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Description of document: Department of Agriculture (USDA) Agricultural Marketing Service (AMS) Statement of Work (SOW) and Business Process Review Reports (Phases I, II, and III) for contract number AG6395DI00629 (also referenced as GS00F0025L), E.L. Hamm and Associates, Inc., for the National Organic Program Business Processes Study, 2011

Requested date: 15-December-2018

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Source of document: USDA, Agricultural Marketing Service  
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1400 Independence Avenue, SW.  
Room 2095-S, Stop 0203  
Washington, DC 20250-0203

May 7, 2019

**Delivered via Electronic Mail**

**Re: Final Response to FOIA Request 2019-AMS-00064-F**

This is the final response to your Freedom of Information Act (FOIA) request, dated December 14, 2018, to the U.S. Department of Agriculture's Agricultural Marketing Service (AMS). Your request was received on February 1, 2019 and sought access to:

[A] copy of the Statement of Work (SOW) for contract number AG6395D100629 (also referenced as GS00F0025L) to E.L. Hamm and Associates, Inc., and a copy of the final report (and any final presentation(s)) produced by the contractor to AMS. The contract was awarded and performed in 2010-2011. The subject was for the National Organic Program Business Processes Study.

The AMS FOIA staff works with subject matter experts across the Agency to locate responsive documents. For this request, a search was conducted within the National Organic Program (NOP). The NOP is a regulatory program housed within the USDA Agricultural Marketing Service responsible for developing national standards for organically-produced agricultural products. These standards assure consumers that products with the USDA organic seal meet consistent, uniform standards. AMS' search began on February 6, 2019. Our search provided responsive records in AMS' control on that date.

We have processed 99 pages that are responsive to your request. After a thorough review, we have determined that parts of 12 pages are exempt from disclosure under (b)(5) of the FOIA, 5 U.S.C. § 552, as amended. The remaining 87 pages are being released in their entirety. Accordingly, this request is granted in part.

Exemption 5 of the FOIA protects "inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than in litigation with the agency." The Agency records that are subject to protection in full or in part under Exemption 5 are pre-decisional and deliberative and therefore privileged under the "deliberative process" privilege. The general purpose of this privilege is to prevent injury to the quality of agency decisions. Within this

record set, AMS is withholding specific recommendations to NOP staff and leadership regarding steps to increase program efficiencies.

This concludes processing of your request. You may appeal our determination within 90 days from the date of this letter. Your appeal should be clearly marked to indicate that it contains a FOIA appeal and include specific reasons why you believe modification of the initial action is warranted. Any such appeal should be addressed to:

Bruce Summers  
Administrator  
Agricultural Marketing Service  
1400 Independence Avenue, S.W.  
Stop 0201, Room 3071  
Washington, D.C. 20250-0201

If you have any questions about the way this request was handled, please contact Natalie Anderson at (202) 378-2575, or [JoAnna.Gorsage@usda.gov](mailto:JoAnna.Gorsage@usda.gov). If you have general questions or concerns regarding AMS' FOIA procedures or regulations, please contact our FOIA Public Liaison, Bill Allen, at (202) 720-3785 or via email at [AMS.FOIA@usda.gov](mailto:AMS.FOIA@usda.gov).

Additionally, you may contact the Office of Government Information Services (OGIS) to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at [ogis@nara.gov](mailto:ogis@nara.gov); telephone at (202) 741-5770; toll-free at 1-(877) 684-6448; or facsimile at (202) 741-5769.

Thank you for your interest in AMS programs and policies.

Sincerely,

*Mark R. Brook*

Mark R. Brook  
FOIA Officer  
Agricultural Marketing Service

Enclosure

**Statement of Work**  
**National Organic Program Business Processes Study**  
**Agricultural Marketing Service**  
**U.S. Department of Agriculture**

**1. BACKGROUND**

The National Organic Program (NOP) was established as a result of the Organic Foods Production Act of 1990 (Act; 7 USC 6501 et seq.). It is a program within the Agricultural Marketing Service of the U.S. Department of Agriculture. NOP develops, implements, and administers national production, handling, and labeling standards for organic agricultural products. It enforces organic production, handling, and labeling standards. It accredits certifying agents (foreign and domestic) who inspect organic production and handling operations to certify that they meet USDA standards. NOP consists of the office of the Deputy Administrator, and three divisions – Standards Development, Accreditation & International Activities, and Compliance & Enforcement.

The Standards Division develops new and amends existing NOP regulations and provides interpretation of the regulations. It administers certification cost-share programs. It also manages the National List Petition review process and database.

The Accreditation and International Activities (AIA) Division is responsible for all activities regarding the approval of State organic programs and accreditation of certifying agents authorized to certify operations under NOP regulations. The AIA Division approves and monitors recognition agreements with foreign government agencies authorized to accredit certifying agents in countries outside of the U.S. AIA also collaborates with the Foreign Agricultural Service and the Office of the U.S. Trade Representative in the development and monitoring of arrangements with other countries regarding organic standards equivalence.

The Compliance & Enforcement Division ensures compliance with NOP regulations at Title 7, Section 205 of the CFR. Specifically, the Division processes and investigates complaints alleging violations of NOP regulations. It conducts proactive compliance and outreach activities. It also initiates enforcement actions against violations of NOP organic production, handling, and labeling standards.

NOP anticipates establishing an enterprise-wide information technology system that administers and manages all the core program processes and activities, captures and maintains essential information for program functioning, evaluation, and trend analyses, and allows for easy generation of a variety of reports. To prepare for this anticipated project, NOP needs to examine and document its core business processes, identify and address potential gaps, and finalize and implement an improved set of business processes that will serve to inform and specify the business requirements of its enterprise information technology system.



## **2. OBJECTIVES**

NOP requires professional consulting services for an independent study and documentation of its core business processes. The contractor will provide recommendations to increase program efficiencies based on the study. This study is critical in identifying the essential requirements of an effective information technology system for the program and in ultimately formulating an effective strategy for implementing organizational and operational enhancements. The primary objectives of the study are as follows:

- 1) To analyze current NOP business and management processes and division responsibilities in order to validate the mission of the program, explore best business practices, and identify potential gaps and alternatives.
- 2) To identify organizational and operational improvement and standardization opportunities, and recommend options and changes that will improve program business and management operations and efficiencies, and optimize the program's value to its stakeholders.
- 3) To standardize and document business and management processes through the use of process maps, standard operating procedures, and office operation manuals that are accessible to program stakeholders and staff.
- 4) To identify ways to position the program to be fully capable and efficient in strengthening enforcement of NOP regulations in an "age of enforcement" and increasing the integrity of the organic marketplace.
- 5) To define the essential requirements of an information technology system for automating core program business functions and processes, managing these functions and processes efficiently, and generating data analyses and reports for program evaluation and stakeholder inquiries.

## **3. SCOPE**

The contractor shall provide all professional consulting services necessary to design and prepare documents specified in this scope of work. The contractor shall employ a proven methodology, based on past experience. The contractor shall conduct extensive fact finding/data collection to understand the existing program and business operations and to facilitate a gap analysis which will result in recommendations for improved processes. The resulting improved processes will be the basis for developing an efficient and effective information technology system for the program. Specifically, the scope of this project includes:

- 1) Conducting a study to analyze and potentially improve core program processes: The study will identify and map current work processes related to core processes, recommend improvements, and recommend necessary standard operating procedures and manuals to be used as guides for implementing improvements.
- 2) Developing process maps that clearly capture the "As Is" processes, identifying gaps and recommending options based on best business models.

- 3) Developing process maps that clearly capture the improved “To Be” processes. Such maps will delineate workflow responsibilities and procedures for all operational areas.
- 4) Defining the essential business requirements of the information technology system what will facilitate mission accomplishment for the program.

#### **4. SPECIFIC REQUIREMENTS**

It is anticipated that this project will be conducted in three phases. Although the contractor may recommend additional steps, tasks, or sub-tasks in its proposal, the proposal must demonstrate an ability to complete the following tasks:

**Phase I:** Evaluate, document, and map current core processes. The contractor shall conduct data gathering and research to include document reviews, direct observations/site visits, interviews, etc. to gain a full understanding of the existing program functions and processes.

**Phase II:** Establish idealized “To Be” processes, based on best business and management practices and identified gaps.

**Phase III:** Delineate the essential business requirements of an enterprise-wide information technology system for the program.

#### **5. DELIVERABLES**

**Phase I:** The deliverable for this phase will be maps, diagrams, or some other visual representations that depict or identify the following:

- Core business functions and processes.
- Activity/Workflow relationships.
- Essential categories of information needed to carry out program mission.
- Current inter-agency, international and/or industry interactions.
- Bottlenecks and gaps.

**Phase II:** There will be two deliverables for this phase. The first deliverable will be maps, diagrams, or other visual representations that depict the following:

- Recommended business processes.
- Recommended activity/workflow relationships.
- Other recommended improvements.
- Recommendations for structure and resource changes to accomplish improvements

The second deliverable for this phase will be a report to include improvements, options, and recommendations.

**Phase III:** The deliverable for this phase will be a report, delineating the essential business requirements of an enterprise-wide information technology system that effectively and efficiently carries out the program's mission.

**Performance Standards (Acceptance Criteria)**

<b>DELIVERABLES</b>	<b>PERFORMANCE STANDARDS (ACCEPTANCE CRITERIA)</b>
"Current Processes"" Business Processes	<p>The contractor shall develop and document the "AS-IS" model of NOP business processes as outlined within this Statement of Work.</p> <p>Delivery of documentation within established timeframe.</p> <p>Acceptability is based on accuracy of analysis and general appearance of the maps/charts and the report.</p>
"Future Processes"" Business Processes (2 deliverables)	<p>The contractor shall develop and document the "TO-BE" model of NOP business processes as outlined within this Statement of Work.</p> <p>Delivery of documentation within established timeframe.</p> <p>Acceptability is based on accuracy of analysis and general appearance of the maps/charts and the report.</p>
Essential Requirements of NOP Information technology system	<p>The contractor shall develop a report, delineating the essential requirements of NOP IT system.</p> <p>Delivery of documentation within established timeframe.</p> <p>Acceptability is based on accuracy of material and general appearance of the report.</p>
<b>General Deliverables</b>	
Project Plan	The contractor shall submit a project plan that demonstrates sound use of personnel and the project requirements.

**Deliverable Review**

NOP shall have 10 working days to review each draft and final deliverable. NOP shall have the right to reject or require the correction of any deficiencies found in the deliverables. In the event of rejection of any deliverables, the contractor shall be notified in writing and shall have 10 working days to correct the deficiencies at no additional cost to NOP. NOP shall have 10 working days to review corrections of any rejected deliverables. NOP will notify the contractor in writing that the required documents are sufficient to meet the above SOW requirements. Approvals of deliverables shall not be considered valid until the deliverables are approved in writing by NOP. In order to avoid problems with expectations of products, the contractor is encouraged to submit a draft

document to NOP at 7 business days prior to final delivery to ensure acceptance criteria of products are met.

The Contractor shall formally respond to all written review comments from NOP within five business days of receipt or sooner. This response should indicate agreement/disagreement, and how the concern will be addressed within the next submission or resubmission. The final deliverable shall also include a traceability matrix indicating final disposition of all written review comments received.

All work products will become the intellectual property of USDA. The contractor may retain copies of scheduled reports and any deliverables that are available to the public. The contractor may not retain copies of any other deliverable.

### **Performance Monitoring**

Performance will be monitored using the following methods:

- **Monthly Status Reports:** The contractor shall prepare and deliver monthly progress reports as outlined below.
- **In Process Review:** The contractor shall be prepared to present periodic costs and performance information while in process. The focus shall be on identifying costs and schedule variances in completion of tasks.
- **Project Oversight:** The project will have a designated Federal Project Manager (FPM) to provide oversight of Contractor activity to monitor and assure quality, customer satisfaction, and timeliness of deliverables.
- **Quality Control Plan:** The contractor shall establish and maintain a quality control plan for the project. Quality control plan shall measure performance against the basic workflow and shall ensure all products meet standards of best practices recognized by Industry and the Federal government.

**Monthly Status Reports:** The contractor shall provide a monthly status report via email for the project(s) within 5 days of the end of the month to the FPM.

The following information is required for each monthly status report:

- 1) Hours and dollars billed per project, to include balance per project;
- 2) Summary of costs for each cost element (labor, travel, subcontracts, consultants, other direct costs, indirect costs) incurred during the period.
- 3) Hours billed per employee based upon agreed categories;
- 4) Activities achieved during the period based on agreed upon categories;
- 5) Status of deliverables during that period;
- 6) Estimate to complete all work remaining on the project, and projected monthly expenditures by project area to the completion date; and
- 7) Any other issues that need attention.

## **6. Administration**

- 1) Government Officials: The following individuals represent NOP in the conduct of this project.

Contracting Specialist: Serita Daniel, Chief, Resource Management Branch

COTR: Ruihong Guo, Director, NOP Compliance and Enforcement

NOP Federal Project Manager: Arthur Neal, Associate Deputy Administrator

- 2) Meetings:

- 1) NOP and the contractor will mutually determine, at the beginning of the project, the frequency of meetings. Examples are kick-off and close-out meetings, site visits, interviews, and review meetings.
  - 2) Periodic progress conference calls may be held to set and clarify project goals and policies, project constraints, submission schedule, and other relevant project information. Frequency of conference calls will be mutually determined by NOP and contractor.
  - 3) The contractor will combine site visits and meetings whenever possible. The contractor will coordinate all meetings and visits with NOP prior to visit. If applicable, the contractor will coordinate and develop a meeting agenda.
- 3) Payment: Funds obligated by this contract will be managed through the USDA's Agricultural Marketing Service Budget Office. AMS Budget Office will process transfer of funds in connection with this statement of work. The contractor invoices for work performed will be processed for payment when the work products have been reviewed and approved by NOP.

## 7. **PERIOD/PLACE OF PERFORMANCE**

The anticipated period of performance for this project is approximately six (6) months from date of award. The principle place of performance for this project will be the contractor's facility. However, the contractor will have to interact with NOP staff and perform some of the work at NOP headquarters in Washington, DC.

## 8. **GOVERNMENT RESPONSIBILITIES**

The government will provide all documentation related to the study and access to AMS resources/staff. The government will provide comments on all deliverables/reports no later than ten workdays of receipt.

## 9. **ADDITIONAL CONTRACT CLAUSES**

**52.237-2 Protection of Government Buildings, Equipment, and Vegetation (Apr 1984)**

As prescribed in 37.110(b), insert the following clause in solicitations and contracts for services to be performed on Government installations, unless a construction contract is contemplated: The Contractor shall use reasonable care to avoid damaging existing buildings, equipment, and vegetation on the Government installation. If the Contractor's failure to use reasonable care causes damage to any of this property, the Contractor shall replace or repair the damage at no expense to the Government as the Contracting Officer directs. If the Contractor fails or refuses to make such repair or replacement, the Contractor shall be liable for the cost, which may be deducted from the contract price.

**452.224-70 Confidentiality of Information (Feb 1988)**

(a) Confidential information, as used in this clause, means -- (1) information or data of a personal nature, proprietary about an individual, or (2) information or data submitted by or pertaining to an organization. (b) In addition to the types of confidential information described in (a)(1) and (2) above, information which might require special consideration with regard to the timing of its disclosure may derive from studies or research, during which public disclosure of primarily invalidated findings could create an erroneous conclusion which might threaten public health or safety if acted upon. (c) The Contracting Officer and the Contractor may, by mutual consent, identify elsewhere in this contract specific information and/or categories of information which the Government will furnish to the Contractor or that the Contractor is expected to generate which is confidential. Similarly, the Contracting Officer and the Contractor may, by mutual consent, identify such confidential information from time to time during the performance of the contract. Failure to agree will be settled pursuant to the "Disputes" clause. (d) If it is established that information to be utilized under this contract is subject to the Privacy Act, the Contractor will follow the rules and procedures of disclosure set forth in the Privacy Act of 1974, 5 U.S.C. 552a, and implementing regulations and policies, with respect to systems of records determined to be subject to the Privacy Act. (e) Confidential information, as defined in (a) (1) and (2) above shall not be disclosed without the prior written consent of the individual, institution or organization. (f) Written advance notice of at least 45 days will be provided to the Contracting Officer of the Contractor's intent to release findings of studies or research, which have the possibility of adverse effects on the public or the Federal agency, as described in (b) above. If the Contracting Officer does not pose any objections in writing within the 45 day period, the contractor may proceed with disclosure. Disagreements not resolved by the Contractor and Contracting Officer will be settled pursuant to the "Disputes" clause. (g) Whenever the Contractor is uncertain with regard to the proper handling of material under the contract, or if the material in question is subject to the Privacy Act or is confidential information subject to the provisions of this clause, the Contractor shall obtain a written determination from the Contracting Officer prior to any release, disclosure, dissemination, or publication. (h) The provisions of paragraph (e) of this clause shall not apply when the information is subject to conflicting or overlapping provisions in other Federal, State or local laws.

**452.237-75 Restrictions against Disclosure (Feb 1988)**

(a) The Contractor agrees, in the performance of this contract, to keep all information contained in source documents or other media furnished by the Government in the



strictest confidence. The Contractor also agrees not to publish or otherwise divulge such information in whole or in part in any manner or form, or to authorize or permit others to do so, taking such reasonable measures as are necessary to restrict access to such information while in the Contractor's possession, to those employees needing such information to perform the work provided herein, i.e., on a "need to know" basis. The Contractor agrees to immediately notify in writing, the Contracting Officer, named herein, in the event that the Contractor determines or has reason to suspect a breach of this requirement.

(b) The Contractor agrees not to disclose any information concerning the work under this contract to any persons or individual unless prior written approval is obtained from the Contracting Officer. The Contractor agrees to insert the substance of this clause in any consultant agreement or subcontract hereunder.

**United States Department of Agriculture  
Agricultural Marketing Service**

**National Organic Program**

**Business Process Review  
Report**

**Phases I & II**



**March 2011**



## TABLE OF CONTENTS

	Page
<b>EXECUTIVE SUMMARY .....</b>	<b>1</b>
<b>1. INTRODUCTION .....</b>	<b>3</b>
<b>2. NOP OPERATIONAL ENVIRONMENT.....</b>	<b>4</b>
<b>3. STUDY APPROACH AND METHODOLOGY .....</b>	<b>5</b>
<b>4. FINDINGS AND RECOMMENDATIONS.....</b>	<b>7</b>
<b>NOP PROCESS FLOW CHARTS</b>	
Office of the Deputy Administrator - Certification Cost Share Program .....	11
Office of the Deputy Administrator - Freedom of Information Act Requests .....	14
Office of the Deputy Administrator - NOSB Member Nomination/Selection .....	18
Standards Division - Rulemaking .....	22
Accreditation & International Activities Division - Certifying Agent Accreditation.....	28
Compliance & Enforcement Division - Complaint Handling.....	38



### Acronyms Used in This Report

<u>Acronym</u>	<u>Definition</u>
ACA	Accredited Certifying Agent
AIA	Accreditation & International Activities (Division)
AMA	Agricultural Management Assistance
AMS	Agricultural Marketing Service
APA	Administrative Procedure Act
ARC	Audit, Review, & Compliance (Branch)
ASAP	As soon as possible
CA	Corrective Action (Report)
CAP	Corrective and Preventive (Action or Workplan)
CE	Compliance & Enforcement (Division)
COB	Close of business
DA	Deputy Administrator
ELH	E. L. Hamm & Associates, Inc.
EOY	End of year
EPA	Environmental Protection Agency
FACA	Federal Advisory Committee Act
FAS	Foreign Agricultural Service
FDA	Food & Drug Administration
FOIA	Freedom of Information Act
FRN	Federal Register Notice
IAW	In accordance with
IT	Information Technology
L&S	Livestock & Seed (Program)
LRRS	Legislative & Regulatory Review Staff
MRP	Marketing & Regulatory Program
MS	Microsoft
NFC	National Finance Center
NLT	No later than
NOCCSP	National Organic Certification Cost Share Program
NOFA	Notification of Funds Availability
NoNC	Notice of Non-Compliance
NOP	National Organic Program
NOSB	National Organic Standards Board
OBPA	Office of Budget & Program Analysis
ODA	Office of the Deputy Administrator



## National Organic Program Business Process Review Report

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<u>Acronym</u>	<u>Definition</u>
OFPA	Organic Foods Production Act
OFPA	Organic Foods Production Act
OFR	Office of the Federal Register
OGC	Office of the General Council
OIG	Office of the Inspector General
OMB	Office of Management & Budget
OSEC	Office of the Secretary of Agriculture
RAM	Regional Accreditation Manager
RFQ	Request for Quotes
ROI	Report of Investigation
SD	Standards Division
SOP	State Organic Program
STR	Special Travel Request
USC or U.S.C.	United States Code
USDA	United States Department of Agriculture
USTR	U. S. Trade Representative
WHL	White House Liaison



## Executive Summary

The National Organic Program (NOP) is the element within the U. S. Department of Agriculture (USDA) responsible for administering the Organic Foods Production Act (OFPA) of 1990. The OFPA requires USDA develop national standards for organically produced agricultural products to assure consumers that agricultural products marketed as organic meet consistent, uniform standards. The growth of the industry appears to have far outpaced the growth in resources made available to provide the necessary oversight to the Program. As a result the Program has been in a continual state of catch-up as resources were gradually increased in response to the unanticipated rate of growth of the industry. This, in addition to questions about the business processes themselves, resulted in the USDA Agricultural Marketing Service (AMS) requesting that an independent consulting firm perform a business process review for the NOP.

E.L. Hamm & Associates, Inc. (ELH) was selected to undertake the project. The objectives of the review are outlined in the introduction to the report.

To complete the review, ELH employed a number of methodologies including data analysis, internet research, site visits, individual interviews, iterative draft reviews and updates, and detailed question and answer sessions. During the review, the ELH team made frequent contact with the Associate Deputy Administrator, Division Directors, and NOP staff members identified as subject matter experts to ensure the accuracy of the final review deliverables.

The purpose of this Executive Summary is to provide an overview of the findings and recommendations contained in the full report. As required by the tasking documents, the review is presented in two parts. This first part includes Phases I and II which provide the flow charts of the critical processes within the NOP and the findings and recommendations for the review. The second part, Phase III, presents a set of tables that identify and describe the items to be considered as data elements within a NOP database. ELH has made four specific recommendations which are addressed in more detail in the report.

1. (b) (5)

[REDACTED]

2. (b) (5)

[REDACTED]

3. (b) (5)

[REDACTED]





## National Organic Program Business Process Review Report

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4. (b) (5)



# **Business Process Review Report**

## **Phases I & II**

### **1. Introduction**

In the summer of 2010, the U. S. Department of Agriculture (USDA) Agricultural Marketing Service (AMS) issued a solicitation to perform a business process study for the National Organic Program (NOP). A three phased effort was envisioned which would provide recommendations to increase program efficiencies and assist in identifying the essential requirements of an effective strategy for implementing organizational and operational enhancements.

E. L. Hamm & Associates, Inc. (ELH) was selected to perform the independent review and document core business processes within NOP. The primary objectives of the study are as follows:

- To analyze current NOP business and management process and division responsibilities in order to validate the mission of the program, explore best business practices, and identify potential gaps and alternatives.
- To identify organizational and operational improvement and standardization opportunities, and recommend options and changes that will improve program business and management operations and efficiencies, and optimize the program's value to its stakeholders.
- To standardize and document business and management process through the use of process maps, standard operating procedures, and office operations manuals that are accessible to program stakeholders and staff.
- To identify ways to position the program to be fully capable and efficient in strengthening enforcement of NOP regulations in an "age of enforcement" and increasing the integrity of the organic marketplace.
- To define the essential requirements of an information technology system for automating core program business functions and processes, managing these functions and processes efficiently, and generating data analyses and reports for program evaluation and stakeholder inquiries.

The study effort was divided into three phases as follows:

Phase I. Identify and visually represent the core business functions and processes. Flow charts identifying the inputs and outputs.

Phase II. Utilize the information from Phase I to visually represent recommended changes to the processes identified in Phase I and other potential improvements.



## National Organic Program Business Process Review Report

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Phase III. Provide a report delineating the high level inputs and outputs that would potentially be included in an enterprise-wide (within NOP) database.

This first part of the report provides the results of Phase I and II efforts including the selection of the high level NOP processes, development of workflow and process diagrams of these business processes as they currently function, recommendations for improvements, and identification of missing processes and procedures. The second part, Phase III, presents a set of tables that identify and describe the items to be considered as data elements within a NOP database.

## 2. NOP Operational Environment

In 1990, Congress passed the Organic Foods Production Act (OFPA). The OFPA requires USDA to develop national standards for organically produced agricultural products to assure consumers that agricultural products marketed as organic meet consistent, uniform standards. The OFPA and the NOP regulations require that agricultural products labeled as organic originate from farms or handling operations certified by a State or private entity that has been accredited by USDA. Neither the OFPA nor the NOP regulations address food safety or nutrition.

