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System

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Domestic Origin Verification (DOV) Audit Program

DOV Audit Program

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INTRODUCTION

This document is designed to give guidance to Specialty Crops Inspection (SCI) Division personnel of the United States Department of Agriculture (USDA) and to establish the Domestic Origin Verification requirements for applicants who wish to participate in the Domestic Origin Verification (DOV) Audit Program. It provides policies and procedures and establishes the *DOV Specific Requirements*.

The information has been compiled or developed from sources available to the public as well as from technical knowledge of personnel in the USDA.

Compliance with the Agricultural Marketing Service (AMS) guidelines does not excuse failure to comply with the Food, Drug, and Cosmetic Act or any other applicable Federal or State laws or regulations. If needed, contact your immediate supervisor for any situation not addressed in this manual.

This manual contains links to various internal and external sources of information. For inspection personnel without internet or intranet access, please contact your immediate supervisor to obtain hard copies of documents as needed.

GUIDE FOR ELECTRONIC USAGE

The Administrative, Inspection, and Management (AIM) System of instructional manuals is available electronically in Adobe Acrobat Portable Document Format (PDF) at the following intranet address: <http://agnis/sites/FV/PPB/AIM/default.aspx>.

When accessed electronically, AIM materials have hyperlinks and hypertext (visible as underlined [blue text](#)) available to the PDF user. Clicking on a hyperlink takes the reader to a web site with information relating to the subject. Hypertext will link the reader to a different page within the current manual - or even a different manual - with information relating to the subject. For example, the hypertext in the Table of Contents allows a reader to go directly to the section of interest in the manual by clicking on the section title within the Table of Contents.

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DOMESTIC ORIGIN VERIFICATION AUDIT PROGRAM

GENERAL POLICIES AND PROCEDURES

I. PURPOSE

This document outlines the policies and procedures for the Domestic Origin Verification (DOV) Audit Program. It establishes the *DOV Specific Requirements* and provides information and guidance to applicants for development of their DOV programs and processes. It also establishes audit procedures.

The DOV program is a means for an applicant to develop an auditable process to verify that commodities intended for delivery to the USDA purchase programs are of 100 percent United States (U.S.) origin. Fruit and Vegetable Program (FV) Commodity Procurement Division (CPD) vendors are required by contract to supply only 100 percent U.S. origin commodities to USDA under the commodity purchase program. An applicant has the option to choose the DOV program, or to trace the product for every contract back to growers of U.S. origin.

The DOV program is funded entirely through user fees. Authority to charge fees for this service is provided for under the Agricultural Marketing Act of 1946, as amended, and the Code of Federal Regulations (CFR) 7 CFR 52.51, Regulations Governing Inspection and Certification of Processed Fruits and Vegetables and Related Products. Fees are charged on an hourly basis for assessment of an applicant's DOV written procedures, travel time, on-site auditing, and administrative activities associated with the audit.

II. REFERENCES

SCI Division Audit Management Program Manual, AMP 1.0 (including Appendices)
ISO 19011:2002 Guidelines for quality and/or environmental management systems auditing

III. OBTAINING INFORMATION AND REQUESTING AUDIT SERVICE

A. Information Regarding the DOV program

To obtain information, please contact:

Jessica Brower
DOV Program Manager
USDA Agricultural Marketing Service
Fruit and Vegetable Program
Specialty Crops Inspection Division
98 Third Street SW
Winter Haven, Florida 33880
Telephone: (863) 294-4415
Alternate: (863) 294-7416
Fax: (863) 294-4219
E-mail: Dovs.FV@ams.usda.gov

The *DOV Application for Service*, *DOV Specific Requirements*, *DOV General Policies and Procedures*, *DOV Audit Plan*, *DOV Audit Report*, and *DOV Corrective Action Request* are available from the Fruit and Vegetable Program, Specialty Crops Inspection Division website at <http://www.ams.usda.gov/DOV>.

B. Requesting Audit Service

To request DOV program participation and audit service, the applicant shall obtain the *DOV Application for Service* from the DOV Program Manager or from the DOV website noted above. The completed *DOV Application for Service*, along with the applicant's written procedures as described in the *DOV Specific Requirements* shall be submitted by mail or email to the DOV Program Manager. The *DOV Quick Guide* is available on the website noted above as a summarization of the *DOV Specific Requirements*.

C. Applicant's Responsibilities

The applicant will:

1. Meet the applicable requirements, policies, and procedures outlined in this document. Applicants are responsible for keeping up-to-date with DOV program changes by referencing the DOV program website at <http://www.ams.usda.gov/DOV>, where the DOV program regular updates and other related DOV information is available;

2. Provide a company contact person;
3. Provide the location and access to all facilities/sites (i.e., receiving, production, distribution, etc.) to be audited;
4. Provide the scope of the audit, including the products that are to be covered;
5. Make available to the auditor pertinent audit documents, records, and procedures that are responsive to the audit requirements;
6. Pay the applicable audit fee;
7. Comply with the provisions of this document and other relevant documents applicable to receiving audit services;
8. Limit claims regarding approval to those products within the scope for which approval has been granted;
9. Use DOV program approval in a reputable manner and only make statements regarding DOV program approval which are not considered misleading or unauthorized;
10. Discontinue use of all advertising material that contains any reference to the DOV program, and return any approval documents upon suspension or cancellation of approval;
11. Use DOV program approval only to indicate that the facility and the products produced under the DOV program are in conformance with the DOV requirements;
12. Ensure that no approval or report, including email, or any part thereof, is used in a misleading manner; and
13. Seek and obtain approval from SCI Division prior to referencing the facility's DOV approval within communication media such as brochures and advertising.

D. DOV Program Manager's Responsibilities

The DOV Program Manager will:

1. Review the completed *DOV Application for Service* prior to entering the information into Lotus Notes, to ensure that:
 - a. The requirements for the audit services are clearly defined and understood;
 - b. Any difference in understanding between SCI Division and the applicant is resolved; and
 - c. SCI Division has the capability to perform audit services with respect to the scope of the approval sought, the location of an applicant's operations, and any special requirements, such as language used by the applicant.

Any issues or questions will be resolved with the applicant prior to providing service.

IV. PRE-VALIDATION ASSESSMENT

A. Performing the Pre-Validation Assessment

1. After the DOV Program Manager receives an applicant's *DOV Application for Service* and related written procedures, the DOV Program Manager acknowledges receipt of the information, and a Pre-validation Assessment is performed either by the DOV Program Manager or an assigned DOV Specialist. This assessment determines if the applicant's written DOV program, including the procedures, fully addresses the *DOV Specific Requirements*. The DOV Program Manager or DOV Specialist determines if the applicant's written program is "Adequate," "Requires Clarification," or "Does Not Meet." This assessment evaluates an applicant's written program against the DOV requirements covered by the scope defined in the *DOV Application for Service*.

- a. **Adequate** - If the DOV Program Manager or the assigned DOV Specialist determines that the applicant's written DOV program fully addresses the *DOV Specific Requirements*, the written program is considered "Adequate." The DOV Program Manager will then determine the feasibility of the on-site Validation Audit and approve the applicant's written DOV program for audit. The DOV Program Manager defines the scope of the audit from the *DOV Application for Service*, assigns an audit tracking number, and assigns the Lead Auditor to conduct the audit.
- b. **Requires Clarification** - If the applicant's written DOV program requires minor clarifications from the applicant, the written program "Requires Clarification." The DOV Program Manager or the assigned DOV Specialist then works with the applicant to get the necessary information. If the appropriate information is provided, the DOV Program Manager releases the applicant's program for audit.
- c. **Does not meet the *DOV Specific Requirements*** - If the applicant's written DOV program does not address the *DOV Specific Requirements* or indicates that the applicant would need to make numerous corrective actions based on unclear procedures, it is classified as "Does Not Meet." In this case, the DOV Program Manager or assigned DOV Specialist prepares a *DOV Audit Report* for the Pre-validation Assessment indicating the major non-conformances found. This *DOV Audit Report* is sent to the applicant to inform the applicant of necessary adjustments that need to be made to the program prior to re-submittal.

