United States Department of Agriculture
Grain Inspection, Packers & Stockyards Administration
Federal Grain Inspection Service

FGIS Quality Roundtable
Final Report
December 18, 2009

Global Leader in Grain Quality Assessment

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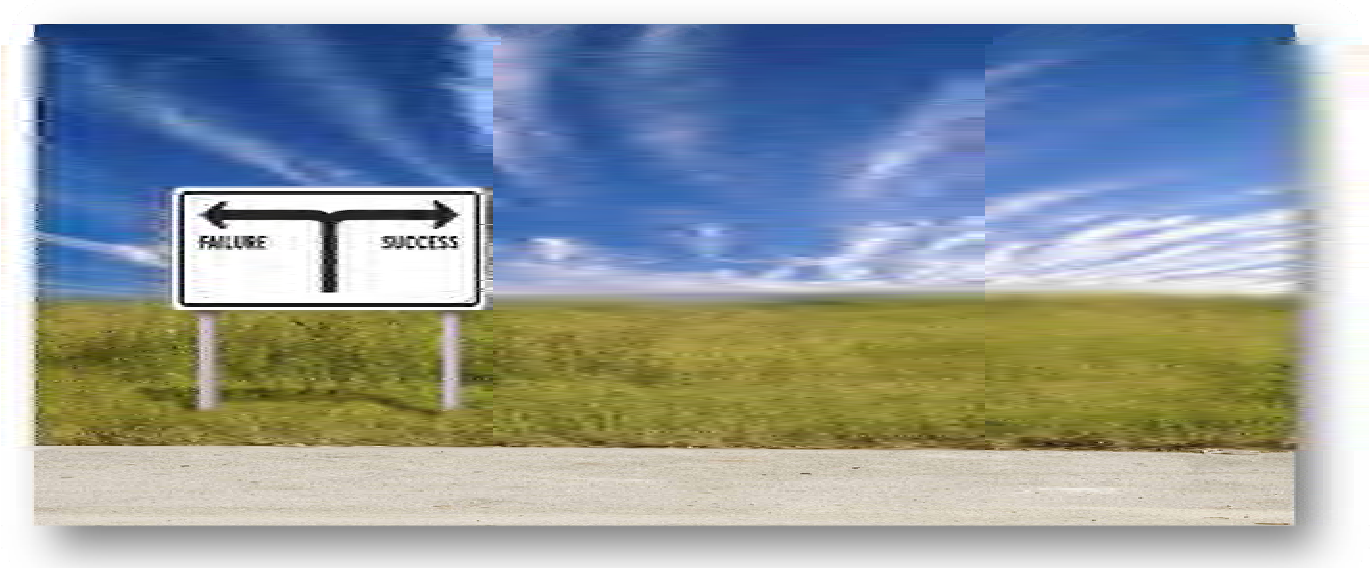


Executive Summary

The current era of organizational and personnel changes prompted the creation of the FGIS Quality Roundtable. Changes that are occurring include the implementation of Quality Management Programs for GIPSA and Official Agency service providers, FGIS Online programs, consolidation of oversight functions to the National Grain Center, creation of the Field Operations and Support Staff (FOSS) and the Quality Assurance and Control Staff (QACS), use of field service specialists, and the need to replace personnel at all levels of the organization due to attrition. The team met to review the activities designed to ensure stakeholders receive the high-quality results they need and deserve to market American grain and commodities. Our challenge was to find the best way to adequately safeguard the integrity of the national inspection system.

Quality of inspection results and services has always been and will continue to be the guiding principle for the success and viability of the Federal Grain Inspection Service (FGIS); yet we have not clearly conceptualized how quality can serve as a guiding principal and how it can be integrated into our basic practices. Our eagerness to meet customer requests to contain or reduce inspection costs and increase individual output capacity appears to have unseated quality in our priority rankings. Our failure to address these conflicting issues and implement lasting solutions has already crippled quality maintenance and improvement efforts.

FGIS must develop mechanisms to address future challenges in delivering quality services under mounting pressure to reduce costs and increase production. Quality Roundtable team members identified threats to quality results in the areas of communication, training, oversight of service providers, staffing, and technology and equipment. The recommendations are summarized in the following objectives:

- Develop and implement on-going, meaningful quality training.
- Assure adequate staffing levels for on-going QA/QC of service providers.
- Implement succession planning before eligible employees choose to retire.
- Formalize accountability for managing service providers and provide a clear direction to align current practices with existing regulations.
- Improve communication within FGIS and with external stakeholders.
- Explore new testing equipment options and improve quality reporting from FGIS*online*.

