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Dear PCO Operators and Inspectors:

COVID-19 brought about changes in the way PCO handled the organic inspection process in 2020, and these changes will extend into 2021. Depending upon each operation's circumstances, inspections this year might occur remotely/virtually, through a limited-contact onsite visit, or via desk audit 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 will be similar to last year. The inspector will contact the client to schedule the inspection and to communicate any preliminary requirements, such as preparation for remote inspections or social distancing protocols for onsite inspections. The inspection process may require more than one scheduled event. For all inspections, an Exit Interview must be conducted and an Inspection Report submitted to PCO. 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 may 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.
- Maintain six feet of separation between stakeholders at all times. Masks should be worn when appropriate, and hand washing and sanitation should be prioritized.
- The inspector and client must communicate regarding any illness or exposure to illness as applicable prior to meeting face to face.
- The inspector may request to visit the operation alone and call the client while onsite.
- 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.

Remote/Virtual Inspections:

- Remote/virtual inspections may occur if the inspector and client can use web conferencing or other software that enables real-time dialog and visual verification of the OSP.
- A preliminary meeting should be held to verify technological capabilities and assure a mutual understanding of inspection processes
- Records should be organized in advance of the virtual/remote inspection so they can easily be shared with the inspector.
- 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.

Desk Audit:

- These are typically reserved for cases in which it is not feasible to conduct an onsite inspection or remote/virtual inspection.
- The inspector will request 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.
- 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.
- 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.

Regardless of inspection method(s), it is critical that the client responds to inspector communications and requests for scheduling, paperwork, etc. Failure to respond to a scheduling request may delay certification and/or result in a Notice of Noncompliance.

It is crucial 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, communicate directly to PCO. 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 and/or delayed certification.

USDA-NOP has **NOT** waived certifiers' responsibility to conduct onsite inspections. Therefore, inspections conducted remotely or via desk audit will have an onsite follow-up when risks to safety have subsided. Follow-up inspections may be announced or unannounced. Please contact PCO Inspection Program Coordinator Stephen Hobaugh (stephen@paorganic.org) with any questions you may have.

Sincerely,



Kyla Smith
PCO Certification Director