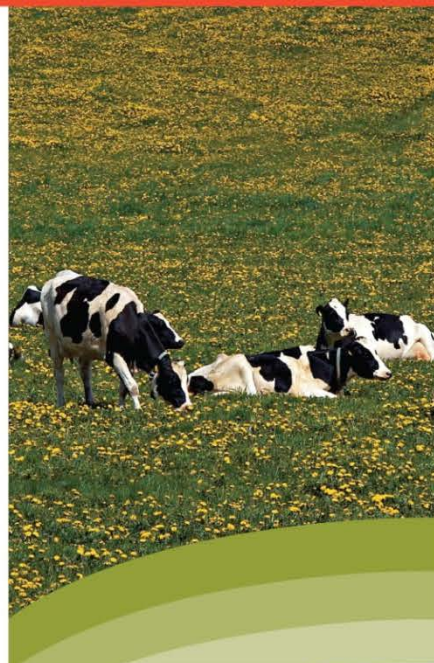
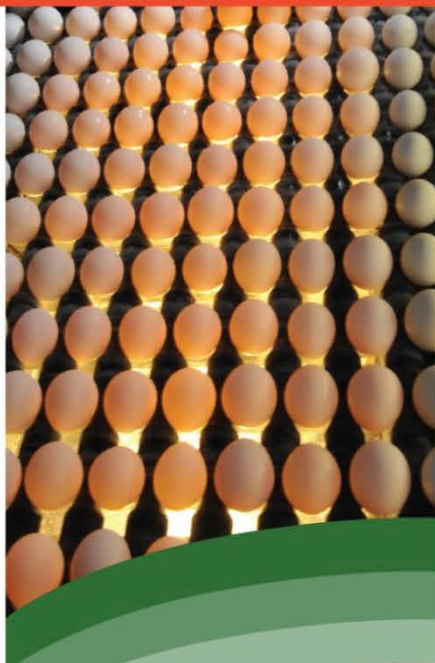




United States Department of Agriculture

# Agricultural Marketing Service

Creating Opportunities for American Farmers and Businesses



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Creating Opportunities for American Farmers and Businesses

## Domestic Origin Verification Audit Program (DOV)



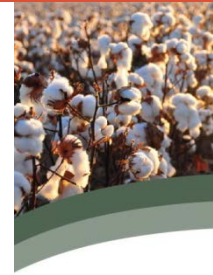
# Background

The AMS Commodity Procurement Program (CP) under its commodity purchase program (USDA Foods) procures a wide variety of agricultural food products.

These purchases are wholesome, high-quality products that go to:

- *Schools (National School Lunch Program)*
- *Food Banks and households country wide (Emergency Food Assistance Program)*
- *To help stabilize prices in U.S. agricultural commodity markets by balancing supply and demand*

# Requirement



- ▶ Products must be 100 percent U.S. Origin
- ▶ 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
- ▶ Domestic origin compliance is required by each vendor that supplies a commodity to USDA by either:
  - performing a trace-back of, at a *minimum*, one code per facility, per purchase order, for each commodity provided on the USDA purchase order

*OR*

*participating in the DOV Audit Program*

# Purpose of the DOV Program

- DOV is an audit based program developed to replace the requirement to trace for every contract.
- Applicants should already have a system or procedures in place to meet the current domestic origin contract requirements.
- 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.
  - ▶ DOV certification is valid for one year
- ▶ 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
  - ▶ receives in-plant inspection

# How to apply to the program?

- ▶ Applicants submit a DOV program manual that details the verifiable written procedures used to ensure compliance with the domestic origin contract requirement along with specific DOV Program requirements.
  
- ▶ Three main segments
  - ▶ Pre-validation Assessment
  - ▶ Validation Audit
  - ▶ Verification Audit

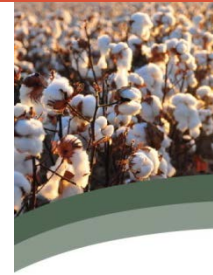
*(The DOV Quick Guide summarizes the specific DOV Program requirements and can be viewed at <https://www.ams.usda.gov/services/auditing/dov> )*



# Pre-Validation Assessment

- ▶ Applicant's DOV program assessed on procedures and processes submitted for review
- ▶ Auditor provides feedback on any elements within the applicant's submitted DOV program
  - ▶ Ensures program fully addresses *DOV Specific Requirements*
  - ▶ Issues that may require additional clarification or information prior to the On-site Validation Audit
- ▶ Three results: *Adequate, Requires Clarification, Does Not Meet*

# Validation Audit



## Applicant's Responsibilities:

- ▶ Pertinent DOV information and program made available
- ▶ Interviews with key personnel
- ▶ Updated information as necessary

## Audit Coordinator:

- ▶ Completes Pre-validation Assessment process
  - ▶ Deems the applicant ready for the on-site validation audit
- ▶ Assigns competent auditor(s) to conduct the validation audit
  - ▶ Discusses any nonconformance with the applicant

# Validation Audit



If any non-conformances are identified:

- ▶ Corrective Action Requests (CAR) are provided to applicant
- ▶ Applicants provide required written responses to the CAR requests
- ▶ Once all the corrective actions are determined adequate, the applicant is an:

*Approved DOV Program Participant*

# Validation Audit



- ▶ If *not* approved as for DOV Audit Program
  - ▶ Notification will be provided by DOV Program Manager
  - ▶ Applicant will be required to continue to submit trace-backs for every contract and commodity for the facility audited

# Validation Audit



In order to maintain status as an Approved Program:

