



**Reminder: Certification Monitoring Visits have been delayed until July due to COVID-19. Auditors will be reaching out to growers two weeks prior to schedule a date and time for the monitoring visit. Please note that all auditors will be taking proper precautions including but not limited to wearing PPE, taking temperatures daily, proper social distancing, and sanitizing of devices. We also ask that growers maintain proper social distancing and notify the auditor if someone on the operation is ill. All auditors will be following CDC, state, federal, and local guidelines pertaining to COVID-19.**

**Don't forget to complete your self-assessment prior to your monitoring visit!**

**If you have questions call GAPC at 865-622-4606.**

## This week: OSHA 300 Forms and Remediation

### 1. OSHA 300 Forms

**GAPC Standard:** Maintain records of all work-related accidents and illnesses serious enough to interfere with the workers' ability to perform their job and/or otherwise required by occupational safety and health laws.

**What the auditor will look for:** Do you have your OSHA 300A, 300, and 301 forms prepared (records of work place accidents)? Including:

**Posted on the farm:**

- OSHA 300A: Date, establishment information, and current number of accidents in 2020 ("0" if none).

**In Records:**

- OSHA 300: Date, establishment information, and log of accidents if any occurred ("0" if no accident occurred).
- OSHA 301: Incident report for each accident or illness that occurred (only needed if an accident or illness occurred).

**Requirements by law:** All growers with 20-249 workers must submit OSHA Form 300A even if no accidents or illness occurred. The date by which growers are required to submit to OSHA the information from their completed Form 300A is March 2nd of the year after the calendar year covered by the form. Learn more information about OSHA 300A form record keeping requirements on their website: <https://www.osha.gov/recordkeeping/index.html>

### 2. Remediation

Remediation is the process of fixing practices that did not meet GAPC Certification Standards. Below are some points about remediation in the 2020 GAPC Certification Program.

- **All remediation must be done within 30 days of the monitoring visit report being submitted to GAPC.**
- Growers will know at the conclusion of the monitoring visit what questions were missed.
- Growers will receive a detail report of their results after the monitoring visit. If a grower provides an email address it will be instantaneous, however, if a grower does not provide an email address the report will be mailed.
- Instructions on how to remediate any remediable issue can be found in the [GAPC Certification Compliance Guide](#).
- Growers will have to schedule and coordinate with the audit firm to get the remediation completed in the 30 day time frame. All invoicing and payments for remediation is at the discretion of the audit firm.

There are six different types of remediation a grower could be asked to go through depending on the non-compliance issue.

1. **Documentation Review (DR):** If documentation review is required for remediation, the grower must collect all missing records and organize the information using the GAPC record templates or the grower's own record keeping method. Once all missing records have been prepared and organized, the grower can send them to the designated remediator for the audit firm. Successful remediation is at the auditor's discretion.
2. **Documentation Review with Corrective Action Plan (DR CAP):** In addition to the Documentation Review, a Corrective Action Plan may also be required. This indicates that the grower must submit, in addition to the appropriate documentation, a report/document that indicates why the grower did not follow the GAPC standard and how the issue will be corrected in the future. A CAP template can be found [here](#).
3. **Documentation Review with Picture (DRP):** If documentation review with picture is required for remediation, the grower must take a picture of the remediated item(s). Once all pictures have been prepared and organized, the grower can send them to the designated remediator. Successful remediation is at the auditor's discretion.
4. **Not Remediable (NR):** There will be some issues on the farm that are simply not remediable, such as rotating crops or planting disease resistant varieties. Non-Remediable issues are opportunities for improvement the following year. Critical NR practices will result in the grower not being Certified.
5. **Visual Inspection (VI):** If a Visual Inspection is required, the goal should be to find a long-term solution to the issue as opposed to a temporary fix. The grower should make all necessary changes or fixes that require an auditor to revisit their farm. Then the grower can contact the auditor who visited their farm to schedule a follow-up visit. In some cases, the Visual Inspection for remediation may include Worker Interviews.
6. **Visual Inspection with CAP (VI CAP):** In addition to the Visual Inspection, a Corrective Action Plan may also be required. This indicates that the grower must submit, in addition to the follow-up visit, a report that indicates why the grower did not follow the GAPC standard, a timeline of how the issue was fixed, and what the solution was. Worker Interviews may also be included if necessary.

**Not everything can be remediated...**

As you read above there are some standards that are not remediable. These standards unfortunately cannot be fixed and depending on your score and whether or not it is a critical standard, may prevent you from becoming GAPC Certified.

**Do I need to remediate everything?**

- **Year 1:** To achieve a passing score for Certification growers must obtain a 100% score on all the Critical Standards labeled Y1 and reach a minimum 75% score on the Additional Standards labeled Y1. If you have missed a Critical standard remediation is REQUIRED. If you have missed an Additional Standard it depends on the score for Additional Standards. You may need to remediate an Additional Standard to achieve the minimum 75% score.
- **Year 2:** To achieve a passing score for Certification growers must obtain a 100% score on all the Critical Standards labeled Y2. Growers will not be scored on Additional Standards in Year 2. If you have missed a Critical Standard remediation is REQUIRED.
- **Year 3:** To achieve a passing score for Certification growers must obtain a 100% score on the Critical and Additional Standards labeled Y3. If you miss a Critical or Additional Standard remediation is REQUIRED.

To find out which standards and questions are remediable and how they are to be remediated review the [GAPC Certification Compliance Guide](#).

Grower's Results	Remediation
Achieved less than 100% on Criticals	Remediation Required on Criticals
Achieved 75% or higher on Additional	Remediation <u>not</u> Required on Additional
Achieved less than 75% on Additional	Remediation Required on Additional

Please note the GAPC Certification Compliance Guide contains a listing of the non-remediation consequences, what happens if you choose not to remediate a practice found to be noncompliant.

- **Not Certified (NC):** Grower is Not Certified as they are not in compliance with Critical Standard.
- **Not Certified Depending on Score (NC\*):** Grower is Not Certified if compliance with the Additional Standard is needed to reach minimum required Additional Certification score.
- **Not Certified and Potential Reportable (NCR):** Grower is Not Certified. GAPC also reasonably believes this practice constitutes a serious violation of the law or a severe infraction that endangers the health, safety, or rights of workers and may be reported to authorities and/or contracting companies.

## COVID-19 Resources

GAPC has compiled resources in English and Spanish to help inform, educate, and train growers, workers, and family members on topics related to COVID-19. The resource pages provide information for planning, educating and preventing the spread of COVID-19 as well as H2-A Visa concerns and the Families First Coronavirus Response Act (FFCRA). Includes: training videos, posters, fact sheets, FAQ's, webinars and links to other resources. For information on a state by state level, visit the COVID-19 Resource Page by State.



[Visit COVID-19 Resource Page](#)

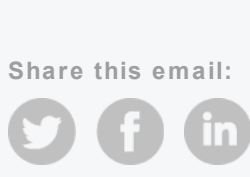
[Visit COVID-19 Resource Page by State](#)



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