The NOP developed national organic standards and established an organic certification program based on recommendations of the 15-member National Organic Standards Board (NOSB). Recommendations made by the NOSB are not official policy until they are approved and adopted by USDA. As authorized by the OFPA, the NOSB is appointed by the Secretary of Agriculture and is comprised of representatives from the following categories: farmer/grower, handler/processor, retailer, consumer/public interest, environmentalist, scientist, and certifying agent.

The standards established in the regulations focus on four primary areas: production and handling, labeling, certification, and accreditation. Production and handling standards address organic crop production, wild crop harvesting, organic livestock management, and processing and handling of organic agricultural products. Labeling standards are based on the percentage of organic ingredients in a product. Certification standards establish the requirements that organic production and handling operations must meet to become certified by USDA-accredited certifying agents. Accreditation standards establish the requirements an applicant must meet in order to become a USDA accredited certifying agent.

The regulations for implementing the provisions of the OFPA and establishing the NOP were published in Title 7, Part 205, National Organic Program, Code of Federal Regulations, in December 2000. Formal implementation of the program occurred in 2002 within the Transportation and Marketing Program of the USDA AMS. The NOP grew rapidly and today is a separate marketing program still housed within the USDA AMS, but with its own staff of approximately 31 people and a budget of \$7M.



Audits of the NOP by the U. S. Department of Agriculture, Office of Inspector General (OIG) dated July 14, 2005 and March 9, 2010 included discrepancies indicating the need for a more comprehensive and structured system of management controls, oversight, and tracking of Program responsibilities and activities. With a recent influx of additional resources, the Program has made considerable strides toward resolving many of the issues identified in the audits and improving its performance, but continues to struggle to catch up and keep pace with the growth and change still occurring within the industry.

### **3. Study Approach and Methodology**

To complete the study, the ELH team employed a number of methodologies starting with an initial review of various internal and publicly available documents obtained either from NOP staff, the AMS/NOP website, or other Internet sites to include:

- The OFPA of 1990
- Final Rule implementing the OFPA and establishing the NOP
- AMS & NOP Strategic Plans
- NOP Monthly Newsletters
- OIG Reports of NOP Audits (2005 and 2010)
- NOP Handbook (This includes the publicly available NOP documents which include guidance and instructions to those who own, manage, or certify organic operations)
- Various internal NOP policy and procedural documents
- NOP Personnel Descriptions
- Other AMS Internet website information

From October 18 through 20, the ELH team visited NOP Headquarters in Washington DC and conducted interviews with various members of the NOP staff as recommended by the Office of the Deputy Administrator. These personnel included:

- Miles McEnvoy, Deputy Administrator, NOP
- Arthur Neal, Associate Deputy Administrator, NOP
- Dr. Ruihong Guo, Director, Accreditation and International Activities Division (AIA)
- Dr. Melissa Bailey, Director, Standards Division (SD)
- Mark Bradley, Director, Compliance and Enforcement Division (CE)
- Betsy Rakola, Cost Share Program
- Judy Ragonesi, Training Manager and NOP Freedom of Information Act (FOIA) Coordinator
- Dana Stahl, Quality Manager
- Katherine Benham, NOSB



## National Organic Program Business Process Review Report

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- Shannon Nally, Standards Division
- Kimberly Barnett, AMS Information Technology (IT) support for NOP

In Modification 2 to the Request For Quotes (RFQ) issued in response to questions submitted by bidders, the NOP identified their six core processes to be studied as:

1. Overall Administration of Program (Administrative),
2. Accreditation of Certifying Agents,
3. Standards Development,
4. Compliance and Enforcement,
5. Administering Cost Share to Farmers, and
6. Facilitating work of the National Organic Standards Board.

After review of the various documents noted above and additional research, the review team determined that not all of the six identified are actually processes as such, but rather are functional areas made up of processes or multiple related, but mostly independent, tasks which are not actually elements in a process. Two of the six, Overall Administration of the Program and Facilitating work of the National Organic Standards Board fell into the category of a functional area, while the others initially identified by NOP were considered processes suitable for charting. The study team identified two additional processes from within the NOP functional areas that were selected for charting.

The selection of the final six high level processes chosen for charting was based on a number of factors including: the original core processes identified; the interviews and discussions with the Deputy Administrator, Associate Deputy Administrator, Division Directors, and various selected staff members; the visibility to the public and/or scrutiny by higher management; and, the discrepancies and areas for improvement identified in the audits. The processes eventually selected for charting were:

1. Certification Cost Share Program
2. Freedom of Information Act Requests
3. National Organic Standards Board Member Nomination/Selection
4. Rulemaking
5. Accreditation of Certifying Agents
6. Complaint Handling

Over the next several months the Hamm study team used the data gathered in the interviews along with further review and research of the policy and procedural documents to prepare draft flow charts using Microsoft (MS) Office Visio software. The study team work closely with NOP selected staff members to obtain additional information during the preparation of the draft flow charts. These draft charts were then converted to MS Office Word format and submitted for review and comment by the NOP staff members. This review and comment period involved multiple iterations and reworks of the charts with the actual number depending on the complexity of the





process and the detail provided in the documents available for reference. The resulting flow charts, which constitute Phase I of the review, are included as part of this report along with a general explanation of the chart format and brief narrative concerning the process illustrated by each flow chart.

### 4. Findings and Recommendations

The unanticipated growth of the organic industry appears to have far outpaced the growth in the resources available to provide the necessary oversight to the Program. As a result the Program has been in a continual state of catch-up as resources were gradually increased in response to the unanticipated rate of growth of the industry. The following findings and recommendations are provided with that understanding in mind.

#### Finding

The current high level processes in which NOP participates (i.e., those that were eventually chosen for flow charting) typically involve interaction with stakeholders outside the NOP, e.g., other Federal Government agencies, states, the public, and foreign governments. While the making of minor procedural changes may be within the authority of NOP to increase efficiency (e.g., the use of the internet and e-mail for contact/correspondence vice formal hard copy communication in selected situations) the majority of these processes and their associated procedures are not within the authority of NOP to change. They are often dictated by law, rule, or regulation; or by higher level agency or Federal Government policy or direction and include not only required actions but also levels of review/clearance, timing, public notification or information access, approval authority, etc.

#### Recommendation

(b) (5)

[REDACTED]

(b) (5)

[REDACTED]





## National Organic Program Business Process Review Report

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- (b) (5) [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

### Finding

Organizationally NOP is still evolving and adjusting to the changes occurring in a dynamic organic food program environment both nationally and internationally. (b) (5)

(b) (5) [Redacted]

(b) (5) [Redacted]

■ (b) (5) [Redacted]

■ (b) (5) [Redacted]

■ (b) (5) [Redacted]

■ (b) (5) [Redacted]

### Recommendation



## National Organic Program Business Process Review Report

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(b) (5)

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Finding

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Recommendation

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Finding

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Recommendation

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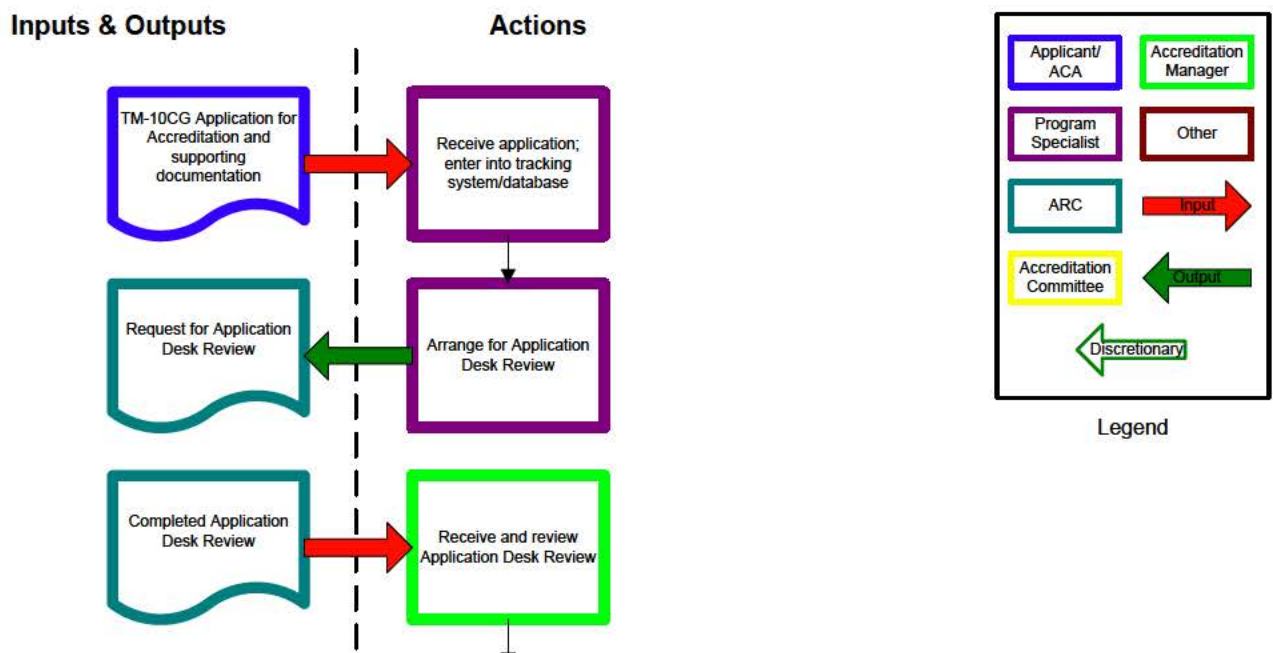
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## NOP Process Flow Charts

### General

This section of the report presents flow charts of the critical processes within NOP. The charts were developed using MS Office Visio software and converted to MS Office Word format for inclusion in this report. A number of flow chart formats were considered in order to provide the best visual representation for the processes to be charted. The goal was to produce easily followed, uncluttered charts clearly illustrating the high level inputs to and outputs from the NOP which the review was tasked to identify. These inputs and outputs were shown to the left side of the chart separated by a dashed line, with NOP routing and internal staff actions to the right side of the line. Color coding with accompanying legends was used on each chart to indicate the individual, staff element, agency, etc. responsible for providing the inputs and outputs or performing the necessary actions in the process. Additional notes/comments were added where applicable. Inputs were indicated by red arrows crossing the dashed line and outputs were indicated by green arrows. See the partial chart shown below for illustration.





## **Office of the Deputy Administrator**

### **Certification Cost Share Program**

The National Organic Certification Cost-Share Program is authorized under & U.S.C. 6523, as amended by section 10301 of the Food, Conservation, and Energy Act of 2008. Administered at the USDA level out of the Office of the Deputy Administrator, the Certification Cost Share Program reimburses eligible producers and handlers for a portion of the cost of organic certification. By offering reimbursement for certification-related expenses, the USDA recognizes the cost of regulation and its prohibitive nature for some and makes certification more affordable.

State agencies (typically Departments of Agriculture) work with the USDA to administer the program. After entering into a cooperative agreement, the state agencies process applications for cost share funds, and the USDA reimburses them. Applicants typically submit a one page application to their State's department of agriculture along with proof of certification and an itemized invoice. After satisfactory review of the application, the State may reimburse the applicant for 75% of the cost of certification, up to a maximum of \$750 per year on a first come, first served basis until funds are exhausted.

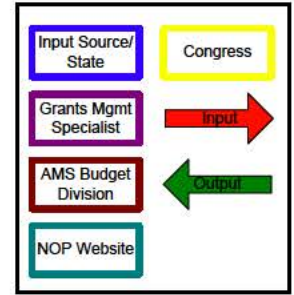
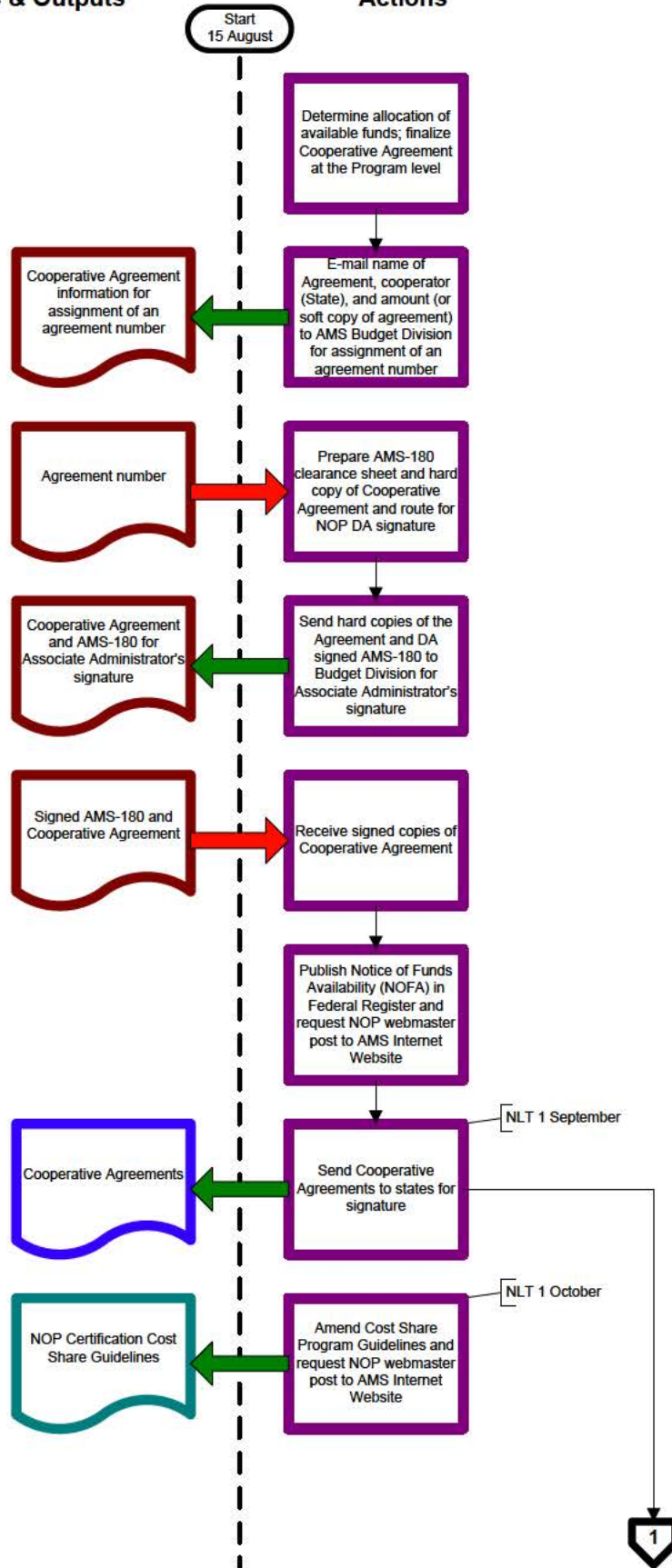
Funding comes from two sources, the National Organic Certification Cost Share Program (NOCCSP) and the Agricultural Management Assistance (AMA) Program. Funds are made available each fiscal year on a state-by-state basis with each states allocation roughly proportional to their historical activity and the number of certified operators in the state.

An internal NOP document detailing the process is currently under development.

# NOP Certification Cost Share Program Flow Chart

## Inputs & Outputs

## Actions



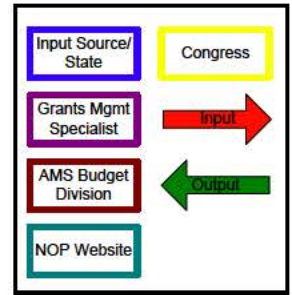
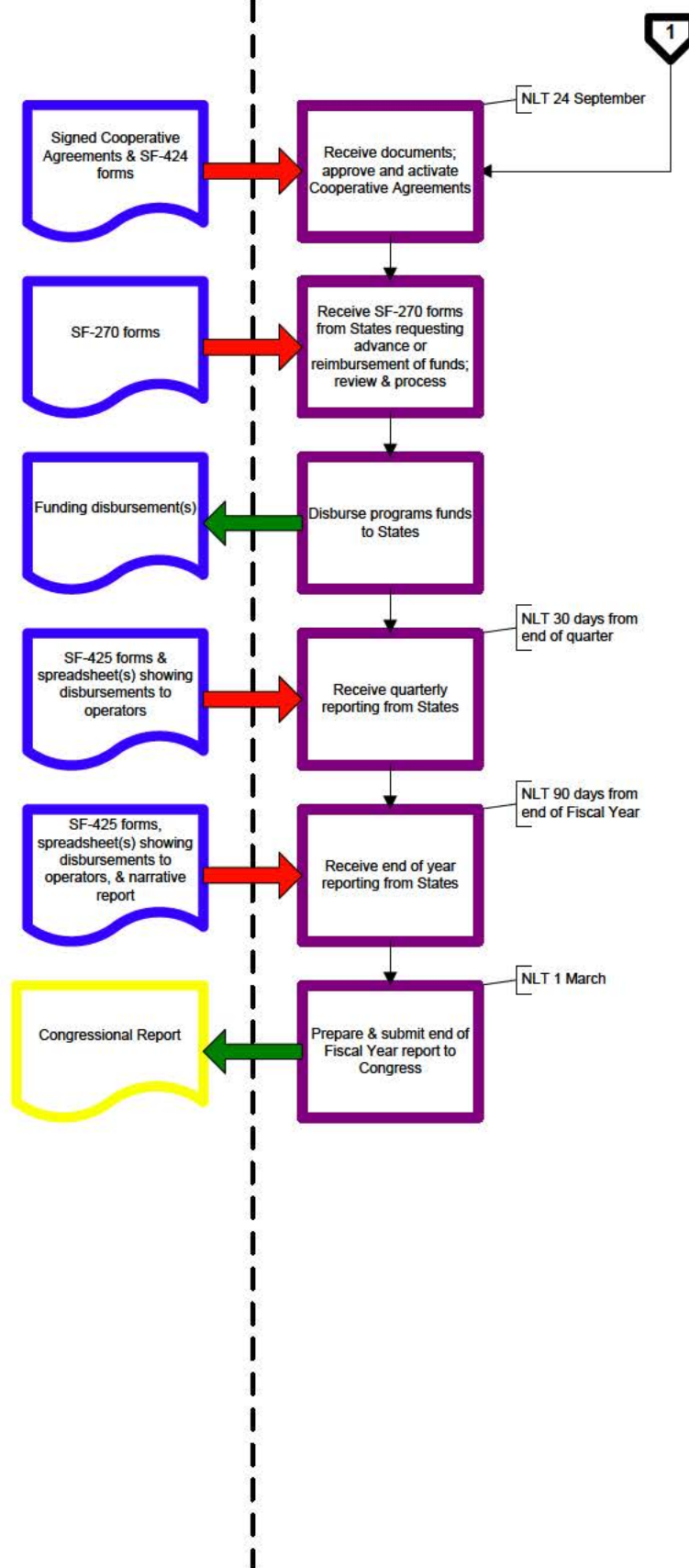
Legend



# NOP Certification Cost Share Program Flow Chart

## Inputs & Outputs

## Actions



Legend





## **Office of the Deputy Administrator**

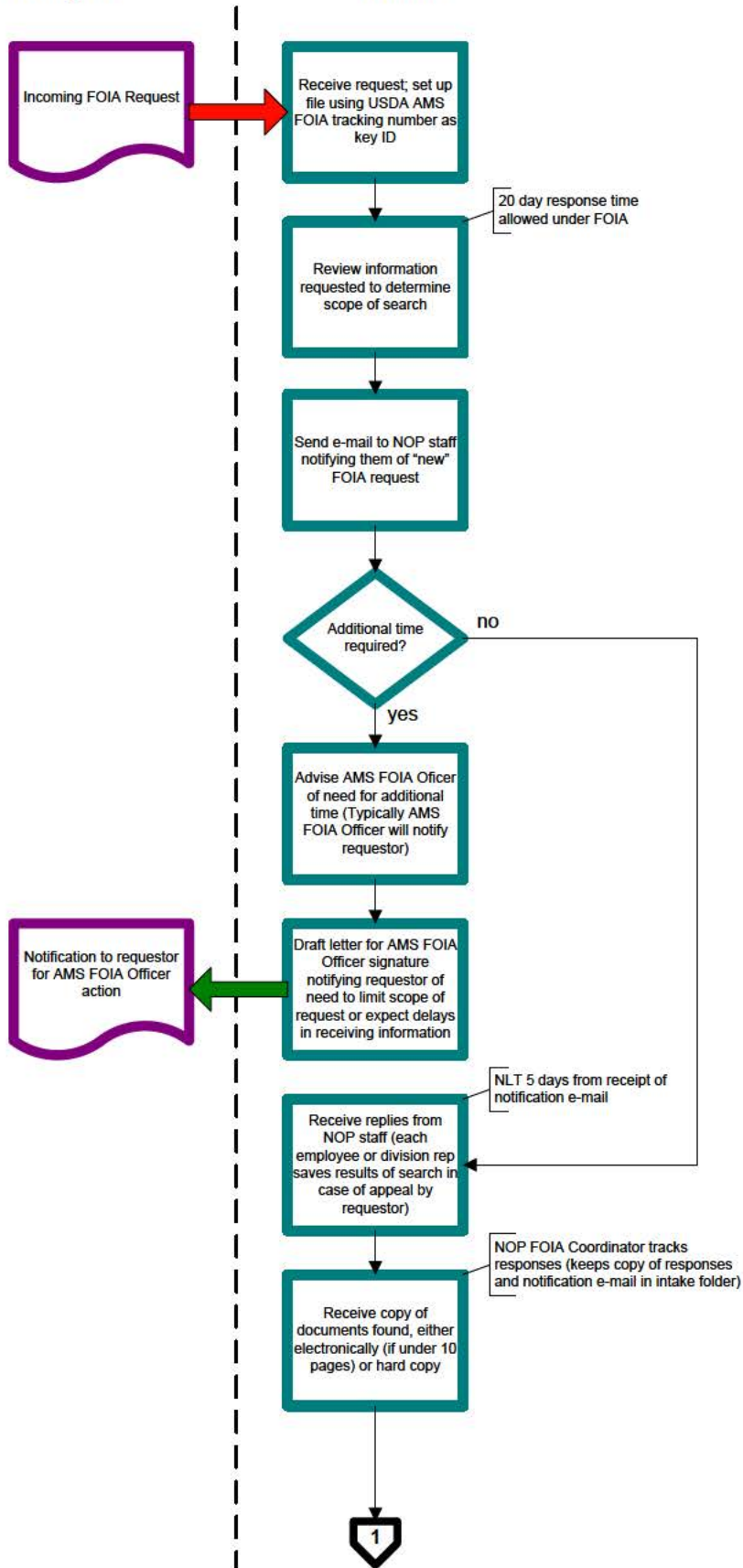
### **Freedom of Information Act Requests**

Freedom of Information Act Requests must be processed in accordance with the Freedom of Information Act, 5 U.S.C. §552 and the USDA Freedom of Information Act Regulations, 7 C.F.R., Part 1. Responding to FOIA requests within NOP is performed by the NOP FOIA Coordinator working out of the Office of the Deputy Administrator in coordination with the AMS FOIA Officer. NOP 1032, Processing Freedom of Information Requests, provides additional detailed guidance to the Coordinator in the performance of their duties. Due to the stringent requirements of the Act, a structured, detailed process is critical for timely response and compliance.