V. ON-SITE VALIDATION AUDIT

To become an "*Approved DOV Program Participant*," an On-site Validation Audit is required to verify the applicant's conformance to the *DOV Specific Requirements* covered by the scope defined in the Application for Service.

A. Applicant's Responsibilities

The applicant will:

1. Make pertinent DOV information available by electronically submitting its DOV program and relevant documentation on the secure AMS SharePoint site: (<https://agnisx.ams.usda.gov>). Information, shall include, but is not limited to:

- a. Signed Application for Service;
 - b. DOV Manual or Plan; and
 - c. Attachments to DOV Manual or DOV Plan which should include, but are not limited to:
 - (1) Company organizational chart;
 - (2) Procedures and work instructions;
 - (3) Grower records;
 - (4) Supplier records and traceback documents, as applicable;
 - (5) Production records;
 - (6) Traceback records and trace process flow charts or explanations; and
 - (7) Corrective action records.
2. Ensure that the DOV program and procedures have been implemented prior to the on-site audit.
3. Make the following resources available during the audit:
 - a. Interview time with key personnel;
 - b. Escort for facility tour;
 - c. Working space for the DOV auditor(s); and
 - d. Appropriate management personnel for the audit and the closing meeting.
4. Submit written responses to the *DOV Corrective Action Request(s)* (CAR) within the agreed-to time.
5. Keep its DOV program and attachments up to date on the AMS SharePoint site.

B. DOV Auditor's Responsibilities

DOV Auditors shall conduct audit activities in accordance with *ISO 19011:2002*, Section 4 and Section 6. If only one auditor is assigned, that auditor is the Lead Auditor. The Lead Auditor may assign the Lead Auditor Responsibilities to an audit team member, except as noted otherwise.

The Lead Auditor will:

1. Prepare for the audit by:
 - a. Scheduling an On-site Validation Audit and notifying the applicant of the following information: (1) a proposed audit date(s), (2) the projected cost of the audit, and (3) the name(s) of the auditor(s) scheduled to perform the audit.
 - b. Reviewing the applicant's DOV program posted on the AMS SharePoint site (<https://agnisx.ams.usda.gov>) where applicants are required to enter their DOV program and procedures. If the auditor needs a document(s) to clarify a procedure prior to the audit, the auditor shall obtain it directly from the applicant. However, if a document is needed to meet a DOV program requirement, the auditor should notify the applicant and request that the applicant upload it into the AMS SharePoint site.
 - c. Preparing the *DOV Audit Plan* electronically in Lotus Notes; reviewing past audits, written procedures, and supporting documentation; and notifying the DOV Program Manager or a designated DOV Specialist that the *DOV Audit Plan* is ready for approval.
 - d. Providing the approved DOV Audit Plan to the applicant prior to the audit.
 - e. Assigning work to the audit team, if more than one auditor is assigned to conduct the audit. (The assigning of duties is a Lead Auditor responsibility.)
 - f. Preparing documents for reference and for recording audit proceedings.

2. Conduct the on-site audit by:
 - a. Conducting the opening meeting.
 - b. Communicating during the audit with facility representatives and members of the audit team to exchange information and assess the audit progress.
 - c. Verifying the accuracy and relevancy of the applicant's documentation, including the written procedures relevant to the audit.
 - d. Interviewing appropriate employees to verify their knowledge of the applicant's DOV process and their role in the process.
 - e. Conferring with the audit team members prior to the closing meeting to review the audit findings, if an audit team is assigned.
 - f. Generating audit findings including the identified major and minor non-conformance(s) and opportunities for improvement (OI). Audit findings are identified as non-conformances or OI. All non-conformances are reported. An OI is not required to be reported on the *DOV Audit Report* but may be reported to assist an applicant in improving its program. The following are the working definitions of these forms:

Major non-conformance (MNC): compromises the integrity of the program or product to the extent that program approval should be denied, revoked, or delayed until effective corrective action can be completed. Any absence or complete breakdown of a program requirement is considered a major non-conformance.

Minor non-conformance (NC): does not compromise the integrity of the program or product. Minor non-conformance(s) not corrected or addressed in a timely manner may be upgraded to a major non-conformance.

Opportunity for Improvement (OI): area identified with potential for strengthening the process or procedure. Although not identified as a non-conformance, an OI has the potential to become a non-conformance if not improved or addressed.

- g. Conducting the exit meeting with the applicant to discuss the audit results and findings. **The auditor shall not give final disposition (approval or denial of program participation) of the audit when discussing the findings.** The auditor discusses a mutually acceptable due date with the applicant for the applicant's response to each CAR.
 - h. Recording names of meeting attendees.
- 3. Prepare the audit report documents by:
 - a. Entering the information gathered during the audit into the appropriate Lotus Notes templates for the *DOV Audit Report*, *DOV Audit Report Details*, and applicable CAR(s);
 - b. Notifying the DOV Program Manager or designated DOV Specialist that the audit report documents are ready for approval. The DOV Program Manager or the designated DOV Specialist will make the final determination regarding inclusion of audit non-conformances in the audit report.
 - c. Signing and dating the *DOV Audit Report* once it is approved by the DOV Program Manager or designated DOV Specialist.
 - d. Sending the original signed copy of the *DOV Audit Report* and *DOV Audit Report Details* to the applicant along with the request(s) for corrective action (CAR). This should be sent within 10 days of the audit. At the request of the applicant, an alternative to mailing is sending it electronically, but this requires conversion of the report and report details to Adobe "pdf" format prior to sending. The CAR(s) must be sent to the applicant in Microsoft Word format so the applicant can complete their responses electronically.
- 4. Conduct audit follow-up by:
 - a. Following up on the applicant's response(s) to the CAR(s) to ensure the applicant meets the requested due date(s). On a case-by-case basis, the DOV Program Manager may grant an extension of the due date based on recommendations by the auditor.

- b. Completing the Auditor's Recommendation Section of the CAR.
 - (1) Once an applicant's response to a CAR is determined acceptable by the auditor and is reviewed and accepted by the DOV Program Manager, the auditor completes the "Auditor's Recommendation" section at the bottom of the *Corrective Action Request* noting the response is acceptable, and sends a signed copy of the completed CAR to the applicant.
 - (2) If an applicant's response to a CAR is not acceptable after review and consideration and possible extensions given by the DOV Program Manager, the auditor will not accept the CAR and, in the "Auditor's Recommendation" at the bottom of the CAR, the auditor will enter "Not recommended for approval because...(please state the reason why)." The auditor will send a signed copy of the completed CAR to the applicant, either by mail or by converting it to Adobe "pdf" and sending it electronically.
 - c. Conducting the Follow-up Audit as assigned by the DOV Program Manager, when appropriate, to verify execution and effectiveness of corrective actions.
 - d. Reviewing the documents posted by the applicant on the AMS SharePoint site: (<https://agnisx.ams.usda.gov>), archiving outdated documents, and approving documents based on the outcome of the audit. The "Current View" is required to show the applicant's approved program.
5. Complete the audit by:
- a. Electronically posting the completed Audit Records in Lotus Notes as follows:
 - (1) *DOV Audit Report* (signed copy scanned into Adobe "pdf" format);
 - (2) *DOV Corrective Action Request(s)* which includes the applicant's response(s); and
 - (3) Billing document.