Given the inherent costs associated with ensuring quality services, management's commitment to support and allocate resources for quality purposes is crucial. Conflicting priorities within organizational units need to be understood and addressed if we want to better invest in areas where quality does not meet expectations. Management must communicate to the grain industry and front-line employees their willingness to support quality and their intention to allocate resources for quality efforts.

The recommendations in this report are the basis of a roadmap for FGIS to consistently deliver quality results and remain a global leader in grain inspection and weighing. These recommendations are initial thoughts (with assessment of agreement) rather than consensus

positions. Some of the proposed solutions are diametrically opposed and need further debate and refinement. The Quality Roundtable would like to participate in the next phase to develop the specifics needed for implementation.

Team Charge

To thoroughly and critically evaluate the official inspection system and programs; to determine the most efficient and effective allocation of resources (human) and mechanisms; to adequately safeguard the integrity of the national inspection system; and to assure our grain, rice and pulse stakeholders inspection uniformity nationwide and around the world. Central to the evaluation is assuring appropriate means are in place to encourage and enable service providers to maintain a sensible balance between mounting pressures to reduce costs and increase production, and practicing prudent quality control principles.

Team Members

Seated (from left to right):

- Beverly Whalen, Agricultural Marketing Specialist, Policies, Procedures, & Market Analysis Branch, Field Management Division
- Idelisse Rodriguez (recorder), Program Analyst, Office of the Deputy Administrator
- Jim Brown, Quality Assurance Specialist, New Orleans Field Office
- Vincent Volpe (Union member), Agricultural Commodity Grader, New Orleans Field Office

- Ed Durgin, Manager, Portland Field Office
- Joe Hearns, Quality Assurance Specialist, League City Field Office
- John Sharpe (sponsor), Director, Technical Services Division
- Diane Palecek, Assistant Director, Field Operations and Support Staff, Field Management Division

Second Row:

- Dave Funk, Associate Director for Methods Development, Technical Services Division
- Randy Deike (AAGIWA member), Grain Inspection Program Manager, Washington Department of Agriculture
- Mark Wooden, Compliance Officer, Review Branch, Compliance Division
- Dave Lowe, Agricultural Commodity Grader, Board of Appeals and Review, Technical Services Division
- Mark Fulmer (AAGIWA member), Official Agency Manager, Lincoln Inspection Service, Inc.
- Ken Critchfield, Assistant Director, Quality Assurance and Control Staff, Field Management Division
- Dave Mundwiler, Manager, Toledo Filed Office
- Ron Metz, Manager, Cedar Rapids Field Office
- Mike Eustrom, Chairman, Board of Appeals and Review, Technical Services Division

Methodology

The Quality Roundtable met on November 19 -20, 2009, in Kansas City, Missouri, to identify and make recommendations to improve noted shortcomings in the following areas: current practices, organizational structure, training, technology, managing competing priorities, oversight/accountability, equipment, and human resources and allocation delivery. An outside facilitator was provided to help the team achieve their goal. The sponsor assisted the team in obtaining requested information and acted as a liaison with management. A recorder was provided to capture the discussion and compile a draft report.

In the areas mentioned above, the team identified current deficiencies that threaten the ability of the official system to consistently deliver the quality results needed by stakeholders; discussed the primary factors that contribute to identified deficiencies; and proposed recommendations for actions to address these deficiencies.

An electronic rating tool was provided by the facilitator at the end of the meeting to rank recommendations in order of agreement and priority (see Appendices A and B). This report groups recurring topics and overlapping recommendations into five problem areas: training, staffing, oversight of service providers, communication, and technology and equipment. The current and forthcoming issues, desired outcomes and proposed solutions are outlined under each of these problem areas.

Training

Issue

The Quality Roundtable understands that training is and will always be constrained by budget. However, the need to develop and implement meaningful quality training is an issue that has to be repositioned in the priority list. The overall perception is that training is fragmented and inconsistent. The need for schooled and proficient training staff is evidenced by the lack of standardized quality training programs at some locations. Not surprisingly, employees are less motivated to obtain training because of limited budget, demanding work hours, excessive time restrictions, and lack of incentives.