# NOP Freedom of Information Act (FOIA) Flow Chart

## Inputs & Outputs

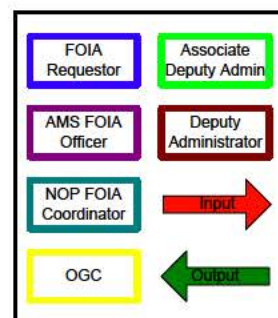
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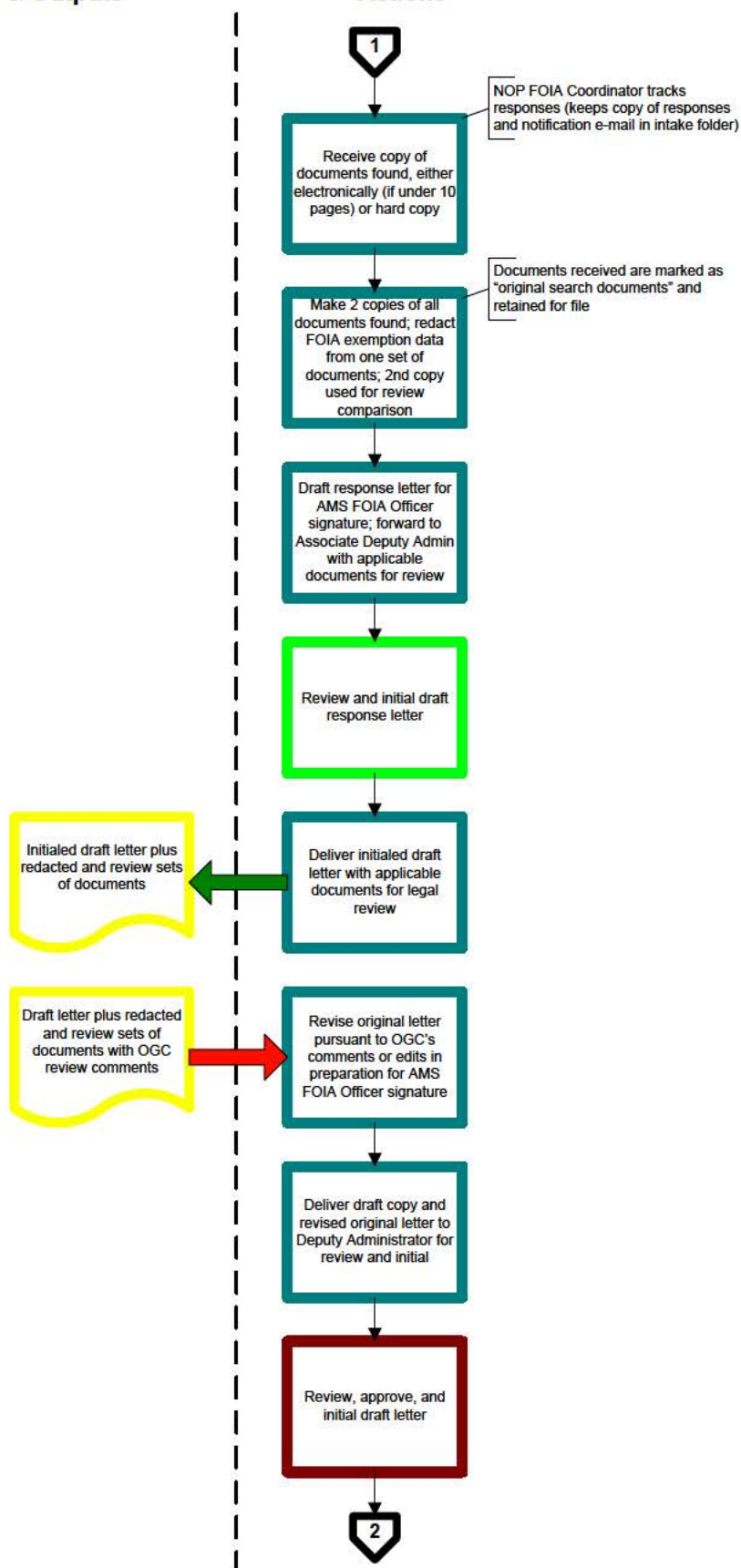
# NOP Freedom of Information Act (FOIA) Flow Chart

## Inputs & Outputs

## Actions



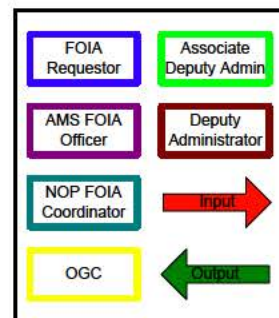
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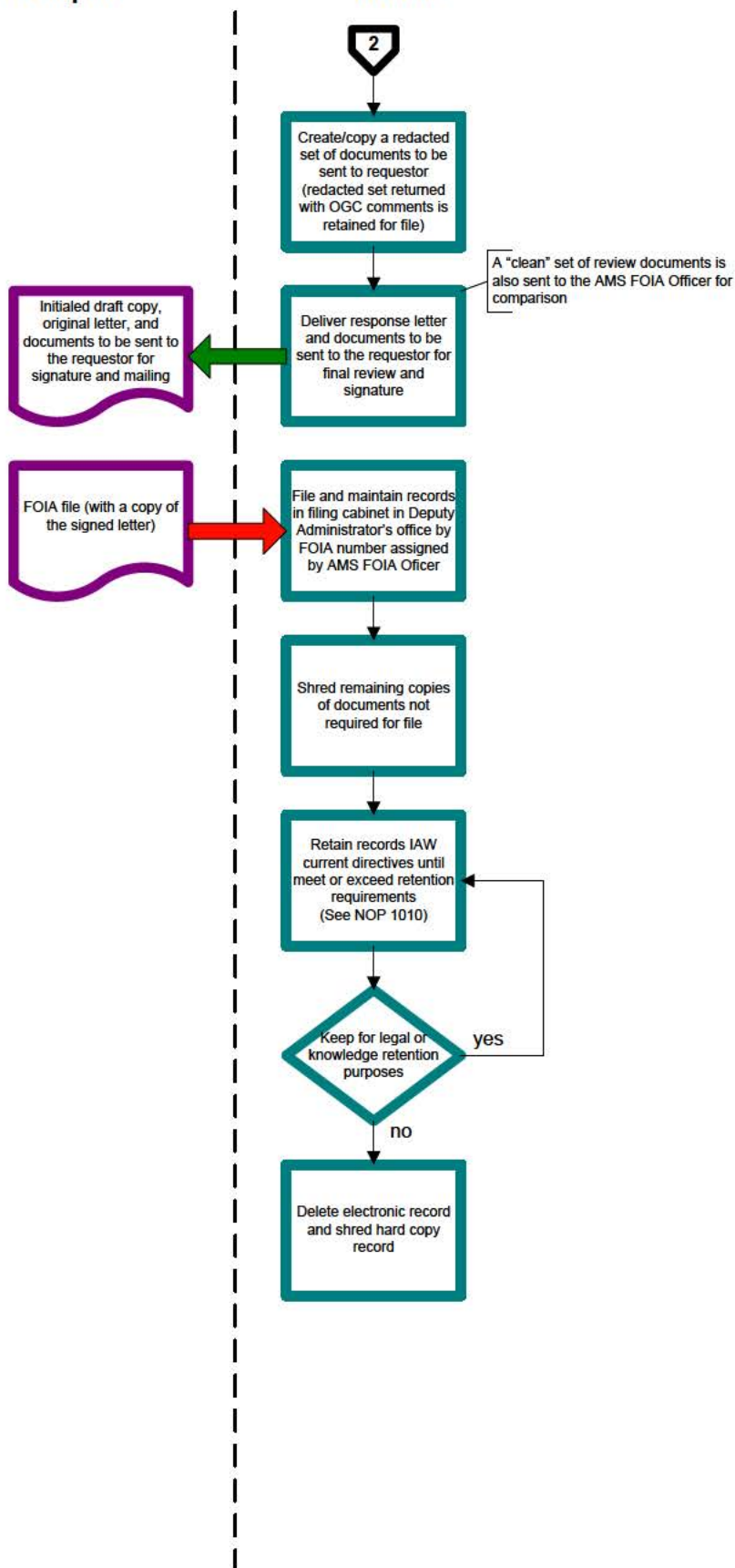
# NOP Freedom of Information Act (FOIA) Flow Chart

## Inputs & Outputs

## Actions



## Legend





## **Office of the Deputy Administrator**

### **National Organic Standards Board Member Nomination/Selection**

The National Organic Standards Board was authorized by the Organic Foods Production Act as a 15 member advisory board appointed by the Secretary of Agriculture. The Board's main mission is to make recommendations concerning whether a substance should be allowed or prohibited in organic production or handling, to assist in the development of standards for substances to be used in organic production, and to advise the Secretary on other aspects of the implementation of the OFPA. The Board operates in accordance with the Federal Advisory Committee Act (5 U.S.C. Appendix 2).

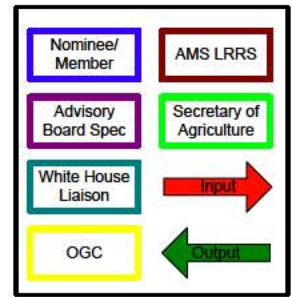
The first NOSB was appointed in 1992 with members serving staggered terms of 3, 4, or 5 years with all subsequent board appointees serving 5 year terms. This requires an annual effort to nominate and select new members to the Board.

An NOP document detailing this process does not exist at this time.

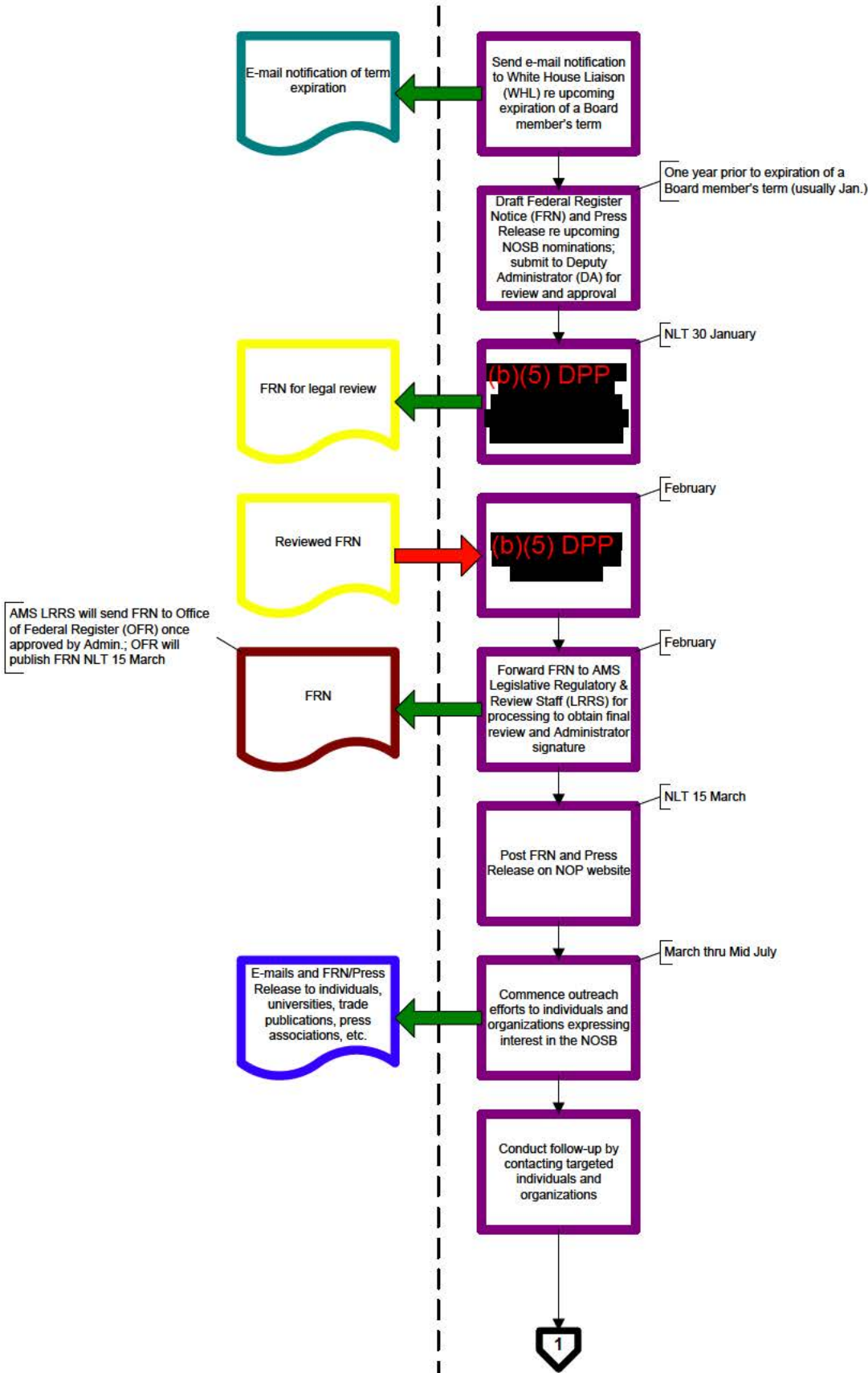
# NOSB Member Nomination/Selection Process Flow Chart

## Inputs & Outputs

## Actions



Legend

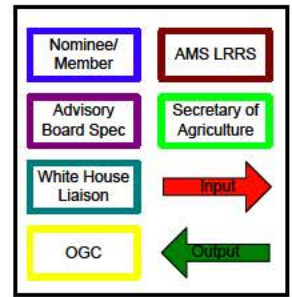




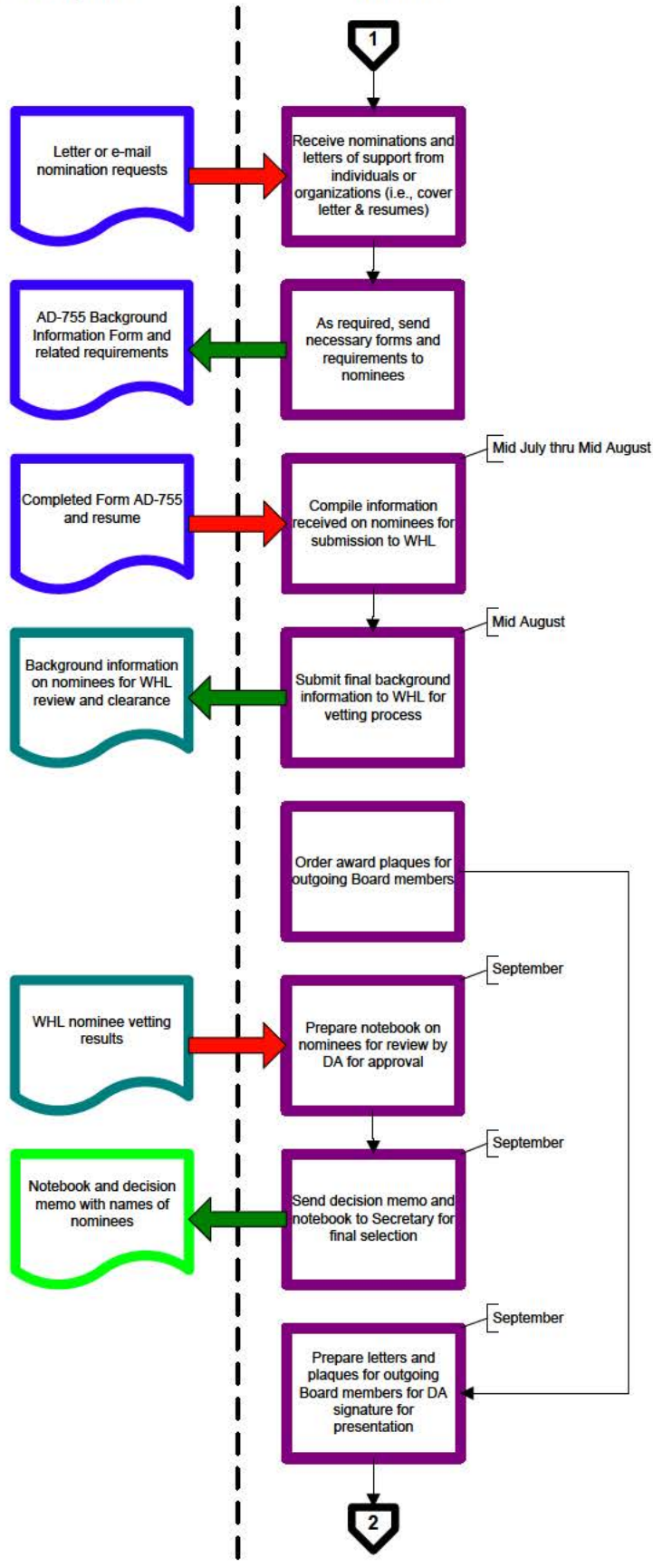
# NOSB Member Nomination/Selection Process Flow Chart

## Inputs & Outputs

## Actions



Legend

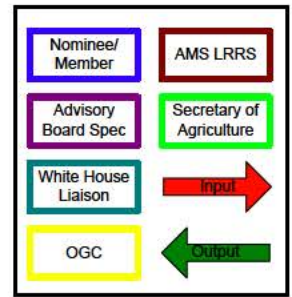




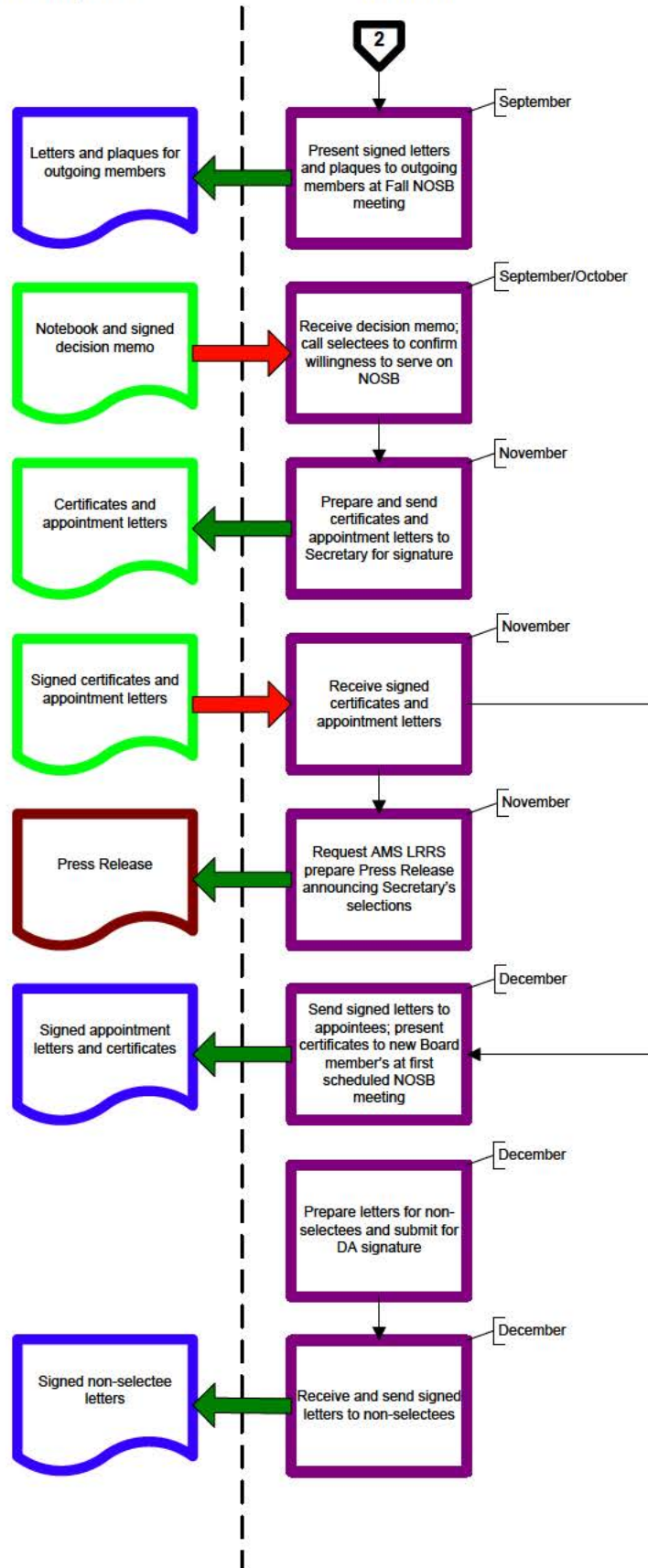
# NOSB Member Nomination/Selection Process Flow Chart

## Inputs & Outputs

## Actions



Legend





## **Standards Division**

### **Rulemaking**

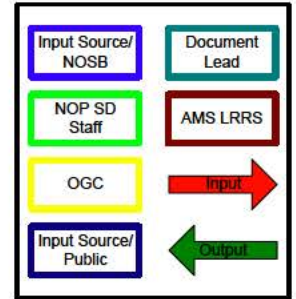
Rulemaking within the U.S. Federal government is conducted in accordance with the Administrative Procedure Act of 1946. Within NOP, the Standards Division is responsible for pursuing the rulemaking process to promulgate new regulations and amend existing regulations including changes to the National List. Typically recommendations will come through the NOSB (e.g., via Petitions for Evaluation of Substances for Inclusion on or Removal From the National List of Substances Allowed and Prohibited in Organic Production and Handling), but may also be the result of an Office of the Inspector General audit, technical corrections to existing regulations, or requests from external sources.

An NOP document detailing this process as pursued by NOP does not exist at this time.

# NOP Rulemaking Process Flow Chart

## Inputs & Outputs

## Actions



Legend

Approximate Timeframes for Review:  
AMS Administrator (Varies)  
Marketing & Regulatory Program  
(MRP) Undersecretary (30 days)  
USDA Office of Budget & Program  
Analysis (OBPA) (30 days)  
Office of Management & Budget  
(OMB) (60 days)

Final Recommendation  
for making Rule

Submitted Workplan

Review recommendation  
and prepare draft  
Workplan; seek  
clarification/additional  
information from NOSB,  
as needed

Route Workplan for  
internal review and  
comment within NOP to  
include SD peer reviewer  
and SD Director; revise  
as necessary

Route Workplan to  
Deputy Administrator for  
review and sign off

Send Workplan to AMS  
Legislative & Regulatory  
Review Staff (AMS  
LRRS) for Departmental  
Clearance

Commence draft  
Document preparation  
concurrent with Workplan  
preparation

Research and compile  
information resources to  
include NOSB, other  
agencies (e.g., FDA &  
EPA), and internal NOP  
Staff

Prepare Preamble and  
Rule in applicable  
explanatory and  
regulatory language

Route Document for  
review and comment  
within NOP Standards  
Division (SD) to include  
SD peer reviewer and  
SD Director

1

Document Lead assigned by Division  
Director to prepare Workplan;  
preparation timeframes are variable  
but typically require at least 45 days

Workplan does not require  
OGC review and concurrence

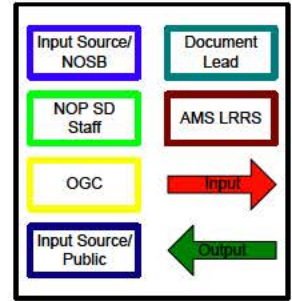
Draft Document preparation  
begins while Workplan is being  
drafted and sent for Clearance

Draft Document preparation timeframes,  
including internal NOP review, are variable  
but typically require at least 60 days

