



Changes to USDA GAP & GHP, Produce Harmonized GAP, and Harmonized GAP Plus+ Audit Billing and Scheduling

Amber D. Vallotton, Food Safety Extension Specialist, Virginia Tech School of Plant & Environmental Sciences,
Eric Bowen, Area Specialized Food Safety Agent, Virginia Cooperative Extension-Nottoway County

Introduction

In Virginia, VDACS conducts the USDA-based audits as a Federal-State cooperator on behalf of USDA. In this role, they come to a farm to audit and verify GAP compliance based on a farm's food safety plan and implementation of practices. Based on recent changes to the USDA Audit Program, please make sure to understand the following information related to audit billing, requests, and scheduling. This is especially important to avoid delays in scheduling audits to meet buyer requirements. These changes apply to USDA GAP & GHP, Produce Harmonized GAP, and HGAP Plus+ audits.

Changes to Audit Fee Structure

Previously, producers received a single bill from VDACS relating to their GAP audit. With the new changes, producers will now receive two bills: one from VDACS and one from USDA.

- The VDACS bill is based on a flat fee of \$108 per hour covering time spent conducting the audit on-site, travel time, and office time spent compiling the report sent to USDA for review.
- The USDA bill is for the time they spend reviewing the VDACS audit report, which is anticipated to be a minimum of two hours (\$108 per hour).
- Additionally, those farms pursuing HGAP Plus audits will be charged a fee of \$250 for Global Food Safety Initiative (GFSI) certification.

Changes to Requesting and Scheduling an Audit

Another important change that is different from previous steps when requesting a GAP audit with VDACS is a new vendor form:

- Producers **must** now complete and submit the new SC-430 billing form for new vendors to USDA **before** VDACS can schedule an audit.
- To avoid delays, producers should make sure to fill out this form and send to USDA as soon as possible, so VDACS can confirm receipt and approval of the producer's SC-430 form.

Steps to Requesting a USDA-based Audit:

1. Complete the "SC-430 Vendor Form" and submit as detailed in the form instructions:

<https://www.ams.usda.gov/sites/default/files/media/SC430VendorForm.pdf>

<https://www.ams.usda.gov/sites/default/files/media/SC430AuditServicesInstructions.pdf>

2. Based on buyer food safety requirements and audit preparation process, complete the "Request for Audit Service" Form SC-237 detailing type of audit needed.

<https://www.ams.usda.gov/sites/default/files/media/SC237Aexp083119.pdf>

3. Email or fax the completed SC-237 form to VDACS.

HGAP and HGAP Plus+ Audits:

Cynthia Mohan

Phone: 804-786-3548

Cell: 804-920-9516

Fax: 804-371-7785

Cynthia.mohan@vdacs.virginia.gov

GAP & GHP Audits:

Thomas Smith

Phone: 804-786-1808

Fax: 804-371-7785

Thomas.smith@vdacs.virginia.gov

4. A final form that needs to be submitted is the “Agreement for Participation in Audit Verification Programs” Form SC-651. This should also be emailed or faxed to the VDACS auditor (see 3. above).

<https://www.ams.usda.gov/sites/default/files/media/SC651.pdf>

5. Once VDACS has verified that all paperwork is completed and approved, they will give more information about the program procedures and schedule the audit.
6. Remember, that the auditors work the entire state and demand is high, so plan ahead by making sure all the necessary paperwork is submitted in a timely fashion.
7. Virginia Cooperative Extension and the Fresh Produce Food Safety Team is here to assist you in your GAP certification efforts. Don't hesitate to contact our team for guidance and mentoring in USDA-based audits. We encourage you to also check out our comprehensive website, which includes a wealth of resources along with contact information.

While the guidance contained herein is based on the most current information we have as of April 1, 2019, federal policies, protocols, and fees can and do change, so always consult with USDA's website (below) and contact the VDACS auditors to verify any updates and audit costs.

Resources

USDA Agricultural Marketing Service Good Agricultural Practices (GAP) & Good Handling Practices (GHP) Website

<https://www.ams.usda.gov/services/auditing/gap-ghp>

Virginia Produce Safety Website

<http://www.hort.vt.edu/producesafety/>

Virginia Fresh Produce Food Safety Team Contacts

<https://www.hort.vt.edu/producesafety/about.html>



VDACS auditors conducting GAP audits in Virginia.
(Source: Amber Vallotton)