to propose a requirement for a minimum amount of continuing education toward improving inspections. The goals for this topic were to investigate barriers faced in finding successful mentorships, describe the impact of training on the quality of inspections, and explore ways the industry can increase collaboration for effective continuing education.
3. **Inspector Compensation:** Inspector compensation has been identified as a major cause of lack of retention as well as hindering recruitment of new inspectors. Almost 75% of inspectors in the 2021 sample survey stated, *"To be compensated based on experience and quality of inspections . . . would improve the inspection profession."* Approximately half of full-time inspectors responding reported income of <\$50,000/year, just over 25% reported income of \$50-\$75,000/year, and just under 25% reported income of >\$75,000/year. These figures represent a small sample size: 53 inspectors. Also worth noting, the distinction between "part-time" and "full-time" was not objectively defined, allowing participants to self-define these terms. Regional variation in the cost of living also has an impact on compensation; the data was not segregated by region. More and better data collection is needed.

Though some inspectors report being satisfied with their income, it can take several years to achieve a living wage. It is difficult to attract and retain good candidates when the status quo is investing personal resources in a position without a clear career path or guarantee of a reasonable income. Many inspectors do not charge fees commensurate with their value. Some inspectors report giving away their time for free or having fee schedules that don't cover the true cost of inspections. Those who have audited for other certification schemes note a disparity in fee structure, with organic inspections often being more difficult, complex, and lower paying. The goal of this topic was to identify key issues that

play a factor in income (pay, seasonality, expenses, etc.) and suggest some solutions which could move the needle toward sustainable and fair incomes for inspectors.

4. **Inspector Workload and Working Conditions:** Historically, the method by which an inspector's workload is measured is in the number of inspections conducted per year. The quality and complexity of the inspections are not usually factored into the workload. The toll of isolating, lonely work, and travel spent in mediocre hotels eating mediocre food may not be considered. These personal sacrifices may make a long-term career unappealing and unsustainable. The goal was to understand the aspects of the job that contribute to work/life imbalance and inspector burnout and to explore solutions to establish and encourage expectations and consistency to create a sustainable, long-term career path.
5. **Inspection Quality, Feedback, and Evaluations:** Quality inspections and reviews are foundational in organic certification. Inspectors and certifiers expressed frustration and concern with unskilled inspectors negatively impacting other organic professionals and organic integrity. Direct feedback and evaluations performed by certification agencies communicate areas of strong performance and areas needing improvement and may indirectly improve inspection quality. The goal was to identify ways that certification agencies can improve inspector satisfaction by setting clear inspection expectations and delivering useful, timely feedback and evaluations.
6. **Certification Systems, Forms, and Administrative Tasks:** In some cases, certifier policies, forms, and practices are developed without inspector input. Actively including the inspector perspective in certifier policies, forms, and practices can lead to stronger collaboration, mitigate existing obstacles, and improve efficiency and satisfaction for both parties. Forms, certification review work, and policy play a major role in the quality and efficiency of inspections and reports, with almost 81% of inspectors in the IOIA survey supporting the statement: *"Quality forms are critical to conducting a thorough, sound, and sensible inspection."* Easy-to-use forms and organized inspection files can greatly improve the quality of an inspection and the satisfaction of all parties. Fifty percent of survey respondents agreed that *"I spend a third or more of my inspections on details and/or clerical updates instead of spending time on areas critical to organic integrity."* The goal was to identify areas of certifiers' systems, forms, and tasks that affect the inspector's ability to conduct a thorough and efficient inspection and discuss potential improvements and solutions. Certifiers utilizing administrative staff for these tasks could be a cost-saving measure while training future employees or contractors.

## The Inspector Experience - In Their Own Words

Inspectors perform a critical role at the point where many aspects of organic production and certification intertwine, the requirement of the regulations, the reality of supply chains, the constraints of weather, and the interlaced humanity. Many inspectors are drawn to what they feel is the heart of the certification process, the on-site inspection. It can be exhilarating, frustrating, heartbreaking, rewarding, or a combination of these. Though numbers and statistics identify key areas to address, the core of inspecting embraces the human experience. To capture the human element of inspection work that goes beyond quantitative data, inspectors were asked to share impactful experiences they've had during organic inspections. They shared both good and bad; things that left them on top of the world and gave them a reason to get up in the morning, or those unfortunate yet equally memorable situations which can make them reconsider organic inspection as a career choice.

Virtually every positive experience involved admiration for operators who embraced organic values and the vision of organic, the moments of real human connection, glimpses of sheer beauty, and awe at the display of the natural world and organic farming. Many people who pursue a career in organic certification are mission-driven and find hope and satisfaction when they feel that their career promotes organic values. Inspections can be a time of profound encouragement where inspectors can feel they are a part of a greater cause and larger community. Over and over, inspectors shared positive experiences involving people and our planet:

*"Working with operators who truly understand the principles of organic management and do their very best to meet all compliance clauses inspires me. Many fourth and fifth-generation food producers have navigated the challenges of working with family and working with the certification system successfully, and this gives me hope in the human race. I appreciate being able to sincerely thank these operators for the care they demonstrate for the greater environment and other people, through their food production efforts."*

*"On a dairy inspection, I spotted a species of bird that had previously been observed only three times prior in the state. The producer's son had severe autism and would only respond positively to the sights and sounds of birds on the farm. That we shared this interest immediately created a connection and allowed me to ask questions without the perception of the inspection being an interrogation, rather than a discussion with regard to her organic operation."*

*"I get to visit inspiring growers that are eager to innovate and willing to take chances. That's why I keep doing it!"*

*"Hearing a client say that they like when I do their organic inspection because I am tough but fair is uplifting."*

*"The personal stories I've heard from farmers are worth their weight in gold."*

*"A cherished few farm inspections I have done have been for clients who sell nothing as organic but the mission and spirit of organic is so dearly held that they consider it an honor to call themselves "certified organic."*

*". . . the inspection concluded and there were only minimal issues, the smiles on their faces were priceless!!"*

*"I LOVE MY JOB!!! There is nothing quite like it . . . sitting at a kitchen table at a little Amish farm with several small children positioned practically between you and your computer in sheer awe at the moving light of your screen and lightning-fast fingers on the keyboard . . . walking through lush pasture with a child on her father's hip to see a herd of happy heifers. I wake up knowing that I make the world a better place. Countless moments of deep peace and sheer joy."*

*"I feel extremely lucky to be working in a sector with so many genuinely good people who sincerely care about what they do. I see so much dedication to such a worthy cause - the sustainability of our food system and planet. From farmers who work what seems to be endless hours to the USDA who is actively working to increase opportunity and diversity in organic farming. Certification agencies are full of dedicated people that have been confronted with years of double-digit growth on top of a global pandemic. I was so appreciative that many still found the time to sit in these meetings and contribute to this working group. It was a reflection of their sincere desire and dedication to move this industry forward in a unified and positive way."*

Though inspectors who stay in this industry find strength from these positive experiences, it is not an easy job. Though conducting organic inspections is generally considered safe in the US and Canada, the job may require meeting an operator in isolated or unfamiliar territory.

*"I've showed up for inspections where farmers were slightly drunk when I got there, and completely drunk when I left. I had a farmer start berating me and I hadn't even gotten out of my car yet. Farmers always have my phone number and sometimes my address and I have had people show up at my home."*

When an inspector is doing their job to verify compliance, they are often directly exposed to the private, and sometimes difficult, realities of clients' personal lives. This can be a heavy burden for inspectors.

*"An organic inspection, while part of a professional certification process, is also very personal. We are in people's lives. We are on their land, home, and put in the raw constantly."*

*"Farming and small business are not for the faint of heart for many reasons. Seeing the daily struggle of organic clients with labor issues, weather, market conditions, and family can be a heavy load. These enterprises are more than a 'job'."*

Factors such as management, colleagues, expectations, policies, and support structures can all impact the sustainability of inspecting as a long-term career:

*"There have been years of my life on the road and it's HARD!! I didn't have time to do my laundry for weeks and my mail went unopened for months at a time because I was rarely home for more than a few days at a time. It took a pandemic for me to get a boyfriend - before that, I would meet someone and if it went well, I hoped we could get together again when I'm back in town . . . in two or three weeks. I would load the shopping cart with groceries knowing full well that I was going to spend \$100 on food that would end up in the garbage, but I NEEDED to feel like a normal person and normal people go grocery shopping and make dinner. I've managed to reduce the travel and maintain a reasonable income, but it was difficult, and I sometimes wonder if it will last."*

*"I love what I do, but the main thing that makes me seriously consider my career choice is the complexity of running one's own business and in particular having to sign almost incomprehensible legal documents annually."*

*"As I advanced as an inspector, I was more likely to be a go-to person for challenging situations. Although I was never personally involved in a lawsuit, I started turning these down due to the higher risk. I would like to have advanced in this realm, but there's little reward without changing careers."*

These perspectives underscore the need for a comprehensive set of strategies to recruit, support, and retain organic inspectors.

## **Section 1: Inspector Business Relationships**

Currently, there are three primary business models for organic inspectors: staff inspectors, independent contractor inspectors, and more recently, inspector cooperatives. The working group discussed the key features of each model and identified the pros and cons for inspectors and certifiers. In general, there was agreement that there is a place for all of these business models, as well as hybrid approaches, within the organic sector. The viability of these and other possible models will depend on whether they can continue to sustain individuals, provide work/life balance, and meet the demand for inspectors in the organic industry. The following descriptions and pros/cons lists can help inform decision-making by certifiers, organic inspectors, and potential new inspectors about which model(s) are the best fit.

### **Independent Contract Inspectors**

In this model, inspectors are independent entities who contract with certifiers to conduct inspections. As independent contractors, they have more freedom to structure their work, including the number of agencies they choose to work with, the number of inspections they choose to take on per year, and how much they are willing to travel. They may operate as a sole proprietor or set up a separate business such as an LLC, S-corp, or other structure. They usually set their fee schedule and negotiate with certifiers regarding fees. Independent contractors do not benefit from employer-paid medical, paid time off, or other benefits from their contracting certifiers. Contractors cover the costs of their work equipment, medical and professional insurance, and continuing education. Independent contractors arrange their own workers' compensation insurance. If injured on the job, not all insurance policies cover workers' compensation claims.

All US states regulate certifiers using contract inspectors. Contractor tests vary in strictness from state to state. In states with stricter regulations, such as California, certifiers can still contract with businesses of 2+ employees that offer organic inspection services.

