



United States  
Department of  
Agriculture

Grain Inspection,  
Packers and Stockyards  
Administration

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October 30, 2012

Reference # 252

TO: FGIS POLICY BULLETIN BOARD

FROM: Robert Lijewski, Director *(for) Pat McCluskey*  
Field Management Division

SUBJECT: Probe Sampling AMA Commodities

ORIGINATING OFFICE: Policies, Procedures, and Market Analysis Branch

### 1. PURPOSE

This memorandum provides clarification to allow, at the discretion of the field office manager or official agency manager, the use of non-licensed personnel to assist official personnel in the probe sampling of commodities covered under the Agricultural Marketing Act of 1946 (AMA).

### 2. BACKGROUND

In 1988 FGIS issued a Program Bulletin authorizing non-licensed personnel, such as elevator employees, to assist official personnel when probing carriers. This change was necessary due to the physicality of some probing functions and limitations of official personnel especially at remote locations. By 1995 this change was implemented into the Grain Inspection Handbook, Book I, Chapter 2, "Probe Sampling," and the Program Bulletin expired. None of the AMA sampling handbooks were updated to reflect this policy, which FGIS PPMAB believes applied to all probing duties, inclusive of both the USGSA and AMA.

### 3. POLICY

At the discretion of the official agency or field office manager, non-licensed personnel may assist official personnel in obtaining samples, provided that: (1) all nonlicensed personnel are under the direct, physical supervision of official personnel at all times; (2) the ratio of official personnel to nonlicensed personnel is reasonable and practical; and (3) official personnel determine the general condition of the commodity and whether additional samples are needed due to quality differences.

The entire sampling process must be viewed by official personnel at all times. In situations where nonlicensed personnel are assisting official personnel on probe sampling railcars, official personnel must be able to see both the inside of the carrier and the individual probe samples at all times to make determinations of distinctly low quality (DLQ) and quality differences within the carrier. This policy mirrors current instructions in the Grain Inspection Handbook, but will now specifically apply to all AMA commodities such as rice, edible beans, peas, lentils, and other processed commodities covered under the AMA.

#### **4. FILING INSTRUCTIONS**

File a copy of this memo with the Bean Inspection Handbook; Hop Inspection Handbook; Pea and Lentil Handbook; Processed Commodities Handbook; and Rice Inspection Handbook until the handbooks are revised to include this change. Field office managers please ensure that a copy of this memorandum is provided to official agencies operating within their circuit.

#### **5. QUESTIONS**

Direct any questions concerning this policy to Pat McCluskey, Policies, Procedures, and Market Analysis Branch (PPMAB), at (816) 659-8403, or email at [Patrick.J.McCluskey@usda.gov](mailto:Patrick.J.McCluskey@usda.gov), or Tony Goodeman at (202) 720-0291, or email at [Anthony.T.Goodeman@usda.gov](mailto:Anthony.T.Goodeman@usda.gov).