- b. Distributing the official DOV audit records to the Area office where the applicant is located for filing in the applicant's file. The following official DOV audit records are required to be provided to the Area office:
 - (1) The *Audit Plan*;
 - (2) Signed copies of the *DOV Audit Report* and *DOV Audit Report Details*;
 - (3) Signed *Corrective Action Requests* along with the applicant responses;
 - (4) Any pertinent work papers, as applicable. The *DOV Audit Report Details* document is the only work paper required to be filed; and
 - (5) Signed Application for Service.
- c. Providing the billing information to the Area office where the applicant is located.
- d. If applicable, the auditor's Time and Attendance record and the Travel Voucher corresponding to the audit service should be sent to the Area office where the applicant is located, if and when that office's sub-center number was used.

C. Area Office's Responsibilities

The Officer-in-Charge of the area where the applicant is located will:

1. Coordinate with the DOV Program Manager to determine an auditor qualified to perform DOV audits.
2. File the official DOV audit records in a file folder labeled with, at a minimum, the audit program name and audit identifier. For example: *DOV Audit, 09SEN1000*. The file shall contain the following:
 - a. The *Audit Plan*;
 - b. Signed copy of the *DOV Audit Report* and *DOV Audit Report Details* that was sent to the applicant. The applicant is mailed the original signed document, or a signed electronic copy in Adobe "pdf" format, whichever is preferred by the applicant;
 - c. Signed *Corrective Action Requests* along with the applicant responses;
 - d. Any pertinent work papers, as applicable. The *DOV Audit Report Details* are required to be filed; and
 - e. The *Application for Service*.
3. Ensure that the applicant (Auditee) is billed based on the information provided by the auditor.

VI. APPROVAL STATUS

A. Notification of Approval or Denial into the DOV Program

1. The DOV Program Manager will notify an applicant of approval or denial of the applicant into the DOV program based on the results of an On-site Validation Audit, Verification Audit, or Follow-up Audit after final acceptance of the audit report. The DOV Program Manager will notify the applicant by letter of their approval or denial into the DOV program. To safeguard impartiality, the DOV Program Manager will not have participated in an audit that he/she is responsible for approving. If the DOV Program Manager performs an audit, the report is approved by a DOV Specialist.

2. An applicant approved for participation in the program will receive notification and a certificate indicating the applicant's facility is an *"Approved DOV Program Participant."*

B Posting Approval Status on USDA Website

1. The applicant may agree to have the facility's name, address, and products covered under the DOV program posted on the USDA Website identifying it as an *"Approved DOV Program Participant"* at <http://www.ams.usda.gov/DOV>.
2. The signed *DOV Application for Service* provides authorization to post the applicant's information on the CPD and SCI Division websites.

VII. MAINTAINING APPROVED PROGRAMS

A. Applicant's Responsibilities

The applicant will:

1. Keep its DOV procedures updated.
2. Meet the applicable requirements, policies, and procedures outlined in this document. Applicants are responsible for keeping up-to-date with DOV program changes by referencing the DOV program website at <http://www.ams.usda.gov/DOV>, where DOV program regular updates and other related DOV information is available.
3. Immediately notify the DOV Program Manager to amend the scope of the facility's DOV program approval, if the facility plans to:
 - a. Implement or change a written procedure that controls components or products that are received or purchased, or segregates domestic from non-domestic products including those "not established" as domestic;
 - b. Change the domestic origin status as stated on the *Application for Service*; or
 - c. Change the components or products noted in the *Application for Service*.

B. DOV Program Manager's Responsibilities

Depending on the nature, and extent of the changes, the DOV Program Manager may require a Verification Audit at the applicant's facility.

VIII. VERIFICATION AUDITS FOR CONTINUED PARTICIPATION

A. Frequency of Verification Audits

1. Verification audits of "*Approved DOV Program Participants*" will be performed at least once a year to verify the applicant's continued adherence to its domestic origin verification program as identified in its procedures.
2. Verification audits will follow procedures outlined in Section VI. The desk audits shall follow the same procedures outlined in that section, except the audit will not be on-site.
3. AMS reserves the right to audit more frequently.
4. Factors that **MAY** increase audit frequencies include, but are not limited to, the following:
 - a. Handling non-domestic components or products;
 - b. Geographic location of the processing facility or where the crops are grown;
 - c. Distressed crops;
 - d. Whistle-blower reports;
 - e. Changes in the applicant's management or key contact person;
 - f. Numerous suppliers (not growers);
 - g. History of non-conformance with domestic origin requirements; and/or
 - h. Multiple components or products.

B. Surveillance Activities

Surveillance activities may be appropriate under a number of circumstances; for example, after an applicant makes changes to its DOV program, a Verification Audit may not be required, and surveillance activities may be appropriate.

1. Surveillance activities may be conducted on-site or as desk reviews depending on the nature of the participant's program. The DOV Program Manager will make this determination.
2. Records of surveillance activities will be kept in the applicant's DOV audit file.

C. DOV Certificate Approval Period**1. Validation Audits**

An applicant that has had an acceptable On-site Validation Audit will receive an approval valid for up to one year from the date of the audit, or receipt and resolution of its corresponding CAR(s), whichever is later.

2. Verification Audits

An applicant that has had an acceptable Verification Audit will receive an annual certificate only if it has been audited at least one time during the 12 month period beginning on the approval date of its On-site Validation Audit, and continuing each year thereafter.

IX. DENIAL OF DOV PROGRAM PARTICIPATION AND REINSTATEMENT**A. Denial of DOV Program Approval**

1. USDA, AMS may deny DOV program approval to an applicant for any of the following reasons:
 - a. Failing to follow the *DOV Specific Requirements* including failure to immediately notify the DOV Program Manager when it (1) implements or changes a written procedure that controls components or products that are received or purchased, or implements or changes a procedure to segregate domestic from non-domestic products including those "not established" as domestic; (2) changes the domestic origin status as stated on the *Application for Service*; or (3) changes the components or products noted in the *Application for Service*.

- b. Presenting false or misleading information at any point, including in the submission of the *DOV Application for Service*, procedures, during an audit, or at any time during program participation.
 - c. Denying USDA reasonable access to facilities and records within the scope of the DOV program.
 - d. Failing to respond to the *Corrective Action Requests* in the agreed-to time.
 - e. Failing to pay USDA, AMS audit, grading, or other fees for service.
2. Also, if deemed in the best interest of the USDA, AMS, an applicant's DOV program approval may be denied or revoked. Examples of reasons for such action include, but are not limited to, a request by CPD to suspend the applicant for inability to meet contract requirements, customer complaints, or the applicant's inability to provide the required domestic origin documentation.

B. Denial Notification

Prior to denial, the DOV Program Manager shall notify the applicant in writing of the denial, the effective date, and details of actions required to regain approval status, as appropriate.

C. Reinstatement

Additional audits may be conducted at the applicant's expense to become reinstated.

X. CANCELLATION OF AUDITING SERVICE

The applicant may cancel service at any time by notifying the DOV Program Manager. Applicants that cancel service may reapply and be reassessed for DOV program participation. Fees may be charged for services rendered.

XI. FEE FOR SERVICES

The cost of the Pre-validation Assessment, On-site Validation Audit, Verification Audits, and Follow-up Audits, including audit preparation and travel time, are the responsibility of the applicant.

Fees charged for service are charged according to the established hourly rate for audits.

XII. DOCUMENT CONTROL

A. Applicant's DOV Program

1. Only AMS authorized personnel may access the applicant's DOV program.
2. An applicant's DOV program is the property of the applicant and SCI Division will treat it accordingly. SCI Division does not retain applicants' DOV programs on file other than the documents electronically maintained on the Share Point secure website.

