

CHAPTER 1

GENERAL INFORMATION

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1.1 POLICY

The Grain Inspection, Packers and Stockyards Administration, Federal Grain Inspection Service (FGIS), is responsible for the effective performance of the official inspection and weighing system. To ensure that the official system provides high quality service that meets or exceeds the customer's expectations, FGIS shall maintain a quality assurance\ quality control (QA\QC) program or system that encompasses all Federal, state, and private agencies delegated, designated, or otherwise authorized to provide official services.

- a. FGIS' QA\QC program is the fundamental basis upon which the official system relies on to provide quality service. Consequently, the QA\QC activities performed by the Board of Appeals and Review (BAR), FGIS field offices, or official agencies shall be considered as being of equal importance to providing official services.
- b. The complexity of local markets will govern both the design and staffing requirements of local QA\QC systems. The QA\QC program staffing needs in FGIS' export offices, which have direct authority over many agricultural commodity graders (ACGs) and serve as a liaison with domestic points of origin, will differ from the needs of FGIS' domestic offices. Likewise, the degree of direct involvement by the field office manager (FOM) will differ among offices depending on the level and complexity of original services provided by the office.
- c. Regardless of an office's situation, **QA\QC duties must be viewed as primary--** not secondary--functions, and each FOM must ensure that his/her respective quality assurance specialist (QAS) has adequate resources to operate an effective QA\QC system. Likewise, each official agency manager (OAM) must completely support his/her agency quality assurance specialist (AQAS).
- d. **Each FGIS field office and official agency must have at least one QAS.** Offices with two or more QAS/AQAS must designate one as the **Primary--** for BAR/field office liaison purposes. Offices may elect to have additional inspectors/graders who assist the QAS/AQAS; e.g., grading monitoring samples.

1.2 BACKGROUND

In January 1994, FGIS established a three-member ad hoc factfinding team (FFT) to evaluate the effectiveness of the national inspection system's quality assurance processes and to make recommendations for improvement. The FFT report, which was developed with input from FOMs, industry representatives, and senior FGIS managers, provided a basic framework for an effective QA\QC system. The report stated that the national inspection system's QA\QC system must be:

- Statistically-sound.
- Field-based and field-owned.
- Flexible--able to be tailored to any situation.

- Focused on preventing problems, not just finding them.
- Designed to encourage teamwork and lateral communication.
- Able to provide some performance measurement (i.e., mini-GIMS).
- Customer directed (i.e., BAR serves QAS; QAS serves ACGs and licensed inspectors (LIs)).

1.3 OVERVIEW

- a. FGIS' QA\QC program is a proactive system for monitoring grading accuracy and ensuring consistent inspection results, both on a national and a local basis. It also provides official agencies and FGIS field offices with a wealth of information and a wide range of analytical tools which will greatly enhance their ability to prevent quality problems and address quality concerns.
- b. The new QA\QC program involves multiple systems and activities working together to ensure that the national inspection system provides quality service. All levels of the national system--Federal, state, and private--play an important role.
- c. Key features of the new program are:
 - QA\QC-dedicated computers, with special software and expanded data storage/retrieval capability, are in place at the local level (field office).
 - Local personnel are trained on data input, electronic data transfer, output, data analyses, and graphing.
 - National QA\QC processes will be uniformly accomplished. The processes use a balance of feedback (reactive) and forward (proactive) control tools.
 - Mandatory official agency participation in selected quality processes.
 - Local QA\QC processes that are standardized but flexible in usage and used as needed to detect and prevent grading disagreements.
 - Identification of critical control points (CCPs) at each service location. These are factors and/or subfactors that have historically needed special emphasis due to the difficulty of the test or frequency of the problems in the marketing system.
 - A management philosophy/culture change from inaction-reaction to action-prevention.