In recent years, FGIS, following USDA's policy, has moved away from hands-on training to virtual training in AgLearn. The members of the Quality Roundtable recognize the cost-effectiveness and accessibility of such a system. However, AgLearn should be used to complement rather than substitute applied training since the set of skills needed by FGIS inspectors and technicians are obtained through continual practice and training.

Desired Outcomes

Training is a resource that should be portable and accessible to all employees. More importantly, training needs in FGIS must be aligned with job competencies in terms of content and time. It is critical that training styles match different learning styles and that employees learn "why" not just "how" during critical training modules. In order to match competencies and training needs, we must develop a field-based training staff which is qualified to provide quality training and establish on-going training to enhance consistent competency.

FGIS needs to provide advancement opportunities and hold employees accountable for the training they receive. Training opportunities must be offered that will encourage inspectors to attend formal training sessions and utilize assorted self-help tools to sharpen skills needed to preserve customer confidence. The implementation of incentivized learning and the addition of training that leads to promotion could further motivate employees and increase morale. For instance, FGIS could build upon the Agency's investment in participants of the Leadership Development Program (LDP) by creating on-going development/mentoring opportunities for program graduates. Continual training is a prerequisite for inspectors to be successful and meet customers' quality expectations.

Proposed Solutions

Solutions are listed from highest to lowest ranking (actual ranking number in parenthesis). These rankings are based on the weighted averages of agreement and priority shown in Appendix B.

a. (11) Re-examine role of AgLearn in training.
b. (16) Re-prioritize what is mandatory for training.
c. (29) Improve quality control reporting and support with training.
d. (30) Re-evaluate IDP program for effectiveness.
e. (34) Establish priority on developing training staff for critical training modules.
f. (41) Create on-going development after completion of leadership training programs (e.g., Leadership Development Program).
g. (44) Institute learning verification – process of learning oversight.
h. (66) Consider developing learning contracts.

Staffing

Issue

The ability of the official system to consistently deliver quality results is threaten by two personnel issues: 1) inadequate field staffing for oversight and QAQC functions, and 2) imminent loss of experienced employees through attrition.

The possible adverse effects of central monitoring cannot be taken lightly. The Quality Roundtable is concerned that FGIS will not have enough staff to address recurrent quality issues with Official Agencies (OA). Current staffing levels lead to unavoidable interruptions that create opportunities for mistakes. While central monitoring provides efficiencies of scale, the reorganization has not transferred sufficient staff to implement assigned responsibilities. Field Management Division's QACS is tasked with identifying and correcting quality issues. However, QACS only has a staff of two, and will not be staffed with a sufficient number of personnel nor personnel with the technical expertise to resolve quality issues, including both inspection and testing functions. Similarly, FOSS has a small number of field service specialists to cover a large territory.

FGIS also needs to reconsider appropriate staffing levels at field offices. By having fewer overseers out in the field, FGIS has lost personal interaction with customers and official service providers. Field offices do not have adequate personnel to address quality issues; this problem will increase as eligible employees choose to retire in upcoming years.

Additionally, the rapid speed of commerce has given way to new technological advances in the grain industry. The introduction of electronic inspection and weighing machinery, such as automated scales, require technical expertise that Agricultural Commodity Graders (ACG) do not have. FGIS needs to examine how this technology fits within the Agency's range of responsibilities. If FGIS has an obligation to learn how these systems work and actively operate this new technology, then we also have an obligation to hire or train employees with needed specialized skills.

Desired Outcomes

It is imperative that FGIS assures adequate staffing levels for on-going QA/QC of service providers. To this end, central monitoring must be re-examined to determine if our current structure is still adequate for the Agency. If centralized monitoring remains the agency's preferred course of action, the existing task force (or some other group) must be tasked with ensuring that appropriate staff is assigned to implement re-organized responsibilities and define a much needed clear delegation of authority regarding quality.

In order to avoid knowledge loss in field offices, succession planning must take place before eligible employees choose to retire from FGIS. FGIS must begin to assess needed skills and reevaluate specialists' positions. Simultaneously, current employees need a clear, performance-based path for advancement and hiring practices must be established to assure quality workers enter our workforce.

