USDA QUALITY SYSTEM ASSESSMENT (QSA) PROGRAM CHECKLIST

☐ ***Audit the Program against the following QSA Program requirements:***

PROGRAM REQUIREMENTS – QAD 1002B Procedure, QAD 1013 and GU7309CCA

Text in blue is specific to GU7309CCA

Text in green is specific to QAD 1013 and QAD 1002B Procedures.

(1) Identify program documents and sections that address each criterion.

(2) Explanations and/or comments must be provided to provide enough evidence of conformance or non-conformance, as applicable.

QAD 1002 B Procedure, QAD 1013 & GU7309CCA

Blue text is specific to GU7309CCA

Green text refers to QAD 1013 and QAD 1002B

3 Supplier Evaluations and Re-evaluations **3.1 Producer (including producer-feeder)**	**Applicant Reference Document**	**Conform (Y/N?)**	**Objective Evidence/Findings/ Remarks**
3.1 Initial onsite evaluations of each producer are required if the claim may change over time or location. Therefore, any program that includes, but is not limited to health, feeding, and/ or management claims requires initial onsite evaluations of producers. (Also, QAD 1013 Procedure, Section 4.3.1) **3.1.1.1** Annual onsite re-evaluations of each producer are required. (Also, QAD 1013 Procedure, Section 4.3.2)			

3 Supplier Evaluations and Re-evaluations **3.1 Producer (including producer-feeder)**	**Applicant Reference Document**	**Conform (Y/N?)**	**Objective Evidence/Findings/ Remarks**
3.1.1 Initial onsite evaluations of each producer are not required if the claim does not change over time or location, such as date of birth (age), source, and breed claims. However, the evaluation must be sufficient to verify that animals conform to the claim. The **risk** associated with the producer must be considered when determining whether or not it is necessary to conduct an initial onsite evaluation. a) Annual onsite re-evaluations of producers are required at frequency of 10% or 2, whichever is greater. b) Alternatively, annual onsite re-evaluations of producers may occur at a frequency of 5% or 2, whichever is greater, if the company conducts initial onsite evaluations of each producer. c) If the company evaluates independent groups of animals, then annual onsite re-evaluations of producers may occur at a frequency of 3% or 2, whichever is greater.			
3.1.3 Minimum requirements for evaluations and re-evaluations of producers include the following: a) Person-to-Person interaction (face-to-face or telephone communications); b) Review of production records, as appropriate, to ensure conformance; c) Documented procedures, as appropriate, to ensure conformance; d) Communication of the program requirements to ensure conformance; e) A detailed questionnaire appropriate to the claim and activities that occur at the location, (USDA must review and approve the questionnaire prior to use,); and f) Communicate to producer that USDA may visit his/her location(s) to verify the approved USDA PVP or QSA Program's activities.			

3 Supplier Evaluations and Re-evaluations **3.1 Producer (including producer-feeder)**	**Applicant Reference Document**	**Conform (Y/N?)**	**Objective Evidence/Findings/ Remarks**
3.2 Dairy Calf Ranch, Backgrounder, Stocker, Feedyard, Auction Market, and Non-regulated Feed Mill: **3.2.1** Initial onsite evaluations of each operation are required, regardless of the claim. (Also, QAD 1013 Procedure, Section 4.3.1) **3.2.2** Annual onsite re-evaluations of each operation are required, regardless of the claim. (Also, QAD 1013 Procedure, Section 4.3.2)			
3.3 Regulated Feed Mill **3.3.1** Evaluations and re-evaluations of regulated feed mills are not required. However, the company must ensure that the requirements outlined in GU7309CCA Sections 4.2 and 5 are met. -			

4 Required Documentation and Records of Suppliers **4.1.1 Producer (including producer-feeder)**	**Applicant Reference Document**	**Conform (Y/N?)**	**Objective Evidence/Findings/ Remarks**
4.1.2 Each approved supplier must maintain documented procedures and records appropriate to the operation and necessary to provide evidence of conformance. Documents and records must be retained for the timeframe necessary to provide evidence of conformance. *NOTE: Depending upon a supplier's on-farm activities, the questionnaire (3.1.3e) may serve as a documented procedure. For example, a producer who has 2 calving seasons and does not receive calves from outside sources may use the questionnaire to document how the calves are identified, where they are located, and how dates of birth are assigned.*			
4.2 Regulated Feed Mills 4.2.1 When applicable based on the claim, each regulated feed mill must provide the company with a certificate of compliance or a letter of guarantee stating that the feed to be used for program animals meets the program requirements.			