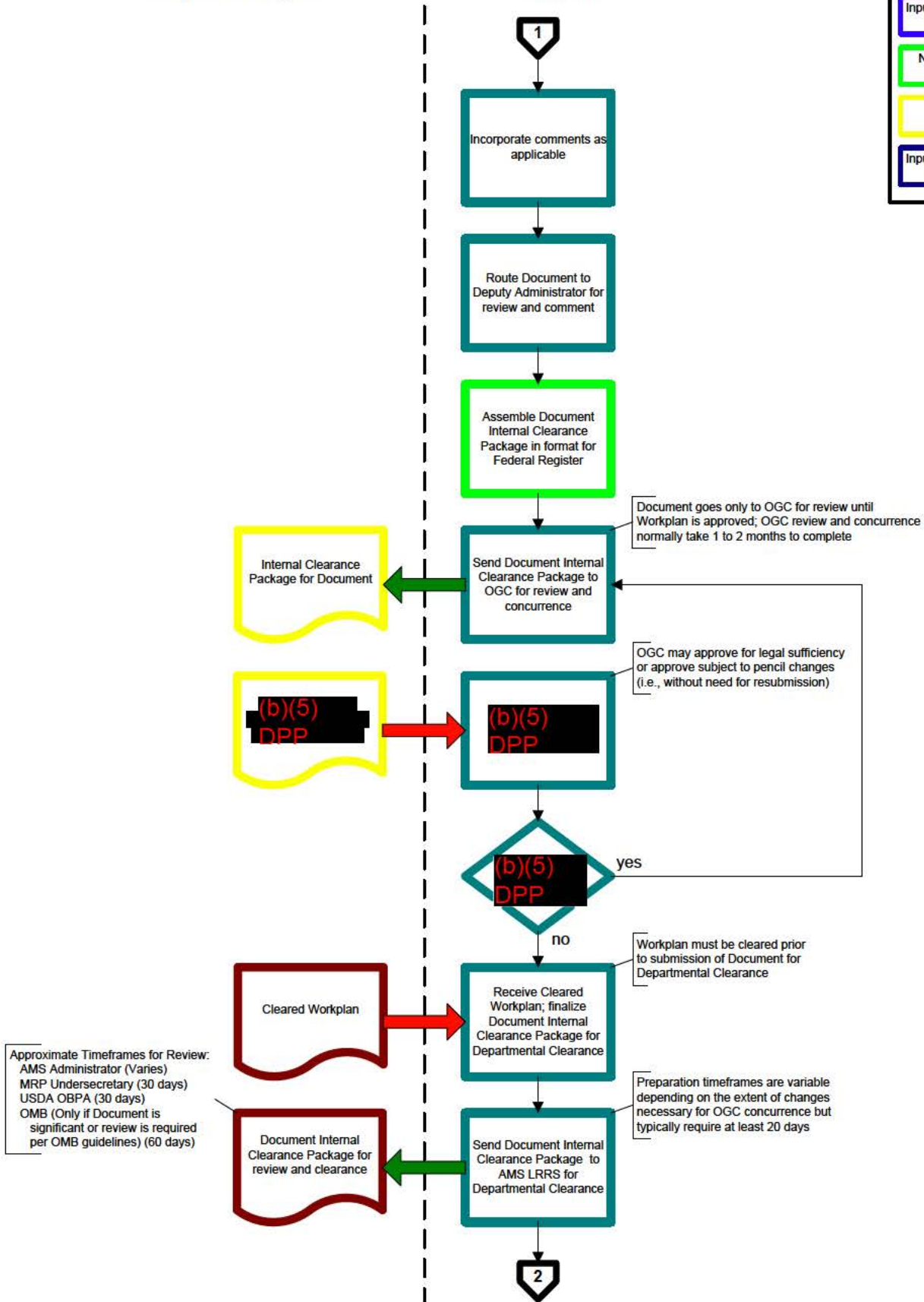
# NOP Rulemaking Process Flow Chart

## Inputs & Outputs

## Actions



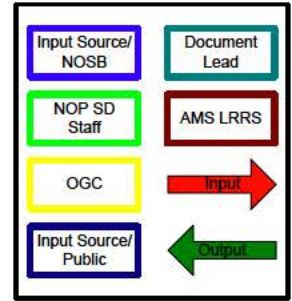
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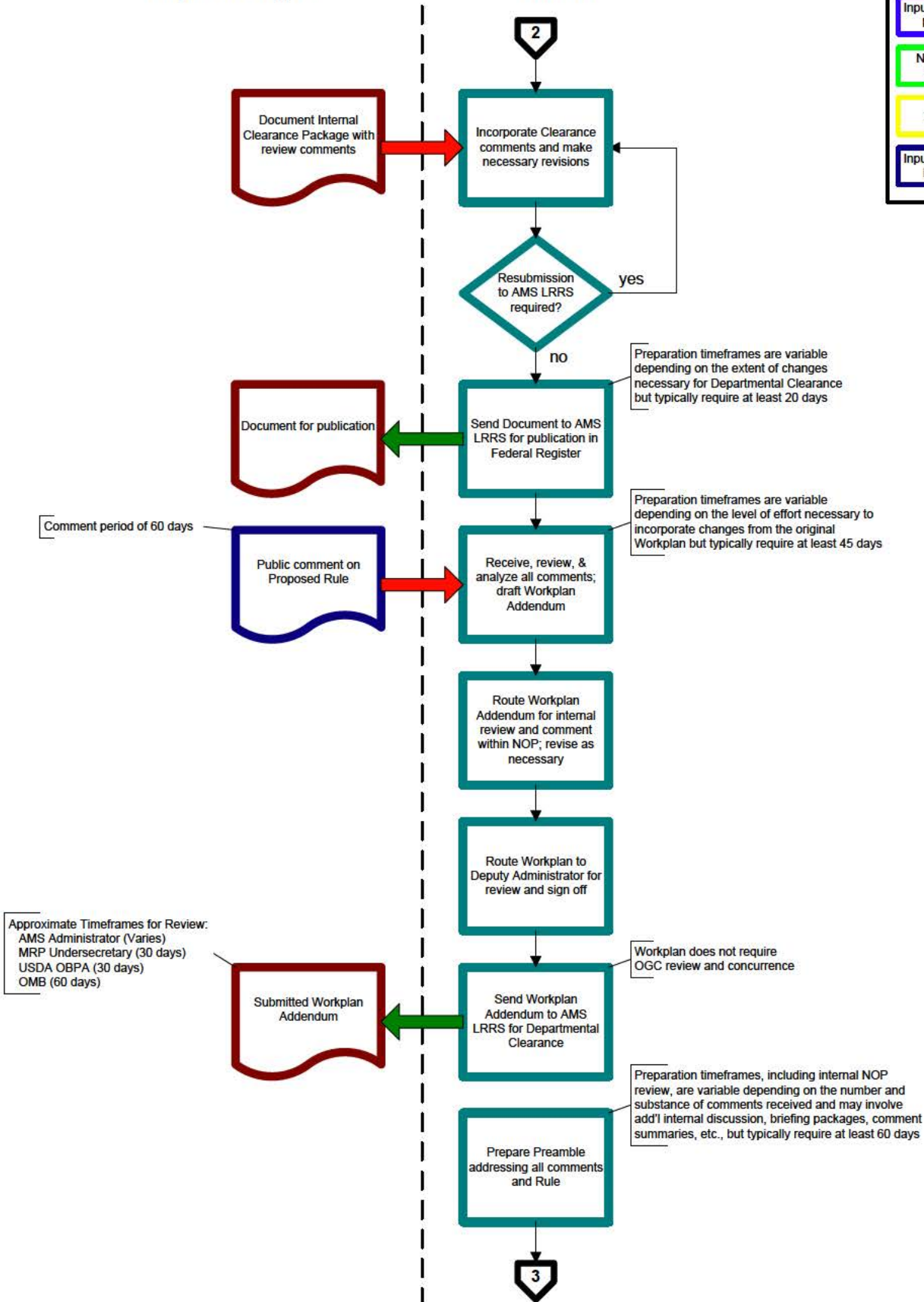
# NOP Rulemaking Process Flow Chart

## Inputs & Outputs

## Actions



Legend

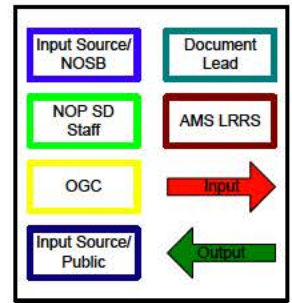




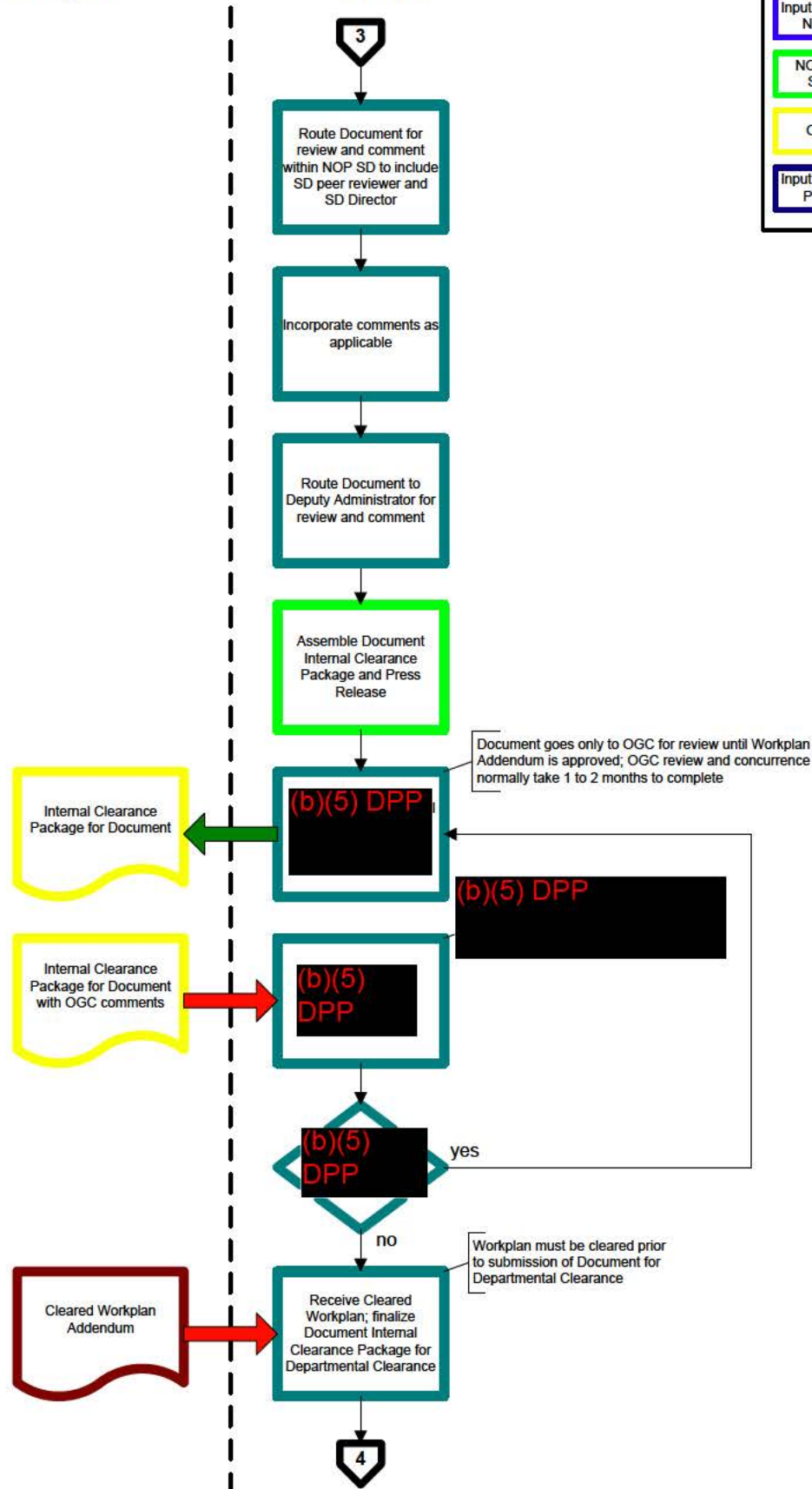
# NOP Rulemaking Process Flow Chart

## Inputs & Outputs

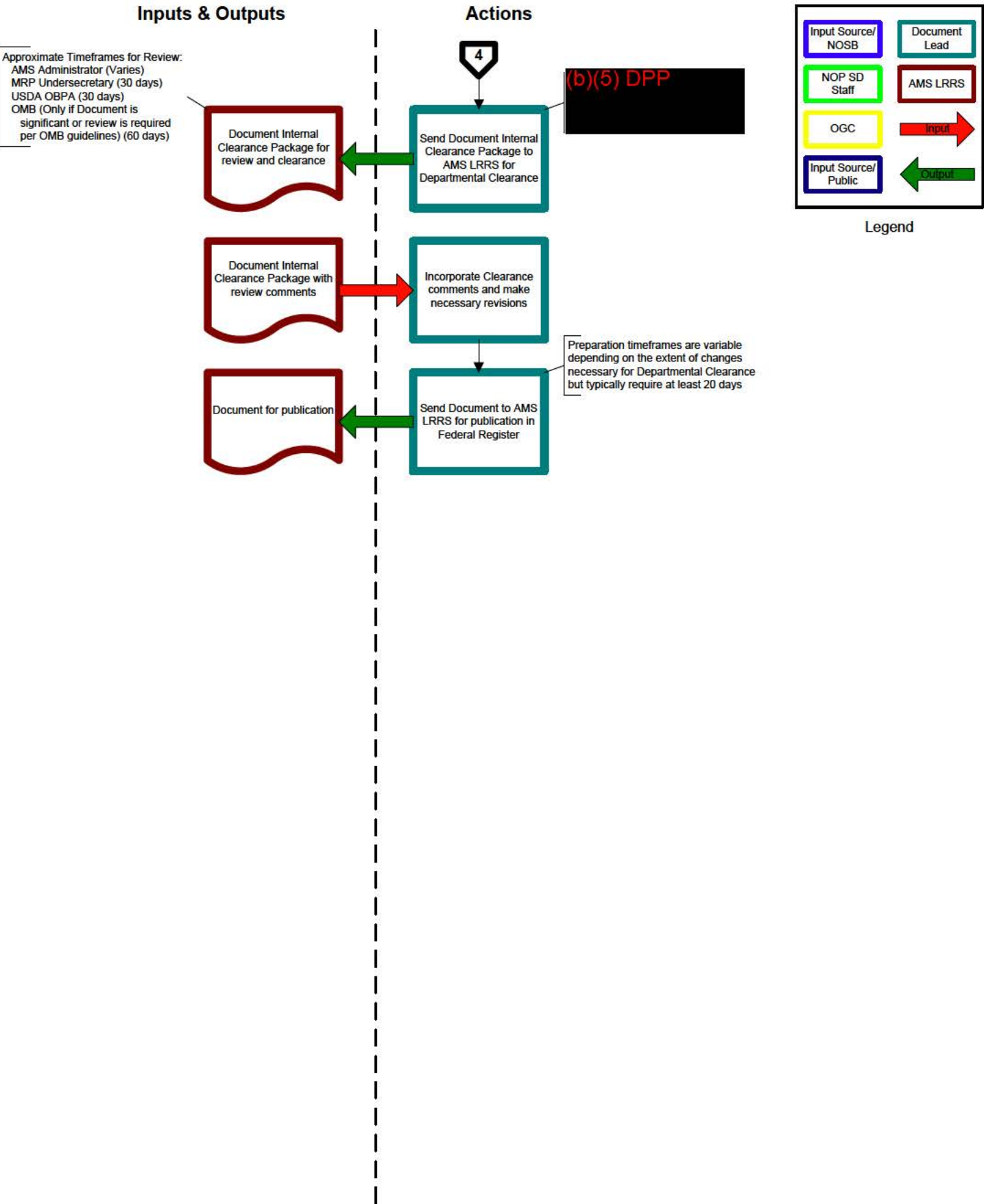
## Actions



Legend



NOP Rulemaking Process  
Flow Chart







## Accreditation & International Activities Division

### Certifying Agent Accreditation

While AIA performs other functions within NOP, its primary function is accreditation of organic certification agencies under the authority of the Organic Foods Production Act of 1990 as described in the NOP Final Rule and delegated by the AMS Administrator. This includes not only initial accreditation, but also oversight and monitoring to ensure continued compliance with the regulations to maintain that accreditation, both foreign and domestic. After initial accreditation, certification agencies enter a 5 year cycle which includes interim and accreditation renewal assessments.

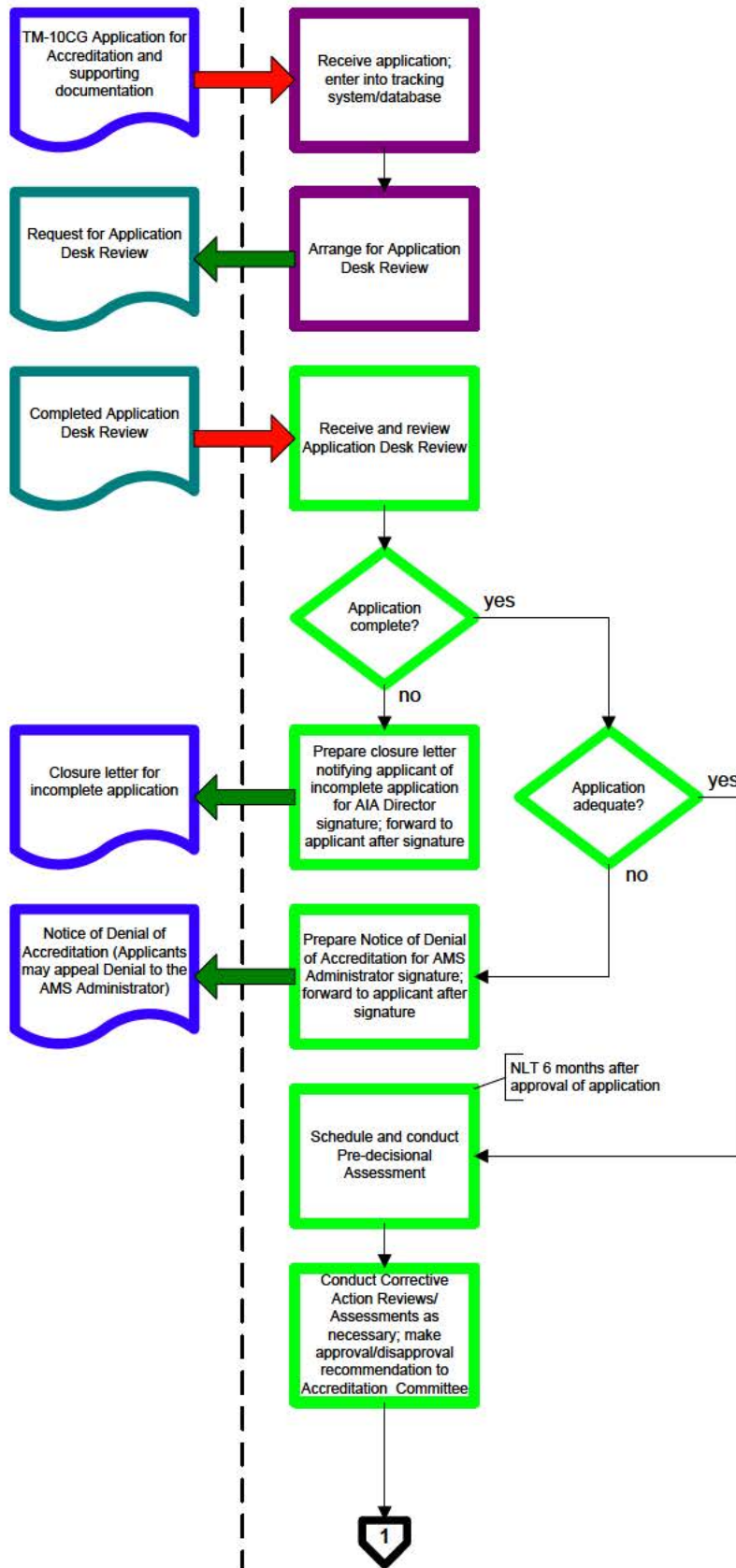
There are a number of NOP documents in the NOP 2000 series that provide detailed procedures for performance of this function. It was noted during the flow charting evolution that (b) (5)

[REDACTED]

# NOP Certifying Agent Accreditation Flow Chart

## Inputs & Outputs

## Actions

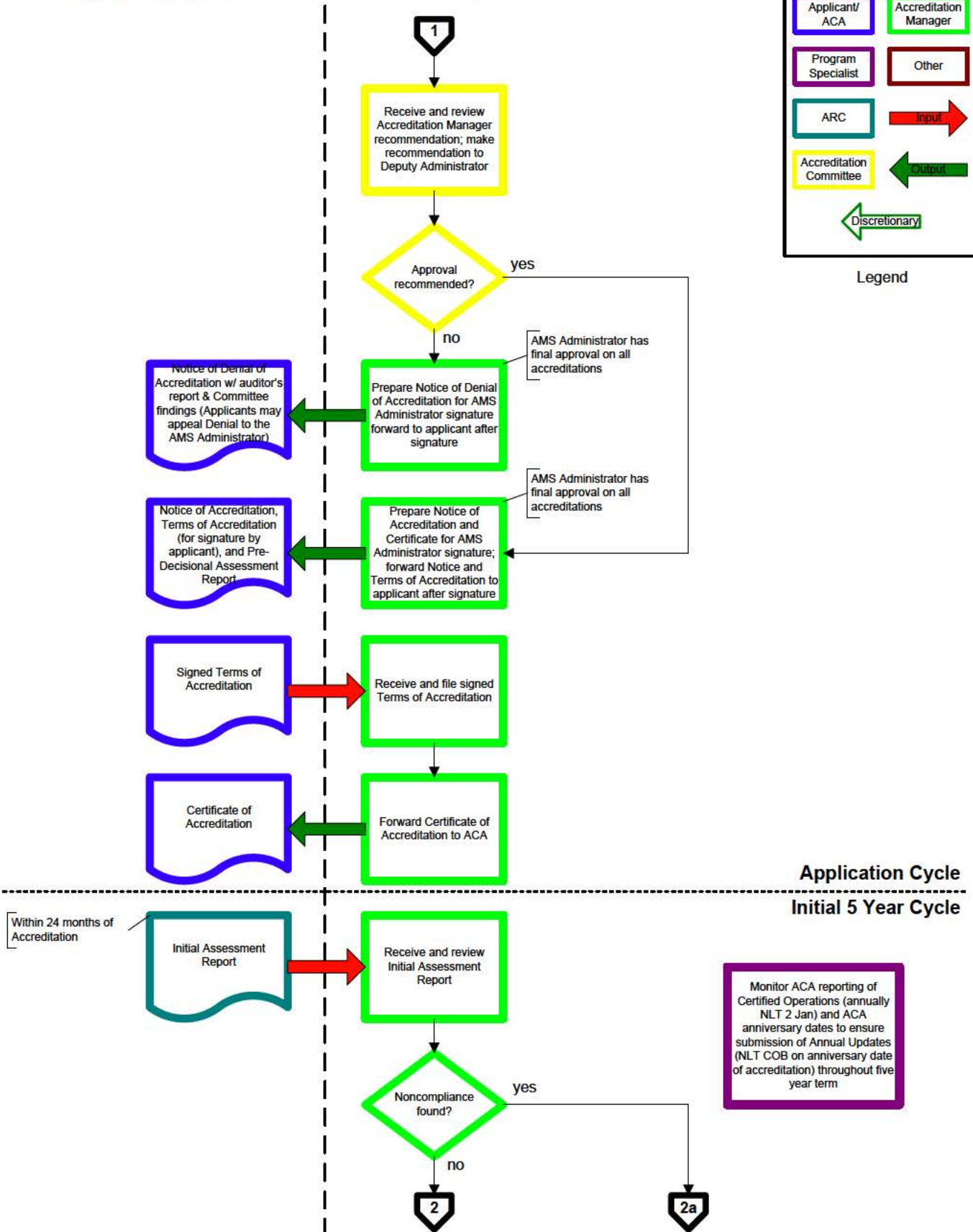
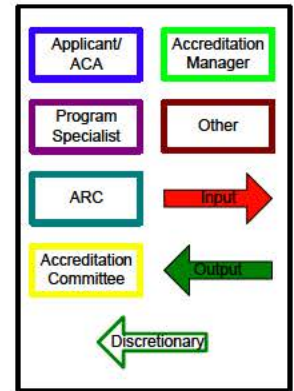


Legend

# NOP Certifying Agent Accreditation Flow Chart

## Inputs & Outputs

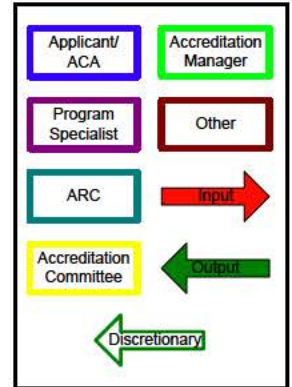
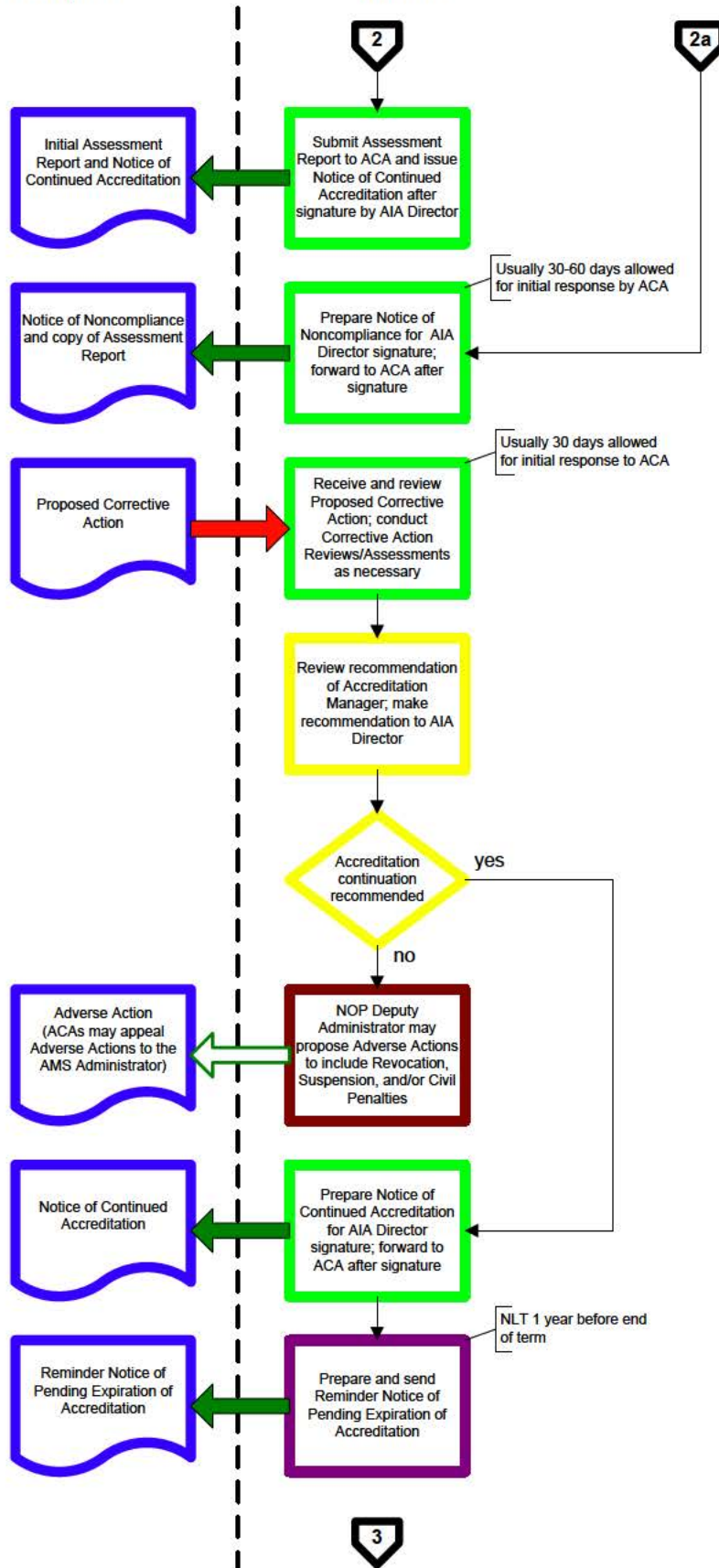
## Actions