Proposed Solutions

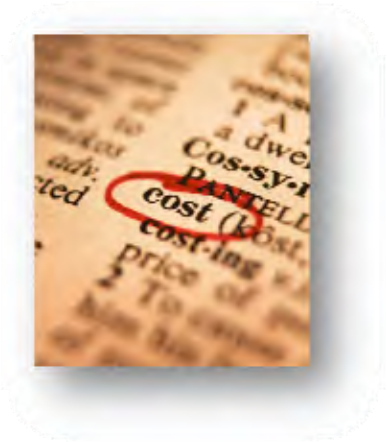
Solutions are listed from highest to lowest ranking (actual ranking number in parenthesis). These rankings are based on the weighted averages of agreement and priority shown in Appendix B.

a. (14) Screen candidates to assure they are capable of being trained to do the job.
b. (19) Establish a centralization task force if centralization is going to be integral in the long-term plan.
c. (24) Assess deficiencies in current skill sets and develop plans to address deficiencies.
d. (26) Harmonize standards for ACG & licensed inspectors to assure consistency.
e. (49) Assess need to add additional field staff for enhanced oversight.
f. (53) Move away from specialists to a clearinghouse for addressing questions and issues.
g. (56) Streamline quality control structure and move back to FMD (see *k* for alternative solution).
h. (59) Create a performance-based incentive system and publish results within offices.
i. (62) Eliminate responsibility for understanding internal workings of electronic weighing systems (see *j* for alternative solution).
j. (64) Implement procedures and add staff to effectively deal with automated scale issues (see *i* for alternative solution).
k. (65) Create a single Quality Control Group to decide quality issues and balance priorities (not FMD or TSD) (see *g* for alternative solution).

Oversight of Service Providers

Issue

FGIS does not have the mechanisms in place to adequately address future oversight challenges. The Agency's inherent conflicts between being a service provider and a regulatory entity have created a growing tension between those who focus on productivity (service) and those who focus on quality and regulatory matters. From a service standpoint, it is certainly important that we focus on productivity, but we frequently face a dilemma as we seek to balance cost, production and quality.



Cost discrepancies and exceptions to procedures are two factors affecting oversight. Pressure from the grain industry to reduce costs has been constant and consistent throughout the years. In some instances, official service providers charge fees which are less than the FGIS schedule because they seek to control costs and keep their customers from seeking alternatives to the official services they provide. One concern relates to the flexibility FGIS gives to service providers to implement local inspection plans to address customer quality and cost concerns. When a service provider revises procedures and costs (e.g., official commercial inspection services), FGIS approves and monitors these agreements. Providing oversight regarding these various agreements is more challenging than when service providers all inspect according to procedures outlined in FGIS handbooks, instructions or notices (the "gold standard").

It has been alleged that some service providers may be modifying procedures yet issuing certificates which indicate that "gold standard" procedures are being followed and implemented. Some service providers may use shortcuts while charging for "gold standard" inspections. Customers should pay for and receive the level of service they request. FGIS has and continues to provide services at a reasonable cost while at the same time addressing consistency and accuracy issues. However, if our stakeholders elect to receive more limited information to conduct business transactions and are also willing to accept less rigorous testing/weighing information to lower their costs, FGIS may need to adopt a new understanding of how "quality" is defined.

In some instances, the official procedures in our handbooks and directives are reinterpreted and altered to accelerate production at service locations. Allowing these modifications has a twofold effect: they speed up inspection procedures and increase productivity, but they create a technical and ethical dilemma. While Field Office Managers have the responsibility and latitude to interpret ambiguous aspects in the handbooks and directives, a more problematic situation occurs when the assigned workload or working conditions take precedence over the implementation of clearly specified official inspection processes. This puts employees in a serious ethical dilemma. They are "told" to follow the official procedures, but know that doing

so will not permit the assigned workload to be completed; in these instances, employees may take shortcuts to complete their work.

When allowed, exceptions or modifications should be properly documented, as documentation is a vehicle to promote transparency. While official procedures and processes were put into place to address specific sampling and quality matters, they may need be revisited and revised as necessary to achieve a balance between quality and productivity. FGIS ought to be able to solve these issues internally to preserve our stakeholder's confidence in the domestic system and avoid repercussions in export markets.