1.4 NATIONAL PROGRAMS

- a. National (QA\QC) programs are processes that must be uniformly conducted and/or participated in by all official inspection locations. These programs include:
- (1) The national Sample Inspection and Monitoring System (SIMS),
 - (2) The BAR/QAS Subjective Testing and Evaluation Process (STEP),
 - (3) BAR-initiated referee and survey sample exchange programs,
 - (4) The Intermarket Monitoring Program (IMP),
 - (5) Crop quality studies, and
 - (6) The FGIS Early Alert Program.

The aforementioned programs provide a reasonable balance between performance and ability at the national level, and are considered critical to the credibility of official testing services.

NOTE: It cannot be overemphasized that the quality tools and processes that comprise the national program represent the minimum QA\QC effort needed to assure national uniformity, prevent major problems, maintain grading tolerances, and evaluate the standards. But, to improve quality, field offices and agencies must develop strong, local (QA\QC) programs that build on the foundation laid by the national program.

- b. Like the Grain Inspection Monitoring System (GIMS), national SIMS is a file sample monitoring program. Also like GIMS, it has two purposes: to monitor the quality of the inspection service provided by the official inspection system (primary), and to provide data to evaluate standards and procedures (secondary).
- c. BAR/QAS STEP program is a proactive quality control process that requires routine separation exchanges between the QAS and the BAR. The sample selection and submission rates may be varied according to the complexity of the market, prevailing market conditions, and the QAS' familiarity with and understanding of those conditions. When properly executed, STEP provides for continuous evaluation of the QAS' individual interpretive skills and provides specific and timely feedback to assure proper alignment at the local and national levels.
- d. BAR-initiated referee and survey sample exchange programs are also integral components of the national QA\QC framework. These programs provide FGIS with an efficient mechanism to identify weaknesses and direct and control needed improvement efforts. Referee/survey sample data compliments data obtained via SIMS and STEP. And, like STEP, referee/survey samples focus on ability, not performance.

- e. The IMP program compares origin and destination (domestic) inspection results on individual barge and railcar shipments; thus, serving as the ultimate verification as to whether the official system is meeting the needs and expectations of the customer.
- f. FGIS' Crop Quality and Early Alert programs provide the official system and end users with information about the quality of the new crop and recent regional shipments. This allows FGIS to "head-off" problems before they get out of hand.

1.5 LOCAL PROGRAMS

- a. Local (QA\QC) programs are vital links in the quality chain. Unlike the national program, local programs allow field offices and agencies an opportunity to directly address or prevent local/regional problems and to monitor factors and subfactors that are unique to their area. These programs also promote team building and provide a fertile ground for pilot testing new, innovative QA\QC approaches. Local programs must be flexible. Consequently, they will vary from circuit to circuit. But, within each circuit, local programs must be uniformly conducted and/or participated in by all service points and official personnel. Local programs may include:
 - (1) A local Sample Inspection and Monitoring System (SIMS),
 - (2) QAS/AQAS Subjective Testing and Evaluation Processes (STEP),
 - (3) Field office-initiated referee and survey sample exchange programs, and
 - (4) A wide range of QA\QC tools, such as over-the-shoulder reviews, opinion samples, and same portion monitoring.
- b. Every FGIS field office manager must develop a local program for his/her circuit by October 1, 1996. Local programs should be designed to focus on factors/ subfactors and procedures that most affect the quality of the inspections performed in the circuit.
 - (1) Assessing Needs. Prior to developing a local program, the FOM should meet with key field office and official agency personnel to identify and prioritize the circuit's inspection vulnerabilities; i.e., what factors are most likely to challenge the circuit's inspectors.
 - (2) Designing Local Programs. The local program must be:
 - Focused--target factors/subfactors that are of most importance.
 - Flexible--able to be changed as the local situation changes.
 - Sound--use nationally recognized QA\QC tools.
 - Easy to administer--keep red-tape to a minimum.
 - Able to provide accountability--show progress and improvement.
 - Measurable--can be gauged in terms of money and human resources.