**Business Model: Independent Contract Inspectors**

Pros	Cons
<ul style="list-style-type: none"> <li>• Inspectors are truly independent and self-employed: they have flexibility in when, where, and how much to work, can reject assignments if desired, and can specialize in particular scopes.</li> <li>• Inspectors can negotiate their pay rates with certifiers, and contract inspections can be higher paying than a staff salary.</li> <li>• Inspectors can work for more than one certifier and can terminate service to a certifier or be terminated without having to report it as quitting or being fired on a résumé.</li> <li>• Inspectors can gain valuable experience, insight, and perspective by working for multiple certifiers. This can improve the quality of their work, bring more consistency between certifiers, and reinforce allegiance to the standards and the organic industry rather than a specific organization.</li> <li>• Inspectors can choose to travel shorter distances by working for multiple certifiers with clients in a specific area.</li> <li>• Using contract inspectors provides certifiers with flexibility and agility; they can rely solely on contractors for inspections or employ some staff inspectors and use contractors to address needs in their inspection workforce for coverage of a particular geographic region, market demand, or scope specialization.</li> <li>• Certifiers using contract inspectors often spread the workload out over many individuals, which means if a contract is terminated, the impact is less significant than a staff inspector vacancy.</li> </ul>	<ul style="list-style-type: none"> <li>• Contractors lack access to employer-paid health insurance, time off, workers' compensation, medical leave, or retirement benefits.</li> <li>• Different legal protections are afforded to contractors compared to staff inspectors.</li> <li>• Inspectors are responsible for their overhead costs, including administrative work, equipment, liability insurance (if required/desired), external training fees, and continuing education tuition costs.</li> <li>• Contract inspection workload can be seasonal and unstable throughout the year. Contract inspectors are not eligible for unemployment benefits during periods of slow or no available work.</li> <li>• Inspectors may not have income protection if inspections are canceled.</li> <li>• Inspectors working for more than one certifier must remain abreast of the policies, procedures, forms, and expectations of multiple organizations.</li> <li>• Inspectors can feel disconnected from certifiers because they are not staff or considered part of the team and may not be asked for input and feedback on certifier decisions, forms, policies, etc.</li> <li>• Certifiers may invest significant time in onboarding, initial training, and conducting evaluations of each contractor.</li> <li>• Inspectors are limited in their ability to charge overtime, contributing to long days and the hazards of traveling and working while fatigued.</li> </ul>

**Certifier Staff Inspectors**

In this model, inspectors are hired by a certifier as employees. They may be hourly or salaried, full- or part-time. The certifiers are responsible for income reporting and tax withholding requirements, employee rights, and legal protections including access to unemployment benefits for staff inspectors. The certifier often provides the required technology (computer, phone, etc.) needed by the inspector to perform the functions of their job, pays for job-related training, and covers their work-related expenses.

The option for staff inspectors to work for other inspection agencies varies. Full-time, exempt positions often restrict staff inspectors from taking on outside work. Staff inspectors paid hourly may also have restrictions on certification-related work conducted for outside agencies. Government certifiers may also have policies that allow them to perform inspections or perform other certification work for another certifier (government agency or private) on a case-by-case basis.

**Business Model: Certifier Staff Inspectors**

Pros	Cons
<ul style="list-style-type: none"> <li>● Provides a stable, year-round income for inspectors.</li> <li>● Inspectors have access to employee benefits, including healthcare, paid time off, worker's co-retirement benefits, equipment necessary for their job (laptop, company vehicle, etc.), and a company credit card or per diem allowance.</li> <li>● Inspectors have legal protections that come with being an employee, including access to unemployment insurance and workers' compensation.</li> <li>● Staff inspectors focus on their employer's work and gain expertise in the certifier's policies, procedures, and forms.</li> <li>● Inspectors who receive in-house training as part of their professional development may produce better inspections and reports. This can include training to other private standards offered by the certifier, thus expanding the inspector's qualifications and work opportunities.</li> <li>● There is more opportunity for the inspector to develop relationships and be part of a community within the organization.</li> <li>● Inspectors have a place at the table and the opportunity to provide feedback and guidance during the development of a certifier's policies, procedures, and documents.</li> <li>● This model may be particularly beneficial for inspectors just entering the field due to the stability of full-time work and ongoing training.</li> </ul>	<ul style="list-style-type: none"> <li>● Annual income can be less than the earning potential of a full-time contract inspector.</li> <li>● Many certifiers do not allow full-time staff to perform work for other certifiers, so inspectors don't have the opportunity to earn additional income through contract inspection.</li> <li>● Inspectors may have limited choice in the type of inspections/scopes to which they are assigned and limited or no ability to reject work.</li> <li>● Inspectors for government agencies may split their time between multiple programs outside of the organic industry. This can make it harder to specialize and gain expertise in the organic program.</li> <li>● A high volume of travel is generally required, which can lead to burnout and turnover.</li> <li>● The general practice of rotating an inspector out of an operation's inspection cycle every 3-4 years makes it more difficult to schedule full-time work within their local region.</li> </ul>

**Inspector Cooperative**

In this model, independent inspectors join to form a cooperative organization (co-op). Co-ops are member-owned and operated for the benefit of the members. The purpose of an inspector

co-op is to provide contract inspectors with many of the benefits, legal protections, and stability of employment provided to staff inspectors, while still allowing for an independent and flexible career. Benefits of a co-op model for inspectors include shared operational costs for business services, standardized fair compensation, and access to affordable insurance and retirement benefits. Compensation can be more reliable across a range of experience (apprentice to experienced inspector) through negotiated contracts with certification agencies. Co-op members typically pay a one-time membership fee to join a co-op and have access to its services.

Certifiers benefit from the co-op model because of the ability to contract with multiple experienced inspectors using a single point of communication. A co-op model combines the flexibility of contract inspection with the stability that staff inspectors provide certifiers and their clients.

**Business Model: Inspector Cooperative**

Pros	Cons
<ul style="list-style-type: none"> <li>● Organizational structure allows the co-op to contract directly with the certifier and to negotiate as a group for pay rates and working conditions.</li> <li>● Contracting with a co-op gives certifiers access to a suite of highly qualified inspectors with diverse experience, expertise, and geographic location, thereby streamlining the contracting process and reducing administrative burden.</li> <li>● For the inspector, membership combines the flexibility and choice of being an independent contractor with the stability and benefits of a staff inspector. It may be easier for an inspector to maintain a part-time schedule.</li> <li>● Opportunity to collaborate and trade work with other co-op members.</li> <li>● The co-op structure provides new inspectors access to mentorship and creates peer-to-peer learning opportunities for all members.</li> </ul>	<ul style="list-style-type: none"> <li>● An emerging inspector model is not yet widely available.</li> <li>● Co-op may need to have a minimum number of members for the benefits to outweigh the costs of administration.</li> <li>● Managing a co-op requires communication, negotiation, and conflict management skills for successful administration. Management decisions can take longer.</li> <li>● Co-op inspectors may lose some control over their workload or exact pay rate.</li> <li>● Removes the direct relationship between the independent contractor and the certifier and may out-compete some independent contractors.</li> <li>● Up front membership costs can be a barrier to participation.</li> </ul>

**Certifier Case Studies**

There are many ways that certifiers currently structure their inspection programs and meet their inspection labor needs. Many agencies still primarily use contract inspectors, while others utilize staff-based inspection programs. Several certifiers shared specific details about their

organic inspection program, how they structure their inspector workforce, and how their programs have evolved.

**Certifier A:** This certifier has shifted from primarily contract inspectors to primarily staff inspectors in recent years. This is due to legal requirements that require inspections performed in their state to be done by employees. They found that many of their long-time contract inspectors did not want to take a full-time staff position, so they have established part-time hourly staff inspector positions that allow the staff person to contract for other certifiers. Part-time inspectors working more than 30 hours/week on average are eligible for benefits, including paid time off, medical insurance, and retirement benefits. Certifier A still uses about 40 contractors to conduct inspections outside of their state.

**Certifier B:** This certifier has shifted from primarily contract inspectors to exclusively full-time staff for domestic inspections, in anticipation of their state implementing legal requirements that will impact their use of contractors. Their 21 full-time staff inspectors have done 100% of Certifier B's US-based inspections since January 2021. They hire contract inspectors for international inspection work. Certifier B found multiple benefits to using staff inspectors, including being able to provide additional support and training on forms and systems, a greater focus on inspection quality and consistency, and opportunities for inspectors to gain experience volunteering, such as participation in this working group.

**Certifier C:** This state agency organic certification program has three dedicated staff members and seven field staff who also have other duties within the state department of agriculture outside the organic sector. The organic program uses 8-10 independent contract inspectors each year, depending on staff capacity. The field staff receives inspection assignments in their geographical area. The certifier asks each contractor for the number of inspections they would like and the region where they would prefer to work and does their best to accommodate those preferences. The certifier assists with arranging mentorship for beginning contract inspectors and focuses on developing relationships with contractors, supporting their needs as much as possible, and providing ongoing training and support to all contract and staff inspectors. The organic program is attempting to increase the percentage of inspections that staff inspectors perform and provide more stability and protect the inspection schedule from fluctuations due to changes in contractors' schedules, needs, lives, and geography.

**Certifier D:** This certifier employs two staff inspectors, 6-8 staff that do both inspection and review work, and contracts with about 50 inspectors. They have had trouble filling open positions for staff inspectors in geographic areas where they are needed and have concerns about scrambling to cover 100+ inspections if a staff inspector were to leave the organization. They are also hesitant to take on the overhead, training, administrative support, and other

costs of bringing on new employees, so they continue to rely on contract inspectors for the majority of their inspections.

### **Inspector Insurance Coverage and Indemnification Clauses in Contracts**

Liability risk is an increasing concern for independent contractors. Finding adequate insurance can be difficult. Some contract clauses shift liability to inspectors, hindering the inspectors' ability to protect themselves even with a valid insurance policy. Some contract inspectors have been denied coverage or had their insurance canceled, making them personally liable. When certifiers require a specific policy or coverage, it may create a barrier for some contract inspectors. The goal of this topic was to explore how certification agencies can support inspectors and share in the responsibility for risk.

A survey of working group participants found the following:

- Nearly all independent contractors carry general liability insurance. About half reported that they were also covered under some type of insurance policy by the certifiers for whom they work.
- Very few of the independent contractors in the working group carried errors and omissions (E&O) insurance. The consensus was that because inspectors are not responsible for making certification decisions, they did need E&O insurance. Some reported that the certifiers they work for added them to the agency's E&O policy.
- In some cases, certifier/inspector contracts include indemnification clauses that might impact the inspector's insurance, possibly leaving them exposed in the event of a liability issue.

At the request of the working group, the Montana Department of Agriculture's legal counsel reviewed a standard indemnification clause in an independent inspector's contract and a general liability insurance policy for a contract inspector, through the lens of how the indemnification clause in the contract might impact the insurance coverage. They determined that it was situationally dependent, and therefore very difficult to say if/when the indemnification clause might impact the coverage. The legal counsel provided the following feedback:

*"It can be a case-by-case basis depending on the documents' legal wording. Often it would just be a matter of informing the insurance company. It also matters what you are indemnifying. For example, did you make a professional mistake, get in a car accident on the farm, or get accused of sexual harassment? These could all play out very differently between the indemnity contract and the insurance."*

The working group discussed these concerns. No working group member had personal

experience with their insurance refusing a claim, and none had explicitly discussed indemnification clauses with an attorney or their insurance agency. There was a general agreement that the best practice would be to check with the insurance agency regarding indemnification clauses before signing the contract.

## Section 2: Inspector Qualifications and Training

Conducting a high-quality organic inspection is detailed, technical work. It requires knowledge of organic standards, application of various inspection techniques, understanding of the operation being inspected, and excellent interviewing and written communication skills.

Comprehensive basic inspector training is a key first step to ensuring that inspectors have sufficient knowledge and skills necessary to consistently perform high-quality organic inspections. Ongoing training and continuing education, including webinars, mentorships, in-person training courses, and field evaluations provide opportunities for inspectors to improve their skill set and stay current with evolving issues. These opportunities allow inspectors to gain expertise and specialization in various aspects of certification and learn from the perspectives of others.

The working group discussed the challenges encountered by new inspectors, including accessing high-quality training, locating mentors, lack of apprenticeship opportunities, variations in training requirements, and differences in training offered by certifiers. Innovations in inspector training could widely support inspector retention.