Desired Outcomes

Oversight of service providers will deteriorate in the future without continuous monitoring and a stronger quality control program. In the first place, FGIS must aim to formalize accountability for managing service providers. By doing so, we will be better able to proceed when exceptions are needed (i.e., who has the authority to determine when requirements can be waived or modified).

Secondly, FGIS quality leaders need a clear direction from management to align existing regulations with current and future practices. We already have a helpful resource in the Advisory Committee to monitor trends in grain trade and gain input from the industry. Five years from now, the economic and marketplace challenges facing our official system will be different. Consequently, management must determine if the Agency is willing to substantially change the system or would rather make minor adjustments and let the marketplace deal with issues considered beyond our scope.

Proposed Solutions

Solutions are listed from highest to lowest ranking (actual ranking number in parenthesis). These rankings are based on the weighted averages of agreement and priority shown in Appendix B.

a. (3) Require all offices to participate in a quality control program.
   Note: The new QAC module of FGIS Online will accomplish both this item as well as the item on the next bullet. It will encompass anyone providing original service, including private, state, and federal.
b. (12) Establish a robust on-going monitoring program that engages service providers routinely.
c. (20) Perform better screening of applicants for designation.
d. (23) Encourage expedited review of regulation on container shipments.
e. (36) Keep track of procedural exceptions and make information available to reviewing officers.
ϕ. (39) Consider eliminating or more strictly limiting the service exception program.
g. (67) Freeze centralization of monitoring in place for three years until system is effectively implemented with current functions.

Communication

Issue

Communication problems within FGIS will impede our desire for quality if they are not addressed effectively. For example, improvements need to be made to enhance communication between DC Headquarters and the field staff. Opening and improving communication channels among geographically-separated working groups gives field personnel a better understanding of the work conducted in Headquarters and vice versa. In return, all employees gain a sense of appreciation for the work they perform.

After assessing internal communication needs, FGIS should evaluate communication opportunities with external organizations, such as the grain industry and official service providers. By strengthening communication with these groups, FGIS could leverage their influence without compromising the quality of our services.

Desired Outcomes

Communication must be a priority across the organization to assure information is available and disseminated. The proposed solutions to improve communication have the common goal of creating transparency in our processes. Quality control processes could be supported with measurement systems designed to hold people accountable for effective communication. More importantly, FGIS should strive to clarify and communicate specific roles and responsibilities for service and quality.

Proposed Solutions

Solutions are listed from highest to lowest ranking (actual ranking number in parenthesis). These rankings are based on the weighted averages of agreement and priority shown in Appendix B.

a. (4) Clearly communicate a quality commitment to front line employees.
b. (32) Clearly state a quality policy that articulates expectations and ensure the policy is enforced.
c. (37) Broaden the decision making group to include varied opinions and those impacted by competing priorities.
d. (42) Conduct regional listening sessions to identify communication issues and develop plan to address communication deficiencies with all stakeholders.
e. (51) Conduct an assessment and audit of current communication efforts.
f. (63) Establish policy requiring all employees to check e-mail every 72 hours.

Technology and Equipment

Issue

The Quality Roundtable concluded that there is inadequate attention to problems with maintenance and alignment of testing equipment. The checktesting system does not accurately reflect ongoing performance because not all equipment is tested and not all critical control points are checked regularly. At times, both FGIS and service providers fail to account for the environmental impacts on equipment. More specifically, FGIS personnel have noticed that Diverter-Type Mechanical Samplers (D/T) may not have been properly installed because employees from official agencies, who are responsible for approving the D/T sites, are not adequately trained on D/T installation and inspection.

A major flaw of our current online business application, FGIS*online*, is that it does not provide adequate quality reports. Additionally, the IT staff is limited and therefore unable to provide readily available support.

Desired Outcomes

FGIS must keep abreast of changes in technology. By evaluating new testing equipment options and exploring opportunities to establish new standards, the Agency can improve its efficiency and relevance. During this process, however, it is critical that we identify limits of technology. For instance, using pictures of grain kernels on a computer monitor for remote grading is not as effective as viewing the actual kernels.

We recommend exploring ways to conduct checktesting more efficiently and effectively and improving or adding useful features to current online systems and inspection technology.