- (3) Documenting Local Programs. Local programs must be documented, in writing, and signed by the FOM.
- Documentation must be holistic--cover all local/field office concerns including the technical supervision of ACGs, as well as the monitoring of official agencies.
 - Documentation must be specific; i.e., who will do what, what will be done, when will it be done, and where will it take place.
 - Documentation must provide for periodic evaluation and revision.
 - Documentation must address intermarket complaint monitoring/resolution, new crop studies, and early alerts.
 - Documentation must cover all local crops and programs.
- (4) Announcing Local Programs. The FOM must share the details of the local program with all effected groups and individuals, including ACGs.

1.6 ONLINE QUALITY CONTROL

One of the most important actions we can take for assuring quality is to provide inspectors the tools needed to ensure that analyses are performed correctly the first time. Inspectors need to know that the equipment that they are using is performing accurately. They also need to have tools available to aid them in making difficult subjective determinations. The best way to improve quality is by providing online personnel with the tools needed to prevent errors in the first place. Online quality control tools include:

- Check testing procedures.
- Instrument calibrations.
- Reference samples.
- Interpretive line slides.
- Interpretive line prints.
- Wheat variety samples.
- Wheat classification handbook.

1.7 ROLES AND RESPONSIBILITIES

- a. Director - Field Management Division. Responsible for ensuring that providers of official inspection services optimize the utilization of the QA\QC system and deliver quality service to customers.
- b. Director - Technical Services Division. Provides technical services to support the FGIS' QA/QC system; e.g., technical training, research, central reference standards, and problem solving support.
- c. Quality Coordinator.
 - (1) Serves as FGIS' primary contact/representative for QA\QC issues and programs;
 - (2) Oversees the day-to-day operation of the national program;
 - (3) Works in close relationship with the BAR in initiating modifications and changes to BAR-directed QA\QC programs and otherwise serves as an active liaison between the BAR and FGIS field offices in planning, developing, and implementing national QA\QC initiatives;
 - (4) Participates, with the Director of Field Management Division, in evaluating QA\QC programs and effectuating changes when deemed necessary;
 - (5) Works with the FGIS Training Officer to plan, direct, and coordinate QA\QC training;
 - (6) Facilitates QA\QC communications between Headquarters, Technical Services Division (TSD), the BAR, FGIS field offices, and official agencies; and
 - (7) Coordinates QA\QC technical (computer/statistical) support activities.
- d. Board of Appeals and Review.
 - (1) Serves as the central reference for grading factors;
 - (2) Checktests, align, and calibrate inspection equipment, including moisture meters, dockage testers, and protein analyzers;
 - (3) Provides technical training, investigation, and problem solving assistance, as requested by the Quality Coordinator or field office managers;
 - (4) Maintains and supports anchor agreements with QAS;
 - (5) Ensures and demonstrates stable alignment with accepted standards;
 - (6) Provides advance information on crop quality and potential grading problems to the inspection system;
 - (7) Develops new and improved inspection methodology and QA\QC tools, and maintains proven processes to assure the integrity of BAR results; and

(8) Maintains the master IMP data base and performs all necessary statistical analyses.

e. Field Office Managers.

- (1) Oversee the day-to day operation of the local QA\QC program in the field office circuit;
- (2) Initiate and direct the resolution of local QA\QC problems;
- (3) Ensure that the QAS is in line with the BAR;
- (4) Ensure that ACGs and LIs are properly trained and local QA\QC programs are developed and implemented; and
- (5) Liaison with OAMs to ensure compliance with national and local QA\QC programs.