### **Inspector training: qualification requirements and availability**

Certifiers vary in their baseline inspector training and qualification requirements and requirements for their continuing education. In 2017, the ACA, in coordination with IOIA, convened a working group and published [Guidance on Inspector Qualifications](#) to encourage more consistency between certifiers in this area. Some certifiers reported implementing the recommendations in the guidance while others reported not implementing the recommendations. One certifier stated they had not implemented any recommendations and cited NOP not finding significant issues with their method of approving and evaluating inspectors. One certifier noted that as a state program where all their staff are both inspectors and reviewers, they couldn't completely adhere to the recommendations because they needed to find individuals who were qualified and well-suited for both roles.

Participants reported that certifiers invest more time and resources in technical training for staff inspectors than for independent contractors. These certifier investments may include covering the cost of basic IOIA training courses and mentorship for a new staff inspector. Certifiers have control over the quality and topics of continuing education. Certifier training may be more quickly provided to staff inspectors, for example as remediation after an accreditation audit. Certifiers report investing in specialized training for staff inspectors to address areas of growth, remediate deficiencies, and improve quality.

Independent contractors are generally expected to make these investments on their own time

and with their own resources. Certifiers vary in the annual training provided to and required for contract inspectors.

There was consensus among participants that both staff and contract inspectors have access to sufficient technical training resources to support their work. IOIA basic training for all three scopes is available online as well as in-person. Other sources of supplemental training include the NOP Organic Integrity Learning Center (OILC), industry training available at no cost, ACA/IOIA annual meetings/training, individual certifier training, eOrganic webinars, and local extension offices. Contract inspectors identified a pain point as being expected to participate in overlapping or redundant training between multiple certifiers. A solution may be for certifiers to work together pre-competitively to find training efficiencies and increase consistency.

With the expected implementation of the SOE rule, the NOP regulations will require additional training for inspectors and certifiers. SOE proposed specific requirements around training and qualifications for inspectors. The group agreed that the resources listed above will provide sufficient low-cost or free training to assist inspectors in meeting the 20 hours per year training requirement that will be required by SOE if it is published as proposed. There was also hope that this minimum requirement will increase the quality and consistency of inspection, although some expressed concern about using a quantitative requirement (20 hours/year) without a qualitative component (whether the training received in those 20 hours is useful in improving an inspector's knowledge and skills). This was discussed further in the Inspection Quality, Feedback, and Evaluations section.

Certifier training often highlights the inconsistencies between certifiers. There may be subtle variations in what certifiers consider a complete inspection. The differences can be as complex as how certifiers interpret vague, controversial, or undeveloped standards (i.e., hydroponic and apiculture).

Certifiers should cross-train non-inspector certification staff and staff/contract inspectors to expand understanding of each other's roles in the certification process and how each role's work impacts the work of the other.

Specific topics where more training resources for inspectors are needed:

- Inspection techniques for processing operations, particularly large and complex handlers
- Training on all SOE changes
- Audit trail exercises (mass balance and traceback)
- Supply chain logistics and import/export verification

- Different types of crop production systems (e.g., row crops vs. produce vs. permaculture)
- Different types of livestock production systems (e.g., dairy vs. poultry)
- Inspection techniques for input suppliers
- Soft skills necessary for inspection
- Cross-training on certification reviewer work and how reviewers use inspection reports and materials to do their work and support compliance decisions
- Additional opportunities for peer-to-peer learning between inspectors

### **Mentorship/apprenticeship**

Mentorship/apprenticeships are a crucial piece of the inspector training process, allowing new inspectors to gain real-world inspection experience under the guidance of experienced inspectors. Inspectors who have completed an apprenticeship in a new scope are in demand by certifiers. Additionally, many working group participants cited apprenticeship and peer evaluations as the most valuable learning opportunities in their career, and a way to build a network of support and community with other inspectors, as captured in this comment from one participant:

*"I think learning from other inspectors is not something that is utilized enough. I think a great training tool is going on an inspection with someone else and having someone come along on my inspections . . . Inspectors could have someone to bounce ideas off of and ask questions that they may otherwise not feel confident enough to ask a certifier or ask during a group inspector meeting etc. I have learned that texting/emailing/calling other inspectors when things arise has made me a better inspector. And those same inspectors have reached out to me. We can be a great resource for each other."*

However, lack of access to mentorship and inability to complete necessary apprentice inspections was identified as a primary hurdle for new inspectors to gain sufficient qualifications and experience to enter the field. Some key factors that were cited include:

- Many certifiers require new inspectors to complete a mentorship/apprenticeship before conducting solo inspections. Staff inspectors generally conduct their apprenticeship after being hired as part of onboarding on paid time. There is no consistent mechanism for contractors to complete apprenticeship requirements while being compensated.
- Student loans and grants offered for professional training common in other sectors are lacking for organic professional services.
- It can take months or even years for new contract inspectors to find a mentor; there is little incentive to mentor when not compensated.

- Experienced inspectors can be concerned about helping to bring a new inspector into the field who may then compete with them for work. One contract inspector shared the following:

*“After delivering a crop training for IOIA, I agreed to work as a volunteer mentor with 5 apprentices one summer for 3 certifiers, as no remuneration was available. I knew we needed more inspectors in my region. I asked the new inspectors to not undercut my rates, which I shared with them. I asked the certifiers to please still hire me and not give all their work to the new inexperienced inspectors to respect my time. It was a lot of logistics and work to have them shadow me, observe them and review their reports. I was assigned no further work from those 3 certifiers once they had my reference letters for those I had trained and mentored. Very disappointing and disrespectful.”*

- The status quo for contract inspectors is that mentorships are unpaid for both the mentor and apprentice. There may be cases where the apprentice pays the mentor a nominal amount not commensurate with the typical fee schedule of an experienced inspector. The apprentice must cover the costs of their travel and expenses during the mentorship, in addition to lost wages during the mentorship period for both the mentor and apprentice. This can be a significant barrier for any potential inspector but is particularly detrimental to socially disadvantaged people or those from marginalized groups.
- A completed mentorship/apprenticeship is generally defined by a certifier based on the number of inspections shadowed/witnessed, and a sign-off by another inspector, but there is no consistent framework or guidance for how the mentorship is conducted. There is a lack of standardization as to what exactly a mentorship entails and the minimum qualifications for experienced inspectors to mentor new inspectors. This means the quality of the mentorship and the benefit to new inspectors can vary widely. In some cases, this results in new inspectors being sent out into the field before they are fully prepared.

Certifiers presented different perspectives on mentorship requirements and access for contract inspectors. Most organic certifiers expect contractors to have the knowledge and the skill set to perform the job of inspector without training. Certifiers generally do not invest in providing mentorship for inexperienced contract inspectors. Though certifiers assess their business risk when providing training to independent contractors, including the risk of retention, matching mentors and apprentices is generally outside the scope of the certifier business model. Certifiers may not want to bear the costs of apprentice inspectors shadowing a mentor if they

do not need an inspector where the apprentice is located. Confidentiality concerns, client agreements, and liability concerns are among the reasons cited as additional risks.

Some certifiers have programs that connect potential inspectors with mentors and facilitate a mentoring process. Certifiers reported inconsistent follow-through by the new inspectors under the purview of these programs. Several certifiers have implemented paid mentorship because the need for qualified inspectors is so great. The apprentice inspector is usually paid a small or no stipend.

Some participants expressed concern about the qualifications and experience of individuals acting as mentors for new inspectors. Several anecdotes were shared, including inexperienced inspectors (<30 inspections completed) or experienced inspectors with questionable quality of work being asked to mentor. Participants expressed support for establishing baseline competencies for inspectors providing mentorship. These requirements should ensure that a qualified mentor provides high-quality training and useful guidance to move the candidate forward for hire/contract. There is a clear and urgent need to provide new inspectors access to high-quality mentorship.

In 2022, IOIA developed and piloted a NOP-funded apprenticeship program which will provide a new model and better access for entry-level inspectors through partnerships with certifiers and/or organic companies. It defines mentor and apprentice competencies, offers a rigorous curriculum, and includes follow-up support for up to one year. In the pilot program delivery, the mentors were compensated, and apprentices provided evaluation feedback in place of registration fees. It is yet unclear whether there will be industry-wide support for this model. It promises to bring entry-level inspectors on more quickly and efficiently, but a viable funding model without government support has yet to be tested.

### **Section 3: Inspector Compensation**

For a career as an inspector to be viable, staff and contract inspector positions need to meet the threshold for a living income. Compensation should be commensurate with the market value provided for organic certification. Pay rates for organic inspectors are impacted by many variables that can result in inconsistent and unpredictable annual income. These include training, qualifications, level of experience, scope expertise, desirable specializations, geographic location, willingness to travel, certifiers' fee structures, reimbursement policies, and short-notice availability. There are different compensation models for staff and contract inspectors.

Compensation issues are intertwined and not easily isolated. Compensation relates to many other aspects impacting inspector retention: workload, travel, quality of life, and how these factors influence inspection quality and efficiency. This section represents the working group discussions that touched on the key issues affecting inspector compensation.

#### **Lack of Comprehensive, Accurate Data on Inspector Compensation**

There is very little publicly available quantitative data on organic inspector compensation. This puts inspectors at a significant bargaining disadvantage in the labor market. Inspectors cannot benchmark their pay rates against an industry average or standard because one does not exist. Inspectors may not know if they are underpaid or if they are undercharging for their work. Anecdotally, organic inspector pay rates vary widely based on many factors (as listed above) but without reliable data, there is no direct way to account for the impact of those factors on pay rates.

Additionally, this lack of data is a key barrier to entry for potential new inspectors. IOIA reports that several universities continuously ask IOIA for compensation data because it is one of the first questions their students ask in assessing whether inspecting is a viable career. Prospective inspectors cannot easily make informed decisions without information about entry-level pay rates or a roadmap for career and pay progression that incorporates experience, expertise, and other factors. Those who enter the field may set their rates lower than market averages or rates of other inspectors for quick entry to the market, undercutting other inspectors in their region.

However, inspectors have historically been reluctant to share their pay rates or fee schedules.

Working group participants cited multiple reasons:

1. Traditional taboos about pay or salary information.
2. Certifier policies that prohibit inspectors from sharing contract details including pay scale.
3. Concerns about being undercut by other organic inspectors and losing work.

4. Personal preference - some inspectors consider their fee schedule proprietary as they have invested years of trial and error developing it.

Inspector income data is essential to produce a clear picture of current, standard pay rates for organic inspectors. IOIA, ACA, and other organic sector groups have attempted to gather compensation data through anonymous inspector surveys but have received a limited response. Conclusions drawn regarding inspector pay rates have been insufficient. In early 2022, IOIA and the Organic Integrity Cooperative Guild distributed a compensation and benefits survey designed to collect specific data on current compensation and benefits paid to organic inspectors and reviewers. It is important to note that only about half of the participants chose to answer the question about how much they are paid.

Addressing a lack of inspector pay transparency is a pre-competitive issue for the organic certification sector and one that certifiers must prioritize to support inspector retention. Efforts to get pay rate information directly from inspectors have been unsuccessful. It may be more productive to ask certifiers to provide this critical data. This data could be used to develop a standardized pay scale for organic inspection work.