Proposed Solutions

Solutions are listed from highest to lowest ranking (actual ranking number in parenthesis). These rankings are based on the weighted averages of agreement and priority shown in Appendix B.

a. (10) Develop contingency plan for providing IT support on weekends, holidays, etc.
b. (21) Take existing modules and bring them up to date with current technology, i.e. transfer slides to DVD.
c. (27) Add grade and limit error checking to all programs.
d. (33) Re-visit decision to have reports built in-house (timeliness).
e. (35) Deliver equipment check testing report.
f. (45) Require ITW to be used on all rail CUSUM, composite and combined lot inspections.

g. (47) Implement proposed check testing and equipment performance management plan.
h. (48) Establish FGIS data sensitivity, security and ownership protocol.
i. (58) DT manufacturer must review and approve installation with support of official agency.
j. (61) Make alternatives to Arcview available to ease mapping.

Final Remarks

At the end of the Quality Roundtable meeting, team members had a final opportunity to identify other areas that threaten the mission of the organization and/or highlight those issues that were most important to them. Since these were offered as individual contributions, the electronic rating tool was not utilized to rank these recommendations. Below is an unabridged list of those suggestions for management's consideration:

- Explore the possibility of hiring back retirees as contractors.
- Bridge the gap between Agricultural Commodity Technicians and Agricultural Commodity Graders through a training program/contract instead of competition.
- Compensate technicians for the work they perform collaterally as equipment specialist.
- Create a relocation policy for GS-14 supervisors and above, i.e., require incumbents to relocate to take a managerial position**.** For example, if the applicant works in Kansas City (KC), he/she cannot take a GS-14 managerial position in KC before working at a different location. The purpose of this policy is to give applicants an extensive understanding of FGIS different program areas.
- Recruit and hire quality people and train them appropriately.
- Make succession planning a priority and capture the knowledge of employees before they depart.
- Carefully consider the impact of consolidation policy on OAs.
- Recognize the need for time and resources to fully implement centralization of services.
- Clarify quality responsibilities under reorganization.
- Revisit the centralization initiative and assess if it is still the direction FGIS needs to take.
- Consider allowing OAs to test for grading proficiency/accuracy.
- Send clear signals in relation to quality to eliminate conflicts among people.
- Recognize that FGIS will experience change and, at the same time, will be an agent of change.
- Improve the official inspection system without dismantling it.
- Re-visit the *Quality Assurance and Quality Control Program for the USDA Report* issued on September 29, 2006, by Paradigm and look for new or similar recommendations.
- Indicate what to anticipate when the Quality Management Program is fully implemented.
- Extend the same confidence and trust we have in our own employees to service providers. Then, remove those identified as untrustworthy.
- Take full advantage of available resources to improve the oversight program.
- Refocus attention in quality to regain customer trust in the quality of services we provide.
- Continue activities which allow us to better understand the perspectives and quality concerns of our overseas customers.

Conclusion

The proposed solutions in this report contribute to the improvement of the processes, knowledge, culture and networks embedded in the quality of our services. Given the current Administration's endorsement of a transparent government, this effort could not be any timelier. Transparency in our quality control principles is vital to maintain the credibility of our services. The consequences of inaction such as congressional scrutiny, loss of customers' trust, and tarnishing of our good reputation must be avoided at all costs.

The Quality Roundtable is appreciative and thankful for the opportunity given by management to discuss significant quality issues and recommend solutions to ensure that inspection and service quality are maintained and coordinated throughout the official inspection system. Team members look forward to their continued participation during further debate of these recommendations and the implementation phase. We look forward to the Executive Management Team's feedback and to further discussions and/or execution of the proposed solutions.

Appendix A

Participants established individual agreement and priority ratings for each recommendation using the following scales:

