

# 5

Export Program  
Manual

## Special Procedures

### *Special Programs • Authorized Certification Official (ACO) Accreditation*

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#### 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 7CFR353 and the North American Plant Protection Organization (NAPPO) standard for ACOs for issuance of export certificates.

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](mailto:michael.d.ward@aphis.usda.gov)>.



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.

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## ACO Quality Manual

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

**1.1** The State Plant Health Director (SPHD) must notify the Export Certification Specialist (ECS) upon hiring of new employees for participation in export certification activities.

**1.2** ECS nominates Plant Protection and Quarantine (PPQ) personnel in the current computer database.

**1.3** Export Services (ES) approves or disapproves nominee to become candidate.

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

The Professional Development Center (PDC) conducts the Federal training course for initial accreditation of the candidate and administers the final examination to the candidate. The PDC enters the dates of training and test results (pass/fail) into the database. The candidate must pass with a score of 80 percent or higher.

The State Plant Health Director (SPHD) of the candidate notifies the ECS when the candidate has completed 1 year experience.

The ACO is now accredited to sign export certificates and receives their official documentation of accreditation which is valid for 3 years from date of accreditation.

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

**2.1** The State Plant Regulatory Official (SPRO) or designee submits information to the ECS for the nomination of an individual to become an ACO. This information will include the individual's plant health regulatory experience and educational credentials.

**2.2** The ECS reviews the information to verify that the nominee has met the experience and educational requirements as stated in the NAPPO RSPM No. 8 (<http://www.nappo.org/Standards/REVIEW/RSPMNo8-e.pdf>) Standard for ACO issuance of export certificates, (Appendix 1) Section 2.4.2 and the Federal regulation 7 CFR 353.6 ([http://a257.g.akamaitech.net/7/257/2422/01jan20061500/edocket.access.gpo.gov/cfr\\_2006/janqtr/pdf/7cfr353.6.pdf](http://a257.g.akamaitech.net/7/257/2422/01jan20061500/edocket.access.gpo.gov/cfr_2006/janqtr/pdf/7cfr353.6.pdf)).

**2.3** The ECS enters the individual in the database as a nominee.

**2.4** ES approves or disapproves the nominee to become a candidate. If approved, training is authorized.

**2.5** The ECS conducts the Federal training course for initial accreditation and administers the final examination to the candidate. The ECS forwards the candidate's examination to the PDC for scoring and enters the dates of training into the database. The PDC enters the dates of training and test results (pass/fail) into the database. The candidate **must** pass with a score of 80 percent or higher.

**2.6** The ACO is now accredited to sign export certificates and receives the official documentation of accreditation which is valid for 3 years from date of accreditation.

### **Section 3: Reaccreditation of ACOs**

**3.1** The database will notify the ECS in advance of the expiration of an ACO's accreditation. The ECS notifies and schedules Federal reaccreditation training with the ACO prior to the date of expiration.

**3.2** The ECS conducts the Federal reaccreditation training course and administers the reaccreditation examination to the candidate. The ECS forwards the candidate's reaccreditation examination to the PDC for scoring and enters the dates of training into the database. The PDC enters the dates of training and test results (pass/fail) into the 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 reaccreditation will be valid for 3 years from date of reaccreditation.

## 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. Errors and remedial actions should be noted on the Issuing Office copy.

**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
- ◆ Recorded incorrect approved country name
- ◆ Failure to date an export certificate
- ◆ Misspelled words
- ◆ Recorded 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 will be placed in inactive status for one of the following reasons:

- ◆ Failure to successfully complete reaccreditation every 3 years following initial accreditation.
- ◆ Failure to participate in the export certificate issuing process within 2 years of initial accreditation.

**5.2** When an ACO becomes inactive, the ECS will change the status of the ACO in the database to inactive and notify the ACO.

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

**5.4** An ACO can be returned to active status 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:

- ◆ If they knowingly or deliberately sign a fraudulent export certificate with any intentional false statements or misrepresentations relative to the export certificate
- ◆ If they make three major errors within a 12 month period
- ◆ If they repeat 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 Federal initial training course 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 last 3 months of the suspension period.

## **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 examinee passes the retest, see section 1.2, 2.5, or 3.5 as appropriate.

**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.