### **Organic Inspector Compensation Compared to Related Industries**

Anecdotally, auditors for other certification/food safety schemes operating in food and agriculture seem to be paid higher rates than organic inspectors. In some cases, the work is also significantly less complex than organic inspections. Some participants shared their direct experience auditing for other programs:

*"I audited on-farm food safety schemes between 2010 and 2019. My rate started at \$50/hr. and soon went up to \$75/hr. or \$600/day. In 2016 it was \$700/day and by the end, I was offered \$93.75/hr. or \$750/day. This was for on-farm food safety, but I believe the facility audit schemes (SQF, BRC, etc.) pay more. The going rate by now would probably be about \$800-900/day for SQF. And salaried food safety professionals would be making around \$80K or more, by now."*

*"As a food safety auditor, I often felt we were just checking off boxes. The audits weren't as forensic. It was quite boring, actually. No mass balance or traceback exercises were performed by the auditor, rather we would check off that the client had done their own traceability/mock recall exercises at some point during the year and review the results of the same. There wasn't the pressure on the auditor of having to do the selections and calculations in real-time, as we do during organic inspections."*

*"I veered away from food safety to focus more on my interests and passion for organic knowing it paid a bit less. But in the end, the work we do is just as complex and challenging,*

*if not more. And should pay accordingly."*

*"I averaged about \$4,000/week doing other audit schemes and my best week was \$8,000. That didn't include the expense report where I was able to charge \$350+ in expenses per facility or about \$700 a day for hotel, flights, meals, etc. In 2018, when 60% of my work was other certification schemes, my income after expenses was \$111,000 and I bought a lot of very expensive new technology and carried E&O and general liability insurance."*

*"A typical audit was two hours and all I had to do was look through various policies, do a quick walk-through, and make sure that their last mock recall was successful. The report outline was all checkboxes."*

Organic inspectors working for lower pay than auditors for comparable programs is problematic for retention of organic inspectors. More data is needed on current market rates for auditors of other certification schemes. This data should be collected and considered as part of the development of a standardized pay scale for organic inspection work. Inspectors who supplement their income with non-inspection consulting work impact inspector retention and availability of experienced inspectors.

### **Inspector Satisfaction with Compensation**

Most inspectors stated they did not know how their fee schedules compared to the market average. Therefore, the working group discussion primarily focused on individual inspector satisfaction with their compensation and the factors affecting it.

Staff inspectors generally felt they were paid fairly, with a minority expressing that their pay was not competitive across other industries in high-cost-of-living geographic areas. Some expressed concern that raises will not keep pace with their increased experience and expertise.

Contract inspectors were split in their satisfaction with their pay. About two-thirds reported feeling fairly paid and listed the following as the most significant contributing factors:

1. Pay rates commensurate with experience and qualifications that incentivize their long-term inspector retention.
2. Control overcompensation, including:
  - a. Autonomy to set fees and to be selective as to which certifiers to work with, expressing appreciation for certifiers who accept inspectors' fee schedules by default or as an alternative to their standard fee structure.
  - b. Opportunities to periodically raise rates to reflect increased experience and expertise and to account for cost-of-living adjustments.

- c. Access to sufficient work to meet their needs and goals for annual income.
3. Fair pay for travel time and reimbursement of reasonable inspection-related expenses, sufficient to support comfort and safety while traveling.

Contract inspectors reporting dissatisfaction with their pay cited several contributing factors:

1. Pay not reflective of experience and qualifications.
2. Lack of control over compensation, including mandated fee schedules for contract inspectors and flat-rate fee schedules, including:
  - a. Flat rate fee schedules that reward efficiency but can hinder a thorough investigation, especially with unexpected issues during inspection. This can contribute to a problematic cycle of poor quality.
  - b. Flat rate fees are not appropriate for complex, time-consuming assignments, where an experienced inspector is essential.
3. Policies that don't cover compensation for travel time or complexities, insufficient or no reimbursement for travel expenses.
4. Additional duties beyond direct inspection work, such as mentoring new inspectors or performing large administrative tasks like file management and cleanup of assigned files with little or no additional compensation.

Both the inspectors reporting satisfaction and dissatisfaction agreed that flat rate fee schedules allow for more income predictability. There was also consensus that any additional duties (mentoring, administrative tasks) should be appropriately compensated.

Certifiers were split on the use of flat rate fee schedules. Flat rate fee schedules simplify and streamline certifiers' budgeting processes. Some certifiers shared the inspectors' concerns about quality and fairness using a flat rate model. Certifiers that currently use the flat rate model have taken steps to provide additional support to inspectors including raising base rates. The group discussed that if flat rates are used, it should be best practice to allow for additional compensation for unexpectedly lengthy or complex inspections and fair policies and compensation around travel time, expenses, and any additional duties.

### **External Factors Impacting Inspector Compensation**

When asked about other significant factors other than pay rates that impact annual income, inspectors identified the following:

1. **Seasonality of Inspection Work.** Seasonal employment was the most frequently cited issue impacting inspector income. Most inspections in North America occur between April and November. Inspection work available outside this range is typically for

handling operations offered by a limited number of certifiers. Some certifiers have a review/inspection cycle for handling that reduces work offered for all scopes in winter. Contract inspectors, especially those who specialize in crop and livestock inspections or do not work for agencies that offer "winter work," generate a year's income within 7-9 months. Inspectors may experience burnout after a season of intense demands followed by a long period without work. This burnout may lead inspectors to turn down work offered in the winter to have a break after intense inspection months.

2. **Out of Pocket Travel Expenses.** Some certifiers do not reimburse any inspection expenses, while some set limits on reimbursement and others offer full reimbursement. Inspectors reported that they may incur more expenses than what is covered by a certifier's expense cap, particularly if inspecting in high cost of living areas and opting to stay in safe, comfortable accommodations, or to eat healthy meals. Some inspectors choose to add non-reimbursable items that enhance their quality of life while traveling.
3. **Increased Complexity and Expectations.** The NOP has increased requirements for certifiers and inspectors which adds complexity to the certification process. Inspectors are spending increased time and money on training and increased time on site during an inspection. Pay rates, especially flat rate fee structures, don't always keep pace with this additional time/training/effort. Some inspectors report reducing the total number of inspections they perform each year because inspections now take longer, which can reduce compensation.
4. **Inefficiencies and Errors in the Certification Process.** These issues increase inspector time spent per file and are particularly impactful when inspectors are paid a flat rate. Examples cited by inspectors included:
  - a. In the absence of planning and coordination by certifiers, inspectors cannot maximize the efficiency of inspection trips, resulting in wasted time, money, and resources on outliers. All parties could benefit from analysis of geographic efficiencies and matching inspectors and scopes with certified locations at the ideal time of year. Certifiers can look at zip codes of fields and facilities and work with inspectors to build efficient multi-inspection trips when possible. When renewal inspections are scheduled, certifiers can start planning for their next year's annual renewal inspection cycle.
  - b. Certifiers can have a predictable plan for growth to take on new clients where they have capacity.
  - c. Hasty or insufficient initial review or failure to address compliance issues during the previous year's final review results in additional inspection time. These

concerns can be dealt with earlier by the reviewer. Assigning an inspection before the client file has been reviewed can result in wasted time on-site.

- d. Preparing for an inspection that must be postponed because the file was not ready. Inspections that end up canceled or re-assigned can result in unpaid time for inspectors and certifiers.
  - e. Previous inspections of poor quality, when not accurately reflecting an operation's compliance, can lead to time-consuming inspections the following year.
5. **Pandemic.** Several inspectors listed the pandemic as a significant factor in reducing their income in 2020 and 2021. Some inspectors chose to exit inspections during this time, either to retire or find alternative work, which only exacerbated the need for qualified inspectors. Participants agreed that the pandemic and the impact on contract inspectors in particular served to bring issues around inspection work and compensation to the forefront.

### **Time Tracking and Billing Practices, and Impact on Compensation**

The working group discussed current practices inspectors and certifiers use to accurately track and bill time spent preparing for and conducting inspections, writing and submitting inspection reports, and traveling for work. Most contract inspectors reported that they currently track some or all their inspection-related time, with the notable exception of most who are paid a flat rate. Staff inspectors working for agencies who charge clients by the hour for inspection also track their time. Notably, several inspectors reported that they had only begun fully tracking all their time within the past year or two and had been surprised by how much they had been underestimating their working time. The consensus was that tracking time was a beneficial practice for all inspectors regardless of their fee schedule structure to provide an accurate picture of the amount of time required to do their work.

When asked about billing for time worked, the contract inspectors were split into two camps. Many inspectors do not bill for all their tracked time; significant items often not billed for include:

1. Travel time spent working on other operators' files.
2. Time spent scheduling inspections and planning/booking travel.
3. Time spent researching a unique or unusual aspect of an operation or a process or machinery that is unfamiliar to the inspector.
4. Administrative tasks like email, printing, or coordinating with certifiers, that are difficult to attribute to one specific operation.

New and inexperienced inspectors acknowledged that they were less efficient than more seasoned inspectors and they would often reduce their billable time to account for that.

Some inspectors felt ethically challenged by billing for the true time spent on inspections at struggling operations, particularly when the certifier passes the entirety of the inspection cost on to the operator. A few inspectors recounted fielding questions from operators about their mileage, time spent on inspection, and how much it was going to cost. This prompted some discussion about the certifier practice of isolating the cost of the inspection on the client's inspection invoice. If the inspection cost is identified, it singles out the inspector as a key contributor to the expense of certification. This can be awkward between the client and the operator and can put pressure on inspectors to reduce their billing.

Alternatively, some inspectors were adamant about billing for all the time spent on an inspection. These inspectors stated that accurate time tracking and billing are necessary to capture and reflect the true cost of the inspection and to set appropriate expectations for certifiers and clients on inspection costs. Additionally, billing for all time spent on an inspection is the only way to ensure adequate compensation for their work. Several inspectors noted that once they began to accurately track their time, they could effectively increase their annual income by simply billing for the actual time spent on inspection work. As one participant stated,

*"The biggest raise I could give myself is to truly charge for all the time spent writing reports. This is something I am challenging myself to do instead of eating the time inefficiencies of the whole system."*

Many certifiers echoed their support for accurate accounting of actual time preparing for inspection, time-on-site, and finalizing the report as a key strategy to support inspector retention. This also creates an opportunity to provide increased compensation for inspectors. Some certifiers noted that they base the anticipated final review time on the inspection time, so accurate reporting was critical for the efficiency of their system. Several certifiers also noted that inspector invoicing has direct budget implications for their organizations and that they need accurate data to appropriately plan and understand the true costs of running a certification program.

### **Inspector Evaluations and Impact on Compensation**

About half of contract inspectors reported that they regularly receive performance evaluations and accordant raises (or increased rates). The other half noted that they had raised their rates or received increases from certifiers over time, but it was not directly correlated with performance. Staff inspectors reported that some increases in compensation were connected

to performance, but seniority with the certification agency and number of years of inspection experience was a more significant factor in pay increases.

In general, certifier participants expect contract inspectors to advocate for their rate increases, although some did proactively provide merit increases for high-performing inspectors. State certifiers noted that their inspector salaries are dictated by regulations and may require a legislative act to change, so performance evaluations have little impact on compensation. The organic sector can explore support for government certifiers through ACA working groups and offering voices of support on new legislation supporting organic agriculture and those working in the sector.

Most inspectors stated they would like to see certifiers offer cost of living increases and merit increases based on performance and focus less on seniority. As one inspector put it:

*"There are circumstances where years of experience relate to quality of work, but not always. Some new organic inspectors "get it" right away and do an excellent job both on-site and in their reports. Some long-time inspectors may be sliding along with the minimum quality considered acceptable. So, time spent inspecting is not the only way to judge if an inspector deserves more money."*

### **Other Compensation and Benefit Opportunities**

Certifiers reported offering other benefits to reward high-performing inspectors in addition to increased pay rates. These included prioritizing their work requests and offering attractive assignments, holiday bonuses, and gift cards. The consensus was that these types of acknowledgment are appreciated by inspectors.