B. Audit Record Retention

Audit records are retained by SCI Division for three years from the audit date.

XIII. RECONSIDERATIONS AND APPEALS

A. Request for Reconsideration

An applicant has the right to request reconsideration of any adverse audit finding or decision issued regarding its participation in the DOV program.

Reconsiderations shall be submitted in writing to the DOV Program Manager or the SCI Division Director (see the mailing address in Section VI. B.) within 30 working days of the date of the official DOV audit report, and shall include the basis for the disagreement with the findings and the requested alternative decision or action.

The DOV Program Manager shall review the request for consideration. A written decision will be sent to the applicant within 30 working days from receipt of the request.

B. Request for Appeal

If the resulting decision by the DOV Program Manager concerning the request for reconsideration is not satisfactory to the applicant, the applicant has the opportunity to appeal the DOV Program Manager's decision. Appeals must be made within 30 working days of the date of the DOV Program Manager's decision and shall include the basis for the appeal and the requested alternative decision or action. Appeals shall be submitted in writing to the SCI Division Director.

The SCI Division Director will respond within 30 working days from the date of receipt of the appeal. The applicant shall send the appeal to:

Director, SCI Division
Fruit and Vegetable Programs, AMS
U.S. Department of Agriculture
1400 Independence Ave., SW, STOP 0240
Washington D.C. 20250-0247
Email: Lorenzo.Tribbett@ams.usda.gov
Phone: (202) 720-5870
Fax: (202) 690-1527

The result of the decision made by the Director of SCI Division is final.

For additional information regarding reconsiderations and appeals refer to the SCI Division, Quality Management System Manual, Appendix B, QMS B6.0, Complaints, Disputes, and Appeals Procedure.

Domestic Origin Verification (DOV) **SPECIFIC REQUIREMENTS**

Purpose

This document provides the requirements of a Domestic Origin Verification (DOV) Audit Program. The DOV program is an audit-based program to verify contractors', subcontractors', suppliers', or processors' procedures for ensuring that fruits, nuts, and vegetables sold to the U.S. Department of Agriculture (USDA), Agricultural Marketing Service (AMS) are of 100 percent U.S. origin. The DOV program is a fee-for-service program open to all suppliers and their subcontractors. Contractors may choose the DOV program in place of the document trace-back otherwise required for each contract to verify compliance with domestic origin requirements. The USDA, AMS, Fruit and Vegetable Programs (FV), Commodity Procurement Division (CPD) announcements and invitations define the domestic origin requirements.

Scope

DOV Specific Requirements apply to applicants who voluntarily request participation in the DOV program. Applicants must meet all the applicable requirements outlined in this document to participate in the DOV program.

Due to the nature of an applicant's operation or its products, specific requirements may be considered for exclusion. The applicant shall explain why specific requirements should be excluded with respect to their operation and DOV program. Exclusions are limited to requirements in this document within Sections 3.2.a, 3.2.b, and 4.2. Exclusions could also apply to either Sections 2.0.a or 2.0.b, not both. Exclusions shall not affect the applicant's ability to provide conforming components or products that meet the domestic origin requirements in the USDA, AMS, FV, CPD announcements and invitations.

References

USDA, AMS FV, CPD announcement and invitations
DOV Program General Policies and Procedures
DOV Quick Guide

Definitions

See DOV Glossary of Terms

1.0 General Program Requirements

Applicants shall submit a documented program that addresses the following *DOV Specific Requirements*:

- a. General Requirements - Establishing, documenting, implementing, and maintaining its DOV procedures and processes;
- b. Requirements for Receiving or Purchasing Components or Products - Selecting growers and suppliers based on their ability to provide components or products that are of domestic origin;
- c. Identification and Verification Method - Identifying each end item component or product and describing the method for documenting that it came from domestic growers;
- d. Monitoring the DOV Process - Verifying the method for (1) documenting that each end item component or product is of domestic origin, (2) preventing the use of components or products not intended for the DOV program, and (3) controlling non-conforming components or products; and
- e. Corrective Action - Taking corrective action to eliminate the cause of non-conformances encountered.

The domestic origin verification procedures shall be established, documented, implemented, and maintained to ensure that products delivered to the USDA conform to the USDA domestic origin requirements.

These procedures and processes shall be organized in a manner that provides easy access for reference and auditing (i.e., a manual).

Top management shall designate a management representative who, regardless of other responsibilities, shall have responsibility and authority that includes:

- a. Ensuring the DOV procedures needed for the applicant's DOV process are established, implemented, and maintained, and
- b. Reporting to the applicant's top management on performance of its DOV program and process.

2.0 Requirements for Receiving or Purchasing Components or Products

The applicant shall have a verifiable written procedure addressing receiving or purchasing domestic origin components or products from growers and suppliers. This relates to components and products that are similar to that delivered to the USDA.

Note: A grower is an individual or entity that develops a fruit, nut, or vegetable through a process of natural growth to maturity (e.g., plants, cultivates, grows, and harvests).

Note: A supplier is someone whose business is to supply a particular service or commodity including, but not limited to, raw materials, components, or finished products (i.e., individual, processor, subcontractor, broker, or contractor). For the purposes of this document, “supplier” does not include growers.

- a. If components are received from growers, the written verifiable procedure shall:
 1. Describe the process used to (1) communicate the domestic origin requirement to growers, and (2) select growers based on their ability to provide components or products of domestic origin (e.g., making it a requirement of purchase, including in its contracts, field checks, etc.).
 2. Include a current list of growers, along with evidence that they are domestic growers (domestic addresses and/or field locations, etc.). If there are non-domestic growers, they must be identified as such and included in the procedure described in section 4.2.
- b. If components or products are received from suppliers, the written verifiable procedure shall:
 1. Describe the process used to (1) communicate the domestic origin requirement to suppliers, and (2) select suppliers based on their ability to provide components or products of domestic origin.
 2. Include a current list of all suppliers who supply components or products similar to those used in USDA contracts, regardless of whether or not the components or products are intended for use in USDA contracts. The list of suppliers shall show the respective

components or products for each supplier. If components or products from a supplier are used for domestic components in the applicant's DOV process, the list shall include whether that supplier also handles non-domestic components or products.

3.0 Identification and Verification Method

3.1 Identification

The applicant shall have a verifiable written procedure that uniquely identifies products (components or raw materials and/or finished products). It must include a detailed example along with an explanation of the identification (e.g., code or positive lot identification) used to represent each component or product requested for approval into the DOV program. If multiple components or products are requested for DOV program approval, an explanation of each end item code or positive lot identification is needed for each component or product.

The method for identifying the components or products shall be such that the identification transfers through phases of product realization, from receipt through processing to delivery (including warehousing and storage), as applicable.

The identification shall also transfer back to purchased components or products and their origin, as applicable.

3.2 Verification Method

The applicant shall have a verifiable written procedure for the method used for documenting that the end item component or product is of domestic origin. The method shall provide records that are verifiable back to a domestic grower or list of domestic growers. Through documentation, the applicant shall be able to provide the history, location, or activity (e.g., receiving, packing, processing, warehousing) of the component or product, as applicable, from the end item back to its domestic origin (growers).

Note: *An acceptable method for documenting domestic origin is trace-back. Methods of tracking or verifying domestic origin may vary depending on the facility. It may or may not include working back through every step of receiving, packing, processing, and/or warehousing.*

- a. If raw components are not **directly** received from growers, and have gone through an intermediary facility or stage of receipt but have not changed form (i.e., have not been processed), the applicant shall include in its verifiable written procedure how it ensures the components maintain their

domestic origin integrity through the intermediary facilities or stages of receipt. These facilities or stages of receipt may include, but are not limited to, receiving stations, produce packing facilities, and/or warehouses, as applicable.