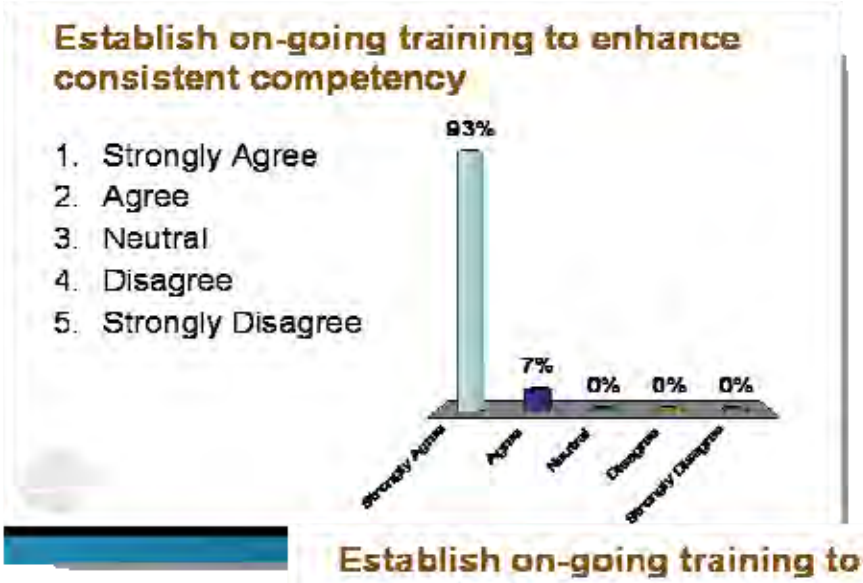
Agreement

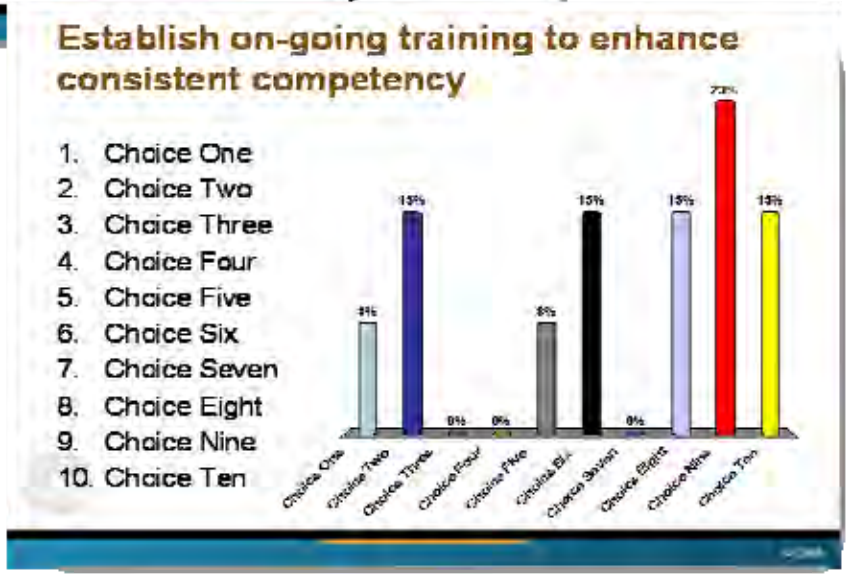
1. Strongly Agree
2. Agree
3. Neutral
4. Disagree
5. Strongly Disagree

Priority (scale 1-10)

1 = low priority
5 = important priority that needs attention soon
10 = critical priority that if not address immediately could lead to imminent failure

Rating Example





Appendix B

The recommendations in the following table are sorted from highest to lowest weighted average, first by agreement and then by priority.

Weighted Average (highest to lowest)		Recommendations
Agreement	Priority	
4.93	6.45	1. Establish on-going training to enhance consistent competency.
4.81	7.79	2. Assure adequate staffing for on-going QA/QC of service providers.
4.79	7.07	3. Require all offices to participate in a quality control program.
4.77	6.61	4. Clearly communicate a quality commitment to front line employees.
4.62	5.65	5. Assure training includes “why” not just “how”.
4.5	6.21	6. Accept that there is cost inherent in ensuring quality.
4.46	6.42	7. Assure an adequate number of supervisors to oversee the work of service providers.
4.46	6.32	8. Assure staff is assigned to implement re-organized responsibilities.
4.43	5.49	9. Clarify and communicate specific roles & responsibilities for service & quality.
4.41	6.6	10. Develop contingency plan for providing IT support on weekends, holidays, etc.
4.39	6.95	11. Re-examine role of Aglearn in training.
4.38	5.85	12. Establish a robust on-going monitoring program that engages service providers routinely.
4.37	5.84	13. Establish hiring practices to assure quality workers and ensure practices are enforced.
4.34	6.37	14. Screen candidates to assure they are capable of being trained to do the job.