Several certifiers shared that they offer increased opportunities for advanced work to their best and most experienced inspectors. However, the inspectors were unanimous that receiving highly complex, problematic, or technically challenging assignments is not a reward unless additional compensation is provided. The working group discussed ways to provide additional compensation and support for inspectors taking on such work. Suggestions included:

1. Certifiers could assign complexity ratings to operations and provide additional compensation for more complex or higher-risk inspections. There has been some limited adoption of this by certifiers using various methods. As an example, one certifier reported that they pay more for inspections of new applicants. Others may pay higher rates for expedited inspections, unannounced inspections for cause, or fraud investigations.
2. Certifiers could establish a separate or additional fee schedule for inspections that take longer than expected, involve a hostile client, pose a high risk of an adverse action, or

are highly complex. This could include a paid preparation meeting to give background, answer questions, and strategize for the inspection and include an additional fee for the inspection.

## Section 4: Inspector Workload and Working Conditions

Reasonable, sustainable workload and working conditions that support personal well-being are necessary to retain organic inspectors. A high workload and a lack of work/life balance are common among organic inspectors and are a cause of inspector burnout. When asked to share a personally challenging inspection experience one inspector painted this picture:

*“Leaving a farm after inspecting my last (the 24th) poultry house for the week on a hot Carolina August afternoon and having my car break down - I realized in that moment that I wasn't going to make it home that night and was going to miss most of the family outing my wife had planned for my return after spending 80% of the previous month on the road.”*

Issues raised by both contract and staff inspectors include the seasonality of inspection work, the drain and strain of long periods of travel, living out of hotels and being away from friends and family, and increased complexity and expectations at inspection. This identifies a need for realignment of certifiers' expectations and inspector needs for a reasonable workload and working conditions.

Organic inspectors are often mission-driven and may initially accept personally detrimental working conditions that they perceive to be for the benefit of the mission of organic. Over time, it takes a toll on personal well-being and can result in burnout. On the other hand, some inspectors have been doing this work for decades and have found ways to make it sustainable. Some who are relatively new to inspecting find it to be a viable career path. The working group explored how inspectors and certifiers determine workload and inspection schedules, identified key challenges to sustainable inspection work, discussed inspector strategies for workload management and preventing burnout, and identified ways for certifiers to support inspector work/life balance.

### Determining Inspector Workload

In informal polls within the working group, contract inspectors who self-identified as full-time reported conducting a range of 70-300+ inspections on average each year, split by about half conducting 70-150/year, and the other half conducting 150-300 per year. Contract inspectors who self-identified as part-time reported conducting anywhere from 5-85 inspections per year. The majority of these inspections occur between April and November.

Certifiers reported that they generally expect contract inspectors to request their desired number of inspections and manage their workload. Certifiers also noted that the quality and timeliness of the inspector's previous work and their geographic location are determining factors as to how many inspections were assigned to an individual inspector. Some agencies

require contract inspectors to accept a minimum number of inspections per year to maintain their contracts.

Informal polling of full-time staff inspector working group participants returned an average reported inspection load of 100-130 inspections per year. While this was lower than many full-time contract inspectors, staff inspectors noted they had much less ability to select or decline work. One part-time staff inspector reported doing 180 inspections per year. Certifiers reported that staff inspector workloads ranged from 40-180 per year based on geographical region, travel parameters, complexity, scope, and balancing inspections with other duties (particularly at government agencies where inspectors have other roles outside the organic program). Staff inspectors reported some seasonality to their work but were more easily able to spread out workload throughout the year compared to contract inspectors.

### **Factors Influencing Contract Inspector Workload**

Contract inspectors discussed the factors that impact their decisions regarding how much work they take on. The most significant were:

1. **Income needs.** Contract inspectors must take on enough inspections to meet their needs and goals for income. Yet, the lack of availability of work between December and March means many full-time contract inspectors must earn a year's living in 7-9 months, which can contribute to burnout.
  - a. Notably, contract inspectors who self-identified as part-time reported more satisfaction with their inspection workload and better work/life balance than full-time inspectors. They generally find the work to be sustainable, with many primarily taking on local inspections and minimizing inspection-related travel. However, most part-time inspectors report having other sources of income or financial support and therefore do not need to earn a full-time income from organic inspections. While part-time inspection work can be a good option for some individuals and can support inspector retention, it does not address the need for the sector to provide better avenues and support for sustainable, full-time organic inspection work.
  
2. **Scope, Type, and Complexity of Inspections.**
  - a. Inspectors who typically conduct inspections for larger or more complex operations and those inspecting handling operations, tend to perform fewer overall inspections. Inspectors who focus primarily on crop operations tend to perform more inspections.
  - b. Several inspectors reported that they could take on more work when performing remote inspections, as they were able to complete them quickly and without travel. However, others found that remote inspections were draining, more

prone to disruption due to technical difficulties, and often took longer than on-site inspections if clients were not well versed in the remote platforms or virtual file sharing.

3. **Availability of Local Work and Minimizing Travel.** Most contract inspectors prefer to stay relatively local and avoid overnight travel or long inspection trips when possible. Minimizing travel provides more time for conducting inspections and in theory, inspectors can take on a larger workload. However, this can mean juggling work for numerous certifiers to get enough inspections close to home. Planning a workload for multiple certifiers is particularly challenging when the agreed-upon workload changes, like when the work is delayed past the agreed-upon time or when the total workload increases or decreases significantly.

### **Challenges to Workload Sustainability and Preventing Burnout**

1. **Travel.** Work-related travel is required and expected for most organic inspectors. Contract inspectors accept work requiring travel to have a sufficient workload to meet their income needs and many staff inspectors are given assignments requiring travel. While each inspector's travel preferences may vary, frequent and extended travel was cited by a majority of inspectors as the primary cause of burnout. Reasons cited by inspectors include:
  - a. It is difficult to have a reasonable work/life balance, or any personal/home life when traveling frequently.
  - b. Travel is physically and mentally draining.
  - c. It can be difficult to find nutritious food and decent accommodations everywhere. Desirable food options can be expensive in urban areas and lacking or unavailable in rural areas.
  - d. Travel can be expensive if the certifier does not pay for travel time or reimburse all travel expenses.
  - e. Travel is unpredictable. Many things can disrupt a scheduled trip, such as bad weather, illness, automobile breakdowns, traffic accidents, last-minute operator cancelations, delayed/canceled flights, or other events. Such unpredictability can disrupt an inspector's schedule. Many inspectors shared stories about travel nightmares, such as this one:

*“End of a one and half-day long inspection. Feeling exhausted, I finally was within about a mile of my hotel in Raleigh NC. It was pushing 8 pm. As I usually do, I decided it was best to get gas before I settle in for the night as it was going to be a long haul in the morning. I slowed down in*

*my rental car to make a right-hand turn into the gas station. BANG. Rear ended! It was going to be a very long evening. Didn't end up getting to my hotel until about 1 am after all the paperwork and police statements etc. My morning client was kind enough to delay by a few hours b/c I needed to go get a new rental car. This was one of my more intense trips pushing about seven inspections in four and a half days. I think I realized after this one that I may need to re-evaluate as I was feeling quite burnt out after this adventure."*

- f. Many inspection trips are planned to maximize the number of inspections in the fewest number of days and to minimize expenses. This leaves little time for exercise and leisure since the comfort and well-being of the inspector are not considered.
  - g. Inspectors are challenged to produce a high-quality report when there is a lag time between the on-site inspection and report writing time.
  - h. Several staff inspectors noted that they had little to no control over the amount of travel required for their work, which makes it feel unsustainable.
2. **Seasonality of Inspections.** Many inspectors work more than eight hours a day, seven days a week, during the inspection season. Contract inspectors expressed a desire for certifiers to spread out inspection work, offering more between December-March, or to offer contract inspectors other types of work (e.g., review work, special projects) during these months.
  3. **Inefficient Assignments and Scheduling.** Many inspectors expressed dissatisfaction when assignments trickled out throughout an inspection season rather than having a list of assignments provided at the beginning of the season. Also problematic are frequent requests for one-off inspections, especially on short notice or requiring travel during the year. These approaches make it difficult to plan out a schedule and impact personal life.
  4. **Frequent yet unpredictable challenges at inspection.** Administrative and quality issues outside the inspector's control, including poor previous inspections and outdated/inaccurate OSPs, can lead to much more time on-site than planned and to a negative experience for everyone involved in the inspection. Many inspectors reported discontinuing working for certifiers where administrative and quality issues are a regular occurrence.

## **Inspector Strategies for Sustainable Workload and Work/Life Balance**

Inspectors shared strategies for making their workload and schedule more sustainable and combating burnout. These include:

### **1. Strategies for scheduling and work/life balance:**

- a. Plan out the year as far as possible with tentative inspection dates. This makes it easier to respond to requests for one-off inspections.
- b. Set scheduling routines that work best for your lifestyle - e.g., limit the number of inspections/inspecting days per week, alternate inspection weeks with report writing weeks, no work on weekends, etc.
- c. Schedule inspections to start at mid-day and go over into a second day if needed. This breaks up the inspection a bit and provides more time for travel, file preparation, and report writing.
- d. For contract inspectors, limit the number of certifiers you contract with.
- e. Accept primarily local work whenever possible to avoid frequent overnight travel and long trips on the road.

### **2. Strategies for travel:**

- a. Limit travel to a specific distance/length of time whenever possible and consider scheduling time off to recuperate after long trips.
- b. Stay in decent accommodations that support rest and relaxation while away from home. For extended trips in the same region, consider a short-term apartment rental to provide a consistent and comfortable place to stay.
- c. Find ways to enjoy travel. Eat good food and partake in local culture. Many inspectors request trips to certain locations where they have friends/family or just want to visit.
- d. Take up hobbies that are compatible with travel - hiking, running, fly fishing, photography, knitting, etc.
- e. Download audiobooks or listen to podcasts.
- f. Maintain an exercise regimen schedule as part of the travel schedule.

## **Certifier Support for Sustainable Inspector Workload and Work/Life Balance**

Certifiers acknowledged that inspection work can be challenging and exhausting. The group discussed that while there were several common themes arising from these discussions, inspectors are individuals, and each one may want and need different things. This can make it challenging for certifiers to set universal policies to support inspectors and underscores the need to address identified challenges. Both certifiers and inspectors should prioritize

relationship-building that can support individual inspector needs.

Certifier participants listed the following ways they support inspectors' work/life balance:

**1. Provide tailored benefits for staff inspectors**

- a. Hire staff inspectors in specific geographic areas to reduce travel.
- b. Provide paid vacation and personal time off.
- c. Minimize inspector time spent on administrative work.
- d. Provide phone, computer, and other technology equipment and support.
- e. Provide a company credit card for travel expenses.
- f. Provide a vehicle, if needed.
- g. Provide a stipend for incidental expenses incurred during travel (e.g., exercise class, museum admission, movie ticket).

**2. Develop genuine individual relationships with contract inspectors**

- a. Try to accommodate inspector needs and preferences, particularly for travel (locations, time spent, mode of transportation, and the number of assignments).
- b. Encourage open communication and requests for support.
- c. Support inspectors in setting reasonable boundaries for themselves, including turning down work when necessary for their well-being.
- d. Allow contract inspectors to bundle assigned travel with other client visits with costs shared or pro-rate them.
- e. Every inspector is different, and a one-size-fits-all approach doesn't work.

