



STATE OF IDAHO

DEPARTMENT OF AGRICULTURE

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POLICY MEMO

Procedures for Organic Inspection and Specialized Material Review Contract Employee Consideration with the Idaho State Department of Agriculture Organic Program.

Produced under Policy Directive NO. 16-02 exempting competitive selection procedures required by IDAPA and Idaho Code for Annual Price Agreements for the services of qualified inspectors to perform Organic Inspections & Specialized Material Reviews for the Idaho State Department of Agriculture (ISDA).

Contract Inspectors:

In order to meet the requirements outlined in § 205.504 "Evidence of expertise and ability," all contract organic program personnel will provide evidence of successful completion of the following trainings for each operational category of inspection in order to be considered for contract work with ISDA:

- International Organic Inspector Association (IOIA) training: Basic Crop Inspection, Basic Handler Inspection, Basic Livestock Inspection.

*Applicants who have Completed IOIA Advanced Inspection Trainings will be provided with preferential consideration, when completed in addition to basic inspector training in the category of inspection they are applying to perform as a contractor for ISDA.

When a contract inspector has not received the above training experience, ISDA will consider education and experience in organic inspections or formalized material review. Contractors who have completed IOIA training will receive preferential consideration, but alternative experience and training may be considered.

ISDA will conduct in-house training in Boise or other location convenient for organic contract inspectors or ISDA staff. Contract inspectors are required to undergo annual training over ISDA inspection policies and procedures once minimum qualifications have been confirmed to perform ISDA organic inspections. These updated trainings may be conducted remotely via phone or email. Each potential inspector will observe an inspection in each category of inspection they are to perform by ISDA personnel, and will be observed performing two inspections per category of inspection by ISDA personnel prior to being assigned contract inspections in that inspection category for the agency. (Note - This policy is new for 2015, and does not apply for inspectors who have been performing inspections for ISDA prior to 2015, as they have already been observed on inspection, and have been reviewed annually.)

Annual training for contract inspectors will include updated policy communication. When possible, the inspector will also be scheduled annually to observe an inspection performed by an ISDA staff member.

Annual Evaluations:

In order to meet the requirements outlined in § 205.504 “Evidence of expertise and ability,” and NOP 2027 Instruction on Personnel Performance Evaluations, performance evaluations of personnel and contract staff will be conducted annually, whenever practical. The program manager will conduct or assign qualified staff to conduct field evaluations to evaluate all inspectors during an on-site inspection on an assigned schedule. In addition to on-site evaluations, all inspectors will be evaluated on their ability to schedule and submit inspection reports within a reasonable time as described in Section VI.

Personnel with consistent poor evaluations or who consistently do not comply and implement NOP Standards will not be used in the organic program. Confidentiality and conflict of interest affidavits will be acquired from all staff annually by the Program Manager. Personnel that willfully violate the confidentiality or conflict of interest standards will be immediately removed from participation in the organic program. All actions will be documented and filed in the organic program’s personnel file.

Annual Review of Qualified Inspectors.

ISDA will post this memo on the ISDA organic program website under a contract inspector link. Anyone may contact ISDA to be considered for contract work with the organic program. It is the program’s main priority to utilize program resources as efficiently as possible. Therefore, contract employees will only be sought to fill the necessary gap in workload that cannot be covered by program resources and employees. ISDA will accept inquiries from any contract inspector interested in conducting inspections for the organic program annually. Depending on the timeframe of the inquiry, the inspector may be evaluated for use in the future inspection season(s) if the workload has already been allocated and in process for the existing season. The following information will be requested from each potential new inspector:

- A cover letter, outlining the desired scope of work, a desired rate schedule, the number of inspections or material reviews that the inspector / individual can commit to, and any other information that the applicant considers pertinent.
- A resume, outlining experience and qualifications pertinent to conducting organic inspections or material reviews, including training and a list of the USDA NOP accredited certifying agents the inspector conducts work for.
- Documentation to demonstrate completion of IOIA training or material review training, as applicable, including score in the training.
- At least three professional references, with permission to contact those references implied by the submittal of a request to conduct contract work for ISDA.
 - Note that references from other state agencies conducting organic certification will be given priority, due to the unique nature of representing a state agency on inspection.

Equal Consideration of Candidates.

Qualifications of both existing and prospective contract inspectors will be evaluated annually. Existing inspectors whose work performance meets or exceeds the NOP and ISDA standards consistently will not be eliminated from contract work with ISDA where the inspector’s availability, cost structure, and workload needs are aligned. However, every applicant will be given equal consideration, including rate,

work experience, references, performance history, and qualification for contract work with ISDA. Location of the inspector, and costs associated with travel to inspections will be a consideration for evaluation of current and prospective contract inspectors. Material reviews can be conducted remotely, so location will not be a consideration when evaluating a material review contractor, unless onsite training or evaluation is determined to be necessary to meet ISDA and USDA NOP standards. All inspectors considered will disclose actual or perceived conflicts of interest, and will agree to adhere to ISDA and USDA NOP policies. Any inspector who violates procedural or ethical considerations while conducting work for ISDA will not be used.

Annual Price Agreements.

Annual price agreements will be conducted according to State and ISDA fiscal and contracting policies. The program manager for the organic program will conduct formal or informal negotiations with potential contract employees whom have been determined to meet the program needs as outlined earlier. All agreements will be exercised with prudent business judgment, and according to sound business practices that are in accordance with the best interest of the state. Price agreements will be in place for every contract inspector who will perform inspections or material reviews for the organic program. Rates will be based on inspector qualifications, and will be outlined in a fee schedule attached to the annual price agreement.

Once negotiations have been completed and agreed to by the program manager and the contract employee, a price agreement will be drafted utilizing the template provided by Division of Purchasing or as otherwise developed by ISDA's legal counsel. All price agreements will undergo division, fiscal, legal, and director's office review. Once approved within ISDA and according to agency policy, the price agreement will be sent to the inspector for final signature.

Signed copies will be on file with the agency fiscal and legal division. A copy will also be sent to the inspector / contract employee, and saved to the staff folder for that inspector in the organic program.