4 Required Documentation and Records of Suppliers **4.1.1 Producer (including producer-feeder)**	**Applicant Reference Document**	**Conform (Y/N?)**	**Objective Evidence/Findings/ Remarks**
4.3 Backgrounder, Stocker, Feedyard, Auction Market, and Non-regulated Feed Mill **4.4 Dairy Calf Ranch** **& 4.4.1** Each approved supplier must maintain **documented procedures and records** appropriate to the operation and necessary to provide evidence of conformance. These may include documented procedures and records that are standard to the approved program as well as those that are unique to the operation. (For example: standard procedures for control of documents and records and supplier evaluations; and unique procedures for identification and traceability.)			
4.3.1 & 4.4.2 The following requirements must be addressed: a) Control of Documents b) Control of Records c) Operation Representative d) Training e) Receiving Process f) Identification and Traceability g) Preservation of Product Additionally, the operation must have a documented shipping procedure and shipping records. Records must include the date, the number of animals in the shipment, animal identification, the name of the shipper, the name of the receiver, and the claim(s) to which the animals conform. *NOTE: Animal identification may include individual identification, group identification, or other identification as appropriate.* h) Control of Non-Conforming Product. *NOTE: Non-conforming animals must be identified in a manner that clearly identifies them from conforming animals.* NOTE: These are elements from QAD 1002 Procedure			

4 Required Documentation and Records of Suppliers **4.1.1 Producer (including producer-feeder)**	**Applicant Reference Document**	**Conform (Y/N?)**	**Objective Evidence/Findings/ Remarks**
4.4.2a A **dairy supplier list** from which calves are sourced. The list must contain the name of the dairy, an identification number (as applicable), the approval date, and the removal date. **4.4.2b** A **schedule** identifying when calves are picked up at each approved dairy and **supporting information**. The schedule may contain the name of the dairy or another code assigned to the dairy. Supporting information must include the number of calves collected on the scheduled date, the dairy of origin, and calf identification. NOTE: Each calf must be traceable to the dairy of origin. Therefore, appropriate animal identification must be used. **4.4.2c Documented criteria for visual verification of the age** of calves at pickup. (For example: 1 to 2 day old calves have wet navels, soft hooves, and thick, soft, lush coats.) **4.4.2d Documented method for assigning the date of birth** of the calves. This method must be consistent with the pick-up schedule. At a minimum, the calf's date of birth must be recorded as the date of the previous pick-up. (For example: Calves are picked up on the 1st and 15th of each month. Calves picked up on the 15th are assigned a date of birth of the 1st.) This methodology, along with the criteria for verifying the age, is used to ensure that the date of birth has been assigned properly.			
5 Training of Suppliers **5.1** Suppliers must be trained only if they are personnel with responsibilities in the approved program. However, training of all suppliers is encouraged since the company must ensure that animals and products received from outside establishments and used in the program conform to specified receiving requirements. 5.2 The company must communicate the specified receiving requirements to suppliers. (QAD 1002 Procedure Clause 4.2)			

	Applicant Reference Document	Conform (Y/N?)	Objective Evidence/Findings/ Remarks
6 Evaluator of Suppliers **6.1** Evaluators, including the person making the final decision, must be independent of the supplier and free from bias and conflict-of-interest. This ensures that the evaluation findings and conclusions are based solely on the evidence collected, thereby making the evaluation an effective and reliable tool. (Also, QAD 1013 Procedure, Section 4.3.3.)			
6.2 When there is an inherent conflict of interest, the supplier evaluation must include controls that limit the conflict-of-interest. (For example: The buyer may conduct the supplier evaluation of the producer, but the final decision is made by another person.)			
-When a company approves its own suppliers, the company must maintain an approved suppliers listing. (QAD 1013 & 1002B Procedures, Section 4.2.1) - The approved suppliers listing must (a) identify the supplier's name, address, and approval date; and (b) be available to the USDA for review. (QAD 1013 & 1002B Procedures, Section 4.2.2) -The company must also maintain the date that suppliers were removed from the suppliers listing. (QAD 1013 & 1002B Procedures, Section 4.2.2)			
7 Company's Approved Supplier List **7.1** Companies with an approved USDA PVP or QSA Program must make their supplier lists available to QAD.			
8 Program Compliant Tags (PCT) **8.1** The use of a PCT allows animals to retain claims that do not change over time or location, such as date of birth (age), source, and breed, regardless of movement between approved and unapproved locations. If animals move from an unapproved to an approved location, then the approved location must read the PCT and access the individual animal information from the approved USDA program that enrolled the animal. *NOTE: If the claim may change over time or location, such as health, feeding, and/or management claims, then animals with must move from one approved location to another approved location even if a PCT is used.*			