If the component has changed form (i.e., has been processed), follow the requirements in (b).

- b. If processed components or products are received or purchased from a supplier(s), the applicant shall include in its verifiable written procedure how the supplier ensures that the components or products maintain domestic origin integrity prior to receipt by the applicant.

Note: Current acceptable methods are: (1) the supplier is an “Approved DOV Program Participant” or (2) the applicant requests a trace-back from each supplier where the supplier’s components or products are used in a USDA contract. The applicant shall have a record of reviewing these trace-backs for adequacy. The trace-backs shall be on file, or the supplier’s “Approved DOV Program Participant” certificate shall be on file.

4.0 Monitoring the Domestic Origin Verification Process

4.1 Verification Activity

At least once a year, for each component or product in the DOV program, the applicant shall verify the method described in Section 3.2 and be able to show evidence of its verification activity through records. If a non-conformance is found during the verification by the applicant, it shall be corrected. Non-conformances and their corrective action shall be documented.

4.2 Segregating (Preventing the Use of) Components or Products Not Intended for Customers Requiring Domestic Origin

The applicant shall have a verifiable written segregation procedure addressing the process for segregating (preventing the use of) components or products that are non-domestic and those “not established” as domestic from those delivered to or destined for USDA, or destined for customers requiring only domestic origin products. Components or products that are similar to those destined for USDA are also required to be segregated.

- a. As applicable, the verifiable written procedure shall include the process for segregating non-domestic components or products from products delivered to or destined for USDA, or destined for customers requiring only domestic product. The written procedure for known “non-domestic” components or products shall include:
 1. Positive identification - from receipt through processing, packaging, storage, and shipment - to show a clear distinction between the domestic components or products intended for USDA, and those non-domestic components or products that are not intended for USDA;
 2. Release authority; and
 3. Physical separation, as applicable.
- b. As applicable, the verifiable written procedure shall also include the process for segregating components or products that are “not established” as domestic from those delivered to or destined for USDA, or destined for customers requiring domestic origin product. Components or products “not established” as domestic are those from suppliers who are either not “Approved DOV Program Participants,” or who do not provide trace-back on supplied components or products. The applicant is required to keep the suppliers’ tracebacks on file. The verifiable written procedure shall include:
 1. Positive identification - from receipt through processing, packaging, storage, and shipment - to show a clear distinction between the domestic components or products intended for USDA, and those “not established” as domestic;
 2. Release authority; and
 3. Physical separation, as applicable.

4.3 Controlling Non-conforming Components or Products

The applicant shall have a verifiable written procedure to control non-conforming components or products in its DOV process.

Non-conforming components or products are a quantity of product that is purchased, received, processed, packed or shipped that is not controlled and specifically covered by the applicant's DOV procedures, and does not fulfill the specified domestic origin requirements.

The procedure shall include the following elements, as applicable, based on the applicant's operation:

1. Identifying and segregating non-conforming components or products;
2. Determining its disposition;
3. Authorizing release, such as for a program other than the applicant's DOV process;
4. Maintaining records of all non-conforming components or products and any subsequent actions taken;
5. Determining the cause of the non-conformance and taking action so that it does not occur again;
6. Immediately reporting to the USDA, AMS, FV, Commodity Procurement Division if non-domestic product is shipped to the USDA. A notification shall also be sent to the USDA, AMS, FV, Specialty Crops Inspection Division's field office in the applicant's area. Field office locations may be found at www.ams.usda.gov/processedinspection; and
7. Immediately notifying the DOV Program Manager when a non-conformance is found and it results in a necessary change, either in the applicant's DOV procedures, in the applicant's domestic origin status, or in the components or products noted in the *Application for Service*.

5.0 Corrective Action

The applicant shall take action to eliminate the cause of non-conformances in order to prevent recurrence. Corrective actions shall be appropriate to the operation and non-conformances encountered.

The applicant shall maintain records of corrective actions taken as a result of the review or audit process. The applicant shall also maintain records of corrective action(s) taken as a result of AMS DOV audits.

Domestic Origin Verification (DOV)
QUICK GUIDE

- This guide is based on the DOV Specific Requirements.
- The DOV procedures shall be organized in a method to provide easy access for your company's reference and auditing, i.e., a manual.
- All requirements shall be addressed. Applicants shall explain why specific requirements should be excluded with respect to their operation and DOV program. Exclusions are limited to requirements 3.2.a, 3.2.b, and 4.2. Exclusions could also apply to either Clause 2.0.a or 2.0.b, not both.

Domestic Origin Verification Quick Guide
1.0 General
The applicant's DOV manual shall include the name of the person who is responsible for 1) ensuring that the DOV procedures needed for the applicant's DOV process are established, implemented, and maintained; and 2) reporting to top management on the applicant's DOV program performance.
2.0 Requirements for Receiving or Purchasing Components or Products
The applicant shall have a verifiable written procedure addressing receiving or purchasing domestic origin components or products from growers and/or suppliers. <i>Note: A grower is an individual or entity that develops a fruit, nut or vegetable through a process of natural growth to maturity (e.g., plants, cultivates, grows, and harvests).</i> <i>Note: A supplier is someone whose business is to supply a particular service or commodity including, but not limited to, raw materials, components, or finished products (i.e., individual, processor, subcontractor, broker, or contractor). For the purposes of this document, the term supplier does not include growers.</i> a. If components are received from growers, the written verifiable procedure shall: 1. Describe the process used to (1) communicate the domestic origin requirement, and (2) select growers based on their ability to provide components or products of domestic origin (e.g., makes it a requirement of purchase, includes in its contracts, field checks, etc.). 2. Include a current list of growers along with evidence they are domestic growers (domestic addresses and/or field locations, etc.). If there are non-domestic growers, they must be identified as such, and included in the procedure described in Section 4.2. b. If components or products are received from suppliers, the written verifiable procedure shall: 1. Describe the process used to (1) communicate the domestic origin requirement, and (2) select suppliers based on their ability to provide components or products of domestic origin (e.g., makes it a requirement of purchase, includes in its contracts, requires DOV participation, requires trace-backs for every USDA contract, etc.). 2. Include a current list of all suppliers who provide components or products similar to those used in USDA contracts regardless of whether or not the components or products are intended for use in USDA contracts. The list of suppliers shall show the respective components or products for each supplier. If components or products from a supplier are used for domestic components in the applicant's DOV process, the list shall include whether that supplier also handles non-domestic components or products.
3.0 Identification and Verification Method
3.1 Identification
The applicant shall describe how end items are identified. The verifiable written procedure for identifying the end item (e.g., code or positive lot identification) shall be included giving a detailed example of that identification along with its explanation. If multiple components or products are requested for DOV program approval, an explanation of each end item code or positive lot identification is needed for each component or product.