# NOP Certifying Agent Accreditation Flow Chart

## Inputs & Outputs

## Actions



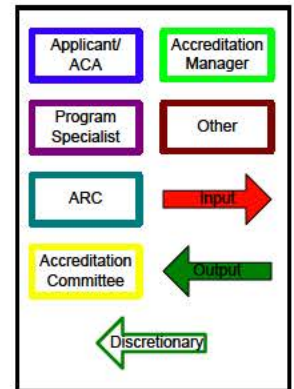
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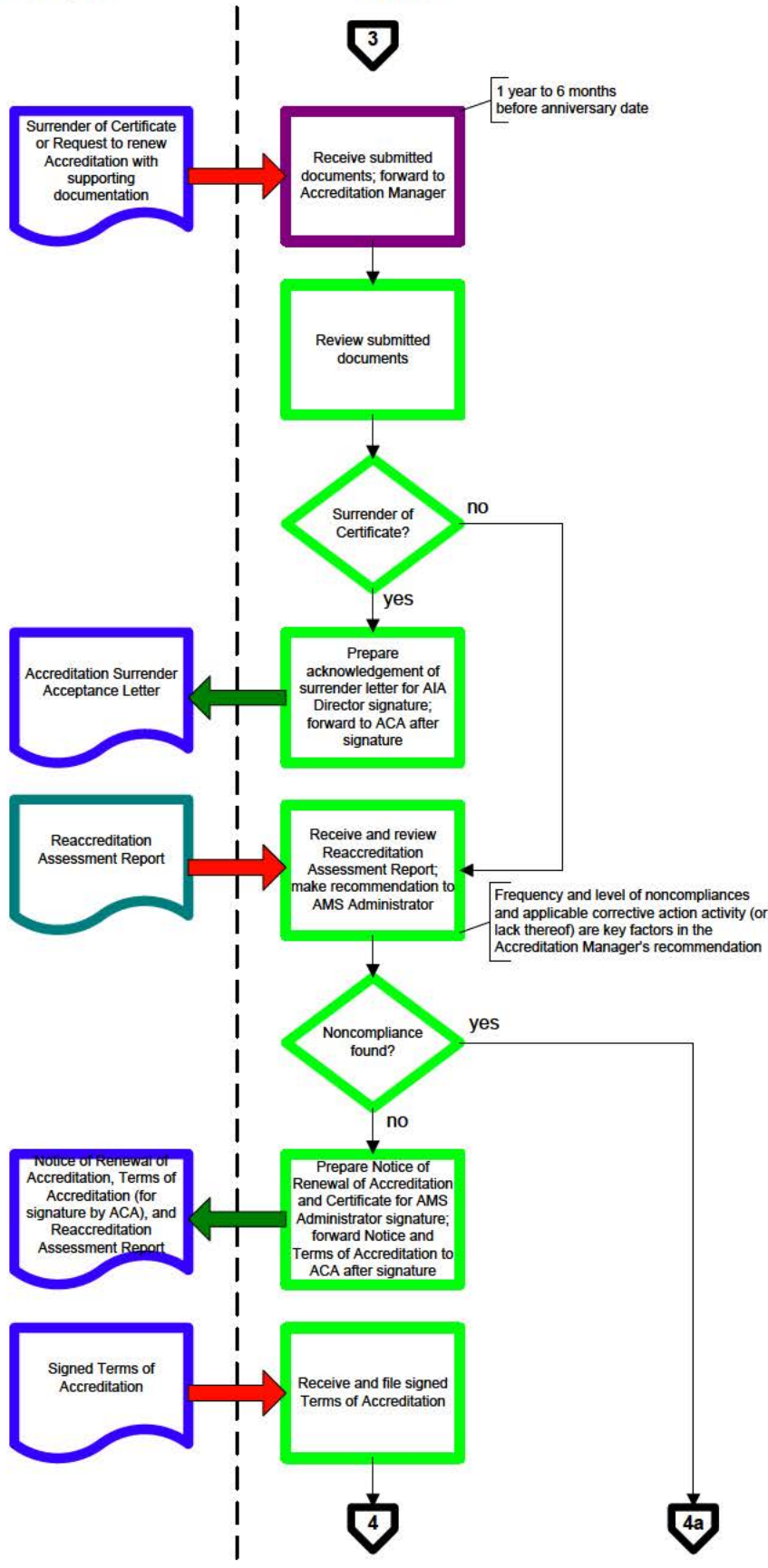
# NOP Certifying Agent Accreditation Flow Chart

## Inputs & Outputs

## Actions



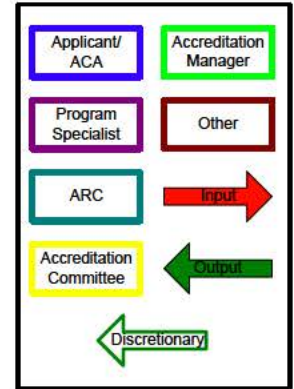
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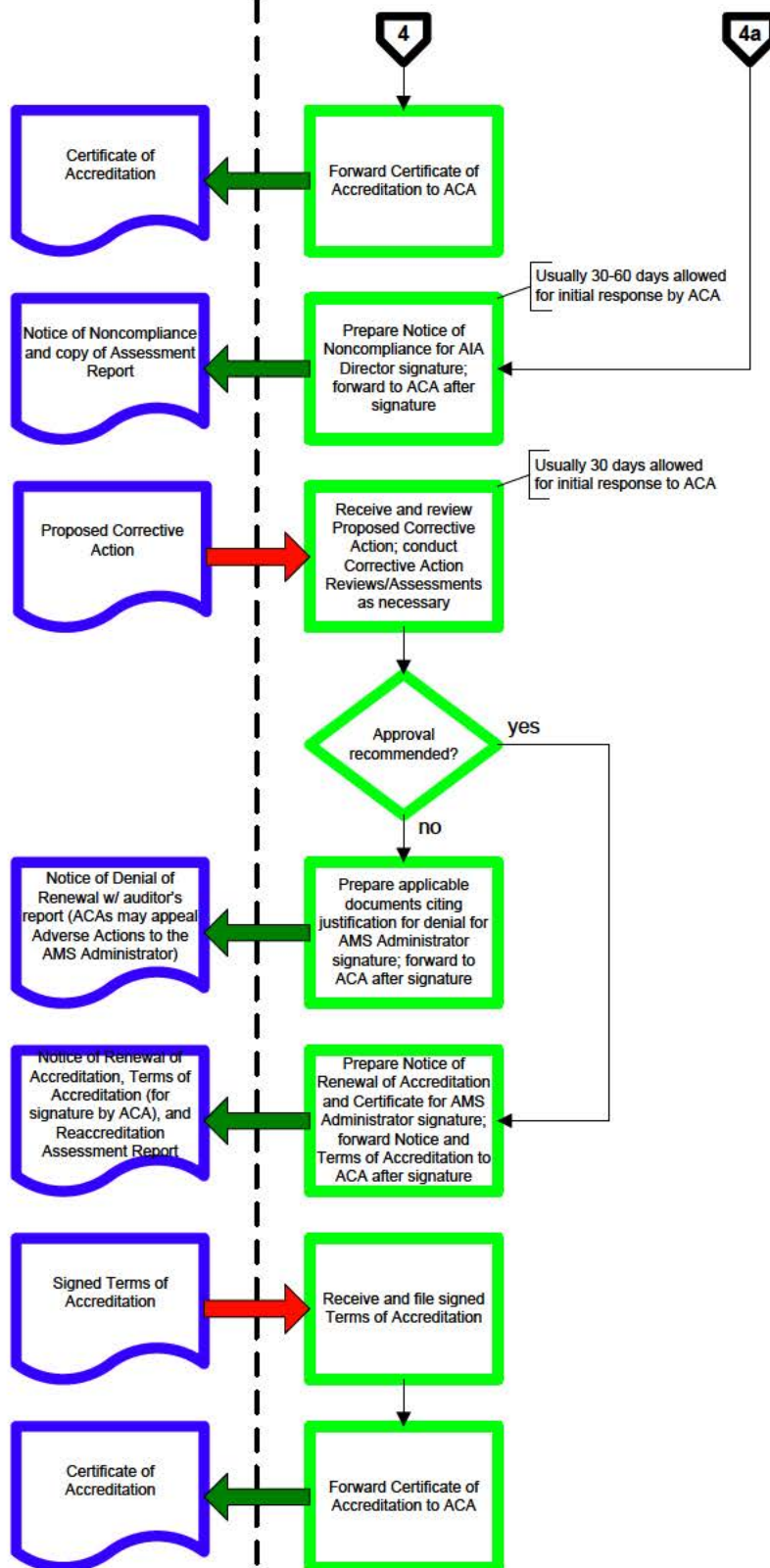
# NOP Certifying Agent Accreditation Flow Chart

## Inputs & Outputs

## Actions



Legend



Initial 5 Year Cycle

Subsequent 5 Year Cycle

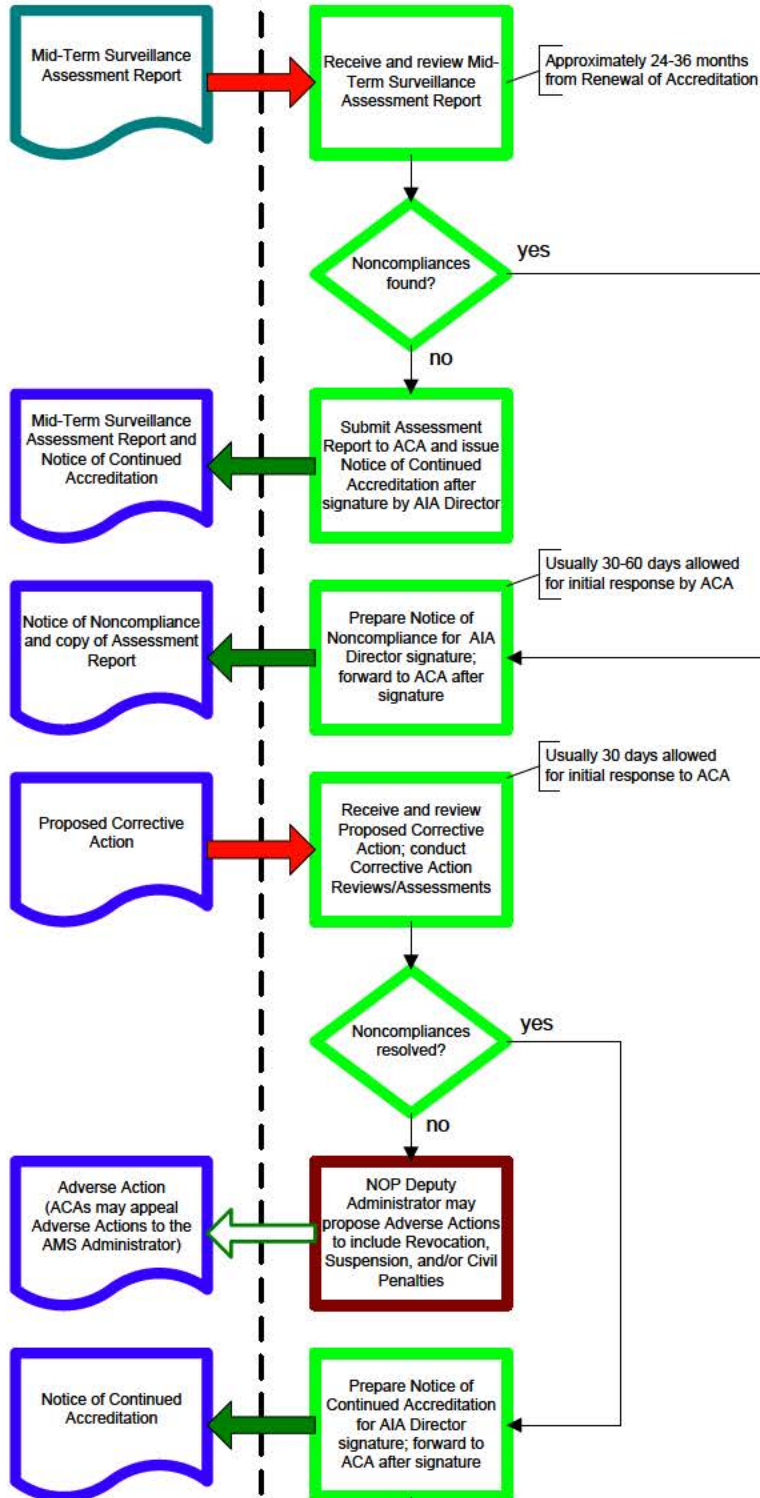
# NOP Certifying Agent Accreditation Flow Chart

## Inputs & Outputs

## Actions

5

**Initial 5 Year Cycle**  
**Subsequent 5 Year Cycle**



Legend

Monitor ACA reporting of Certified Operations (annually NLT 2 Jan) and ACA anniversary dates to ensure submission of Annual Updates (NLT COB on anniversary date of accreditation) throughout five year term

6



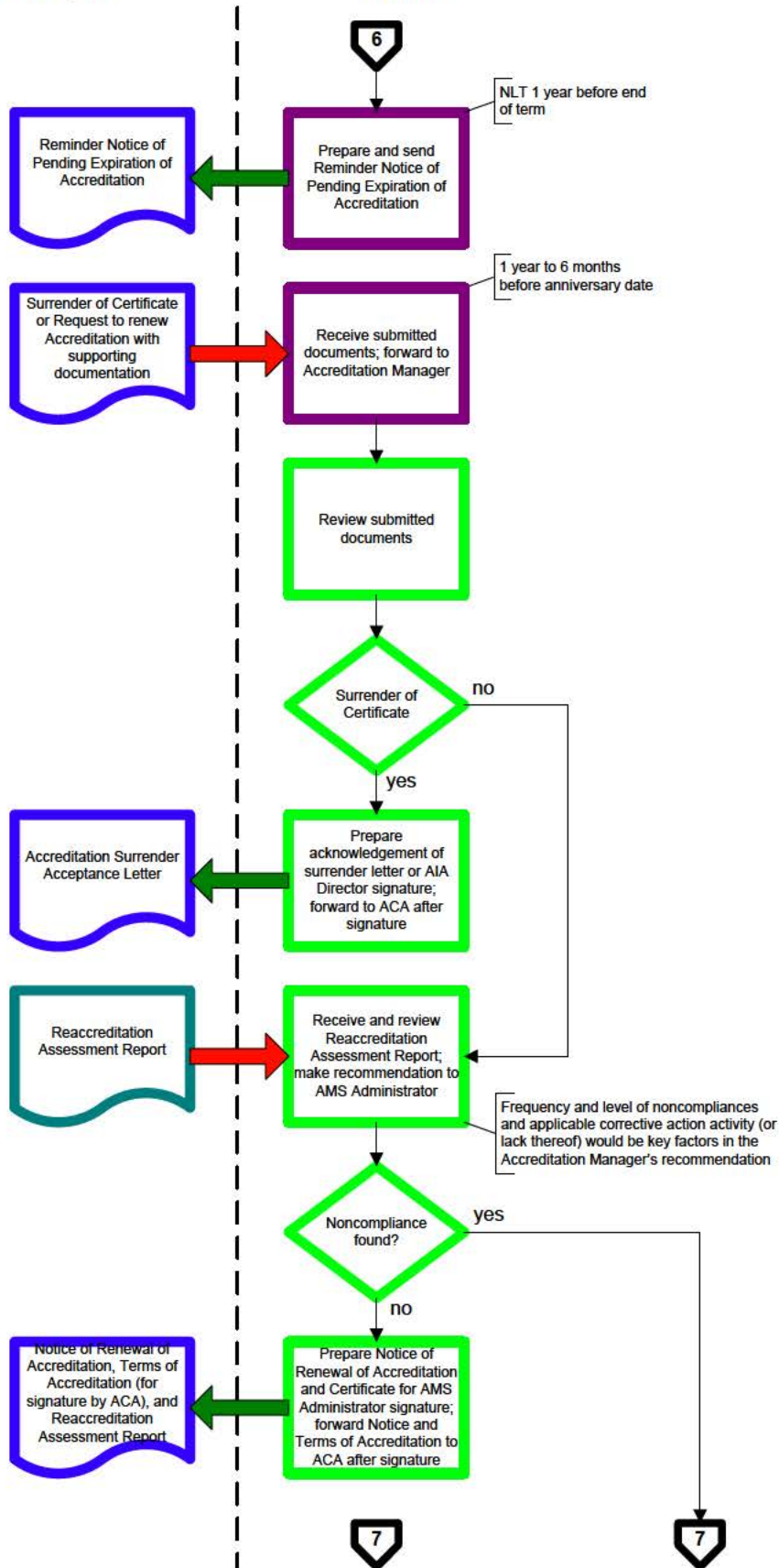
# NOP Certifying Agent Accreditation Flow Chart

## Inputs & Outputs

## Actions



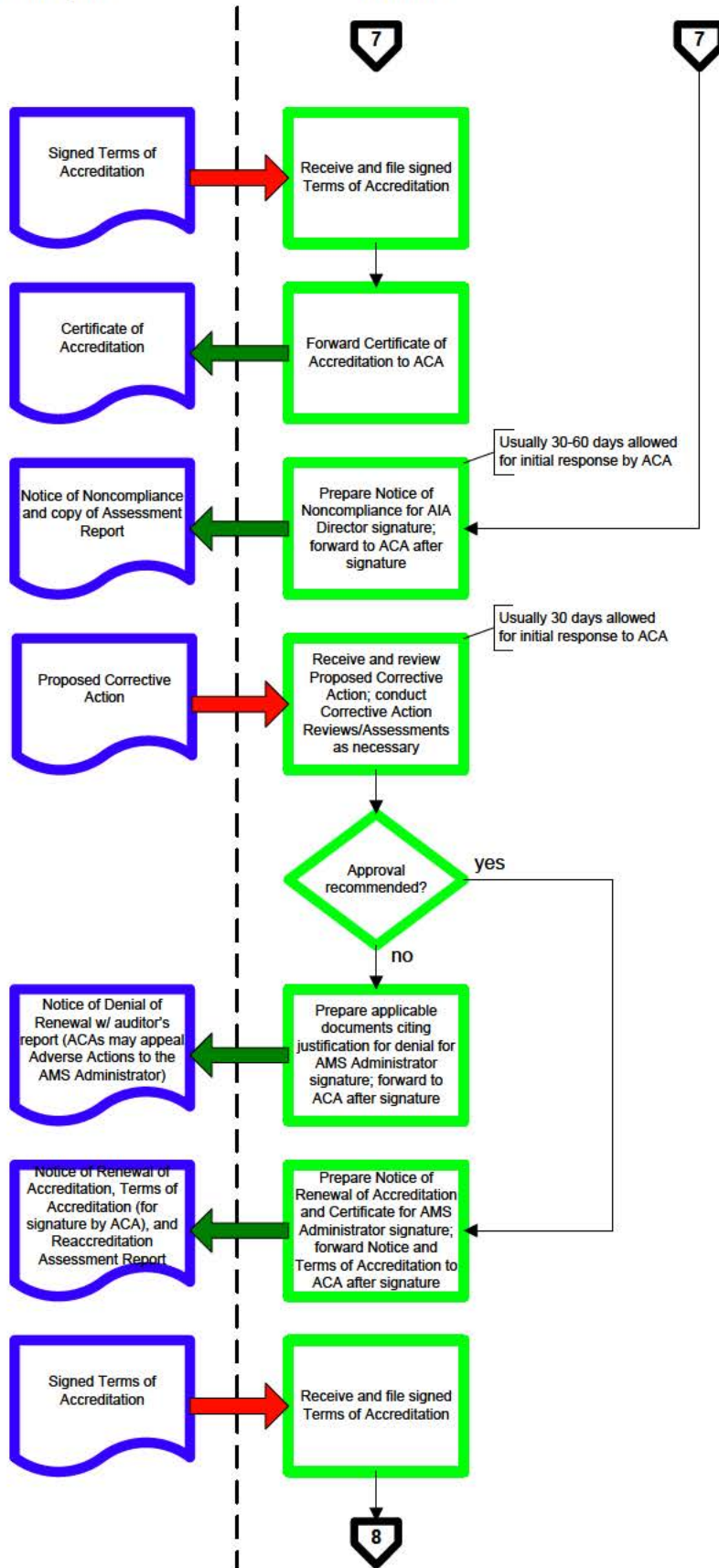
Legend



# NOP Certifying Agent Accreditation Flow Chart

## Inputs & Outputs

## Actions



Legend

# NOP Certifying Agent Accreditation Flow Chart

Inputs & Outputs

Actions



Subsequent 5 Year Cycle



Legend



## **Compliance & Enforcement Division**

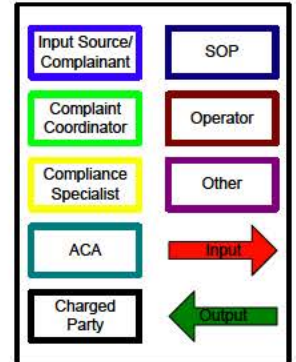
### **Complaint Handling**

The Compliance and Enforcement Division is responsible for ensuring compliance with the Organic Foods Production Act of 1990 and its implementing regulations within the NOP Final Rule. One of the primary means of performing this function is through the processing and investigation of complaints alleging violations of the regulations, i.e., complaint handling. Complaints can be filed via outside correspondence (i.e., Hotline, e-mail, telephone, postal mail, etc.) or generated by NOP compliance staff through investigative or compliance monitoring activities. The complaint handling process consists of three phases: Intake, Investigation, and Closure as illustrated in the flow chart. NOP 4001 and NOP 4000-1 provide detailed procedures for performance of this function. A number of document templates have been developed to expedite the process, where applicable.