	Applicant Reference Document	Conform (Y/N?)	Objective Evidence/Findings/ Remarks
8.2 If the company requires the use of a PCT, then the following requirements must be met: a) A PCT is a one-time use, tamper-evident tag, which contains a non-repeatable, unique number. It may be an EID, RFID, or a visual tag. The company must provide evidence that the PCT meets these requirements. b) The PCT must be applied (1) under an approved USDA PVP or QSA Program and (2) at the farm or ranch of birth or at an alternative location as approved on a case-by-case basis. c) The company must control the use of PCT, including a documented procedure for tag allocation and an inventory record. The PCT inventory record i) May be maintained by either the company or the producer. ii) Must include the tag number, the producer, and the associated claim(s). iii) Should include dates of activity, the tag status, and changes of identify when a tag is replace with another. *NOTE: Unused PCTs should be recorded within the company's program to strengthen inventory control*			
9 Back Verification **9.1** The verification of claims for animals that have left the farm or ranch of origin may occur only if the claim does not change over time or location, such as date of birth (age), source, and breed.			
9.2 To use back verification, the company must include a documented procedure and records specific to the activity within the approved program. Documents and records must be maintained for the timeframe necessary to provide evidence of conformance.			

	Applicant Reference Document	Conform (Y/N?)	Objective Evidence/Findings/ Remarks
9.3 The following requirements must be met: a) The producer must receive an evaluation. The evaluation must meet the requirements outlined in Section 3, as applicable. b) Animals must be identified (ear tag, brand, etc). The method must match the information collected during the evaluation of the producer. c) Animals must have moved directly from the farm or ranch of origin to the location where back verification occurs. The location must be approved by the company in accordance with Section 3 and Section 4, as applicable. d) Animals must be traceable to the farm or ranch of origin. e) A copy of the production record(s) supporting the claim(s) must be maintained by the company or approved location. f) The producer must maintain (1) shipping records that include the date, the number of animals in the shipment, animal identification, the name of the shipper, and the name of the receiver; and (2) a bill of sale, if applicable, including the date, the number of animals sold, animal identification, the name of the seller, and the name of the buyer. ***NOTE: Companies that include back verification as an activity within the approved program are subject to increased audits to verify conformance to the requirements. Such audits may include verification activities at the producer level.***			
4.1 Internal Audit (applicable to 1002B and 1013 **4.1.1** The company must conduct internal audits at planned intervals.			

	Applicant Reference Document	Conform (Y/N?)	Objective Evidence/Findings/ Remarks
4.1.3 The internal audits must determine whether the QMS a) Conforms to the planned arrangements, to the requirements of this Procedure, and to the QMS requirements established by the company; and b) Is effectively implemented and maintained.			
4.1.4 The company must have a clear documented procedure which specifically defines: a) The planning of an audit program, which must consider the status and importance of the processes and areas to be audited, as well as the results of the previous audit; b) The audit criteria, scope, frequency, and methods; c) The selection criteria of the auditors and conduct of auditors which must ensure objectivity and impartiality of the audit process (Auditors must not audit their own work.); d) The responsibilities for planning and conducting audits; e) The reporting of results; f) The follow-up activities (Follow-up activities must include the verification of the actions taken and the reporting of the verification results.); and g) The maintenance of records.			
4.1.5 Within the area being audited, management must ensure that actions are taken without undue delay to eliminate detected non-conformances and their causes.			
4.1.6 The company must maintain <u>records</u> of the internal audits. *(Note: Review previous IA report. What was the date of the report? Have the findings been addressed?)*			