Domestic Origin Verification Quick Guide	
3.2 Verification Method	
The applicant shall have a method for tracking the end item component or product to show that it came from domestic growers. The company shall have a verifiable written procedure for the method used for documenting that the end item component or product is of domestic origin. Through documentation, the company shall be able to provide the history, location, and activity (e.g., receiving, packing, processing, warehousing, etc.) of the component or product, as applicable, from the end item back to its domestic origin (growers). <i>Note: An acceptable method for documenting domestic origin is trace-back, a method beginning at the end of a process (code or positive lot identification) and working back through the process either to the beginning or to a designated point to verify that the end item came from growers of domestic origin. Methods of tracking or verifying domestic origin may vary depending on the facility. It may or may not include working back through every step of receiving, packing, processing, and/or warehousing.</i>	
a. <u>If raw components are not received directly from growers and have gone through an intermediary facility or stage of receipt but have not changed form (i.e. have not been processed),</u> the applicant shall include in its verifiable written procedure how it ensures the components or products maintain their domestic origin integrity through the intermediary facilities or stages of receipt. These facilities or stages of receipt may include, but are not limited to receiving stations, produce packing facilities, and/or warehousing, as applicable. If the component or product has changed form (i.e., has been processed), follow the requirements for (b) below. b. <u>If processed components or products are received from a supplier,</u> the applicant shall include in its verifiable written procedure how the supplier ensures that the components or products maintain domestic origin integrity prior to receipt by the applicant. <i>Note: Current acceptable methods are:</i> (1) the supplier is an "Approved DOV Program Participant" or (2) the applicant requests a trace-back from each supplier where the supplier's components or products are used in a USDA contract. The applicant shall have a <u>record</u> of reviewing these trace-backs for adequacy and the trace-backs shall be on file, or the supplier's "Approved DOV Program Participant" certificate shall be on file.	
4.0 Monitoring the Domestic Origin Verification Process	
4.1 Verification Activity	
At least once a year, for each component or product in the DOV program, the applicant shall verify the method described in Section 3.2 and be able to show evidence of its verification through records. If a non-conformance is found by the applicant during its verification process, corrective action shall be taken and documented. The applicant's annual verification activity records shall be on file for review by the DOV Auditor.	
4.2 Segregating (Preventing the Use of) Components or Products Not Intended for Customers Requiring Domestic Origin	
The applicant shall have a verifiable written segregation procedure addressing the process for segregating components or products that are non-domestic or those "not established" as domestic from those delivered to or destined for USDA, or destined for customers requiring only domestic origin product. Segregation is also required for components or products that are similar to those delivered to the USDA. a. As applicable, the verifiable written procedure shall include the process for segregating non-domestic components or products from those that are delivered to or destined for USDA, or destined for customers requiring only domestic origin product. The written procedure shall include: 1. Positive identification from receipt, through processing, packaging, storage, and shipment to show a clear distinction between the domestic components or products intended for USDA and those non-domestic components or products that are not intended for USDA; 2. Release authority; and 3. As applicable, physical separation.	

Domestic Origin Verification Quick Guide	
4.2 Segregating (Preventing the Use of) Components or Products Not Intended for Customers Requiring Domestic Origin (continued)	
b. As applicable, the verifiable written procedure shall also include the process for segregating components or products that are “not established” as domestic from those that are delivered to or destined for USDA, or destined for customers requiring domestic origin product. Components or products “not established” as domestic are those from suppliers who are not “Approved DOV Program Participants” or who have not provided trace-back(s) on the supplied components or products (see 3.2.b). The verifiable written procedure shall include: 1. Positive identification from receipt, through processing, packaging, storage, and shipment to show a clear distinction between the domestic components or products intended for USDA and those “not established” as domestic; 2. Release authority; and 3. As applicable, physical separation.	
4.3 Controlling Non-conforming Components or Products	
The applicant shall have a verifiable written procedure to control non-conforming components or products. <i>Note: Non-conforming components or products are a quantity of product that is purchased, received, processed, packed or shipped that is not controlled and specifically covered by the applicant’s DOV procedures and does not fulfill the specified domestic origin requirement.</i> The procedure shall include the following elements, as applicable, based on the applicant’s operation: 1. Identifying and segregating non-conforming components or products; 2. Determining its disposition; 3. Authorizing release, such as for a program other than the applicant’s DOV process; 4. Maintaining records of all non-conforming components or products and any subsequent actions taken; 5. Determining the cause of the non-conformance and taking action so that it does not occur again; and 6. Immediately reporting to the USDA, AMS, FV, CPB if non-domestic product is shipped to the USDA. A notification shall also be sent to the USDA, AMS, FV, Specialty Crops Inspection Division field office in the applicant’s area. Field office locations may be found at www.ams.usda.gov/processedinspection. 7. Immediately notifying the DOV Program Manager when a non-conformance is found and it results in a necessary change in its DOV procedures, a change in the applicant’s domestic origin status, or a change in the components or products noted in the Application for Service.	
5.0 Corrective Action	
Corrective action <u>records</u> relating to non-conformances in the applicant’s DOV process shall be maintained either when identified by the applicant or when found during a DOV program audit.	

Domestic Origin Verification (DOV)
APPLICATION FOR SERVICE

Name and Address of Facility Where Audit Services Are Requested:
Billing Address:
List the components and products that are requested for DOV program approval (Fruit, nut, or vegetable components and/or products):
Check Appropriate Domestic Origin Status: ☐ Process and/or handle ONLY domestic fruit, nut, and vegetable components or products, including components or products from suppliers that are similar to that delivered to the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS). ☐ Process and/or handle domestic and non-domestic fruit, nut, and vegetable components or products that may include finished product from suppliers that are similar to that delivered to the USDA. Non-domestic components and products and those "not established" as domestic are controlled by a written Segregation Procedure .
I (we) agree: 1. To comply with all applicable provisions of the General Terms and Conditions of the Procurement of Agricultural Commodities or Services, and Commodity Procurement Branch (CPB) announcements, specifications, and invitations. 2. To allow reasonable access to facilities and provide all documentation or records within the scope of the DOV program. 3. To immediately notify the DOV Program Manager when it (1) implements or changes a procedure to control components or products that are received or purchased, or to segregate domestic from non-domestic including those "not established" as domestic; or (2) changes the domestic origin status as stated on the application; or (3) changes the components or products noted in this application. 4. To immediately notify the USDA, AMS, Fruit and Vegetable Programs (F&V), CPB and the nearest Specialty Crops Inspection Division Field office when non-conforming components or products are shipped to the USDA. 5. To provide a completed <i>DOV Application for Service</i> and related verifiable written procedures. 6. To respond to Corrective Action Requests. 7. To suspension or denial from DOV program approval if deemed in the best interest of the USDA, AMS. Reasons for suspension or denial of approval include, but are not limited to, the inability to provide the required domestic origin documentation, a request by CPB to suspend the applicant for inability to meet contract requirements, or customer complaints. 8. To authorize posting of information regarding this approval on the USDA Internet website. Signing this application provides the authorization to post the applicant's information on the website. If you do not want your company's name posted on the web, please check ☐ . 9. To pay all applicable fees associated with this auditing service.

Signature of Applicant or Representative:	Title of Applicant Representative:	Date:
Print or Type Name of Signer:	Telephone No.:	E-mail address of Applicant's Representative:

Return the application and related documents to E-mail:

DOV.fv@ams.usda.gov

Or mail to the DOV Coordinator. Find the DOV Coordinator's address at

<http://www.ams.usda.gov/DOV>

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0581-0234. The time required to complete this information collection is estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.

Domestic Origin Verification (DOV)
AUDIT PLAN

The DOV auditor is responsible for preparing this plan for the activities of the DOV audit. The Audit Plan is discussed with the applicant (Auditee) during the opening meeting.

Auditor's Name (Print Name)	
2 nd Auditor (Print Name)	
Name of Facility Audited (Auditee)	
Auditee Street Address (Where the on-site audit is conducted.)	
Auditee Contact:	
Auditee Phone Number:	
Scope/Purpose of Audit (Pre-validation Assessment, Validation Audit, Verification Audit, or Follow-up Audit)	
Scheduled Audit Date:	

The "REMARKS" area may be used to take notes or record information needed for the audit.