1.8 ANCHOR AGREEMENTS

- a. Anchor agreements establish the protocol between the BAR and an FGIS field office, or between an FGIS field office and an official agency, for the purpose of maintaining alignment on interpretive factors and/or subfactors.
- b. FGIS field offices must have written anchor agreements (see attachment 1) with the BAR. Official agencies must have written anchor agreements (see attachment 2) with the local FGIS field office.
- c. The agreements must:
 - Identify the individuals designated by the field office/agency as the QAS/AQAS, as well as any and all “back up” or assistant QAS/AQAS;
 - Specify the QA\QC tools that will be used to monitor the grading accuracy of the field office/agency--including participation in national/local SIMS;
 - Establish the policy on attending BAR/field office quality meetings (e.g., each AQAS must attend an annual field office meeting and is encouraged to attend as many quarterly meetings as possible);
 - Identify CCPs (Field Office/BAR agreements must also include STEP sample submission rates); and
 - Outline the internal processes that will be used for assuring interpretive alignment between the respective offices.

NOTE: Anchor agreements merely document local policies, the importance of certain grading factors, and the frequency that particular kinds of separations/samples are to be forwarded to the BAR or field office. Consequently, they should be reviewed and updated, as situations change.

Attachment 1, "Example-Field Office/BAR Anchor Agreement"

ANCHOR AGREEMENT BETWEEN THE FARMLAND FIELD OFFICE AND THE BOARD OF APPEALS AND REVIEW

To ensure that the Farmland Field Office, Quality Assurance Specialist's (QAS) subjective interpretations are properly and consistently aligned with the Board of Appeal and Review (BAR) and that such interpretations are efficiently and effectively disseminated and monitored throughout the circuit, we agree to comply with the following Quality Action Plan.

General Information.

The Farmland Field Office oversees inspections provided by 6 private/state agencies, who employ a total of 50 inspectors. The grain/commodities inspected at one or more of these locations include corn, wheat (HRS, HRW, and Durum), soybeans, sorghum, and edible beans (pea beans, pintos, kidneys, and great northrens).

The Farmland Field Office's QAS is John Homes, the Back-up QAS is Mike Freeman.

The subjective factors/subfactors routinely seen in this market and which we consider to be critically important from a quality control standpoint, hereafter referred to as critical control points (CCPs) are :

Corn	germ and mold damage.
Wheat	germ, mold, and scab damage; DHV, HVAC, and WOCL.
Soybeans	damage-by-heat and heat damage.
Sorghum	germ and mold damage.
Edible Beans	dirt/grime, machine damage, water blistered, and frost damage.

Less frequently seen factors/subfactors that when present also challenge the inspection system's ability to uniformly and consistently apply the correct interpretation include:

Corn	blight and frost damage.
Wheat	sprout damage.
Sorghum	sprout damage and class.

QAS Responsibilities.

- Submit a minimum of one separation per month for each primary CCP listed to the BAR for review. Submissions will represent market channel samples and challenge the QAS' ability to apply the correct interpretation. Depending on market/crop conditions, CCPs are subject to change.
- Submit, on a bimonthly basis, separations representing those factors/subfactors that are infrequently seen in the marketplace. To maintain proficiency, a minimum of two separations for each factor/subfactor listed will be forwarded to the BAR during each six month period.
- Controversial samples/separations in which the QAS' interpretation is challenged by a line inspector will be forwarded to the BAR for opinion and final decision.
- The QAS will maintain a routine separation exchange program (minimum - one sample per week) with all supporting QC personnel (i.e., back-up QAS and ACGs) to ensure consistent interpretations.
- When necessary, to ensure timely and proper adjustments are made in the QAS' interpretation, the QAS will review returned BAR separations, consider any verbal or written explanations offered, and, to confirm their understanding of the correction/explanation, resubmit a separation for review.
- The QAS will immediately inform, personally or through recognized QA\QC personnel, all inspectors of any adjustment in interpretation and conduct necessary follow-up to ensure proper understanding and maintain control of the change.
- The QAS will maintain an awareness of current market/crop conditions and alert inspectors within their circuit, known intermittent or destination inspection points, and the BAR of any potential grading problems. Upon request, separations or type samples illustrating the condition present will be prepared and distributed.
- The QAS or the Back-up QAS will, at least monthly, collect and analyze monitoring data to detect possible inspector or system related weaknesses. The QAS will openly discuss grading problems with their regional contract person and keep them apprised of future developments.

