



United States  
Department of  
Agriculture

Grain Inspection,  
Packers and Stockyards  
Administration

Stop 3630  
1400 Independence Ave., SW  
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July 2, 2010

**Reference # 233**

TO: FGIS POLICY BULLETIN BOARD

FROM: Robert Lijewski, Director /s/ *Robert Lijewski*  
Field Management Division

SUBJECT: Average Quality Uniformity Criteria and CuSum Loading Plan Policy

ORIGINATING OFFICE: Policies, Procedures, and Market Analysis Branch

**1. PURPOSE**

This memorandum recaps the existing policy of the Grain Inspection, Packers and Stockyards Administration (GIPSA) for certifying Component Samples and Sublot Samples when “average quality certification” is requested on the load order.

**2 BACKGROUND**

Section 1.1 b. of the Grain Inspection Handbook 3, Chapter 1, Inspection of Shiplots, Unit Trains, and Lash Barges states that the CuSum plan has an objective of obtaining a consistent minimum quality throughout the lot, using statistically based tolerances which accept occasional portions of a lot that may grade below the desired lot quality. Section 1.1 e. states that any grain not meeting required quality levels is declared a “material portion”. Under the CuSum plan the applicant is allowed variation in all factors including class and subclass. Section 1.2 e. (1) (c) states that inspection plan tolerances are not used when average quality certification is requested.

Average quality is part of the CuSum loading plan and adheres to the basic CuSum rules, e.g. combining acceptable component samples in the order that sampling was completed to form a subplot, etc. Average quality pertains to factors that are grade determining, and some non-grade determining such as moisture content. Average quality is not applicable to class, (except for grain where class is a grading factor) subclass, or factors on which sample grade is determined. The Grain Inspection Handbook, Book III, Chapter 1 is silent on the particular issue of class, (except for grain where class is a grading factor) subclass, special grade factors and sample grade factors, which led to questions at export locations regarding interpretation of the policy with regard to those factors which average quality does apply to.

GIPSA believes that for integrity of the official inspection system, and uniform delivery of grain, no grain should be allowed on board if it does not meet the class (except for grain where class is a grading factor) or subclass requirements, or if it exceeds the tolerance of a special grade factor. The grain must also not contain excessive substances/items (stones, glass) that would cause a sample grade designation.

Chapter 1 of Book III will be revised to explain the average quality certification policy more clearly, provide examples and specific guidance, along with additional clarification on CuSum rules.

### 3. **POLICY**

This memo does not establish new policy or amend existing policy, but reaffirms the current policy, that when “average quality certification” is requested on the load order, average quality will not apply to class, (except for grain where class is a grading factor) subclass, special grade factors or sample grade factors. CuSum rules must be applied. Component samples must meet the type of grain definition for the contracted grain (**e.g. corn, soybeans, wheat, etc.**) Component samples not meeting the type of grain definition for the contracted grain or identified as Sample Grade, because they meet or exceed the Sample Grade limits for that particular type of grain, will be designated as material portions.

Sublot samples must meet the type of grain, class (except for grain where class is a grading factor) and subclass definitions and must not exceed any special grade tolerance for the contracted grain.

Sublot samples not meeting the type of grain, class (except for grain where class is a grading factor) and subclass definitions or exceeding any special grade tolerance for the contracted grain, or identified as Sample Grade, because they meet or exceed the Sample Grade limits for that particular type of grain, will be designated as material portions.

### 4. **AUTOMATED CUSUM APPLICATION**

- Create a verbal inspector controlled factor named **“Type of Grain”** abbreviation **“TGR”** for reporting purposes.
- Report as **“FAIL”** only those results that do not meet the definition of the contracted grain type.
- Enter in subplot remarks the reason for the failure, including applicable percentages.
- A review inspection based on the type of grain will follow the basic rules in Handbook 3, Chapter 1. Review results will be averaged with the previous inspection results.

**5. FILING INSTRUCTIONS**

Retain a copy of this memo with the Grain Inspection Handbook, Book III, until the handbook is revised.

**6. QUESTIONS**

Direct any questions concerning this policy to Bob Lijewski, Field Management Division, at (202) 720-0224, or email at [robert.s.lijewski@usda.gov](mailto:robert.s.lijewski@usda.gov).