4.33	5.83	15. Review new testing equipment options to increase efficiency, productivity and accuracy.
4.3	5.02	16. Re-prioritize what is mandatory for training.
4.27	5.45	17. Make training or training center portable.
4.27	5.37	18. Continue to evaluate new testing technology and explore opportunities to establish new standards.
4.26	6.54	19. Establish a centralization task force if centralization is going to be integral in the long-term plan.
4.25	5.09	20. Better screening of applicants for designation.
4.21	5.6	21. Take existing modules and bring them up to date with current technology, i.e., transfer slides to DVD.
4.21	5.38	22. Allocate resources to address areas where quality does not meet expectations.
4.16	5.7	23. Encourage expedited review of regulations on container shipments.
4.16	5.25	24. Assess deficiencies in current skill sets and develop plan to address deficiencies.
4.16	5.03	25. Develop and implement meaningful quality training.
4.15	5.25	26. Harmonize standards for ACG & licensed inspectors to assure consistency.
4.14	6.18	27. Add grade and limit error checking to all programs.
4.14	5.58	28. More levels for enforcement besides just pulling designation – progressive discipline.
4.14	5.26	29. Improve quality control reporting and support with training.
4.09	4.75	30. Re-evaluate IDP program for effectiveness.
4.08	5.38	31. Push back on demands for cost reduction when it impacts quality.
4.08	5.28	32. Cleary state a quality policy that articulates expectations and

		ensure the policy is enforced.
4.03	5.9	33. Re-visit decision to have reports built in-house (timeliness).
4.03	5.16	34. Establish priority on developing training staff for critical training modules.
3.96	4.79	35. Deliver equipment check testing report.
3.94	4.9	36. Keep track of program exceptions and make information available to reviewing officers.
3.92	4.54	37. Broaden the decision making group to include varied opinion and those impacted by competing priorities.
3.9	5.13	38. Formalize accountability for managing service providers, i.e. training, etc.
3.87	6.52	39. Consider eliminating or more strictly limiting the exception program.
3.85	4.94	40. Need training on how to resolve quality issues.
3.84	4.44	41. Create on-going development after leadership training.
3.83	5.27	42. Conduct regional listening sessions to identify communication issues and develop plan to address communication deficiencies with all stakeholders.
3.83	5.09	43. Identify and benchmark performance against quality expectations.
3.83	3.98	44. Institute learning verification – process of learning oversight.
3.77	4.75	45. Require ITW to be used on all rail CUSUM, composite and combined lot inspections.
3.71	4.89	46. Incentivize learning.
3.69	5.15	47. Implement proposed check testing and equipment performance management plan.
3.69	4.92	48. Establish FGIS data sensitivity, security and ownership protocol.

3.69	4.78	49. Assess need to add additional field staff for enhanced oversight.
3.68	4.6	50. Make communication a priority across the organization, create measurement for communication and hold people accountable for effective communication.
3.64	4.63	51. Conduct an assessment and audit of current communication efforts.
3.61	3.5	52. Create a clear path for advancement that is consistently followed.
3.6	4.15	53. Move away from specialists to a clearinghouse for addressing questions and issues
3.57	4.21	54. Match training style to learning style.
3.55	4.49	55. Re-evaluate program needs and divide service responsibility between GIPSA and service providers.
3.49	4.95	56. Streamline quality control structure and move back to FMD.
3.46	3.43	57. Identify training that leads to promotion.
3.42	5.4	58. DT manufacturer must review and approve installation with support of official agency.
3.4	4.41	59. Create a performance based incentive system and publish results within the office.
3.35	4.09	60. Identify limits of technology, i.e. using actual grain samples instead of photos.
3.33	2.7	61. Make alternatives to Arcview available to ease mapping.
3.19	4.79	62. Eliminate responsibility for understanding internal workings of electronic weighing systems.
2.99	3.06	63. Establish policy requiring all employees to check e-mail every 72 hours.
2.97	3.85	64. Implement procedures and add staff to effectively deal with automated scale issues.
2.91	3.34	65. Create single entity (Quality Control Group) to decide quality

		issues and balance priorities (not FMD or TSD).
2.75	2.42	66. Consider developing learning contracts.
2.63	3.6	67. Freeze centralization of monitoring in place for three years until system is effectively implemented with current functions.
2.33	2.43	68. Balance priority by shifting focus from accuracy to grade.