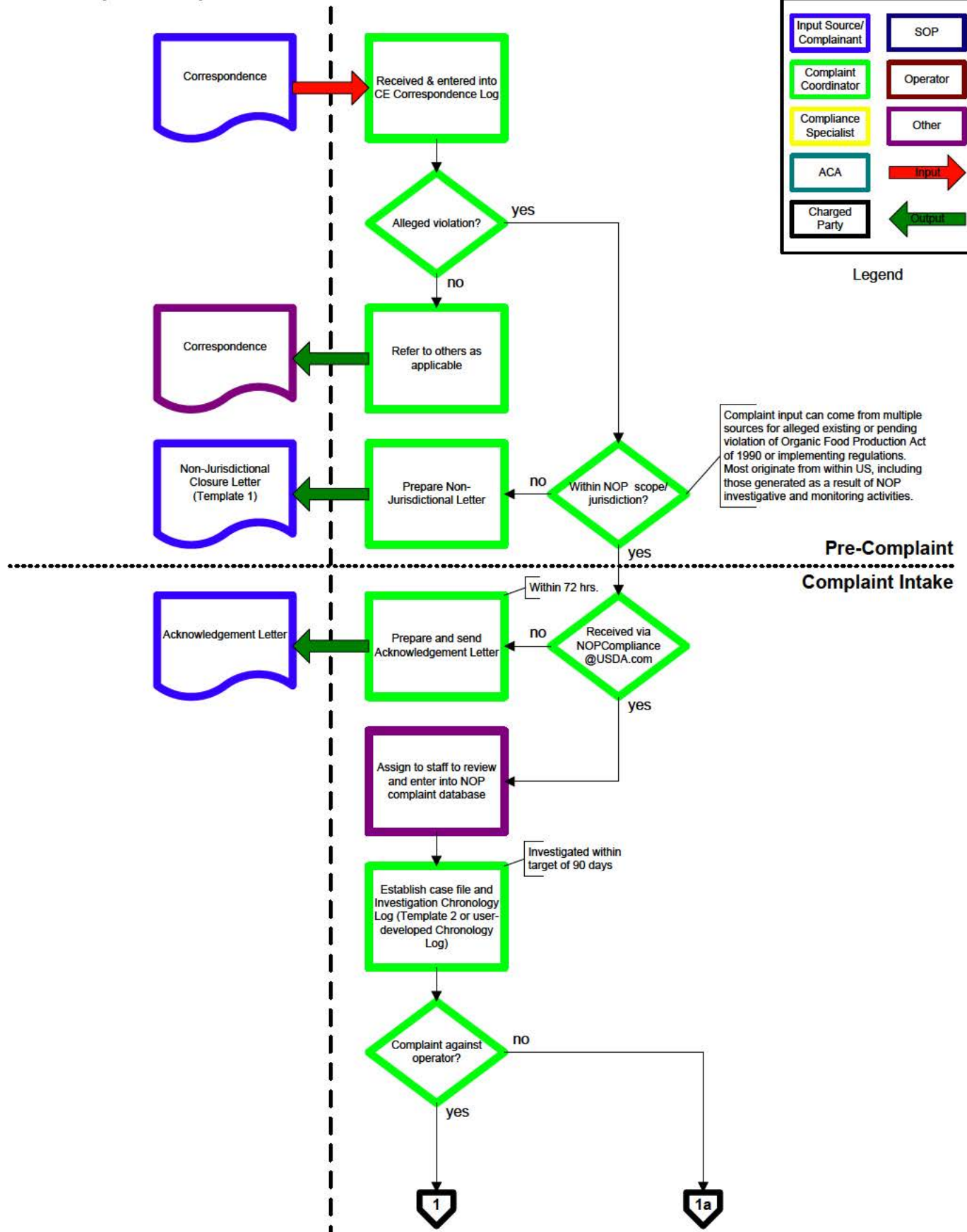
# NOP Complaint Handling Process Flow Chart

## Inputs & Outputs

## Actions

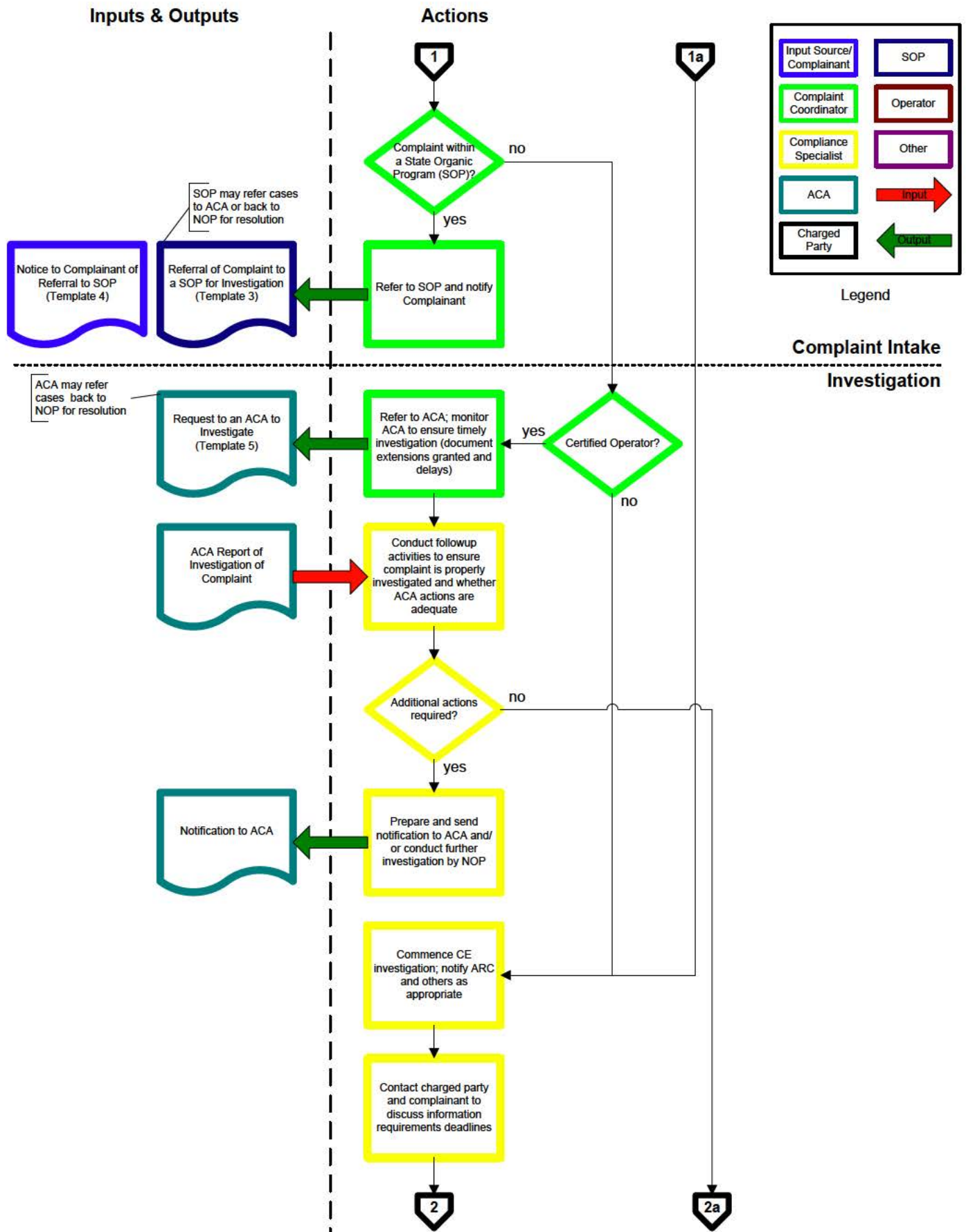


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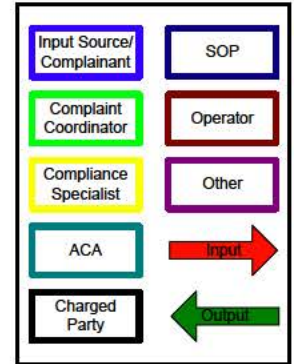
# NOP Complaint Handling Process Flow Chart



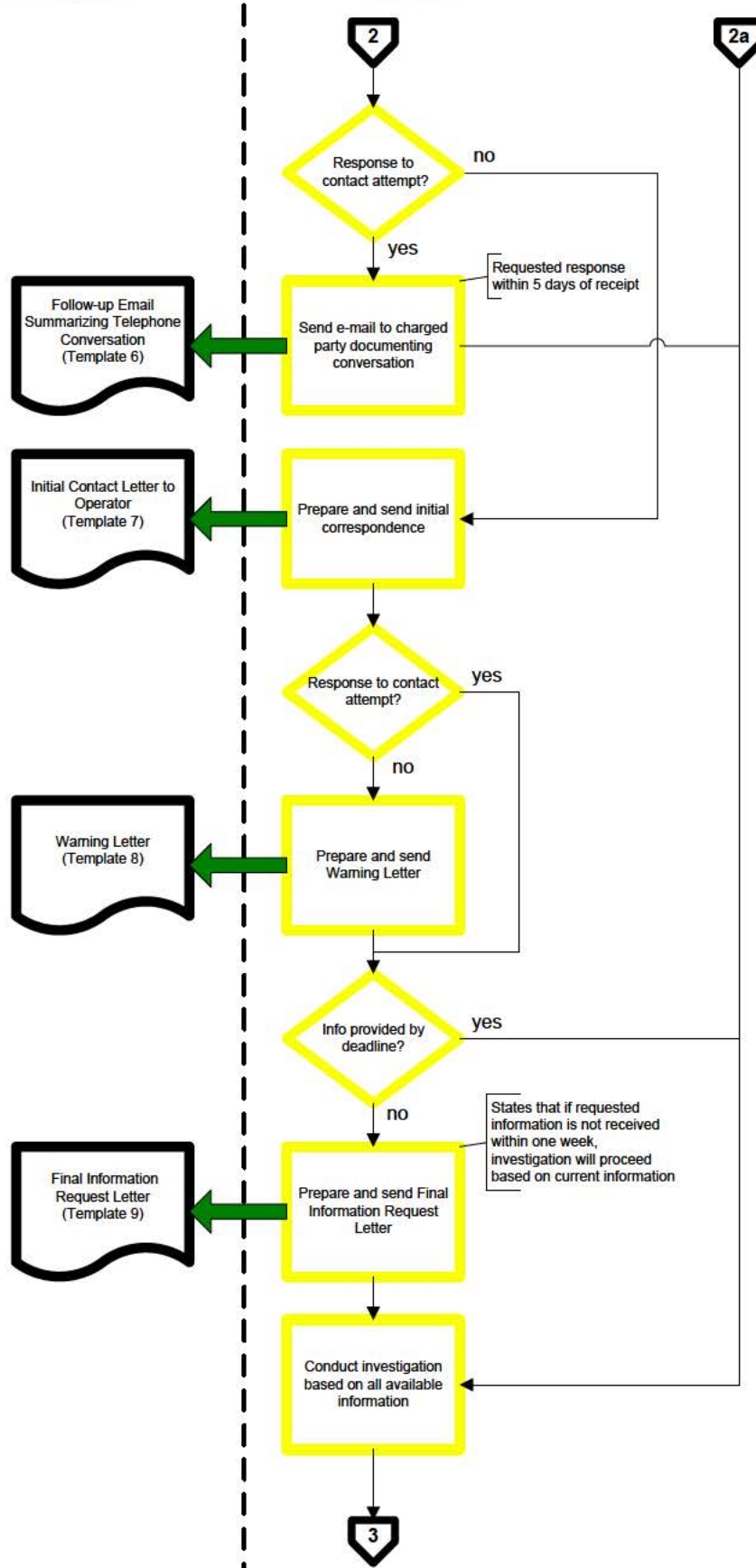
# NOP Complaint Handling Process Flow Chart

## Inputs & Outputs

## Actions



Legend

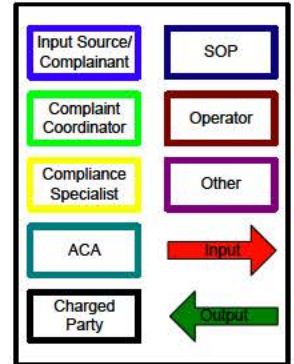




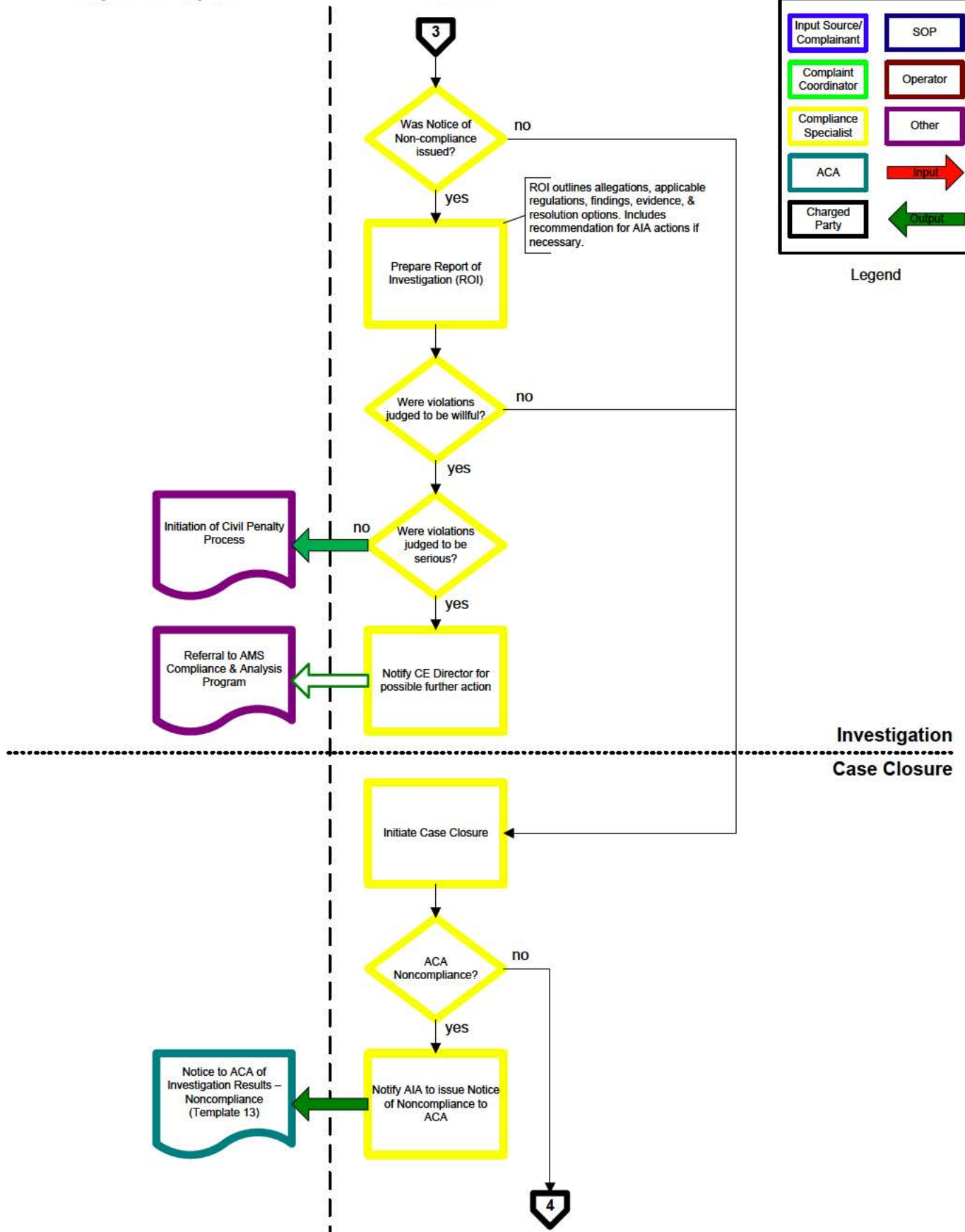
# NOP Complaint Handling Process Flow Chart

## Inputs & Outputs

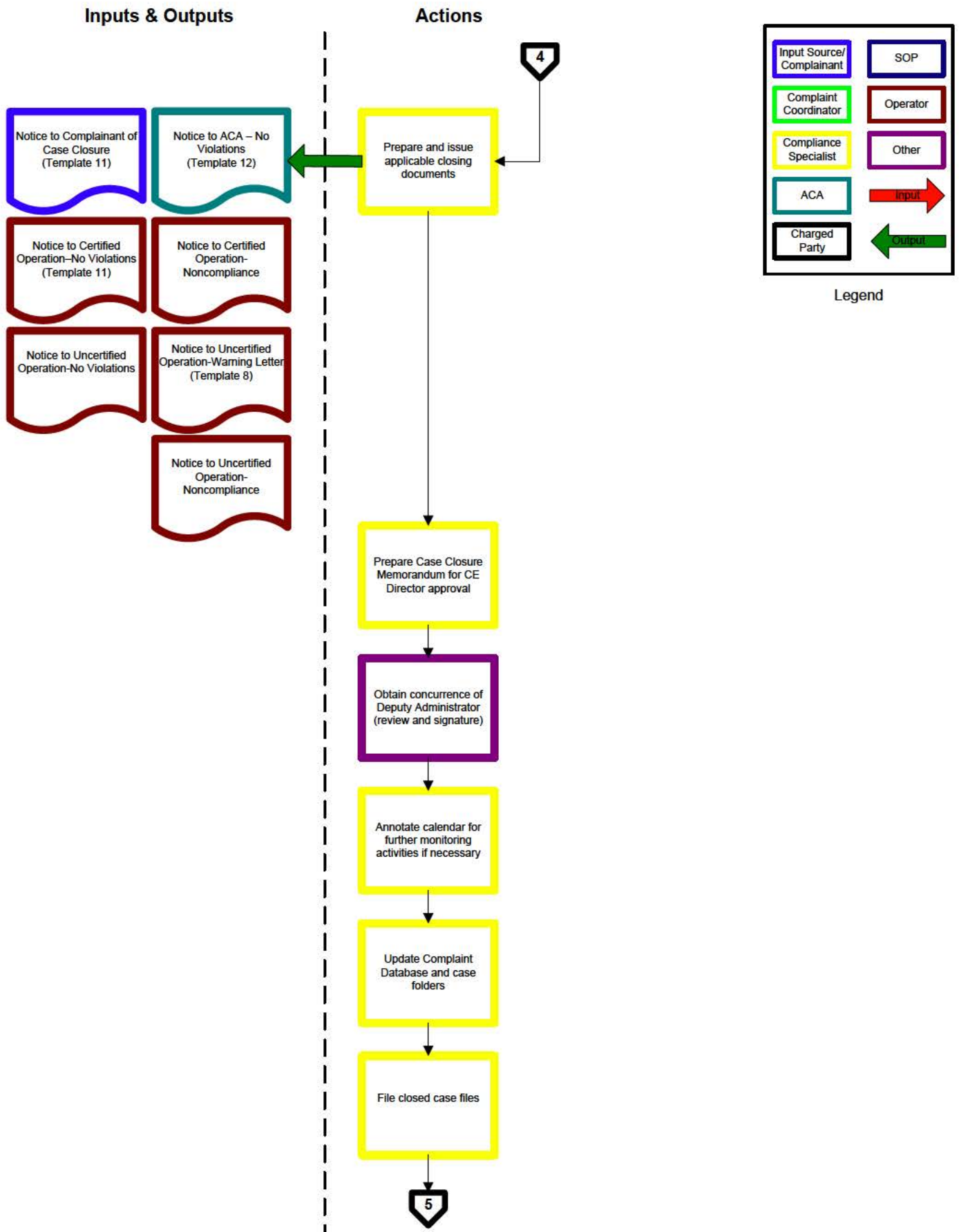
## Actions



Legend



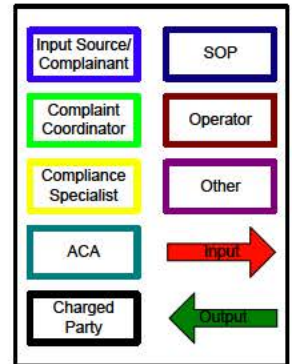
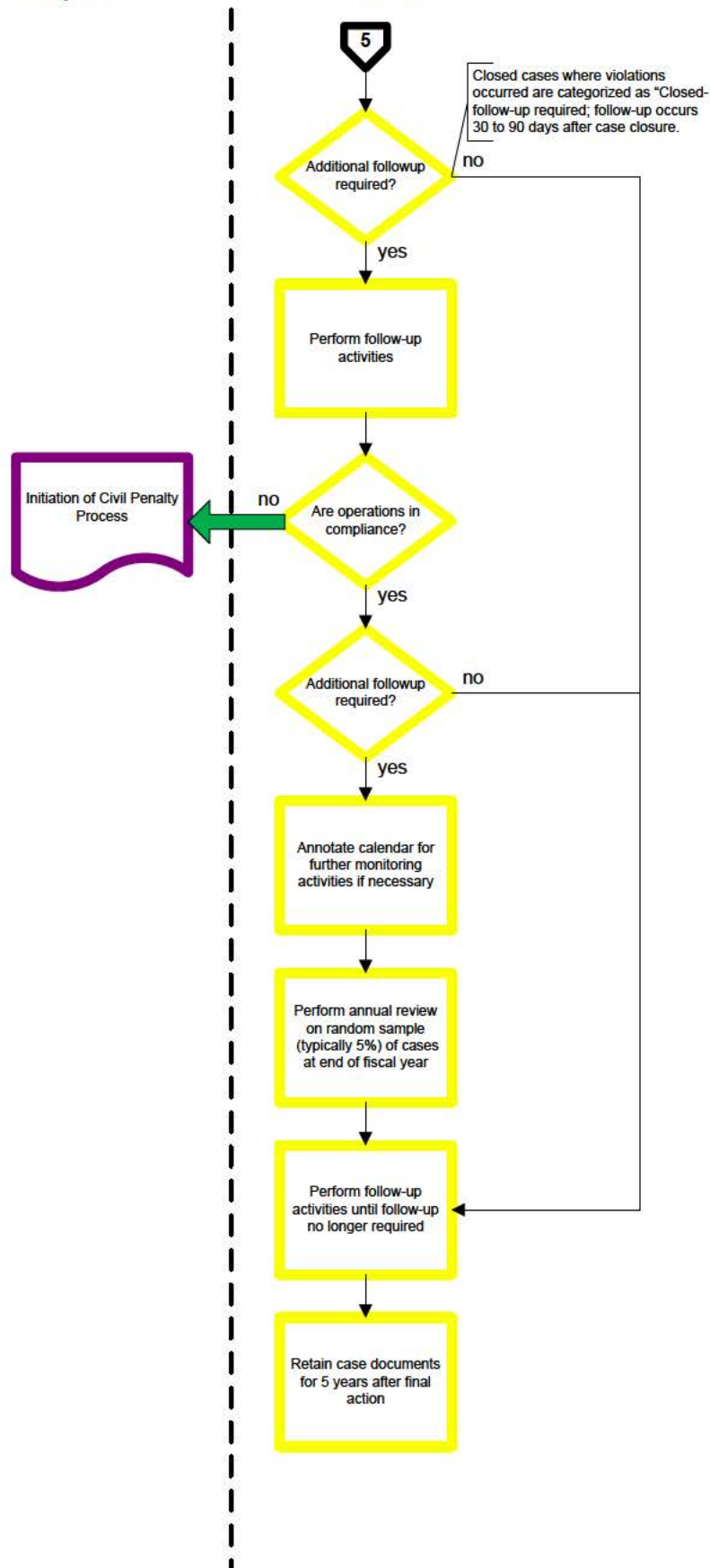
# NOP Complaint Handling Process Flow Chart



# NOP Complaint Handling Process Flow Chart

## Inputs & Outputs

## Actions



Legend

**United States Department of Agriculture  
Agricultural Marketing Service**

**National Organic Program**

**Business Process Review  
Report**

**Phase III**



**March 2011**



## TABLE OF CONTENTS

	Page
<b>1. INTRODUCTION .....</b>	<b>1</b>
<b>2. DATABASE CONSIDERATIONS .....</b>	<b>1</b>
<b>NOP DOCUMENTS/EVENTS FOR DATABASE</b>	
Office of the Deputy Administrator – Certification Cost Share Program .....	4
Office of the Deputy Administrator – Freedom of Information Act (FOIA) Requests .....	7
Office of the Deputy Administrator – NOSB (Executive Director) .....	9
Office of the Deputy Administrator – NOSB (FACA).....	13
Office of the Deputy Administrator - Quality .....	19
Office of the Deputy Administrator - Miscellaneous.....	20
Standards Division .....	22
Accreditation and International Activities Division .....	26
Compliance and Enforcement Division.....	36



### Acronyms Used in This Report

<u>Acronym</u>	<u>Definition</u>
ACA	Accredited Certifying Agent
AIA	Accreditation & International Activities (Division)
AMA	Agricultural Management Assistance
AMS	Agricultural Marketing Service
APA	Administrative Procedure Act
ARC	Audit, Review, & Compliance (Branch)
ASAP	As soon as possible
C&A	Compliance & Analysis (Program)
CA	Corrective Action (Report)
CAP	Corrective and Preventive (Action or Workplan)
CE	Compliance & Enforcement (Division)
COB	Close of business
CY	Calendar Year
DA	Deputy Administrator
ELH	E. L. Hamm & Associates, Inc.
EOY	End of year
EPA	Environmental Protection Agency
FACA	Federal Advisory Committee Act
FAS	Foreign Agricultural Service
FDA	Food & Drug Administration
FOIA	Freedom of Information Act
FRN	Federal Register Notice
IAW	In accordance with
ISO	International Organization for Standardization
IT	Information Technology
L&S	Livestock & Seed (Program)
LRRS	Legislative & Regulatory Review Staff
MRP	Marketing & Regulatory Program
MS	Microsoft
NFC	National Finance Center
NLT	No later than
NOCCSP	National Organic Certification Cost Share Program
NOFA	Notification of Funds Availability
NoNC	Notice of Non-Compliance
NOP	National Organic Program





## National Organic Program Business Process Review Report

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<u>Acronym</u>	<u>Definition</u>
NOSB	National Organic Standards Board
OBPA	Office of Budget & Program Analysis
ODA	Office of the Deputy Administrator
OFPA	Organic Foods Production Act
OFPA	Organic Foods Production Act
OFR	Office of the Federal Register
OGC	Office of the General Counsel
OIG	Office of the Inspector General
OMB	Office of Management & Budget
OSEC	Office of the Secretary of Agriculture
RAM	Regional Accreditation Manager
RFQ	Request for Quotes
ROI	Report of Investigation
SD	Standards Division
SOP	State Organic Program
STR	Special Travel Request
USC or U.S.C.	United States Code
USDA	United States Department of Agriculture
USTR	U. S. Trade Representative
WHL	White House Liaison



# Business Process Review Report

## Phase III

### 1. Introduction

Phase III of the NOP Business Process Review is intended to delineate the high level inputs and outputs that would potentially be included as data elements in an enterprise-wide database. The identified data elements are based on the data collection and flow charting of existing core processes and recommendations provided during the earlier phases of the process review. During Phase I of the review the existing processes and actions were flow charted; Phase II addressed findings and recommendations for changes and/or improvements to these processes.

Although the term "enterprise-wide" was used to describe the database to be developed, (b) (5)

[REDACTED]

The tables included in this report provide not only a listing and amplifying detail for the inputs and outputs shown in the process flow charts, but also include additional documents/events for consideration as data elements in the database. While researching the various reference documents and working with the staff personnel to generate the flow diagrams in Phase I, it became apparent to the study team that (b) (5)

[REDACTED]

### 2. Database Considerations

The following tables reference numerous documents and events which include potential database data elements. However as noted above (b) (5)

[REDACTED]

Some of the more important issues/questions are as follows:



(b) (5)

[Redacted text block]

- [Redacted list item]
- [Redacted list item]
- [Redacted list item]
- [Redacted list item]
- [Redacted list item]
- [Redacted list item]
- [Redacted list item]
- [Redacted list item]
- [Redacted list item]

This is not an all inclusive list, but provides some of the many considerations that should be addressed prior to or during the course of the database development.