Audit Activities	REMARKS
1. Opening meeting	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10. Closing meeting	

Domestic Origin Verification (DOV)
AUDIT REPORT

Name of Audited Facility:		Applicant:		Date of Audit:	
Address: (Street, City, Zip)			Billing Address:		DOV ID#:
Key Contact for Audit:		Telephone of Key Contact for Audit:		Components or Products:	
Type of Audit	☐ Pre-validation Assessment	☐ Validation	☐ Verification	☐ Follow-up	
Audit Scope	☐ All Elements	☐ Specific Elements, Please list:			
Lead Auditor's Name (Print):		Lead Auditor's Signature:		Date Audit Report Completed:	
Names of Attendees at Closing Meeting:					

Please prepare a Corrective Action Response for each finding and submit it to the auditor or via email to:
DOV.fv@ams.usda.gov

Corrective Action Response (CAR) Due Date:

CAR Number	Program Criteria Number	*NC, MNC, or OI	Findings

- NC is a Minor Non-conformance. It does not compromise the integrity of the program or product. A NC that is not corrected or addressed in a timely manner may be upgraded to a Major Non-conformance.
- MNC is a Major Non-conformance. It compromises the integrity of the program or product to the extent that program approval should be denied, revoked, or delayed until effective corrective action can be completed.
- OI is an observation or Opportunity for Improvement. It is not a Non-conformance but has the potential to become a Non-conformance if not corrected or addressed.

Domestic Origin Verification (DOV)
AUDIT REPORT DETAILS

Program approval may be denied or delayed (Pre-validation Assessment and Validation audit) or may be revoked (Verification and Follow-up Audits) if any criterion is answered "No."			
Program Criteria Number	Program Criteria	Yes, No, N/A	Auditor's Notes
1.0	General Requirements		
1.0	Is the applicant's DOV process established, documented, implemented, and maintained?		
1.0	Is there a designated person(s) who has defined authority for ensuring that the domestic origin verification system is established, implemented, and maintained?		
1.0	Is the applicant's DOV program and procedures organized in a method to provide easy access for reference and auditing?		
2.0	Requirements for Receiving or Purchasing Components or Products		
2.0.a	If applicable, does the applicant have a verifiable written procedure it follows addressing receiving or purchasing domestic origin components or products from growers?		
2.0.a.1	Is the domestic origin requirement communicated to the growers by some means?		
2.0.a.2	Is there a list of growers with evidence they are domestic growers?		
2.0.b	If applicable, does the applicant have a verifiable written procedure it follows addressing receiving or purchasing domestic origin components or products from suppliers?		
2.0.b.1	Is the domestic origin requirement communicated to the suppliers by some means?		
2.0.b.2	Is there a list of suppliers?		
3.0	Identification and Verification Method		
3.1	Identification		
3.1	Does the applicant have a verifiable written procedure it follows for explaining the end item identification (code or positive lot identification) for each component or product listed on its DOV Application for Service?		

Program Criteria Number	Program Criteria	Yes, No, N/A	Auditor's Notes
3.2	Verification Method		
3.2	Does the applicant have a verifiable written procedure for the method used to document that the end item component or product is of domestic origin?		
3.2 (cont.)	If so, when an end item code is requested for trace-back, does the applicant use the documents included in the procedure described in 3.2 and do the documents verify domestic origin?		
3.2.a	If applicable, does the verifiable written procedure include how the applicant ensures the components not obtained directly from growers maintain their domestic origin integrity through the intermediary facilities or stages of receipt?		
3.2.b	If applicable, does the verifiable written procedure include how the applicant ensures the components or products maintain domestic origin integrity prior to receipt by the applicant when received from suppliers?		
4.0	Monitoring the Domestic Origin Verification Process		
4.1	Verification Activity		
4.1	At least once a year, has the applicant verified the method described in Section 3.2 for each product and does it have that verification on file? Also, if a non-conformance was found by the applicant, was it corrected and documented?		
4.2	Segregating (Preventing the Use of) Components or Products Not Intended for Customers Requiring Domestic		
4.2.a	If applicable, does the applicant have a verifiable written procedure it follows addressing the process for segregating non-domestic components or products from those delivered to or destined for USDA, or destined for customers requiring domestic origin product? Segregation is also required for products similar to that delivered to the USDA.		
4.2.a.1	Does the procedure include positive identification from receipt, through processing, packaging, storage and shipment to show a clear distinction between the domestic components or products intended for USDA and the non-domestic that are not intended for USDA?		
4.2.a.2	Does the procedure include release authority?		

Program Criteria Number	Program Criteria	Yes, No, N/A	Auditor's Notes
4.2.a.3	If necessary, does the procedure include physical separation?		
4.2.b	If applicable, does the applicant have a verifiable written procedure it follows addressing the process for segregating components or products that are "not established" as domestic from those delivered to or destined for USDA, or customers requiring domestic origin product? Segregation is also required for components products similar to that delivered to the USDA.		
4.2.b.1	Does the procedure include positive identification from receipt, through processing, packaging, storage and shipment to show a clear distinction between the domestic components or products intended for USDA and the components "not established" as domestic?		
4.2.b.2	Does the procedure include release authority?		
4.2.b.3	If necessary, does the procedure include physical separation?		
4.3	Controlling Non-conforming Components or Products		
4.3	Does the applicant have a verifiable written procedure it follows to control non-conforming components or products?		
4.3 (cont.)	Does it include notification of the DOV Program Manager when a non-conformance is found that results in a necessary change in its DOV procedures, a change in the applicant's domestic origin status, or a change in the components or products noted in the Application for Service?		
5.0	Corrective Action		
5.0	Does the applicant maintain corrective action records?		

Domestic Origin Verification (DOV)
CORRECTIVE ACTION REQUEST (CAR)

For Applicant Submittal to USDA in Response to DOV Audit Report

CAR Number _____

Name of Facility Audited:	Location of Audit:
Audit Date:	Corrective Action Due Date:
Auditor:	
The following non-conformance requires a corrective action response to be submitted by your company. Please respond to the auditor or DOV Program Manager on or before the due date. Only record the corrective action for one non-conformance per page.	
Non-conformance (Major or Minor):	
Facility's Corrective Action Response:	
Applicant's Representative:	Date Completed:

Please prepare a Corrective Action Response for each finding and submit to the auditor or via email to:
DOV.fv@ams.usda.gov

(USDA USE ONLY)	
Date Response Received:	DOV ID#:
Auditor's Recommendation:	
Auditor's Signature:	Date:

DOV Approved Letter Example



**United States
Department of
Agriculture**

Marketing and
Regulatory
Programs

Agricultural
Marketing
Service

Fruit and
Vegetable
Program

Specialty
Crops
Inspection
Division

STOP 0247
1400 Independence
Ave., SW
Washington, D.C.
20250-0247

Date:

John Doe, President
YY Company
P.O. Box 0000
Madison, WI 53701

Dear Mr. Doe:

We are pleased to inform you that Enter applicant's name (for example, YY Company, Madison, Wisconsin) has been approved to participate in the Domestic Origin Verification (DOV) Program. This approval extends through enter ending coverage date on certificate, as indicated on your enclosed DOV program certificate.

Now that you are an approved participant in the DOV program, your DOV certificate is the document to use as confirmation that USDA has verified your domestic origin program at this facility. The USDA, AMS, Fruit and Vegetable Programs, Commodity Procurement Division's Website publishes your company's name and address so your customers can readily see that you are approved into the DOV program.

If you have any questions, please contact Enter DOV Program Manager's name.

