United States Department of Agriculture
Grain Inspection, Packers and Stockyards Administration
Stop 3630
1400 Independence Ave., SW
Washington, DC 20250-3630

November 14, 2011

Reference # 241

TO: FGIS POLICY BULLETIN BOARD

FROM: Robert Lijewski, Director
Field Management Division

SUBJECT: CuSum Cutoff Requests During Loading/Unloading of Ships, Unit Trains, or Lash Barges

ORIGINATING OFFICE: Policies, Procedures, and Market Analysis Branch

## 1. PURPOSE

This memorandum clarifies Federal Grain Inspection Service's (FGIS) policy for permitting a "cutoff" on a partially loaded/unloaded lot loaded under the CuSum loading plan.

## 2. BACKGROUND

FGIS allows an applicant to request a "cutoff" to accommodate various requirements to certify weight and/or grades on board at a certain date or time. For purposes of this memorandum, a "cutoff" is defined as an applicant's request to end inspection in order to receive certification on a portion of a shiplot, unit train, or lash barge inspected under the CuSum loading/unloading plan prior to the lot being loaded/unloaded in its entirety. Currently, the Grain Inspection Handbook does not specifically address "cutoffs," or how to handle situations arising where the first sublot presented for inspection is graded as a material portion, and the applicant requests an early "cutoff" on the lot.

## 3. POLICY

FGIS maintains that a "cutoff" may be requested by the applicant at any time, however, there must be grain on board the carrier(s) (or unloaded from the carrier(s) in the case of inbound movements) for this request to be granted. In a situation where the first sublot presented for inspection results in a material portion, FGIS will document the material portion and calculate CuSum values on the material portion sublot. In order to avoid situations where the CuSum loading plan could be circumvented by starting a new log for that load order, **FGIS will not allow a "cutoff" if grain for the particular lot presented for official inspection has not been loaded aboard the carrier.** A cutoff in this situation would reset the CuSum values and circumvent the loading plan.

FGIS will continue to allow "cutoffs" in most other circumstances, such as when necessary for an applicant to meet contract requirements, or provide weight and/or grade certification on a certain date or time.

**Example of inspection log where an early "cutoff" request should be denied:**

| Action | Sublot Number | Bin | Holds | Disposition | Quantity | ODOR | TW | AVG QUAL | M 13.00 | 0.30 0.10 | HT 0.50 | 0.30 0.10 | DKT 3.00 | 0.90 0.30 | FM 2.00 | 0.30 0.10 | SPL 20.00 | 2.20 0.70 | SBOC 2.00 | 1.00 0.30 | IN | INF |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Select | MP-1 | 1-2 | | Returned | 2451500 | OK | 55.2 | | 12.8 | 0.00 | 0.1 | 0.00 | 4.1 | 1.40 | 1.8 | 0.00 | 10.8 | 0.00 | 0.0 | 0.00 | 2-0 | 0 |
| Select | MP-2 | 3-4 | | Returned | 2415200 | OK | 55.0 | | 13.0 | 0.00 | 0.2 | 0.00 | 3.4 | 1.30 | 2.0 | 0.00 | 11.8 | 0.00 | 0.0 | 0.00 | 2-0 | 0 |

## 4. FILING INSTRUCTIONS

File a copy of this memo with the Grain Inspection Handbook, Book III, Chapter 1, Inspection of Unit Trains, Shiplots, and Lash Barges, until the handbook is revised to include this change. Field Office Managers must ensure that a copy of this memorandum is provided to official agencies operating within their circuit.

## 5. QUESTIONS

Direct any questions regarding this policy to Anthony Goodeman, Policies, Procedures, and Market Analysis Branch, by email at Anthony.T.Goodeman@usda.gov or phone at (202) 720-0291; or Wade Berteau, Office of the Director, by email at Wade.S.Berteau@usda.gov or phone at (985)764-2326, Ext. 244.