5
Export Program Manual

Special Procedures

Special Programs • Authorized Certification Official (ACO) Accreditation

Contents

Introduction

These special procedures comprise the *ACO Quality Manual*. The manual was established to facilitate the exportation of commodities to foreign markets. Accreditation recognizes consistent levels of competency and confers specific authority. Accrediting trained personnel, organizations, facilities, and processes associated with phytosanitary functions enhances PPQ's ability to protect plant resources and facilitate safe trade.

The following procedures are in accordance with 7 CFR 353 and the North American Plant Protection Organization (NAPPO) RSPM No. 8, The Authorization of Individuals to Issue Phytosanitary Certificates (http://www.nappo.org/Standards/REVIEW/RSPM8Rev-07-28-08-e.pdf).

Direct questions about PPQ accreditation programs to Mr. Michael Ward, National Accreditation Program Manager, by phone at 301-734-5227, by FAX at 301-734-7639, or by e-mail at <michael.d.ward@aphis.usda.gov>.

> ⚠️ **Important**
> To better facilitate local communication among ECSs, SPHDs, SPROs, and ACOs, ECSs may wish to contact the SPHD to establish or to confirm the proper protocol to follow when giving feedback to SPROs and ACOs who are cooperators.

ACO Quality Manual

Section 1: Initial Accreditation of ACOs—PPQ Plant Protection and Quarantine Candidates

1.1 The State Plant Health Director (SPHD) may nominate the Plant Protection and Quarantine (PPQ) employee through the Export Certification Specialist (ECS) in the Phytosanitary Certificate Issuance and Tracking (PCIT) system. The nomination information **must** include the individual's plant health regulatory experience and educational credentials.

1.2 The ECS reviews the information to verify that the nominee has met the experience and educational requirements as stated in section 5-4 of the Export Program Manual (XPM), *Basic Requirements and Procedures for Nominating Federal or State Candidates*, the NAPPO RSPM No. 8, The Authorization of Individuals to Issue Phytosanitary Certificates (http://www.nappo.org/Standards/REVIEW/ RSPM8Rev-07-28-08-e.pdf), (Appendix 1), Section 2.4.2, and the Federal regulation 7 CFR 353.6.

1.3 Export Services (ES) approves or rejects the nominee to become a candidate in the PCIT system. If approved, training is authorized. Based on time constraints and workload demands, the training may be conducted no earlier than the 9th month of experience. The nominee will **not** be accredited to sign export certificates until 1 year of experience has been completed.

1.4 Candidates **must** meet the following to be accredited as an ACO:

The ECS conducts the Animal and Plant Health Inspection Service (APHIS) training course on Phytosanitary Certification and administers the final initial accreditation examination to the candidate. The dates of training and test results (pass/fail) are entered into the PCIT ACO database. The candidate **must** pass with a score of 80 percent or higher.

The PCIT system will automatically change the role of the candidate to ACO when 1 year of experience is completed.

The ACO is now certified to sign export certificates and may print a copy of the official documentation of accreditation from the PCIT system. This certification is valid for 3 years from date of testing.

Section 2: Initial Accreditation of ACOs—State or County Cooperator Candidates

2.1 The State Plant Regulatory Official (SPRO) may nominate the State or County employee through the ECS in the PCIT system. The nomination information **must** include the individual's plant health regulatory experience and educational credentials. The nominee will not be accredited to sign export certificates until 1 year of experience has been completed.

2.2 The ECS reviews the information to verify that the nominee has met the experience and educational requirements as stated in section 5-4 of the Export Program Manual (XPM), *Basic Requirements and Procedures for Nominating Federal or State Candidates*, the NAPPO RSPM No. 8, The Authorization of Individuals to Issue Phytosanitary Certificates (http://www.nappo.org/Standards/REVIEW/RSPM8Rev-07-28-08-e.pdf), (Appendix 1), Section 2.4.2, and the Federal regulation 7 CFR 353.6.