Sincerely,

Name
Director, Specialty Crops Inspection Division
Fruit and Vegetables Program

Enclosures

DOV Denial Letter Example

	
United States Department of Agriculture	
Marketing and Regulatory Programs	Date:
Agricultural Marketing Service	Jane Doe, President YY Company P.O. Box 0000 Madison, WI 53701
Fruit and Vegetable Program	Dear Ms. Doe:
Specialty Crops Inspection Division	We regret to inform you that your facility located at <u>enter address of facility audited</u> has not been approved into the Domestic Origin Verification (DOV) Program.
STOP 0247 1400 Independence Ave., SW Washington, D.C. 20250-0247	The reason(s) for this denial is:
	If you have any questions, please contact the DOV Program Manager at the following address:
	DOV Program Manager USDA Agricultural Marketing Service Fruit and Vegetable Program Specialty Crops Inspection Division 98 Third Street SW Winter Haven, Florida 33880 Telephone: (863) 294-4415 Alternate: (863) 294-7416 Fax: (863) 294-4219
	Sincerely,
	Name Director, Specialty Crops Inspection Division Fruit and Vegetable Program
	cc:

DOV Extension Letter Example

**United States
Department of
Agriculture**



Marketing and
Regulatory
Programs

Agricultural
Marketing
Service

Fruit and
Vegetable
Program

Specialty
Crops
Inspection
Division

STOP 0247
1400 Independence
Ave., SW
Washington, D.C.
20250-0247

Date:

Jane Doe, President
YY Company
P.O. Box 0000
Madison, WI 53701

Dear Ms. Doe:

Enter applicant's name (for example, YY Company, Madison, Wisconsin) has been approved for their continued participation in the Domestic Origin Verification (DOV) Program. This approval extends through enter date (month, day, year) for the products indicated on the enclosed DOV certificate due to enter reason for the extension (for example, the delayed production because of the expansion of this facility).

The DOV certificate is the document to use as confirmation that USDA has verified your domestic origin program. Your name and address will continue to appear on the USDA, AMS, Fruit and Vegetable Programs, Commodity Procurement Division's Website where your customers can readily see that your company has been approved into the DOV program.

If you have any questions, please contact Enter DOV Program Manager's name.

Sincerely,

Name
Director, Specialty Crops Inspection Division
Fruit and Vegetables Program

Enclosures

GLOSSARY OF TERMS

Agency: The Agricultural Marketing Service (AMS) of the USDA.

Applicant: The entity responsible for establishing, documenting, implementing, and maintaining a DOV program. It is the facility being audited; synonymous with Auditee. Some companies may have several facilities audited but each is considered an applicant even though they may have a different address for billing.

Approved DOV Program Participant: Any entity that has applied for service and met the *DOV Specific Requirements* as established through the audit process described in the *DOV General Policies and Procedures*.

Auditee: Facility audited; synonymous with Applicant.

Code: Unique and permanent finished product identification required for fruit and vegetable processed product lots.

Commodity Procurement Division (CPD): Division within USDA, Agricultural Marketing Service, Fruit and Vegetable Programs responsible for purchasing fruits, nuts, and vegetables for USDA feeding programs.

Component or Product: Any fresh or processed fruit, nut, or vegetable used as an ingredient in product destined for delivery to USDA.

Contractor: A person, agency, corporation, or other legal entity obligated under a contract with the Agency.

Corrective Action Request (CAR): The document the auditor uses to individually record the non-conformances reported on the summary page of the *DOV Audit Report*. The applicant (Auditee) is required to respond to each CAR with its resolution to the deficiency or non-conformance.

Documentation: Policy, procedures, instructions, and records prepared and maintained by the applicant that describe the facility's plans and processes for ensuring that products or components handled conform to *DOV Specific Requirements*. The documentation may be in the form of a well-defined manual or an accumulation of program documents and records.

Domestic Origin Products: Fresh or processed fruit, nut, or vegetables delivered under the USDA purchase programs originating from crops grown, processed, and packed in the United States, its territories or possessions, the Commonwealth of Puerto Rico, or the Trust Territories of the Pacific Islands (hereinafter referred to as the United States). See CPD announcements and invitations.

Domestic Origin Verification (DOV) Program: An audit program to evaluate an applicant's procedures for ensuring that only domestic origin products are delivered under the USDA purchase program. The program is available to contractors, subcontractors, suppliers, processors, and any financially interested party.

DOV Auditor: An AMS employee who has received training and met all the requirements for performing audits on the DOV Audit Program.

DOV Audit Report: The document the auditor uses to record information during the on-site audit. It has a summary page to report deficiencies and non-conformances found during the audit.

DOV Audit Plan: The document the auditor uses to prepare for the on-site audit by documenting the activities planned during the audit.

DOV Program Manager: The AMS employee who is trained in the DOV Audit Program and manages it. DOV Program Manager was previously referred to as the DOV Coordinator.

DOV Quick Guide: The document that summarizes the *DOV Specific Requirements* and provides a quick reference to the requirements.

DOV Specialist: An auditor trained in the DOV Audit Program and who is responsible for assisting the DOV Program Manager in performing Pre-validation Assessments, performing audits, and training auditors.

Entity: Any company or individual supplying a fruit, nut, or vegetable component or product for a USDA contract.

Finding: A conclusion of importance based on observations.

Follow-up Audit: an audit conducted to verify effectiveness of corrective actions resulting from either a validation or verification audit.

Grower(s): an individual or entity that develops a fruit, nut, or vegetable through a process of natural growth to maturity (e.g., plants, cultivates, grows, and harvests).

Handle: to engage in the buying, distributing, or selling of a fruit, nut, or vegetable component or product (e.g., purchase, receive, store, process, warehouse, or ship).

Non-conformance: a departure from or non-fulfillment of the *DOV Specific Requirements* or applicant's DOV program.

Non-conforming Component or Product: a quantity of product that is purchased, received, processed, packed, or shipped that is not controlled and specifically covered by the applicant's DOV program and procedures, and does not fulfill the specified domestic origin requirement.

Non-domestic Origin Component or Product: Fresh or processed fruit, nut, or vegetable that did not originate from crops grown, processed, and packed in the United States. Non-domestic is synonymous with imported.

On-site Validation Audit: the initial on-site audit to review the supplier's facilities, procedures, and records to determine conformance with the *DOV Specific Requirements*.

Opportunity for Improvement (OI): Areas with potential for strengthening. Although not identified as non-conformances, an OI has the potential to become a non-conformance if not improved or addressed.

Pre-validation Assessment: A review performed off-site (not at the applicant's facility) prior to the On-site Validation Audit that established whether or not the applicant has submitted complete documentation (i.e., verifiable written procedures) for its DOV processes in accordance with the *DOV Specific Requirements*.

Processor: A facility that converts raw components or product into finished product. Such a facility may also be a contractor, subcontractor, or supplier.

Segregation Procedure: A document that is prepared and maintained that describes the facility's process for preventing the commingling of domestic and non-domestic product or product "not established" as domestic.

Similar: Component or product possessing the same or almost the same characteristics.

Subcontractor: An individual or entity that performs part or all of the contract requirements for the contractor.

Supplier: An entity whose business is to supply a particular service or commodity including, but not limited to, raw materials, components, or finished products (i.e., individual, processor, subcontractor, broker, contractor). For the purposes of this document it does not include a grower.

Surveillance Activity: A review of a process to determine continuing conformance during an approval period. It is usually limited in scope.

Verification Audit: An audit that verifies the continued compliance of an applicant's DOV processes and procedures.

Trace-Back: A method of tracking components or product beginning at the end of a process and working back through the process either to the beginning or to a designated point to verify that the end item came from growers of domestic origin and was processed and/or packed domestically.

Verifiable Written Procedure: A document that specifies how to perform an activity or process. It is a particular way of accomplishing something. The procedure should describe (1) what the activity is, (2) when the activity is performed, (3) who performs the activity, and (4) if applicable, how, where, and why the activity is performed.