QAD 1002B Procedure, Specified Product Requirements

	Applicant Reference Document	Conform (Y/N?)	Objective Evidence/Findings/ Remarks
5.1.1 Cattle must be traceable to live animal production records. Verification activities for age requirements must be conducted at the harvest, feedlot, and producer levels as required by the submitted QSA Program. Records used to verify this requirement must meet any one of the following criteria (5.1.1.1. to 5.1.1.3):			
5.1.1.1 Individual Animal Age Verification: a) Animals must have a unique individual identification. b) Records must be sufficient to trace the individual animal back to ranch records. c) Records must indicate the actual date of birth of the animal and must accompany each animal through the process.			
5.1.1.2 Group Age Verification a) All animals within a group and born during the same birthing season must be individually identified. b) Records must indicate the actual date of birth of the first calf of the birthing season. c) The age of all calves within a group must be *derived from* the actual date of birth of the first calf born within the group. d) Records indicating the date the bulls are given access to the cows may be used as a supplementary measure verifying the oldest age of animals in the group which is determined in 5.1.12 b.			
5.2.1 All cattle complying with 5.1.1.1, 5.1.1.2, or 5.1.1.3 must be uniquely identified. These identification marks must be transferrable through processing, packaging, storage, and shipping to insure the integrity of the process and the product.			
5.2.2 Shipping documentation (bills of lading, shipping manifests, or letters of guarantee) must have the statement "Product Meets QSA Program Requirements for Age and Source Verification" and must clearly identify the product and product quantity.			

NOTE 1: Assigning an arbitrary date of birth based on the producer's production practices is not an acceptable method for age verification; and does not meet the requirements of QAD 1002B Procedure.
NOTE 2: Producers who have more than 1 calving season during a year must implement a method of identification that ensures the calves from each season are identified, traceable, and controlled.
NOTE 3: Producers who calve throughout the year must individually identify each calf and maintain individual dates of births.

NOTE 4: Artificial insemination dates and bull turn out dates may be used only as a supplementary measure to verify date of birth.
Live animal production records which show the actual date of birth must be supported by the producer's production practices and records.

QAD 1013 Procedure Specified Product Requirements

	Applicant Reference Document	Conform (Y/N?)	Objective Evidence/Findings/ Remarks
5.1 Animals must not be administered hormonal growth promotants (HGPs) at any time during their lifetime.			
5.2 Animals must be traceable to their farm or ranch of birth using live animal production records. Verification activities for specified product requirements must be conducted at applicable levels as required by the submitted QSA Program.			
5.3 Animals must be obtained from, and must be traceable to, approved companies that appear on the *Official Listing of Eligible Suppliers to Export for the European Union*.			
5.4 Animals must be identified prior to leaving the place of birth with a program compliant ear tag. A Program compliant ear tag is a 1-time use, tamper-evident tag, which contains a non-repeatable, unique number. It may be an EID, RFID, or a visual tag. The company must provide evidence that the tag meets these requirements.			
5.5 The company must maintain sufficient records of all rations fed to animals for the life span of the animal to demonstrate compliance. The records must identify the source and ingredients of pre-mixed feed and supplements.			
5.6 When feed or supplements are obtained from sources that process feeds containing HGPs, the company must periodically test feeds to ensure procedures in place effectively prevent HGP-treated feeds from being fed to Program animals. As an alternative, if the feed supplier has an additive-control program monitored by a State or Federal agency, the company may obtain a certificate of compliance or letter of guarantee stating that the feed to be used for Program animals is free of HGPs.			

	Applicant Reference Document	Conform (Y/N?)	Objective Evidence/Findings/ Remarks
5.7 If HGPs are used on the premises, the company must develop and maintain written procedures for accounting for the acquisition, inventory, use, and disposal of all HGP used on the premises. The procedures must ensure that feeds treated with HGPs do not contaminate feed for Program animals. Applicable records must be maintained.			
5.8 Shipping documentation (bills of lading, shipping manifests, letters of guarantee, or electronic transmissions) must accompany each shipment of animals that occurs due to sale or transfer of custody. Shipping documentation must have the statement "Cattle Meet EV Program Requirements for the EU" and must clearly identify the animals and the quantity.			

RECOMMENDATION:

Identify the recommendation for each program if there is more than one. If the applicant was initially approved without an onsite audit, then the recommendation should be for continued approval, not initial approval.

Ready for Initial Audit (Desk Audit)	
Not Ready for Initial Audit (Desk Audit)	
Program Approval with No Conditions (Initial Audit)	
Program Approval with Conditions (Initial Audit) State the conditions that should apply	
Continued Program Approval with No Conditions (Surveillance Audit)	
Continued Program Approval with Conditions (Surveillance Audit) State the conditions that should apply	
Program Denial (Initial Audit)	
Program Suspension (Surveillance Audit)	
Program Withdrawal (Surveillance Audit)	

NOTE: When this Addendum is complete, print to ADOBE and add to the audit documentation. Do NOT copy and paste into a 1002 or 1001 checklist.