2.3 ES approves or rejects the nominee to become a candidate in the PCIT system. If approved, training is authorized. Based on time constraints and workload demands, the training may be conducted no earlier than the 9th month of experience. The nominee will **not** be accredited to sign export certificates until 1 year of experience has been completed.

2.4 Candidates **must** meet the following to be accredited as an ACO:

The ECS conducts the APHIS training course on Phytosanitary Certification and administers the final initial accreditation examination to the candidate. The dates of training and test results (pass/fail) are entered into the PCIT ACO database. The candidate **must** pass with a score of 80 percent or higher.

The PCIT system will automatically change the role of the candidate to ACO when 1 year of experience is completed.

The ACO is now certified to sign export certificates and may print a copy of the official documentation of accreditation from the PCIT system. This certification is valid for 3 years from date of testing.

Section 3: Reaccreditation of ACOs

3.1 The PCIT system will notify the ECS in advance of the expiration of an ACO's accreditation. The ECS notifies and schedules APHIS reaccredidation training on Phytosanitary Certification with the ACO prior to the date of expiration.

3.2 The ECS conducts the APHIS reaccreditation training course on Phytosanitary Certification and administers the reaccreditation examination to the candidate. The ECS forwards the candidate's reaccreditation examination for scoring. The dates of training and test results (pass/fail) are entered into the PCIT ACO database. The candidate **must** pass with a score of 80 percent or higher.

3.3 The ACO is now reaccredited to sign export certificates and the certification will be valid for 3 years from date of testing.

Section 4: Export Certificate Review Process

4.1 The responsible supervisor of the issuing office **must** ensure that record copies and supporting documentation are sent to the appropriate ECS on a weekly, bi-weekly, or monthly basis unless the ACO or issuing office is using the PCIT system with attachments for supporting documents. Errors and remedial actions should be noted on the Issuing Office copy, mail, or email.

4.2 The ECS **must** review at least 5 percent of all record copies along with supporting documentation in a timely manner. It is important that reviews are completed in a prompt manner so that major errors can be addressed before there is a trade incident. The export certificates reviewed should represent the actual range of export commodities certified by various ACOs. The percentage should be increased if a particular ACO or issuing office has a significant number of errors or where a significant number of notifications of noncompliance are received from the National Plant Protection Organization (NPPO) importing country. ES will work with the PPQ regional office upon receipt of notifications of noncompliance.

4.3 The ECS **must** document major errors made by ACOs. Major errors on export certificates include but are **not** limited to the following:

◆ Failure to follow PPQ policy with regard to export certificates (for example, but not limited to):

❖ Certifying disease freedom in grain

❖ Failure to follow inspectional guidelines

❖ Failure to follow known import requirements

◆ Certifying prohibited or ineligible commodities

◆ Certifying CITES commodities at an ineligible port

◆ Certifying commodities from non-accredited or non-compliant sources.

◆ Attesting to conditions from non-accredited or non-compliant sources.

Major errors documented by the ECS **must** be submitted to the SPHD who will review and forward the information to the PPQ supervisor or SPRO of the ACO.

4.4 First Major Error

4.4.1 The first major error will be discussed between the ACO and the appropriate supervisor to address any questions about the error and to determine what corrective action should be taken to prevent recurrences of the error.

4.4.2 The appropriate supervisor will document the discussion and any recommendations that were made to the ACO for future reference. A summary copy of the discussion and recommendations will be forwarded to the respective SPHD. The SPHD **must** forward a copy to the appropriate regional office. The region will review the information and forward to ES.

4.5 Second Major Error

4.5.1 The second major error will be discussed between the ACO and the appropriate supervisor to address any questions about the error and to determine what corrective action should be taken to prevent recurrences of the error.

4.5.2 The appropriate supervisor will request refresher training for the ACO.

4.5.3 The supervisor will document the discussion, recommendations, and training requests that were made to the ACO for future reference. A summary copy of the discussion and recommendations will be forwarded to the respective SPHD. The SPHD **must** forward a copy to the appropriate regional office. The region will review the information and forward to ES.