## **NOP Documents/Events for Database**



## National Organic Program Business Process Review Report

### Office of the Deputy Administrator – Certification Cost Share Program

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
<b>EXTERNAL DOCUMENTS</b>					
NOP Certification Cost Share Program Procedural Guidelines	O	Grants Management Specialist	Annual Cost Share Program; Agricultural Management Assistance Cost Share Program (7 USC 1501-1524) & National Cost Share Program (7 USC 6523)	E-mail to NOP webmaster for posting of amended guidelines to the Agricultural Marketing Service (AMS) Website	No later than (NLT) 1 October
USDA/State Invitation for Cooperative Agreement Cover Letter (Mail merge template) with Cooperative Agreement - sent to states	O	Grants Management Specialist	Annual Cost Share Program; Agricultural Management Assistance Cost Share Program (7 USC 1501-1524) & National Cost Share Program (7 USC 6523)		NLT 1 September
Notification of Funds Availability (NOFA)	O	Grants Management Specialist		Publish in Federal Register E-mail to NOP webmaster for posting of NOFA to AMS Website	NLT 1 September
NOP Certification Cost Share Program USDA/State Cooperative Agreements - signed/approved with SF-424, Application for Federal Assistance	I	States	Annual Cost Share Program; Cooperative Agreement invitation letter from USDA	Determine allocation of funds and notify states via e-mail	24 September
SF-270, Request for Advance or Reimbursement	I	States	Need for advance or reimbursement of funds disbursed to operators	Submission of SF-425, Federal Financial Report & supporting documentation by states quarterly and end of year (not a precondition for disbursement)	Submitted as needed
Funding disbursements	O	Grants Management Specialist	In response to SF-270 requests from states		NLT 1 week from receipt of request





## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
SF-425, Federal Financial Report & supporting spreadsheet documentation (narrative report required with end of year submission)	I	States	Cost Share Program Procedural Guidelines; required quarterly and end of fiscal year	Compilation of data into annual report to Congress, NLT 1 March	Quarterly reports due NLT 30 days after end of qtr; final report due NLT 30 December
NOP Certification Cost Share Program Report to Congress	O	Grants Management Specialist	Annual Cost Share Program; Agricultural Management Assistance Cost Share Program (7 USC 1501-1524) & National Cost Share Program (7 USC 6523)		NLT 1 March
<b>INTERNAL DOCUMENTS TO USDA</b>					
E-mail to AMS Budget Division with supporting documents requesting assignment of agreement number	O	Grants Management Specialist	Internal USDA administrative requirements		15 August
Cooperative Agreement number	I	AMS Budget Division	In response to request from NOP Grants Management Specialist		21 August
Request for Clearance of Cooperative Document (Cost Share Program, USDA/State), AMS-180	O	Grants Management Specialist	Internal USDA administrative requirements		22 August
Request for Clearance of Cooperative Document (Cost Share Program, USDA/State), AMS-180 - signed/approved	I	AMS Budget Division (signed by Associate Administrator)	Internal USDA administrative requirements		1 September
NOP Certification Cost Share Program Weekly Report	O	Grants Management Specialist	Internal management requirements for inclusion in NOP Weekly Activity Report		Weekly NLT COB following Monday





## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
E-mail to NOP webmaster requesting posting of amended Cost Share Program guidelines to the AMS Website	○	Grants Management Specialist	Annual Cost Share Program; Agricultural Management Assistance Cost Share Program (7 USC 1501-1524) & National Cost Share Program (7 USC 6523)		NLT 1 October
E-mail to NOP webmaster requesting posting of NOFA to the AMS Website	○	Grants Management Specialist			NLT 1 September

Note: Shaded I/O blocks indicate items which might be considered inputs or outputs for the individual or the division, but not for the Program as they were identified in the flow charts.



## National Organic Program Business Process Review Report

### Office of the Deputy Administrator – Freedom of Information Act Requests

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Freedom of Information Act (FOIA) Request	I	Agricultural Marketing Service (AMS) FOIA Officer	NOP 1032	Research and respond to request	
E-mail to NOP staff notifying them of FOIA request	O	NOP FOIA Coordinator	NOP 1032	Receive and compile documentation from staff for review by Office of the General Counsel (OGC) and management and drafting of response	Within one day of receipt of request from FOIA Officer
FOIA search results from NOP staff	I	NOP Staff	NOP 1032	Make copies; redact information, as necessary; draft response; route for review	No later than (NLT) 5 days from sending of notification e-mail
Draft letter to requestor notifying of need to limit scope of request or expect delays	O	NOP FOIA Coordinator (signed by AMS FOIA Officer)	NOP 1032	Signed and sent by AMS FOIA Officer as soon as possible	As soon as need for notification is recognized
Draft response letter with applicable documents for OGC review	O	NOP FOIA Coordinator	NOP 1032		NLT 5 days after receipt of request from FOIA Officer
Review/edit the draft response letter with OGC comments	I	OGC	NOP 1032		NLT 5 days after receipt of draft from FOIA Coordinator
FOIA response package including response for FOIA Officer signature, review comments, redacted information documents	O	NOP FOIA Coordinator	NOP 1032	Receive copy of final documents and extra copies from FOIA Officer after mailing	NLT 20 days from AMS receipt of request
Final FOIA file with copy of signed letter and applicable documents	I	AMS FOIA Officer	NOP 1032	Shred extra copies, organize, and file record copy of final documents within one week of receipt from FOIA Officer	



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
<b>Events</b>		<b>Initiated By</b>			
Shred extra copies, organize, and file record copy of final documents	N/A	NOP FOIA Coordinator	NOP 1032 & 1010	Retain records IAW current directives until they meet or exceed retention requirements of NOP 1010	Within one week of receipt from FOIA Officer

Note: Shaded I/O blocks indicate items which might be considered inputs or outputs for the individual or the division, but not for the Program as they were identified in the flow charts.



## National Organic Program Business Process Review Report

### Office of the Deputy Administrator – National Organic Standards Board (Executive Director)

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Determine National Organic Standards Board (NOSB) meeting location in consultation with Office of the Deputy Administrator (ODA) and NOSB	N/A	Advisory Board Specialist	Need for appropriate Board meeting site.	Once site is selected, letter of intent is sent to conference facility and the procurement process begins.	Approximately 9-12 months before meeting; meetings occur every spring and fall.
Letter of Intent to conference facility and vendors providing support services	O	Advisory Board Specialist	To formally advise the conference facility and support services vendors of NOSB intentions.	E-mail to NOP webmaster to post meeting information to Agricultural Marketing Service (AMS) Website Prepare procurement requests for NOSB Meeting site, court reporting services, and audio-visual support services for Deputy Administrator (DA) approval (January/September). (See ODA- NOSB FACA listing)	Approximately 9-12 months before meeting; meetings occur every spring and fall.
Draft NOSB Meeting agenda	O	Advisory Board Specialist	For review and comment by NOSB Executive Committee. Draft agenda items are based on input from board members, stakeholders, or NOP; after review and referral by the Board to applicable committees, the committees select the Board suggested topics they would like to present at the meeting.		Approximately 4.5 months prior to the meeting
Draft NOSB Meeting agenda with NOSB review comments	I	NOSB Executive Committee	Response to draft submitted by Advisory Board Specialist	Edit agenda based on feedback/committee deliberations	Approximately four months prior to the meeting
NOSB Meeting agenda with revisions for Executive Committee approval	O	Advisory Board Specialist	For approval by NOSB Executive Committee		Within 2 weeks



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Approved NOSB Meeting agenda	I	NOSB Executive Committee	Establishes final agenda items for explanation in the Federal Register	Draft Federal Register Notice based on approved agenda information	Approximately 3.5 months prior to the meeting
Draft NOSB Meeting Federal Register Notice	O	Advisory Board Specialist	Notice to comply with Federal Advisory Committee Act (FACA) for Office of the General Counsel (OGC) review/concurrence	DA reviews and signs off prior to submission to OGC	
Draft NOSB Meeting Federal Register Notice with OGC comments	I	OGC	Completion of OGC review	Make any required DA/OGC edits	Approximately 2.5 months prior to the meeting
NOSB Committee recommendations	I	NOSB Committees	For preparation of meeting packet and posting to AMS Website	Reformat recommendations as necessary to prepare meeting packet in uniform format. E-mail to NOP webmaster for posting of Meeting agenda and committee recommendations to AMS Website	Approximately seven weeks prior to the meeting
NOSB Meeting Federal Register Notice with request for comments	O	Advisory Board Specialist	For publishing in accordance with FACA requirement for 15-day public comment period (NOP/NOSB goal is to provide a 30-day comment period)	Once published, the Federal Register Notice is linked from the website along with the agenda and committee recommendations.	Approximately six weeks prior to the meeting
Public Comments in response to Federal Register Notice	I	Public (Comments)	In response to Federal Register Notice of NOSB Meeting	Advisory Board Specialist reviews/posts public comments as received. Post comments to regulations.gov website via Federal Docket Management System Provide compiled comments to NOSB for review prior to meeting.	No later than (NLT) approximately two weeks prior to the meeting.
Post Public Comments to regulations.gov website via Federal Docket Management System	O	Advisory Board Specialist			NLT approximately two weeks prior to the meeting.





## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Compiled Public Comments	O	Advisory Board Specialist	Provided to NOSB members for review prior to meeting.	Comments may still be received after this date, but the NOSB may not have time to review them prior to the meeting. All comments received will be brought to the attention of the Board and will eventually become a part of the public record associated with the upcoming meeting.	Approximately two weeks prior to the meeting
Public Comments received at the meeting	I	Public (Comments)	Requirement to post hard copy comments received at the meeting for public information	Post comments to regulations.gov website via Federal Docket Management System	Within two weeks of completion of the meeting
NOSB Recommendations	N/A	NOSB/Advisory Board Specialist	Coordinated effort by NOSB and Advisory Board Specialist to refine and finalize the meeting recommendations and update them with the voting record for each recommendation for posting.	E-mail to NOP webmaster to post to AMS Website	Approximately one month following the meeting
E-mail to NOP webmaster for posting of meeting information to the AMS Website	O	Advisory Board Specialist			Approximately 9-12 months before meeting; meetings occur every spring and fall
E-mail to NOP webmaster for posting of NOSB Meeting agenda and committee recommendations to the AMS Website	O	Advisory Board Specialist			Approximately seven weeks prior to the meeting
E-mail to NOP webmaster for posting of a link to the Federal Register Notice to the AMS Website	O	Advisory Board Specialist			Approximately six weeks prior to the meeting after publishing of the Notice





## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
E-mail(s) to NOP webmaster for posting of additional meeting related information (e.g. transcripts, presentations, etc.) and/or links to same to the AMS Website	○	Advisory Board Specialist			Various, as required to keep the NOSB Meetings web page current
E-mail to NOP webmaster for posting of NOSB Meeting finalized recommendations to the AMS Website	○	Advisory Board Specialist			Approximately one month following the meeting

Note: Shaded I/O blocks indicate items which might be considered inputs or outputs for the individual or the division, but not for the Program as they were identified in the flow charts.



## National Organic Program Business Process Review Report

### Office of the Deputy Administrator – National Organic Standards Board (FACA)

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
<b>National Organic Standards Board (NOSB) Member Nomination/ Selection</b>					
E-mail notification of expiration of Board member's term to White House Liaison	O	Advisory Board Specialist	Expiration of Board member's term	Nomination/selection process	One year prior to expiration (typically in Jan.)
Draft Federal Register Notice (FRN) and Press Release	O	Advisory Board Specialist	For Office of the General Counsel (OGC) legal review	Federal Register Notice sent to OGC; Press Release held until posting approximately 15 March	No later than (NLT) 30 January
FRN with review comments	I	OGC	In response to submitted draft	Finalize for Deputy Administrator (DA) signature; February	NLT 3rd week in February
Finalized, signed Federal Register Notice to Agricultural Marketing Service Legislative and Regulatory Review Staff (AMS LRRS)	O	Advisory Board Specialist	For publication in Federal Register	Publication in Federal Register approximately 15 March	February
Posting of Federal Register Notice and Press Release on AMS Website	N/A	Advisory Board Specialist			NLT two days after publication in Federal Register
Outreach for NOSB Nominations (includes Federal Register Notice/Press Release to individuals, universities, trade publications, press associations, etc.)	O	Advisory Board Specialist	Organic Foods Production Act of 1990 (OFPA)	Conduct follow-up by contacting targeted individuals and organizations	Commence NLT 2nd week of March
Nominations for NOSB Members	I	Various	Response to outreach		NLT 2nd week in July



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
AD-755 forms and related nominee requirements	O	Advisory Board Specialist	Response to e-mail and/or letter nominations		NLT one week after receipt of nomination
Completed AD-755 forms and resumes	I	Prospective nominees	Response to Advisory Board Specialist request		NLT 1st week in August
Compiled information on nominees	O	Advisory Board Specialist	For White House Liaison vetting of nominees		Mid August
Order plaques for outgoing Board members	N/A	Advisory Board Specialist			NLT 2nd week in September
White House Liaison nominee vetting results	I	White House Liaison	Response to submitted list of nominees		NLT 3rd week in September
Decision memo and notebook on nominees	O	Advisory Board Specialist	For final selection by Secretary of Agriculture	DA must review and approve prior to submission to the Secretary of Agriculture	NLT one week after receipt of vetting results
Letters and plaques for outgoing members for DA signature	N/A	Advisory Board Specialist	Letters of appreciation and recognition of service		September
Signed letters and plaques for outgoing members	O	Advisory Board Specialist	For presentation at Fall NOSB meeting		NLT end of Fall NOSB meeting
Notebook and signed decision memo	I	Secretary of Agriculture	Response to submitted list of nominees	Call to selectees to confirm willingness to serve on NOSB within one week of receiving decision memo	NLT 2nd week in October
Contact selectees to confirm willingness to serve	N/A	Advisory Board Specialist			NLT one week after receipt of decision memo
Appointment letters and certificates for Secretary's signature	O	Advisory Board Specialist			November
Signed appointment letters and certificates	I	Secretary of Agriculture	Response to submitted documents; for presentation to new Board members	Request AMS LRRS prepare Press Release announcing Secretary's selections	November
Request to AMS LRRS to prepare Press Release announcing selections	O	Advisory Board Specialist			November
Signed appointment letters and certificates	O	Advisory Board Specialist		Appointment letters are sent to selectees; certificates are presented at first scheduled Board meeting	December



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Letters for non-selectees for DA signature	N/A	Advisory Board Specialist		Send to non-selectees after signature	December
Signed letters for non-selectees	O	Advisory Board Specialist			December
<b>NOSB Meetings &amp; Other</b>					
Federal Advisory Committee Act (FACA) Database Update to include member information, reports, cost, performance measures, transcripts, and meeting information	N/A	Advisory Board Specialist	Annual update required by OFPA for NOSB as a committee operating in accordance with FACA	White House Liaison review and verification of update completion	November
NOSB Meeting site, court reporting services, and audio-visual support services procurement requests for DA approval	O	Advisory Board Specialist	In preparation for NOSB meetings occurring twice annually in the Spring and Fall	DA must review and approve documents	January/September
Approved NOSB Meeting site, court reporting services, and audio-visual support services procurement requests	I	Deputy Administrator	In response to Advisory Board Specialist submitted procurement documents	Enter signed procurement request form (AD-700) information into Integrated Acquisition Services (IAS) database to allow for processing Purchase Order for approval of vendor services received.	January/September
IAS Procurement Request Data Entry	N/A	Advisory Board Specialist	To allow contract buyer to process vendors requests for payment after services rendered	Notify contract buyer of satisfactory receipt of services rendered after completion of meeting	NLT 3rd week in February NLT 3rd week in September





## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
NOSB Conference and Travel Package Request for Spring and Fall Meetings (Package must include: procurement requests for hotel, court reporting and audio-visual services, conference agenda, vendor quotes, Conference Event Request memorandum, detailed cost analysis/estimation, and Excel spreadsheets detailing estimated travel cost for each board member.)	O	Advisory Board Specialist	To obtain Administrator or (based on dollar amount) Secretary's approval for procurement of conference facility, associated logistics and services, and Board member travel.	DA must review and approve meeting/travel package before submission to the Administrator or Office of the Secretary of Agriculture (OSEC), as applicable, prior to attachment to the Special Travel Request (STR).	Commence in February for completion NLT end of March for Spring meeting Commence in September for completion NLT end of October for Fall meeting
NOSB Conference and Travel Package Request for Spring and Fall Meetings approved by DA	I	Deputy Administrator	Required prior to submission to Administrator or OSEC Official's, as applicable, for approval	Attach to STR submitted for higher level approval.	Commence in February for completion NLT end of March for Spring meeting Commence in September for completion NLT end of October for Fall meeting
Special Travel Request with attachments for Administrator or OSEC Official's approval, as applicable (Attachments include Conference Event Request Memo, cost analysis/estimate, agenda, list of names, and Excel spreadsheet)	O	Advisory Board Specialist	After DA's sign off of Conference Event request, the Special Travel Request is prepared for Conference and Group Travel for members to attend the Board meetings. Submit as an attachment to the Special Travel Request database system.		NLT 2nd week in March NLT 2nd week in October



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Approved Special Travel Request with attachments	I	Administrator or OSEC Official	In response to Advisory Board Specialist submitted documents to allow for meeting travel	After receiving approval and prior to preparing and submitting the final authorization for approval, the Special Travel Request must be attached as a receipt to all board members GovTrip authorizations to allow board members to obtain e-tickets.	NLT 2nd week in March NLT 2nd week in October
E-mail Notification Providing Travel Instructions to New and Old Board Members	O	Advisory Board Specialist	Provide instructions on scheduling final travel and meeting site location and arrangements. The e-mail will also inform who to contact at Boersman Travel office to arrange destination flights to meeting locations	Based upon instructions received, members <u>must</u> contact the Travel office to arrange their flight schedules to attend the meeting.	NLT last week in March, and NLT last week in October
E-mail Post Travel Document to New and Old Board Members	O	Advisory Board Specialist	Provided prior to the meeting for recording and eventual submission of information regarding departure and return dates/times, and all expenses incurred during travel status to attend the meetings for reimbursement.	Based upon information received, Advisory Board Specialist will process into the GovTrip voucher database for reimbursement.	NLT last week in March NLT last week in October
GovTrip Database and Special Travel Request Update	N/A	Advisory Board Specialist	To ensure that all member's personal information is up-to-date in GovTrip. Update travel dates, accounting classification numbers, establish basic expenses, per diem rates in GovTrip for travel authorization approval. Attach approved Special Travel Request.	Prior to DA's review and approval, members travel authorization must be updated and prepare and the approved Special Travel Request must be attached as a receipt to ensure that electronic tickets are released to the members.	NLT 1st week in April NLT 1st week in October





## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Notify contract buyer of satisfactory receipt of services rendered after completion of meeting	O	Advisory Board Specialist	To allow for payment of vendors invoices.		NLT five days after completion of meeting
E-mail reminder to members to submit post-travel document and receipts for processing	O	Advisory Board Specialist	To ensure documentation is received to allow for reimbursement of member incurred travel expenses.		NLT five days after completion of travel
Post Travel Documents and receipts	I	Board Members	Required for Advisory Board Specialist to process final voucher and expense information into GovTrip.	Specialist signs voucher and forwards voucher to DA for final review and approval by National Finance Center (NFC), Minneapolis, MN, for payment.	NLT 2nd week in May NLT 2nd week in December
Travel Voucher and Post-Travel Reimbursements for DA final review and approval by NFC	O	Advisory Board Specialist	Receipt of all applicable documentation from board members; required for disbursal of funds for reimbursement.		NLT 2nd week in May NLT 2nd week in December
Decision Memo for re-establishing NOSB Charter to include the following documents: AD-811 Departmental Regulation Form; AD-116 Clearance and Approval Issuance Form; and the Civil Rights Impact Analysis Report - Departmental Regulation 1042-105	O	Advisory Board Specialist	FACA requirement; prepared for Secretary of Agriculture's approval prior to date of expiration of current charter (occurs every two years)	DA must review and approve all documents prior to routing through Secretary of Agriculture's approval chain	NLT four months prior to expiration of current charter (typically in January)

Note: Shaded I/O blocks indicate items which might be considered inputs or outputs for the individual or the division, but not for the Program as they were identified in the flow charts.



## National Organic Program Business Process Review Report

### Office of the Deputy Administrator - Quality

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
NOP Corrective and Preventive (CAP) Action Work Plan	○	Quality Manager (can be initiated by others and submitted to the Quality Manager)	NOP 1020; in response to identification of an NOP Quality Management System nonconformance and/or opportunity for improvement	Implementation of corrective and/or preventive actions	Within 60 days of identification
Corrective and Preventive (CAP) Action Summary	○	Quality Manager	NOP 1020		Within one week of implementation of work plan
Internal Audit Schedule	○	Quality Manager	NOP 1030 & 1030-1; at least annually (per calendar year)	Audits IAW NOP 1030	No later than (NLT) 15 December for following calendar year
Internal Audit Report	○	Various	NOP 1030 & 1030-2 or International Organization for Standardization (ISO) 19011:2002 Section 6 Audit Activities.	Quality Manager creates CAPs and ensures implementation within 60 days of report; auditor conducts follow-up to verify effectiveness upon implementation	
Management Review Report	○	Quality Manager	NOP 1040 & 1040-1; management review typically after internal or peer review but at least annually (per FY)	Preparation of work plans for implementation of identified actions	NLT one week after review meeting
Management Review Work Plan	○	Quality Manager	NOP 1040 & 1040-2;	Quality Manager verifies implementation and effectiveness of plan within 60 days of completion of work plan	NLT one week after review meeting

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## National Organic Program Business Process Review Report

### Office of the Deputy Administrator - Miscellaneous

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Accredited Certifying Agent (ACA) Training Certificate (training by NOP)	O	NOP Training Manager	Title 7, Part 205, §205.501(a)4; to document attendance at required training provided by NOP	Enter record of attendance into ACA files and database at time of issuance of certificate	Issued upon completion of training
ACA Training Certificate (training by others)	I	Various	Title 7, Part 205, §205.501(a)4; provided to NOP to document required training provided by others	Enter record of attendance into ACA files and database within one week of receipt of certificate	Provided to NOP no later than (NLT) one week after completion of training
NOP Staff Training Certificate		NOP Training Manager	To document attendance of training by NOP staff personnel	Enter into employee personnel records within one week of completion of training	Issued upon completion of training
<b>Bi-Monthly Newsletter</b>	O				
Initiate article list	N/A	Communications Team (Public Affairs Staff, division representatives), Office of the Deputy Administrator (ODA)	Formal Procedure not established	Generate story calendar	During last week of month before release date
Finalize article list	N/A	Communications Team (Public Affairs Staff, division representatives), ODA	Formal Procedure not established		First day of the release month
Develop articles	O	NOP staff	Formal Procedure not established	Communications team creates layout; conducts final check of articles	Fifteenth day of the release month
Clear/Review	N/A	ODA	Formal Procedure not established		During third week of release month
Release	O	Public Affairs Staff	Formal Procedure not established		Last week of release month





## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
<b>Weekly Activity Report</b>					
Receive activity updates	I	Designated division staff (Compliance: Kristin Thornblad; AIA: Bob Pooler; Standards: Melissa Bailey; ODA: Miles or designee; Cost Share: Betsy Rakola; NOSB: Lisa Ahramjian)			COB Thursdays
Compile activity report according to AMS template	O	Public Affairs staff (Soo Kim)			11 a.m. Fridays
Review activity report	N/A	ODA office (Miles McEvoy, or designee)			Noon Fridays
Send to designated USDA recipient list	O	Public Affairs staff (Soo Kim)			Noon Fridays
<b>Correspondence</b>					
Correspondence received by NOP and assigned to appropriate division to draft response	I	Congress, Federal, Foreign, or State government Organization, Certifying Agent, Certified Operation, General Public, etc.	Agricultural Marketing Service (AMS) Correspondence Procedures	Enter date correspondence is received and assigned, to whom it is assigned, and whether there is an associated deadline.	Generally within seven workdays; however, Congressional correspondence is assigned shorter response times (1-3 days)
Correspondence is finalized and sent to addressee	O	NOP Staff			One day from date draft response is received or by the deadline associated with controlled correspondence

Note: Shaded I/O blocks indicate items which might be considered inputs or outputs for the individual or the division, but not for the Program as they were identified in the flow charts.