**3. Implement supportive inspection assignment and scheduling practices**

- a. Assign inspection work with adequate time to allow for advanced scheduling and planning of efficient trips.
- b. Allow inspectors the flexibility to schedule trips as needed.
- c. Assign staff inspectors floating or "on-call" days to allow for expedited scheduling/travel for new clients or rush inspections while minimizing disruptions.
- d. Provide financial support (cancellation fees) to inspectors when operations cancel on short notice (<1 week in advance).

**4. Foster connection and community.** Provide regular opportunities to connect with certifier staff and other inspectors via listserv, weekly office hours support, team check-ins, and evaluations/feedback sessions.

## **Section 5: Inspection Quality, Feedback, and Continuous Improvement**

Inspection quality is a key issue for inspector retention. Certifiers and inspectors must find ways to balance the need to complete inspections efficiently while meeting expectations for quality and integrity. Incentives should be aligned with desired outcomes. The working group discussed how certifiers establish and communicate inspection requirements and expectations, create mechanisms to provide useful feedback, and how best to support inspectors in performing efficient, high-quality inspections.

### **Establishing Expectations for Inspection Work**

Certifiers and inspectors need to agree on expectations for inspection work. A mutually beneficial working relationship is built on a foundation of clear expectations for and responsibilities of each party.

Certifier participants reported that basic requirements and expectations for inspectors are communicated through the contract or the job description, an inspection manual, and as part of onboarding. Some certifiers provide additional inspector resources and guidance, such as an Inspector Code of Conduct or pre-recorded training videos and policy statements to provide additional clarity on expectations. Some certifiers provide an annual update training at the start of each inspection season to communicate changes.

Contract inspectors reported that certifiers who had unclear, vague, or implicit expectations for inspection work tended to provide less feedback during the inspection season. Instead, critical feedback was provided to the inspectors at the end of the inspection season. Some contract inspectors reported receiving feedback and instruction from reviewers that contradicted instructions they'd previously received from the certifier, leading to uncertainty and frustration about expectations.

There was consensus that certifiers should discuss expectations for inspection work in advance, provide those to inspectors in writing, and communicate any changes to expectations in a timely way to both inspectors and certification staff. Certifiers should welcome and encourage proactive questions from inspectors and inspectors should feel empowered to get clarity on expectations.

### **Inspector Feedback Mechanisms, Sources, and Feedback Quality**

Constructive feedback in any position is critical to ensure mutual understanding of expectations and requirements, to identify areas where correction or improvement is needed, to acknowledge and appreciate excellence, and to support professional growth and development. Working group participants reported that certifiers provide feedback in a variety of methods and intervals. The methods varied but included one written performance evaluation per year,

periodic feedback throughout the year focused on critical issues, or receiving evaluations on every inspection after the final review. Some certifiers reported that they emphasize positive feedback and recognizing excellent work with the intention that inspectors feel appreciated and acknowledged.

**1. Timely, inspection-specific feedback.**

All inspectors said they preferred to receive timely feedback on inspection work.

However, only half reported currently receiving timely, inspection-specific feedback.

Receiving feedback after each final review means the inspector receives the feedback in context with the work when inspection-specific details are fresh. Timely feedback makes it easier for inspectors to make corrections and changes to their practices quickly. Inspectors noted that feedback received weeks or months after the inspection could be difficult to interpret especially if details were more difficult to recall. Inspectors reported that special appreciation of instances when certifiers share positive feedback from clients, citing that it boosts morale, especially during the busiest time of year.

Certifiers acknowledged the benefits of inspection-specific feedback for inspectors but reported challenges to these expectations based on limitations of staff resources and sufficient mechanisms to give feedback in their existing systems. Some certifiers have found efficient ways to provide feedback: one certifier uses an evaluation form in their Intact platform that sends feedback directly to the inspector after each review. Other certifiers noted that staffing capacity challenges lead to a primary focus on inspectors whose work has significant quality issues, with all other inspector feedback as a lower priority that sometimes does not get addressed.

**2. Formal annual evaluation.**

About two-thirds of contract inspectors and all staff inspectors reported receiving a formal annual evaluation from each certifier with feedback on overall performance. One-third of contract inspectors reported not receiving an annual evaluation, despite the NOP accreditation requirement for certifiers that all inspectors be evaluated annually. There was speculation that the certifiers had performed the evaluations but may not have shared them with the inspectors, and that this may be due in part to the impacts and aftermath of the pandemic on their work, primarily with staffing capacity not able to meet demand.

Inspectors reported that annual evaluations are most useful for receiving feedback on trends (positive or negative) in their work throughout the year and are most effective when feedback is presented from a variety of sources (reviewers, inspection staff, clients). It is not helpful to receive one-off complaints or inspection-specific critical feedback if time lapses between the inspection and the evaluation, as it can be hard to

remember the specifics of any given inspection as time passes. Inspection-specific issues may not indicate or correlate to overall annual performance.

### 3. Sources of Feedback

**Certification Staff.** Inspectors prefer to receive feedback from experienced staff and those with inspection backgrounds. Many inspectors reported feedback from new or inexperienced review staff to be less helpful. Certifiers generally agreed but noted that this reflects part of their challenge in providing timely feedback that is also high quality. One certifier has approached this by only requiring reviewers to be on the job for at least a year to give performance feedback to inspectors.

**Clients.** Many certifiers ask clients to provide feedback on inspectors. While this provides an opportunity for another perspective on the inspector's work, inspectors expressed conflict of interest and implicit bias concerns about client feedback. Implicit biases like the "self-serving" or "availability" biases may cause an operator to give poor ratings when an inspector has identified more items of concern or higher ratings when inspectors supervise, or "help" clients complete the feedback form and influence the results. Neither result in honest, useful feedback. One suggestion was to have certifiers request the feedback directly from the client, outside of the inspection, and to consider the feedback in the context of the operation's report.

**Field Evaluations.** It is possible to get valuable feedback from field evaluations, particularly for experienced inspectors excluding evaluations conducted solely to meet a certifier's accreditation requirement. Field evaluations need to be performed with the intent of evaluating and improving inspector performance to have value as a feedback mechanism.

### External Factors that Impact Inspection Quality and Efficiency

Participants identified a challenge in finding the balance between quality and efficiency, both in the overall certification process and with the inspection. The group identified two primary factors external to the inspector that most significantly impacted inspection quality and efficiency.

#### 1. Certifier File Management and Client Preparation

Client file management and client preparation for inspection are the two areas where certification staff work has the most significant impact on inspection quality and efficiency. Contract inspectors reported variability among certifiers. Many inspectors reported that cumbersome or disorganized filing systems have been a factor in choosing to stop working for a certifier.

Inspectors listed the following certifier actions as having the most positive impact on the efficiency of an inspection:

- a. Completing an initial review of the client file each year. Verify that the OSP is adequately complete, that outdated information has been removed or marked obsolete, and that the file is organized overall.
- b. Contacting the client to answer questions and collect missing information before releasing the file to the inspector. One inspector shared, *"[In the past] I have spent a lot of time requesting the client fill out and correct OSPs and explaining the questions because things were blank, or they didn't understand. Having somebody at the office go over that with clients using the telephone has been a huge help."*
- c. Providing a clear and concise list of points of focus/special instructions for the inspector and highlighting missing information or documentation to collect.
- d. Issuing a reminder to the operator of the findings and corrective actions from last year's final review, before this year's inspection, and ensuring that a summary of the previous year's findings and corrective actions is readily available to the inspector.
- e. Sending the client an inspection preparation checklist and a "what to expect at your inspection" communication. As one inspector noted, *"More conversations happen at these inspections and it's easier to get a complete picture of the operation. Since the client is prepared, the inspections are more relaxed, and reports contain more details."*

Contract inspectors noted that the quality of file management and client preparation is also variable between individual reviewers at a given agency. Yet, many inspectors do not currently have a formal way of providing feedback to the certifier on reviewer work. There was unanimous support for implementing a reviewer feedback mechanism for inspectors. Several certifiers have already done so and have found the following benefits:

- a. It helps certifiers identify file management and client preparation practices that improve the efficiency of inspections.
- b. It clearly defines the reviewer/inspector relationship as an equal partnership and not a hierarchy.
- c. It helps with cross-training between the two roles and gaining understanding and appreciation for each other's work.

## 2. Poor Previous Inspection Quality

A central theme raised throughout the working group discussions was the impact of a poor inspection on the next inspector. Poor quality inspections lead to a myriad of issues and have an overall negative impact on the integrity of the organic industry. They provide an inaccurate assessment of an operation's compliance, which can result in a longer or less efficient inspection the subsequent year, and lead to frustration for the client and the next inspector. They can require significant additional review work for the certification staff. Inspection quality issues may also lead to the certifier receiving a noncompliance during their accreditation audits.

Every inspector in the working group had experienced showing up at a renewing organic operation for their inspection, only to be faced with unfortunate and unexpected challenges that are a direct result of a poor inspection from the previous year. These include the previous inspector failing to review or verify parts of the operation, documents, or records; failing to compare the OSP to the operation's practices; and failing to identify issues of concern on the Exit Interview. In these circumstances, the subsequent inspection tends to take much longer than anticipated, and the operator is generally unprepared. Often, the OSPs contain obsolete or inaccurate information that cannot easily be caught by certification staff, or the inspector may uncover entire parts of the operation that are not addressed in the OSP. The operator feels frustrated with being asked for more/different information than the previous year because "my last inspector didn't ask to see that," or may have stopped keeping required records that were never requested at inspection. Being given a list of items of concern on the Exit Interview can be very upsetting for the operator, particularly when their last few inspections have had no concerns. They may become hostile or uncooperative. As one inspector shared:

*"I have had both complaints from a client and questioning from the certifier when an inspection takes too long. Why did this year's inspection take seven hours and last year it only took three hours? Well, because last year the inspector skipped several areas of verification. I have even had an operator tell me that a past inspector simply told them that the certain documents should be retained but did not actually verify that those documents are in place. I have had operators tell me that they have never had an inspector ask about nonorganic production and sales. This is an awkward situation to be in and may well turn into one of those situations where a client complains about an inspector."*

The group discussed possible root causes for these inadequate inspections

- a. Inspection quality is influenced by many of the other factors impacting inspector retention, including qualifications and training, workload and working

conditions, and inefficiencies in the certification system that are most visible at inspection. These must be addressed to improve inspection quality overall.

- b. The general demand for inspectors has resulted in certifiers continuing to use sub-par inspectors to complete the inspection work promptly.
- c. Some participants thought that poor inspections were more often performed by more senior inspectors. Some certifiers shared that some of their most experienced inspectors have a casual or informal approach to inspecting and fail to identify minor issues of concern that are discovered in subsequent inspections. Others may be resistant to change as the industry evolves. It has been a challenge to provide feedback and training to address this issue and see results. Other participants pushed back on this theory, stating that the issue was less age/experience related, and more likely related to inspector personality, style, and training.
- d. Some certifiers reported that poor quality inspection issues became more apparent once they hired staff inspectors and moved away from contractors. Many staff inspectors concurred with this assessment and reported regularly having to do a lot of additional work to clean up errors and omissions from the previous inspection by a contractor. The group discussed that staff inspector familiarity and consistent use of one certifier's systems, forms and documents may be a key contributing factor. This was further discussed in the Certification Systems, Forms, and Administrative Tasks topic.