4.6 Third Major Error: See information as specified in *Section 6: Suspension and Reaccreditation of Suspended ACOs* on **page 5-1-9**.

4.7 The ECS will document minor errors that would not warrant formal documentation. Examples of minor errors include but are not limited to the following:

- ◆ Incorrect lining out blocks
- ◆ Failure to complete all blocks
- ◆ Incorrect approved country name
- ◆ Failure to date an export certificate
- ◆ Misspelled words
- ◆ Unclear abbreviations

Minor errors should be handled informally through the appropriate supervisor. This should be documented by the ECS.

4.8 After completing the review process, the ECS should either destroy the copies of the export certificates or retain them for training purposes. Destroy copies by shredding and/or burning (appropriate methods); recycle the copies only if the confidentiality of the information can be maintained. If the copies are retained for training purposes, the ECS is responsible for maintaining and protecting the confidentiality of information on any export documents.

Section 5: Inactivation and Reactivation of ACOs

5.1 An ACO's role will be changed from ACO to ACO Admin in the PCIT System for one of the following reasons:

◆ Failure to successfully complete reaccreditation every 3 years following initial accreditation

◆ Failure to issue export certificates within 2 years of initial accreditation

5.2 When placed in the ACO Admin role, the ACO will **not** be authorized to sign export certificates.

5.3 When placed in the inactive status, the ACO will **not** be authorized to sign export certificates.

5.4 An ACO Admin may be returned to the ACO role when the following two conditions have been completed:

◆ The inactive ACO has completed a 60 day period of refresher experience under the guidance of an active ACO.

◆ The inactive ACO has completed the reaccreditation requirements as specified in Section Three, Reaccreditation of Authorized Certification Officials.

Section 6: Suspension and Reaccreditation of Suspended ACOs

6.1 An ACO will be suspended from issuing export certificates for any one of the following reasons:

- ◆ Knowingly or deliberately signing a fraudulent export certificate with any intentional false statements or misrepresentations relative to the export certificate
- ◆ Making three major errors within a 12 month period
- ◆ Repeating the same major error, after counseling, as specified in Section Four, Export Certificates Review Process, within a 12 month period

6.2 ACOs who accumulate three major errors within a 12 month period will have their ACO accreditation suspended for a period of one year. ES is responsible for notifying the PPQ regional office when suspension of an ACO's accreditation is in order. The regional office will review the information and take appropriate action.

6.3 The regional office will provide a written summary of events and description of actions taken to ES.

6.4 ACOs whose accreditation is suspended are **not** authorized to issue any export certificates.

6.5 In order to reinstate the accreditation of a suspended ACO, the ACO **must** complete the APHIS initial training course on Phytosanitary Certification and pass the exam with a score of at least 80 percent. The suspended ACO may initiate and complete the initial export certification training during the 9th month of the suspension period. The nominee will **not** be accredited to sign export certificates until 1 year of suspension has been completed.

Section 7: Retesting After Failure To Achieve 80% on Final or Reaccreditation Training Exam

7.1 The examinee is notified of failure to achieve a passing grade of 80 percent or higher.

7.2 The examinee is allowed 2 to 45 days to take a retest.

7.3 If the examinee passes the retest, then the dates of training and test results (pass/fail) are entered into the PCIT ACO database. The candidate **must** pass with a score of 80 percent or higher.

The PCIT system will automatically change the role of the candidate to ACO when 1 year of experience is completed.

The ACO is now certified to sign export certificates and may print a copy of the official documentation of accreditation from the PCIT ACO database. This certification is valid for 3 years from date of testing.

7.4 If the examinee fails the retest, he/she is allowed 2 to 45 days to take a second retest.

7.5 If the examinee passes the second retest, see section 7.3

7.6 If the examinee fails the second retest, he/she **must** complete another year of regulatory experience, retake the appropriate training and examination, and **must** achieve a score of 80 percent or higher.