BAR Responsibilities.

- The BAR will provide the QAS with timely and specific feedback concerning the accuracy of their separations.
- At least monthly, or upon request, the BAR will generate a comparison summary of the submitted separations. Included in the report will be graphs that will assist QC personnel in detecting undesirable trends or tracking the progress of any improvement efforts.
- Periodically, the BAR will forward survey/referee samples to randomly selected inspectors to gauge the circuit's understanding of specific factors/subfactors. The information will be shared with the field office and, when combined with local data, will be useful in identifying training needs and provide feedback on continuous improvement efforts.
- The BAR will provide necessary reference materials to assist inspection personnel in understanding and consistently applying the correct subjective interpretations (i.e., interpretative line slides and interpretative line prints) or varietal/seed identification (e.g., wheat classification handbook, variety type samples, and minor oilseed reference guide). The BAR will also maintain an inventory of grain/commodity training samples for use in local seminars, survey/referee samples, collaboratives, etc.
- The BAR will, upon request, assist the QAS in identifying the source(s) of a grading problem and developing a workable action plan to resolve the problem or minimize the impact through better management practices.
- Upon request, or as necessary, a BAR member will be dispatched to assist the QAS, including directing and controlling changes in interpretations.

Signed: _____
Chairman, BAR

Field Office Manager

Attachment 2, "Example-Official Agency/Field Office Anchor Agreement"

ANCHOR AGREEMENT BETWEEN THE CENTERVILLE GRAIN INSPECTION AGENCY AND THE FARMLAND FIELD OFFICE

To ensure that the Centerville Grain Inspection Agency, Agency Quality Assurance Specialist's (AQAS) subjective interpretations are properly and consistently aligned with the Farmland Field Office (FO) and that such interpretations are efficiently and effectively disseminated and monitored throughout the circuit, we agree to comply with the following Quality Action Plan.

General Information.

The Centerville Grain Inspection Agency provides official inspection services at 4 specified services points located in the Tri-County area. The agency employs 12 inspectors, 1 weigher, and 6 samplers. The grains inspected at one or more of the specified service points include corn, Hard Red Winter wheat, and soybeans.

The Centerville Grain Inspection Agency's AQAS for all service points is Larry Black.

The subjective factors/subfactors routinely seen in this agency's circuit and which we consider to be critically important from a quality control standpoint (i.e., CCPs) are:

Corn	germ and mold damage.
Wheat	germ, mold, and scab damage.
Soybeans	damage-by-heat and heat damage.

Less frequently seen factors/subfactors that when present also challenge the inspection system's ability to uniformly and consistently apply the correct interpretation include:

Corn	blight and frost damage.
Wheat	sprout damage.
Soybeans	green damage.

AQAS Responsibilities.

- Submit a minimum of one separation per month for each CCP listed to the field office for review. Submissions will represent market channel samples and challenge the AQAS' ability to apply the correct interpretation.
- Submit, on a daily basis, SIMS select samples.
- Forward controversial samples/separations to the field office for opinion.
- Maintain a routine separation exchange program with all supporting personnel (i.e., back-up AQAS) to ensure consistent interpretations.
- Immediately inform all of the agency's licensed inspectors of any necessary adjustment in interpretation and conduct necessary follow-up to ensure proper understanding and maintain control of the change.
- Openly discuss grading problems with the field office QAS and keep him/her apprised of future developments.

Field Office Responsibilities.

- Provide the AQAS with timely and specific feedback concerning the accuracy of his/her separations.
- Periodically, forward survey/referee samples to randomly selected inspectors to gauge the agency's understanding of specific factors/subfactors. The information will be shared with the AQAS.
- Assist the AQAS in identifying the source(s) of a grading problem and developing a workable action plan to resolve the problem or minimize the impact through better management practices.

Signed: _____
Field Office Manager

Official Agency Manager