## National Organic Program Business Process Review Report

### Standards Division

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Final Recommendation for Rulemaking	I	National Organic Standards Board (NOSB)	Office of the Inspector General (OIG) audit, NOSB, technical corrections, requests from external sources		None
Workplan	O	Standards Division (SD), Document Lead	Administrative Procedure Act (APA) of 1946, NOSB recommendation, OIG audit, technical corrections, requests from external sources	SD Director and Deputy Administrator (DA) review and sign off prior to submission to Agricultural Marketing Service Legislative and Regulatory Review Staff (AMS LRRS) Workplan does not require Office of the General Counsel (OGC) review & concurrence	Preparation timeframes are variable but typically require at least 45 days
Cleared Workplan	I	AMS LRRS	Completion of Departmental Clearance	Workplan must be cleared prior to submission of Document for Departmental Clearance Set trigger for notification/alert at 120 days for Workplan to clear	Departmental clearance typically requires a total of 120 to 135 days, i.e., - AMS Administrator (varies) - Marketing & Regulatory Program (MRP) Undersecretary (30 days) - USDA Office of Budget & Program Analysis (OBPA) (30 days) - Office of Management & Budget (OMB) (60 days)
Internal Clearance Package for Document for OGC review and concurrence	O	SD, Document Lead & SD Staff	Administrative Procedure Act (APA) of 1946	SD Director and DA review and sign off prior to submission to OGC	Preparation timeframes are variable but typically require at least 60 days
Internal Clearance Package for Document with OGC comments	I	OGC	Completion of OGC review	Set trigger for notification/alert at 45 days for Document to clear	OGC (30-60 days)



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Internal Clearance Package for Document for Departmental Clearance	O	SD, Document Lead	Administrative Procedure Act (APA) of 1946	SD Director and DA review and sign off prior to submission to AMS LRRS	Preparation timeframes are variable depending on the extent of the changes necessary for OGC concurrence but typically require at least 20 days
Internal Clearance Package for Document with Departmental Clearance comments	I	AMS LRRS	Completion of Departmental review	Set trigger for notification/alert at 120 days for Document to clear	Departmental clearance typically requires a total of 120 to 135 days, i.e., - AMS Administrator (varies) - MRP Undersecretary (30 days) - USDA OBPA (30 days) - OMB (Only if Document is significant or review is required per OMB guidelines) (60 days)
Document for publication	O	SD, Document Lead	Administrative Procedure Act (APA) of 1946		Preparation timeframes are variable depending on the extent of the changes necessary for Departmental Clearance but typically require at least 20 days
Public comment on Proposed Rule	I	Public (Comments)	Administrative Procedure Act (APA) of 1946		Public comment period (60 days)
Workplan Addendum	O	SD, Document Lead	Completion of incorporation of public comments	SD Director and DA review and sign off prior to submission to AMS LRRS Workplan Addendum does not require OGC review & concurrence	Preparation timeframes are variable depending on the level of effort necessary to incorporate changes from the original Workplan but typically require at least 45 days





## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Cleared Workplan Addendum	I	AMS LRRS	Completion of Departmental Clearance	Workplan Addendum must be cleared prior to submission of Document for Departmental Clearance Set trigger for notification/alert at 120 days for Workplan Addendum to clear	Departmental clearance typically requires a total of 120 to 135 days, i.e., - AMS Administrator (varies) - MRP Undersecretary (30 days) - USDA OBPA (30 days) - OMB (60 days)
Internal Clearance Package for Document for OGC review and concurrence	O	SD, Document Lead & SD Staff	Administrative Procedure Act (APA) of 1946	SD Director and DA review and sign off prior to submission to OGC	Preparation timeframes are dependent on the number and substance of comments received and may involve additional internal discussion, briefing packages, comment summaries, etc., but typically require at least 60 days
Internal Clearance Package for Document with OGC comments	I	OGC	Completion of OGC review	Set trigger for notification/alert at 45 days for Document to clear	OGC (30-60 days)
Internal Clearance Package for Document for Departmental Clearance	O	SD, Document Lead	Administrative Procedure Act (APA) of 1946	SD Director and DA review prior to submission to AMS LRRS	Preparation timeframes are variable depending on the extent of the changes necessary for OGC concurrence but typically require at least 20 days



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Internal Clearance Package for Document with Departmental Clearance comments	I	AMS LRRS	Completion of Departmental review	Set trigger for notification/alert at 120 days for Document to clear	Departmental clearance typically requires a total of 120 to 135 days, i.e., - AMS Administrator (varies) - MRP Undersecretary (30 days) - USDA OBPA (30 days) - OMB (Only if Document is significant or review is required per OMB guidelines) (60 days)
Document for publication	O	SD, Document Lead	Administrative Procedure Act (APA) of 1946		Preparation timeframes are variable depending on the extent of the changes necessary for Departmental Clearance but typically require at least 20 days

Note: Shaded I/O blocks indicate items which might be considered inputs or outputs for the individual or the division, but not for the Program as they were identified in the flow charts.



## National Organic Program Business Process Review Report

### Accreditation & International Activities Division

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
<b>ACCREDITATION</b>					
Accredited Certifying Agents Approved to Issue TM-11 Export Certificates under an Export Arrangement between the US and a Foreign Government – list of Accredited Certifying Agents (ACAs) approved; posted on website	O	Accreditation & International Activities (AIA) Division (signed by Director, AIA)	NOP 2402	Update NOP 7020, List of Accredited Certifying Agents Authorized to Issue TM-11 Export Certificates E-mail to the NOP webmaster for posting to the Agricultural Marketing Service (AMS) Website	No later than (NLT) one week after NOP approval
Accreditation Surrender Acceptance Letter – response to ACAs that have voluntarily surrendered accreditation	O	AIA Division (signed by Director, AIA)	ACA Accreditation surrender letter	File E-mail to NOP webmaster for posting to the AMS Website	NLT one week from receipt of surrender letter
Annual List of Certified Operations	I	Accredited Certifying Agents	NOP 2000 & 2026	Update list E-mail to NOP webmaster for posting to the AMS Website	NLT 2 January
Update List of Certified Operations	N/A	AIA Division, Program Specialist	NOP 2026	E-mail to NOP webmaster for posting to the AMS Website	NLT 15 January
Annual Update Checklist - submitted by ACAs	I	ACA	NOP 2000, 2024, & 2024A	Note receipt and file E-mail acknowledgement of receipt to ACA	NLT close of business (COB) on the anniversary date of the notification of accreditation
Annual Update Late Submission Notice* - sent to ACAs that have not submitted Annual Update	O	AIA Division (signed by Director, AIA)	No ACA Annual Update submission.	Notice of Non-compliance (NoNC) issued when no submission received	NLT one week after due date
Application Closure Letter	O	AIA Division (signed by Director, AIA)	In response to a submitted incomplete Application for Accreditation		



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Authorization to Issue Export Certificates Adequacy Audit – checklist (17011) used to conduct desk audit and demonstrate approval of an ACA's Export Certificate program	O	AIA Division, Program Specialist	NOP 2402; ACA request for authorization to issue certificates.	TM-11 Approval Letter E-mail request to NOP webmaster for posting of list of ACAs approved to issue certificates to AMS Website	Notification of receipt of application within five working days; status of application within 30 working days of acknowledgement of receipt
Certificate of Accreditation	O	AIA Division, Accreditation Manager	NOP 2000; Application for Accreditation, successful Desk Review and Pre-decisional Assessment, and acceptance of Terms of Accreditation	Annual Updates (NLT COB on anniversary date), Annual List of Certified Operations (2 Jan), Initial Assessment (NLT 2 yrs after Accreditation approval date), Mid-term Surveillance Assessment (> 1 yr after Initial Accreditation Assessment and > 1 yr prior to end of accreditation term)	NLT one week after Accreditation Committee review of Pre-decisional Assessment
Corrective Action (CA) Report	O	AIA Division, Regional Accreditation Manager (RAM)	Prepared to document ACA Corrective Action Assessment/Review		NLT one week after completion of Assessment/Review
Notice of Accreditation – issued after pre-decisional audit	O	AIA Division, Regional Accreditation Manager	NOP 2000; Application for Accreditation and successful Desk Review and Pre-decisional assessment	Issue Certificate of Accreditation E-mail to NOP webmaster for posting accreditation status to AMS Website	NLT one week after Accreditation Committee review of Pre-decisional Assessment
Notice of Continuation of Accreditation – issued after Initial and Mid-Term audits	O	AIA Division, Regional Accreditation Manager	NOP 2000; issued after successful Initial and Mid-Term Assessments	E-mail to NOP webmaster for posting to the AMS Website	
Notice of Denial of Accreditation – issued for initial applicants for accreditation only	O	AIA Division, Accreditation Committee (signed by AMS Administrator)	NOP 2000	E-mail to NOP webmaster for posting to the AMS Website	



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Notice of Denial of Renewal - issued for renewal applicants for accreditation	O	AIA Division, Regional Accreditation Manager (signed by AMS Administrator)	NOP _____	E-mail to NOP webmaster for posting to the AMS Website	
Notice of Denial of Reinstatement of Accreditation – for an ACA	O	AIA Division, Regional Accreditation Manager (signed by Director, AIA)	NOP 2000	E-mail to NOP webmaster for posting to the AMS Website	
Notice of Denial of Reinstatement of Certification – for a certified operation	O	AIA Division, Regional Accreditation Manager (signed by Deputy Administrator)	NOP 2605	E-mail to NOP webmaster for posting to the AMS Website	
Notice of Non-compliance (NoNC) -> based on audit report (static-language cover letter that accompanies audit report with NoNCs, requesting corrective / preventive actions response to findings identified in report)	O	AIA Division, Regional Accreditation Manager (signed by Director, AIA)	NOP 2000		Usually 30-60 days allowed for response
Notice of Non-compliance (NoNC) - used for any / all other NoNC letters issued out of AIA	O	AIA Division, Regional Accreditation Manager (signed by Director, AIA)	NOP 2000		Usually 30-60 days allowed for response
Notice of Non-compliance Resolution	O	AIA Division, Regional Accreditation Manager (signed by Director, AIA)	NOP 2000; in response to proposed corrective actions submission by ACA		NLT 30 days from receipt of proposed corrective action



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Notice of Proposed Revocation of Accreditation	O	AIA Division, Regional Accreditation Manager (signed by NOP Deputy Administrator)	NOP 2000	May result in appeal to AMS Compliance & Analysis Program (C&A) with associated staff involvement	
Notice of Proposed Suspension of Accreditation	O	AIA Division, Regional Accreditation Manager (signed by NOP Deputy Administrator)	NOP 2000	May result in appeal to AMS C&A with associated staff involvement	
Notice of Reinstatement of Accreditation – for an ACA	O	AIA Division, Regional Accreditation Manager (signed by AMS Administrator)		E-mail to NOP webmaster for posting of accreditation status to AMS Website	
Notice of Reinstatement of Certification – for a certified operation	O	AIA Division, Regional Accreditation Manager (signed by AMS Administrator)	NOP 2605, Exhibit E; Letter and supporting documents from operator and/or applicable ACA requesting reinstatement	E-mail to NOP webmaster for posting to the AMS Website	
Notice of Renewal of Accreditation – issued every 5 years, after re-accreditation audits	O	AIA Division, Regional Accreditation Manager (signed by AMS Administrator)	NOP 2000; upon successful completion of Reaccreditation Assessment	E-mail to NOP webmaster for posting of accreditation status to AMS Website	
Notice of Revocation of Accreditation – issued to ACA upon revocation	O	AIA Division, Regional Accreditation Manager (signed by AMS Administrator)	NOP 2000	E-mail requesting NOP webmaster to post accreditation status to AMS Website	
Notice of Revocation of Accreditation to ACA clients – issued to ACA clients upon ACA's revocation	O	AIA Division, Regional Accreditation Manager	Issued to ACA clients upon ACA's revocation of accreditation	E-mail requesting NOP webmaster to post accreditation status to AMS Website	





## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Notice of Suspension of Accreditation – issued to ACA upon suspension	O	AIA Division, Regional Accreditation Manager (signed by AMS Administrator)	NOP 2000	E-mail requesting NOP webmaster to post accreditation status to AMS Website	
Notice of Suspension of Accreditation to ACA clients – issued to ACA clients upon ACA's suspension	O	AIA Division, Regional Accreditation Manager	Issued to ACA clients upon ACA's suspension of accreditation		
Re-accreditation Late Submission Notice* - sent to ACAs that have not submitted reaccreditation (5-year) paperwork	O	AIA Division, Regional Accreditation Specialist			NLT one week after due date, i.e., six months prior to anniversary date
Reminder Notice of Pending Expiration of Accreditation	O	AIA Division, Program Specialist	NOP 2000; 5 year anniversary date of accreditation		Approx. one year prior to five year anniversary date
Reminder Notice to Submit Annual Update	O	AIA Division, Program Specialist	NOP 2024; annual anniversary date of accreditation		NLT one month prior to annual anniversary date
Reminder Notice to Submit Client List	O	AIA Division, Program Specialist	NOP 2026		1 December
Template for Submitting Client List – Excel spreadsheet	I	NOP	NOP 2026		2 January



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Temporary Variance Approval Letter	O	AIA Division, Regional Accreditation Manager (signed by AMS Administrator)	NOP 2606; in response to recommendations for temporary variance NOP regulations submitted by ACAs or SOP	E-mail request to NOP webmaster to post variance decision to AMS Website NOP staff will maintain records of temporary variances granted on the NOP shared drive with a copy in the ACAs file under the relevant calendar year. Regional Accreditation Manager monitors for compliance with the scope, details, and duration of the temporary variance.	Recommendation for variance evaluated within three days of receipt; if complete, NOP recommendation to approve/disapprove to AMS within seven days of receipt
Terms of Accreditation	O	AIA Division, Regional Accreditation Manager	Issued to Applicant/ACA for their signature indicating acceptance	Issue Certificate of Accreditation to the Applicant/ACA upon return of signed record	
Terms of Accreditation - signed by ACA	I	ACA	Acceptance of Terms of Accreditation for issuance or renewal of Certificate of Accreditation	Issue Certificate of Accreditation to the Applicant/ACA upon receipt.	
TM-10CG Application for Accreditation	I	Applicant for Accreditation	NOP 2000 & 2024		
TM-11 Approval Letter	O	AIA Division, Regional Accreditation Manager (signed by Director, AIA)	NOP 2402; ACA request for authorization to issue certificates.	E-mail request to NOP webmaster for posting of list of ACAs approved to issue certificates to AMS Website	Notification of receipt of application within five working days; status of application within 30 working days of acknowledgement of receipt
E-mail to NOP webmaster requesting posting of status of accreditation or other action to the AMS Internet Web site	O	AIA Division, Program Specialist, International Activities Manager	NOP 2000; Various		Within one day of change in status



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
E-mail acknowledgement of receipt of Annual Updates	O	AIA Division, Program Specialist	NOP 2024		Within one day of receipt of update
E-mail to NOP webmaster requesting posting of updated list of ACAs approved to issue export certificates	O	AIA Division, International Activities Manager	NOP 2402 & 7020		Within one day of approval
E-mail to NOP webmaster requesting posting of updated list of Certified Operators	O	AIA Division, Program Specialist	NOP 2026		Within one day of completion of updates
E-mail to NOP webmaster requesting posting of status of certification reinstatement to the AMS Internet Web site	O	AIA Division, Accreditation Manager			Within one day of change in status
Letter from Suspended Operator Requesting Reinstatement	I	Suspended Operator and/or applicable ACA	NOP 2605; Notice of Suspension of Certified Operator	Review and/or assessment to approve/disapprove request; issue applicable letter to operator, copy to ACA	NLT two weeks after receipt of request
Letter from Suspended ACA Requesting Reinstatement	I	Suspended ACA	Notice of Suspension issued by NOP to ACA/Triggered by the expiration of ACA suspension.		
Letter of Accreditation Surrender from ACA	I	ACA wishing to surrender accreditation			
Letter Requesting Temporary Variance	I	Certified Operation or ACA	NOP 2606		
Temporary Variance Denial Letter	O	AIA Division, Regional Accreditation Manager	NOP 2606		
Pre-Decisional Audit Report	O	AIA Division, Regional Accreditation Manager	NOP 2000		



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Proposed Corrective Actions for audit results (from ACA)	I	ACA	Notice of Noncompliance received as a result of initial, mid-term, or reaccreditation audit		
Proposed Corrective Actions for other NoNCs (from ACA)	I	ACA	Notice of Noncompliance received as a result other surveillance activity		
E-mail from ACA Requesting TM-11 Approval	I	ACA	Request from certified operation to export organic products.		
<b>RECOGNITION / EQUIVALENCY</b>					
Equivalency Audit Report – sent via e-mail, with a request for technical corrections; 2nd time to address findings; 3rd time finalized report sent. E-mail is NOT a template	O	AIA Division, International Activities Manager	NOP 2200		
International Organization for Standardization (ISO) 17011 Worksheet	I	ACA	NOP 2200 & 2201; Part of Recognition Application		
Letter Requesting Recognition Review – to initiate Recognition on-site audit	I	ACA	Part of Recognition Application		
Notice of Equivalency Agreement	O	USDA	NOP 2100; in response to foreign government's request for equivalency after necessary review and evaluation of program and only after input from the Foreign Agricultural Service (FAS) and U.S. Trade Representative (USTR)		NLT two weeks after receipt of request
Notice of Recognition Agreement	O	USDA	NOP 2200; in response to foreign government's application for recognition after necessary review and evaluation of program		NLT two weeks after receipt of request





## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Peer Review Audit Request – to initiate Equivalency on-site audit	O	AIA Division, International Activities Manager	NOP 2100 and Peer Review Procedures being developed, but not yet finalized		
Recognition Audit Report – sent via e-mail, with a request to address findings. E-mail is NOT a template.	O	AIA Division, International Activities Manager	NOP 2200 and only when priority has been set to proceed by FAS and USTR		
Proposed Corrective Actions to Recognition Audit Report	I	Foreign government applying for recognition			
Notice of Denial of Recognition Agreement	O	USDA			
<b>ARC DOCUMENTS:</b>					
Adequacy (Desk) Audit Report	I	AMS/L&S/ARC Branch	Application for Accreditation: TM-10CG		
Initial On-site Audit Report	I	AMS Livestock & Seed Program, Audit, Review, & Compliance (ARC) Branch	NOP 2000; assessment required NLT 1 year after pre-decisional assessment; requested by AIA	Accreditation Committee reviews and provides a recommendation to the AMS Administrator	Within 30 days of completion of audit
LS-313 Application for Service – this may ALSO be sent by ARC, but could be sent by AIA	I	ARC	NOP 2004; must accompany Application for Accreditation to provide billing authority for ARC for document reviews and audits conducted under the NOP		
Mid-Term Audit Report	I	ARC	NOP 2000; assessment required > 1 year after Initial Assessment and > 1 year prior to end of accreditation term; requested by AIA	NOP Accreditation Manager reviews for possible additional action	Within 30 days of completion of audit
Surveillance Reaccreditation Audit Report	I	ARC	NOP 2000; assessment required for reaccreditation; requested by AIA	Accreditation Committee reviews and provides a recommendation to the AMS Administrator	Within 30 days of completion of audit



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
<b>INTERNAL DOCUMENTS</b>					
Accreditation Meeting Checklist	○	AIA Division, Chairperson, Accreditation Committee			
NOP Audit Checklist	○	AIA, ARC			
Annual Summary Analysis Report for NOP Accreditation Audits	○	AIA Division, Accreditation Manager	NOP 2004-6; submitted to Director, AIA	AIA Director presents a copy of the report with recommendation to Deputy Administrator within 30 days of receipt	Within 30 days of end of FY

Note: Shaded I/O blocks indicate items which might be considered inputs or outputs for the individual or the division, but not for the Program as they were identified in the flow charts.





## National Organic Program Business Process Review Report

### Compliance & Enforcement Division

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
<b>EXTERNAL</b>					
Witness/Interviewee Affidavit	O	Compliance & Enforcement (CE) Division, Compliance Specialist	NOP 4005 & 4005-2 (Template)		Prior to onsite investigation
Exempt Declaration	I	Operator	In response to request by NOP to have a written statement by the operator that they meet the certification exemption criteria stated in Title 7, Part 205, §205.101.	File as correspondence	
Acknowledgement of Complaint	O	CE Division, Complaint Coordinator	NOP 4001	Process complaint per NOP 4001	Within 72 hours of receipt (Note: Immediate acknowledgement occurs when filed through NOPCompliance@usa.gov)
Non-Jurisdictional Closure Letter to Complainant	O	CE Division, Complaint Coordinator (signed by Deputy Administrator, NOP)	NOP 4001 & 4001-1, Template 1; in response to incoming correspondence		Within one week of receipt of communication
Referral of Complaint to a State Organic Program for Investigation	O	CE Division, Complaint Coordinator (signed by Director, CE)	NOP 4001 & 4001-1, Template 3; in response to incoming correspondence alleging violation		Within one week of receipt of communication
Notice to Complainant of Referral to State Organic Program	O	CE Division, Complaint Coordinator (signed by Director, CE)	NOP 4001 & 4001-1, Template 4; in response to incoming correspondence alleging violation		Within one week of receipt of communication
Request to an Accredited Certifying Agent to Investigate	O	CE Division, Compliance Specialist (signed by Director, CE)	NOP 4001 & 4001-1, Template 5; in response to incoming correspondence alleging violation	Follow-up with Accredited Certifying Agent (ACA); 30 day deadline for response from the ACA	Within one week of receipt of communication



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
Initial telephone contact to complainant and charged party	N/A	CE Division, Compliance Specialist	NOP 4001	Follow-up E-mail summarizing telephone conversation	Within one week of assignment
Follow-up E-mail Summarizing Telephone Conversation	O	CE Division, Compliance Specialist	NOP 4001 & 4001-1, Template 6; documentation of initial telephone contact to complainant and charged party	Charged party should respond within 2 weeks.	Immediately after the telephone contact made within one week of assignment.
Initial Contact Letter to Operator	O	CE Division, Compliance Specialist	NOP 4001 & 4001-1, Template 7; written notification to charged party	Cease-and Desist Letter issued if no response within 5 days	Within one week of receipt of assignment
Cease-and-Desist Letter to Operator	O	CE Division, Compliance Specialist (signed by Director, CE)	NOP 4001 & 4001-1, Template 8; issued if no response to contact letter	Final Information Request to Operator issued if no response to cease-and-desist letter	Within one day of response due date
Final Information Request to Operator	O	CE Division, Compliance Specialist	NOP 4001 & 4001-1, Template 9; issued if no response to cease-and-desist letter		Within one day of response due date
Notice to Complainant of Case Closure	O	CE Division, Compliance Specialist (signed by Deputy Administrator, NOP)	NOP 4001 & 4001-1, Template 11	Case Closure Memorandum	Within one week of case closure
Notice to Accredited Certifying Agents of Investigation Results – No Violations	O	CE Division, Compliance Specialist (signed by Deputy Administrator, NOP)	NOP 4001 & 4001-1, Template 12	Case Closure Memorandum	Within one week of case closure
Notice to Accredited Certifying Agents of Investigation Results – Noncompliance	O	CE Division, Compliance Specialist (signed by Deputy Administrator, NOP)	NOP 4001 & 4001-1, Template 13		Within one week of completion of investigation
Resolution of Noncompliances to Operator	O	CE Division, Compliance Specialist	In response to proposed corrective action by the operator		No later than (NLT) 30 days from receipt of proposed corrective action



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
<b>INTERNAL TO CE DIVISION/NOP</b>					
Document Router	○	CE Division, Compliance Specialist	Internal CE administrative requirement		
Complaint Investigation Chronology Log	○	CE Division, Complaint Coordinator	NOP 4001 & 4001-1, Template 2		Within one day of assignment of investigation
Investigative Plan	○	CE Division, Compliance Specialist	NOP 4005 & 4005-1 (Template); Upon assignment to perform an onsite investigation		Within five days of assignment of investigation
Report of Investigation (ROI)	○	CE Division, Compliance Specialist	NOP 4001 & 4001-1, Template 10		NLT 180 days from initiation of investigation
Case Closure Memorandum	○	CE Division, Compliance Specialist (signed and forwarded as recommendation by Director, CE)	NOP 4001 & 4001-1, Template 14	Review and approval signature by Deputy Administrator, NOP Update and close out Complaint Database and case folders.	Within one week of completion of investigation
CE Division Weekly Activity Report	○	CE Division, Director	Internal NOP management/ administrative requirement for eventual input to meet USDA requirement		
CE Division Bi-Monthly Activity Report	○	CE Division, Director	Internal NOP management/ administrative requirement		
<b>INTERNAL DOCUMENTS TO USDA</b>					
OGC Transmittal Memorandum	○	CE Division, Compliance Specialist (signed by Director, CE)	Part of request to initiate formal administrative proceeding in case involving civil penalties		
CE Division Bi-Weekly Status Report	○	CE Division, Complaint Coordinator	Internal NOP administrative requirement for statistical data on case load and status		



## National Organic Program Business Process Review Report

Document/Event	I/O	Generated By/ Submitted By	Required By/In Response To/ Triggered by	Additional Requirements/ When	Suspense
<b>EVENTS</b>		<b>Initiated By</b>			
Follow-up Monitoring of Complaints (Cease & Desist)	N/A	CE Division, Director	NOP 4003; issuance of Cease and Desist letter (random sample of 5% of total relevant cases)		Within six month period following the end of the FY
Follow-up Monitoring of Complaints (Suspended or Revoked)	N/A	CE Division, Director	NOP 4003; issuance of suspension or revocation (including cases closed with consent decrees or settlement agreements) (random sample of 5% of total relevant cases)		Within six month period following the end of the FY

Note: Shaded I/O blocks indicate items which might be considered inputs or outputs for the individual or the division, but not for the Program as they were identified in the flow charts.