



Agricultural Marketing Service
Fruit and Vegetable Programs

Domestic Origin Verification Audit Program (DOV)



Background



The AMS Commodity Procurement Division (CPD) under its commodity purchase program purchases a wide variety of agricultural food products.

These purchases are used:

- *To support the National School Lunch Program in addition to other food assistance programs.*
- *To help stabilize prices in US agricultural commodity markets by balancing supply and demand.*

Requirement



The Commodity Procurement Division requires all vendors through contract to supply 100 percent U.S. origin commodities to USDA .

To qualify all products and product components shall have originated entirely 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.

Requirement



To demonstrate compliance with the domestic origin requirement, each contractor, subcontractor, supplier, or processor that provides a component or product to USDA is required to either:

perform a trace-back of at a *minimum* one code, per facility, per purchase order, for each commodity provided on the USDA purchase order

or

participate in the DOV Audit Program

Purpose of the DOV Program



- The DOV Program is an audit based program developed to replace the requirement to trace every contract.
- Applicants should already have a system or procedures in place to meet the current domestic origin contract requirement.
- The DOV program provides a means for the applicant to use these procedures to develop an auditable process to verify the domestic origin of the product sold to the USDA.

Advantages of Program Participation



- Decreases the number of traces required to be submitted to the USDA and any redundancies.
- Assists applicants in demonstrating continual improvement of their verification procedures.
- Compliance with the domestic origin requirement can be assured *prior* to receipt of components or products from suppliers.

Who is eligible to participate?



- Any financially interested applicant (contractor, subcontractor, supplier, or processor) providing components or products to the USDA may request the DOV Audit Program service.
- The DOV Audit Program may be used whether or not the applicant handles imports, requests lot inspection, or receives in-plant inspection.

How to apply to the program?



Contact the DOV Program Coordinator to discuss the DOV specific requirements and application process.
Contact information can be found at:

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

Complete the required Application for Service form
and submit to the DOV Program Coordinator.

Along with the Application for Service



Applicant's submit a DOV program manual detailing the verifiable written procedures used to ensure compliance with the domestic origin contract requirement along with specific DOV Program requirements.

(The DOV Quick Guide summarizes the specific DOV Program requirements and can be viewed at <http://www.ams.usda.gov/DOV>)

Pre-Validation Assessment



The Applicant's DOV program is assessed based on the documented procedures and processes submitted.

Auditor then provides feedback on any elements within the applicant's submitted DOV program that may require additional clarification or information prior to the On-site Validation Audit.

Validation Audit



Audit Coordinator:

- Completes the Pre-validation Assessment process and deems the applicant ready for the on-site validation audit.
- Assigns competent auditor(s) to conduct the validation audit and discuss any nonconformance with the applicant.

Validation Audit



If any non-conformances are found:

- Written Corrective Action Requests (CAR) are provided to the applicant.
- The applicant is then required to submit written responses to the CAR requests.
- When all the corrective actions are determined adequate, the applicant is an:

Approved DOV Program Participant.

Validation Audit



If an applicant is unable to be approved as a DOV Program Participant, the applicant is required to continue to submit trace-backs for every contract and commodity for the facility audited .

Verification Audits



- At least one on-site audit per year is required to ensure continued compliance with program requirements and approval in the DOV Program.
- Increased frequency of Verification Audits is dependent upon USDA's assessment of the risk of non-compliance of the applicant's program combined with verification audit findings.

Verification Audits



Verification audits are considered compliant and DOV program approval is maintained when no audit deficiencies are found or adequate corrective action is taken in response to audit deficiencies.

Benefits of Participation



- trace-back for every contract is no longer needed.
- greatly reduces the paperwork of numerous traces.
- alleviates the redundancy of trace-back on the same product used for multiple contracts.
- Compliance with the origin requirement is established prior to production rather than traced-back after production.

Benefits of Participation



- Approved DOV Program Participants are listed on the USDA website.
- Contractors can select suppliers from the approved list and be assured that the supplier is able to meet the domestic origin requirement prior to contracting with them.
- Eliminates any contractor concern regarding the ability of the supplier to provide trace documentation after delivery to the contractor.

Summary



- DOV is an audit based program and is an option to the current trace-back requirement.
- DOV improves the way domestic origin is verified.
- Approved DOV Program Participants can be listed on the Specialty Crop Inspection Division websites.

Summary



- DOV Audit Program participation decreases paperwork, trace-backs, and redundancy.
- Any applicant can participate – contractor, subcontractor, supplier, or processor.
- Program participation enhances the management of domestic origin verification.

Resources



Complete DOV Audit Program information is available at: <http://www.ams.usda.gov/DOV>

- Application for Service form
- DOV Audit Program General Policies and Procedures
- DOV Quick Guide
- Audit Report form
- List of Approved DOV Program Participants
- Audit rate information