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Dear PCO Operators and Inspectors:

In 2022, PCO will continue to conduct inspections using methods that prioritize the health and wellbeing of PCO clients and inspectors while meeting the requirements of the USDA-NOP regulations.

Inspections may be conducted using any of the following methods, as applicable to each inspection scenario:

**Limited Contact Onsite Inspections:**

- The inspector and client must discuss and agree upon social distancing and other safety measures indicated by current CDC guidelines.
- The inspector and client must communicate regarding any illness or exposure to illness, as applicable, prior to meeting face to face.
- 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.

**Desk audits:**

- 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 remote/virtual inspection or 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. Follow-up inspections may be announced or unannounced. The USDA-NOP has NOT waived certifiers' responsibility to conduct onsite inspections.

**When working with your inspector to schedule and complete your 2022 inspection, please keep in mind the following policies about inspection cancellations, rescheduling, and refusal:**

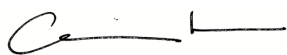
- Clients that cancel an inspection with less than 5 days notice for a non-justified reason\* or fail to communicate an inspection cancellation request may be responsible for customary expenses incurred by the inspector attempting to conduct the inspection and a \$100 penalty fee.
- Clients that reschedule an inspection 3 times for non-justified reasons\* may be issued a Notice of Noncompliance for Inspection Refusal
- Clients that do not respond to 3 requests to schedule the inspection may be issued a Notice of Noncompliance for Inspection Refusal
- If at any time PCO clients or inspectors feel that the PCO Standards of Professional Conduct policy have been breached, either party may end the inspection and report immediately to PCO
- If either party feels that agreed-upon social distancing protocols or other pandemic safety measures are not being followed, they may end the inspection at any time and notify PCO of the issue

\*justified reasons include death in the family, religious reasons, illness

PCO appreciates the efforts clients and inspectors continue to make in order to meet the USDA-NOP requirements and complete inspections during these uncertain times.

For any questions, please contact PCO Inspection Program Assistant Manager, Corinne Wesh (cwesh@paorganic.org).

Sincerely,



Corinne Wesh  
Inspection Program Assistant Manager