- ▶ At minimum one on-site audit per year is required
  - ▶ Ensures continued compliance with program requirements and approval in the DOV Program.
- ▶ Keep DOV procedures updated
- ▶ Notify DOV Program Manager of any changes to Applicant's DOV Program
- ▶ Upon assessment of risk of non-compliance combined with verification audit findings, Verification Audits frequency may increase
  - ▶ Handling non-domestic components or products
  - ▶ Changes in applicant's management or key personnel
  - ▶ History of non-conformance with domestic origin requirements

# Validation Audit



Verification audits are considered compliant when:

- ▶ DOV program approval is maintained
- ▶ No audit deficiencies are found or adequate corrective action is taken in response to audit deficiencies

*Upon approval an annual certificate is provided that is valid for 12 months from approval date.*

# Benefits of Participation

- Trace-back for every contract/commodity no longer needed
- Greatly reduces the paperwork of numerous traces
- Alleviates the redundancy of trace-backs on the same product used for multiple contracts
- Streamlines trace-back requests for No Checkloading Pilot
- 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

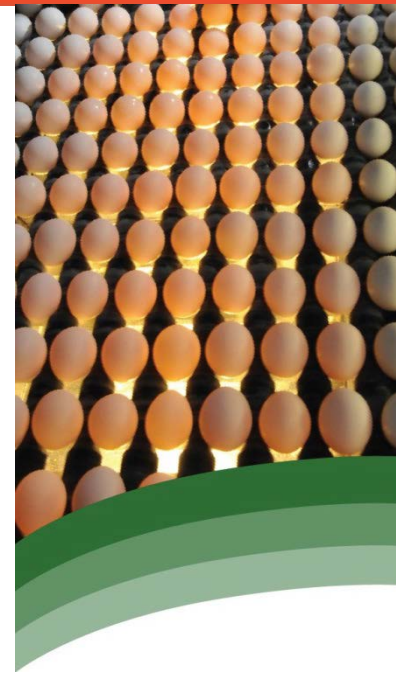
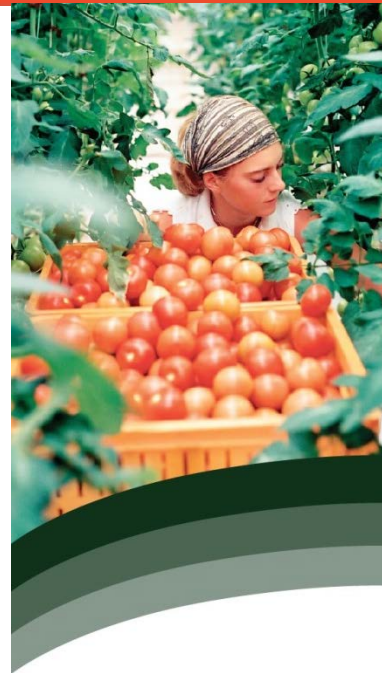
- ▶ Contractors can select suppliers from the approved list and be assured that the supplier is able to meet the domestic origin requirement prior to contracting with them.
- ▶ Eliminates any contractor concern regarding the ability of the supplier to provide trace documentation after delivery to the contractor.





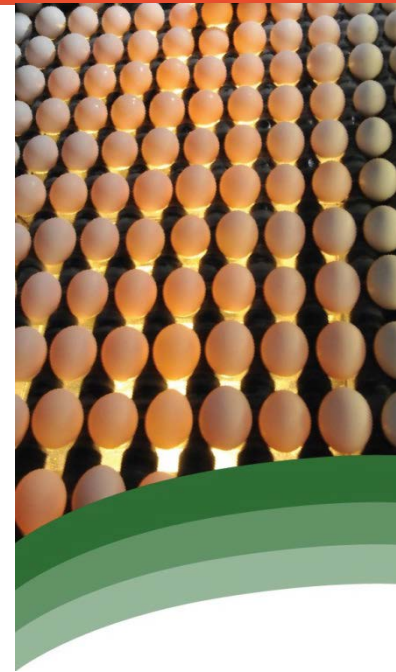
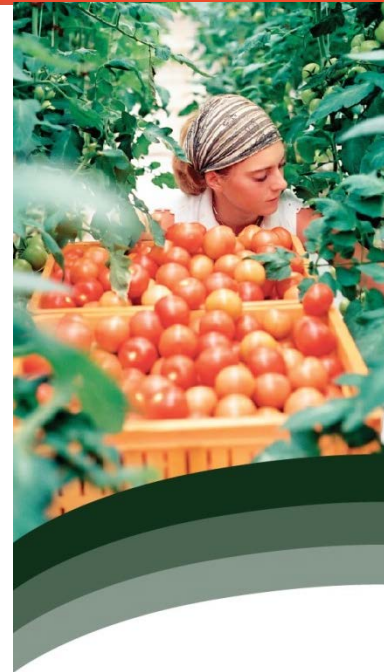
# Summary

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

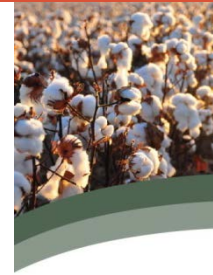


# Summary

- ▶ 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.
- ▶ Streamlines domestic origin requests for No Checkloading Pilot.



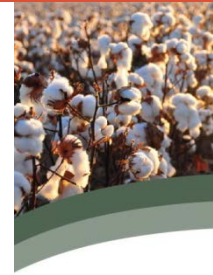
# Resources



Complete DOV Audit Program information is available at:  
<https://www.ams.usda.gov/services/auditing/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

# Resources



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

<https://www.ams.usda.gov/services/auditing/dov>

DOV Program Manager Sean Martin:

[DOVS.FV@ams.usda.gov](mailto:DOVS.FV@ams.usda.gov)

503 586 6473

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