One proposed solution to address this issue was for inspectors to provide feedback to the certifier on the previous inspector's work. The inspectors in the working group had a split opinion on this approach. Some inspector participants supported such feedback to provide insight into the previous inspector's quality of work and could identify quality concerns that certifiers may have overlooked. Other inspectors felt peer review inappropriate and that it should not be part of an inspector's job. They also noted that this feedback would generally come a year or more after the work had been performed and that it may not be useful unless a significant issue is identified. However, certifiers noted that this kind of feedback would be helpful for them to identify concerns about an inspector's quality, and it should be an area of further exploration.

### **Additional Observations**

The prevalence of reviewer turnover and subsequent increase in new and inexperienced reviewers was a recurring theme throughout the working group's discussions. Participants agreed that lack of reviewer retention has a major negative impact on the quality and consistency of certification review work, and it is a significant challenge that the industry

urgently needs to address. More work is needed to identify the reasons for high reviewer turnover and to develop strategies to support and retain reviewers in the organic sector.

Some contract inspectors expressed concern that they don't want to be perceived as troublemakers or to "ruffle the feathers" of certification staff, so they may withhold or be cautious when providing feedback to a certifier than an inspector with employee protections might. As a result, certifiers may not be receiving valuable information that is necessary to initiate and inform positive change. The working group identified the need for further work on fostering a feedback culture in organic certification that trains and supports personnel to give and receive feedback in a respectful, constructive way.

## Section 6: Certification Systems, Forms, and Administrative Tasks

Certifiers' systems, processes, and forms vary widely. OSP forms, inspection report outlines, and formal notification templates must meet regulatory requirements, but certifiers invariably customize forms and templates. There are benefits to using systems and forms that are tailored to the certifier's primary clientele, but they also present challenges. Contract inspectors stated that inconsistency among certifiers' OSP and inspection forms and differences between digital databases and platforms are a source of inefficiency and frustration in their work. Similarly, some certifiers have seen increased quality and efficiency when switching to using primarily staff inspectors who can become experts on the certifier's documents, platforms, and processes.

Additionally, both staff and contract inspectors expressed concern with the amount of time spent before or at inspection performing administrative tasks which could be done by certification staff. For this working group, administrative tasks were defined as the following:

1. General file organization for clarity.
2. Identifying and removing outdated/obsolete/duplicate information from the file.
3. Collecting missing OSP information, such as an entire section of the OSP.
4. Collecting updated OSP documents at the request of the certifier. *This does not include inspectors collecting OSP updates to correct inaccuracies or changes at the operation which are discovered during the inspection.*

Inspectors want to remove as many administrative tasks from their plates as possible. At least a few certifiers are aligned in a desire to shift the burden of administrative work from inspectors to other staff, so inspectors can focus their time on-site on work that requires technical knowledge of an inspector or can only be done during inspection. For this topic, the working group discussed the differences between documentation/forms; the impact of inspectors performing administrative tasks, and what it would take to shift the burden of those tasks away from inspectors. The group also explored the pros/cons of a universal OSP format, the potential impacts it could have on certifiers and inspectors, how it might improve consistency, and what challenges it could present.

### Differences/inconsistencies between certification systems

The working group identified some significant differences between certifiers' systems, forms, and required processes related to inspection work. These include:

1. **Use of online database platforms vs. digital/paper files** for managing client records and submitting inspection reports. How certifiers use online database platforms varies widely.

2. **Inspection scheduling expectations and timelines.** Some certifiers give inspectors autonomy and control of scheduling, while others require inspectors to schedule within a given timeline upon receiving the assignment. Some certifiers schedule inspections and book travel for inspectors.
3. **The quality of file management and organization by the certifier** varies widely, as do the expectations for submitted reports. One inspector noted, *"Sometimes it seems like I am expected to submit documents in a much more organized manner than they are presented to me."*
4. **Certifier expectations for inspectors to perform administrative tasks** as part of their inspection work. There was a wide variation reported. Some certifiers intentionally work to minimize and remove administrative tasks from the inspector's duties, while one certifier tasked inspectors with complete file clean-up before each inspection.
5. **The general design of the OSP and inspection report outlines.** Participants reported wide variation in the number, type, and quality of questions in the OSP and report outlines. Some certifiers primarily rely on checkboxes, some primarily use open-ended narratives, and some use a combination. Open-ended narrative style reports are most useful in combination with the OSP, requiring the inspector to refer to the OSP to answer the questions. A checkbox format can be completed with a quicker review of the OSP during the inspection and can lead to more consistent and efficient reports. Inspectors generally prefer OSPs and report outlines to follow the same flow of information, making it easy to cross-reference. Redundant questions and overly technical, inaccessible language in OSPs and inspection report outlines can be problematic for both inspectors and operators.
6. **Requirements for signatures.** Certifiers differ in their requirements for signatures on inspection reports and exit interview documents and client initials on OSP updates.
7. **Expectations for audit trail exercises.** Some certifiers require inspectors to use specific forms while others expect inspectors to conduct the exercises with their forms. Some inspectors noted that the forms can have editing restrictions that prevent formatting to emphasize important content and are sometimes too simplistic/poorly designed for the complexities of large handlers.

### **Differences in Inspector File Access and Report Submission**

The participants discussed the variety of methods certifiers use for providing inspectors with access to client files and submitting reports, and the pros and cons of each. Some certifiers offer multiple inspection packet options for inspectors, giving options for inspector preferences

to access inspection packets and submit reports. Most certifiers utilizing online database platforms require inspectors to use the platform.

1. **Online database platform with inspector portal.** One example is the Intact Platform (formerly known as eCert). This was the most common system used by all working group participants. There were differences between certifiers in how online database platforms are used and certifier expectations for inspector use.

An online platform can provide inspectors with limited or full access, with access level determined by the certifier, to the entire client record, including digital documents/files and information stored directly in the database. Some certifiers define a specific group of documents that make up the current OSP while still allowing access to other/inactive documents. Other certifiers ask the inspector to assemble their inspection documents from all the files in the database. In some cases, the platform can be used to generate formatted reports for the inspector of client data such as fields/crops, input materials, and other things. The platform can also be structured for inspectors to submit their report/supporting docs as a digital document or complete an inspection report built directly into the database itself.

Participants identified many benefits to online database platforms:

- a. They are powerful tools that can support high-quality and efficient inspections. As one staff inspector reported about their agency's platform, *"I have full confidence in the platform and my preparation, so I don't have any excuse not to do high-quality work while on-site and in completing reports. If I make a mistake, there is no blaming it on the forms or process. It definitely takes pressure off of me and allows me to focus on good work, enjoying the work, and not spending time being frustrated."*
- b. Database platforms can aid inspectors in organizing and scheduling their inspections, as all the necessary information is provided through the portal.
- c. They provide inspectors with access to a client's entire record and history, so they have the same information as the certifier.
- d. When a client record is updated, the information is available to everyone with access in nearly real-time.
- e. These systems have functions including tags/labels, filters, and sorting features which can help organize and navigate files.
- f. Database-generated reports can be used to summarize and present key information for inspectors.

However, there are also challenges and complexities presented by online database platforms that impact the quality and efficiency of inspections:

- a. Efficiency and ease of use by inspectors are dependent on the certifier's design and implementation of the platform. This includes how the database is set up, the certifier's expectations for how inspectors will use it, the simplicity and intuitiveness of the user interface, and how much training/guidance is provided by certifiers. It can be difficult to design efficient workflows with appropriate notification steps that ensure inspectors have all the current information for an operator. Many inspectors noted there is lots of room for improvement in how certifiers implement these platforms, and more consideration is needed for inspectors as primary users. Certifiers acknowledged these challenges - as one certifier observed, *"Databases are complex beasts that can provide a huge organizational and time benefit if the data is entered correctly. They take a clear vision of the goals as well as a thorough knowledge of the capabilities to implement effectively."*
  - b. Organization and file management are critical, particularly when asking inspectors to generate their own inspection packets from the client record. Yet many inspectors reported inconsistent or unorganized file management as a key pain point in using online database platforms. As with any filing system, without clear and consistent file management procedures for reviewers, the document section of the client file can easily become an unorganized dumping ground. As one inspector put it, *"An unorganized digital file is not much better than an unorganized paper one."*
  - c. Use of the platform requires a steady internet connection, which can be a challenge at many operations or while traveling. Internet connectivity issues while on-site can be an efficiency drain, resulting in lost or duplicated work and issues with uploading/downloading files.
  - d. Some certifiers have incorporated the inspection report outline directly into the database (rather than having inspectors upload the report as a digital file). While this allows the certifier to easily capture key data points directly from reports, some inspectors reported that the built-in report outlines are rigid, lacking a mechanism for formatting/spell check, and creating an additional source of frustration. As this feature requires internet connectivity, there is a risk of losing data when there is no autosave feature. This can be inefficient, as some inspectors must duplicate their work by completing a paper checklist and then later entering it into the database.
2. **Digital file sharing.** This was the second most common system used by working group participants. Examples include Dropbox, Google Drive, Sharepoint, OneDrive, and

Box.com. The inspector receives a link to a cloud-based digital file folder where the certifier has provided an inspection packet. The inspector can download the files for offline review. After the report is complete, the inspector uploads the report and any supporting documents back to the digital file folder.

Some inspectors reported digital file sharing as currently the most efficient method to support pre-inspection preparation, as they received a complete packet that required little work beyond reviewing the file. Other inspectors preferred having full access to the client file as provided by an online database platform, to ensure they had the necessary information for a full picture of the operation.

3. **Email.** The certifier emails the inspection packet and the inspector emails back the report and supporting documents.
4. **Physical delivery.** The certifier mails or ships a paper-based inspection packet to the inspector. In some cases, this is intended as a supplement to a digital file drop, and the inspector can either upload or mail back the report and supporting documents.

Participants discussed collecting required signatures (such as on exit interviews or client initials on updated OSP documents) when using primarily digital forms and online systems. Some inspectors bring printed Exit Meeting Interview forms to the inspection to collect signatures, while others have touch-screen devices that clients can use to sign or initial documents digitally. One inspector noted that signing a document via touchscreen has even been acceptable for most people in the Plain community.

Some noted that signatures and client initials on OSP changes are not required by the NOP, and it would be simpler not to collect them. Some certifiers currently do not require inspectors to collect signatures/initials at inspection. Operators sometimes decline to sign or initial Exit Interview forms. However, many inspectors and certifiers stated they still prefer to have clients sign/initial these documents. Signing the exit interview confirms that the client is aware of the findings from the inspection and removes some of the potential for a "he said/she said" situation. Collecting client initials on updated OSP forms can also eliminate some of the need for reviewer follow-up with the client to confirm OSP changes.

### **Performing Administrative Tasks at Inspection**

Both staff and contract inspectors have expressed dissatisfaction with long amounts of time spent before or at inspection performing administrative tasks which could have been done by other certification staff. The group identified which administrative tasks (defined at the beginning of this section) are most commonly performed by inspectors and which take the most time at inspection.

1. **General file organization, identifying/removing obsolete, outdated, and duplicate documents.** Most inspectors cited this task as the most time-consuming and common administrative task they performed and the greatest potential cause of inefficiency in their work. Inspectors agree that file management and reviewing documents for accuracy is an important part of their role while on-site, but old/obsolete/redundant files should be removed from the current file before it is provided to them. This task is especially disheartening if the inspector marks items to be removed or retired one year and recognizes that those changes were not implemented when assigned the file the following year.

Most certifiers noted that they do not ask or expect inspectors to take on this kind of administrative work. However, it is helpful and appreciated when inspectors assist in identifying inaccurate information in a file. Given the number of inspectors who listed this as their most onerous administrative task, it is clear that inspectors are regularly taking on this work with the intention of creating a file that can support a high-quality inspection.

