



106 School Street
Suite 201
Spring Mills, PA 16875

PHONE 814-422-0251
FAX 814-422-0255
paorganic.org

Inspection Expectations for PCO Inspectors and Clients in 2020

COVID-19 has brought about changes in the way PCO is handling the organic inspection process in 2020. The following modifications, while not ideal and not permanent, are designed to protect certified operations, staff, and inspectors while ensuring compliance with the USDA Organic Regulations during this inspection season. We thank you for collaborating with us throughout the 2020 inspection season to accomplish these goals of compliant and safe inspections!

Depending upon each operation's circumstances, inspections in 2020 might occur remotely/virtually (using web conferencing or other tool that allows for real-time viewing and interaction), through a limited-contact onsite visit, or via desk audit (review of records exchanged by email, fax, or postal mail) by the inspector. In some cases, the inspector may opt for a hybrid approach, combining elements of each type to accomplish a full inspection. Onsite inspections are required for new operations prior to certification, which means that in some cases, initial certification may need to be delayed.

Processes for inspections

1. PCO communicates inspection prioritization information to inspector
2. Inspector reaches out to client to discuss scheduling and type of inspection
3. Inspector will communicate any preliminary requirements, as applicable. (May include preparatory meeting for remote inspections, protocols for social distancing in the case of onsite inspection, or timelines for sharing/sending documents for desk audits)
4. Inspection occurs
5. Follow-up on paperwork requirements as applicable
6. Exit Interview (if not already conducted during Step 4)

Below are PCO expectations for each inspection type. We hope this information will help inspectors and PCO clients prepare for their inspections this year.

Limited Contact Onsite Inspections

- Onsite inspections will only occur if the inspector and client agree that the risk of disease spread is low and/or can be sufficiently mitigated using social distancing as appropriate to the situation.
- Six feet of separation between the inspector and client must be maintained at all times.



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- The inspector and client should communicate regarding any illness or potential exposure to illness prior to meeting face to face.
- Masks should be worn when appropriate.
- Hand washing and sanitizing of tools and equipment handled jointly should be a priority for both parties.
- The inspector may request to visit the operation alone and call the client on the phone while onsite.
- Samples of organic product may be collected for residue testing
- The onsite inspection may be limited to essential viewing of the premises. The inspector may request that the interview and paperwork portions of the inspection are handled by phone or other remote means.
- An Exit Interview will be conducted.

Remote/Virtual Inspections

- Remote/virtual inspections will typically only occur if the inspector and client can agree to the use of web conferencing or other software that enables real-time dialog and visual verification of the OSP.
- A preliminary meeting should be held between the inspector and client to ensure the technological requirements can be met and to assure a mutual understanding of how the inspection will proceed and how records and other OSP components will be verified.
- Records should be organized in advance of the virtual/remote inspection so they can easily be shared with the inspector.
- An Exit Interview will be conducted.
- Any elements of the OSP that cannot be verified remotely will be noted by the inspector and followed up on using an onsite visit at a later time. This will be billed separately from the initial inspection activity. Onsite follow-up should not duplicate work performed previously.

Desk Audit

- These are typically reserved for cases in which it is not feasible to conduct an onsite inspection nor a remote/virtual inspection.
- The inspector will request specific records from the client for verification of OSP details.
- The inspector will establish a reasonable timeline for exchange of information, suitable to the client's circumstances, and the client should adhere to that request.



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- Scans or copies of records sent to the inspector. Clients should not send original copies since these must remain in the control of the client's business.
- An Exit Interview will be conducted.
- Any elements of the OSP that cannot be verified via desk audit will be noted by the inspector and followed up on using an onsite visit at a later time. This will be billed separately from the initial inspection activity. Onsite follow-up should not duplicate work performed previously.

Whether the inspection occurs onsite, virtually/remotely, or via desk audit, **it is critical that the client is responsive to inspector communications and requests for scheduling, paperwork, and other details.** Failure to respond to an inspection scheduling request may delay certification and/or result in a Notice of Noncompliance.

It is critical that both parties adhere to social distancing guidelines for onsite inspections. If either party perceives that the other party is not honoring social distancing protocols, this should be communicated directly. If the problem persists, either party is empowered to end the inspection at any time and notify PCO of the problem. Inspectors who do not follow social distancing guidelines may have their work reassigned. Clients who refuse to follow the same guidelines will be seen as having refused the inspection, and this may result in a Notice of Noncompliance.

USDA-NOP has **NOT** waived certifiers' responsibility to conduct onsite inspections during the 2020 season. Therefore, inspections conducted remotely or via desk audit will have an onsite follow-up at a point when risks to safety have subsided. Follow-up inspections may be announced or unannounced.

Contact PCO Inspection Program Manager Jenny Cruse (jcruse@paorganic.org) or PCO Inspection Program Coordinator Stephen Hobaugh (stephen@paorganic.org) with any questions you may have.