2. **Collecting missing OSP documents.** About half of the inspectors cited said they routinely collect missing information that is needed for a complete OSP. Several inspectors noted that it is difficult to sufficiently verify a brand new OSP document received at inspection. They are unable to review it in the context of the rest of the OSP which can result in superficial verification of new information.

There was general agreement that certifiers should have a reasonably complete OSP on file before moving a client to inspection, since verifying on-site practices against the OSP is a primary task of the inspection. Certifiers noted that the need to move the certification process forward promptly sometimes means sending an operation to inspection without all the required OSP information, although they generally try to avoid it. One certifier has disincentivized operators from delaying their required submissions by raising their inspection cancellation/rescheduling fees and notifying operators that a canceled/rescheduled inspection due to an incomplete OSP will incur a fee.

3. **Collecting certifier requested OSP updates.** A few inspectors listed collecting OSP updates at the request of the certifier as a significant burden. However, most inspectors reported that some on-site updates were an expected part of the job. The group discussed that moderation is key. Collecting a few updates is reasonable and can generally be done efficiently, but a long list of things for the client to "have ready for the inspector to collect" hinders a good inspection process. Inspectors generally prefer that certifiers request clients submit updates directly to the office by a deadline and avoid directing clients to provide updates to the inspector. One challenge is information

submitted to the certifier between the inspection assignment and the inspection date must be shared with the inspector.

4. **Addressing inaccurate “no changes” OSP updates.** Several inspectors reported that significant OSP updates are often identified at renewal inspections where the operation has checked a box on the annual update form to state that there were "no changes." This checkbox approach is easier for the client and makes them more likely to submit their annual update on time, but it is often inaccurate. In such cases, the inspector may spend significant time collecting unexpected OSP updates and new information that could have been submitted with their annual update. Certifiers can support more comprehensive annual updates by encouraging operators to review their OSP when completing the update form each year.

Certifiers acknowledged the impacts of these administrative tasks on inspectors, and many reported efforts they are making to reduce or remove these tasks from inspectors' plates. Many certifiers reported significant challenges to shifting these responsibilities. Certifiers must meet regulatory timeline requirements for the certification process. If a client takes too long to provide information, certifiers are faced with either taking enforcement action (issuing a noncompliance or a fee) or kicking the can down the road to the inspector. Formal notification letters can be long, technical, and confusing for many operators so in some cases, inspectors are best positioned to explain these requirements while on-site. Additionally, some certifiers cannot currently shift all administrative tasks to their review staff. Changes to budgets, staffing plans, and internal systems to find areas of efficiency elsewhere take time and leadership buy-in. As one certifier put it:

*“More review hours and more administrative tasks for reviewers means we would need more bodies doing the work, or maybe other positions that are not reviewers or inspectors but who take on some of that administrative work alongside the greater certification process. It would mean a long-term fix to the problem, which takes time and money, both of which are hard to come by.”*

### **Considering the use of a Universal OSP**

The working group discussed the concept of an available universal OSP format as a way to reduce inconsistencies between certifiers and increase efficiency for inspectors, particularly contractors. This could be a mandatory form developed by the NOP, which has been suggested as a possibility, or a voluntary form developed and promoted by the ACA. In general, inspectors, particularly contractors working for multiple agencies, were neutral or in favor of a universal OSP. Certifiers acknowledged the benefit from the client/inspector perspective but had concerns about the practicalities of implementation. The participants identified the following pros and cons of a universal OSP format:

**Universal OSP Pros/Cons lists:**

Pros	Cons
<ul style="list-style-type: none"> <li>● Present a united front for the organic certification sector.</li> <li>● Contribute to more consistent, high-quality inspections and certification.</li> <li>● Ensure an OSP that is compliant with NOP requirements and written in plain, accessible language.</li> <li>● If designed as a base OSP, certifiers could use addendums to ask additional questions as needed.</li> <li>● Remove administrative burdens for operators and certifiers when operators switch agencies.</li> <li>● Streamline the application process for consultants whose clients use different certifiers.</li> <li>● Increase contract inspector training efficiency as they would only have to learn to use one form.</li> <li>● Enable Universal OSP training for inspectors and operations through the OILC and IOIA.</li> </ul>	<ul style="list-style-type: none"> <li>● Certifier collaboration and agreement on a single form could be challenging if not mandated by the USDA.</li> <li>● Change how all certifiers operate and may require expensive rework to database platforms and inspection report outlines.</li> <li>● Remove a way for certifiers to differentiate themselves in a competitive field.</li> <li>● Fail to tailor the OSP for specific clientele or account for differences in policy that would benefit from customization of the form.</li> <li>● Slow and complicate the process to update the form in response to client or inspector feedback, or to address accreditation noncompliances.</li> <li>● Some certified operations may surrender their certificate rather than rewrite their OSP.</li> <li>● Create additional barriers to government certifiers in implementation.</li> <li>● Result in conflicts with forms used by certifiers to inspect and verify multiple schemes, such as Regenerative Organic Agriculture, Animal Welfare Approved, and Non-GMO Project.</li> </ul>

One participant noted that the National Resources Conservation Service had adopted a NOP-approved OSP template that combined the Environmental Quality Incentives Program (EQIP) and the NOP organic program. The USDA expected all certifiers to accept the approved form. However, most certifiers objected to this template because it did not match their forms, and most operators consequently filled out the certifier's forms anyway. This was a source of stress for the operations and consultants using this template, especially after the expectation that it could bring more efficiency to the certification process. The key takeaway was that for a universal OSP format to be successful, it would need either to be mandated by the NOP or the significant majority of certifiers would need to voluntarily commit to using it. Some participants suggested that instead of adopting or mandating an entire universal OSP form, certifiers could start with developing best practices for certification forms.

## **Recommendations for Future Work**

Working group discussions highlighted areas where more work and data collection are urgently needed to drive positive change within the organic certification sector. The following priorities should be topics for future ACA/IOIA working groups.

### **Inspector and Certifier Business Relationships**

1. The ACA, IOIA, and individual certifiers should regularly review the inspector business relationship models and the pros/cons lists, updating them as needed. Periodic assessment of the continued viability of each model will be necessary as the industry continues to evolve and in light of changes to the legal ramifications of certifiers' use of contractors versus employees for inspection work.
2. ACA should convene an ad hoc working group for certifiers within government agencies, to address organic certification issues through the lens of their unique needs and limitations.

### **Inspector Qualifications and Training**

1. ACA and IOIA should continue to collaborate in providing training for inspectors and certifiers that increase efficiency and consistency across the sector.
2. Establish an ACA/IOIA working group to develop guidance and best practices for inspector mentorship/apprenticeship. This group should explore and answer the following questions:
  - a. What mentorship models are currently in use, and what can we learn from them?
  - b. What are the components of a successful mentorship?
  - c. Which mentorship methods are most effective in setting new inspectors up for success? Which methods are beneficial for experienced inspectors looking to gain new skills/knowledge/expertise?
  - d. What factors should be considered when establishing an apprenticeship? These might include the number and scope of inspections, diversity of the size, type, and regional location of operations within each scope.
  - e. What should the eligibility requirements be for mentoring?
  - f. What should a mentorship of a new inspector cost, and how much of that should go to pay the mentor? What is the cost of hiring, onboarding, and training a new inspector? How much of that cost is borne by the new inspector, by the certifier, and by the mentor?

- g. How can the cost of mentorship be paid for, and should that differ between staff and contract inspectors?
  - h. What innovative approaches can the industry develop to create viable access to robust and affordable mentorship programs? Possibilities to consider:
    - i. Certifiers establish mentorship programs that support mentors/apprentices and develop their inspection workforce while mitigating their business risks, e.g., contractual commitments from new inspectors in exchange for subsidized mentorship costs.
    - ii. IOIA and ACA partner to develop an apprenticeship-intensive course that meets the needs of inspectors and certifiers.
    - iii. IOIA and ACA form a legal subsidiary organization to focus on providing mentorship/peer-to-peer training for inspectors (staff or contractors).
    - iv. Inspector co-ops develop and implement mentorship programs to support their membership.
    - v. Pursue access to student loans and grants to support affordable and accessible mentorship.
    - vi. Develop further opportunities for cross-training inspectors and reviewers.
3. IOIA and ACA should revisit this topic after the SOE proposed rule has been published and the changes to inspector qualification and training requirements have been finalized to determine what additional work may be beneficial for the sector.
  4. Cross-train organic inspectors to perform Material Review Organization inspections, especially in the slower inspection months of December-March.
  5. Recruit, train, mentor, and retain inspectors qualified to inspect organic input suppliers.

### **Inspector Compensation**

1. Establish a collaborative ACA/IOIA working group to address inspector pay transparency and equity.
  - a. Survey all organic certifiers in North America to collect:
    - i. Data on their inspector pay rates in context with the various factors that influence pay; and
    - ii. The number of contract and staff inspectors used by each agency.
    - iii. The number of days of inspections performed per year over what number of days.

- b. Conduct a market analysis of inspector compensation for organic versus other adjacent certification/food safety programs.
  - c. Explore aligning the job title/description of an organic inspector with the applicable Department of Labor job category to ensure it represents the type and complexity of the work performed.
  - d. The deliverable will be a baseline pay scale for organic inspection work that accounts for staff versus contractor business relationships, eligibility in each scope, years of experience, expertise/quality of work, geographic location, and travel time/expenses.
  - e. Explore other opportunities and recommend best practices to encourage a culture shift within the industry for transparency in compensation.
2. Explore certification fee models that do not present inspection costs as a separate, pass-through fee to the certified operations.

### **Inspector Workload and Working Conditions**

1. Establish an ACA/IOIA working group to address the concerns with the seasonality of inspection work and inspector travel.
  - a. Develop guidance and/or best practices for how the sector can support more year-round inspection work, offer contract inspectors other types of work in the winter months, and alleviate some of the pressure for inspectors to complete their annual workload in a compressed time frame.
  - b. When the proposed SOE rule is published, it will likely require inspections to be performed at each operation “at least once per calendar year,” rather than every 12 months, which would provide more flexibility for certifiers to spread out inspection work.
  - c. Consider additional best practices for supporting safe and comfortable inspector travel.

### **Feedback, Evaluations, and Continuous Improvement**

1. Establish an ACA/IOIA working group to develop best practices for feedback and implement effective feedback mechanisms within certification, including inspection, to improve quality and efficiency at each step.
  - Develop specific guidance and recommendations for feedback mechanisms to inspectors that provide timely, high-quality feedback.
  - Explore opportunities for more fully incorporating inspectors into the feedback loops that inform certification work as a whole. Consider how to best collect

inspector feedback on the certification process and review staff performance, and how/whether to collect information on significant concerns about previous inspector's performance identified at next year's inspection.

2. Establish a working group focused on certification reviewer retention to explore factors and identify solutions for retaining reviewers in the organic industry.

### **Certification Systems, Forms, and Administrative Tasks**

1. Establish an ACA/IOIA working group to address opportunities for increased consistency in certification forms. This work should include:
  - a. Identifying areas where OSP forms and inspection report outlines could be harmonized across certifiers and create best practices for certification form development.
  - b. Further explore opportunities and benefits to developing templates for some or all of the OSP and for collecting supplemental information such as field history, input materials, ingredients, and field maps.
2. Explore additional opportunities and mechanisms to shift administrative tasks from inspectors to review staff or operators.
3. Explore further development of virtual inspections to ease administrative and travel load, streamline inspections, and add value to the certification process.