USDA Process Verified Program for Seed
General Policies and Procedures

1 Purpose

This document outlines the general requirements of the USDA Process Verified Program for Seed. Specific program requirements for the USDA Accredited Seed Laboratory (ASL) Program, USDA Accredited Seed Sampling Program (ASSP), USDA Accredited Field Inspection Program (AFIP), and USDA Accredited Seed Conditioning Program (ASCP) are outlined in Appendixes A, B, C, and D of this Procedure. The specific program requirements must be met through an approved USDA Process Verified Program. The requirements of the USDA Process Verified Program are defined in *S&T 1001 Procedure, USDA Process Verified Program*. The USDA Process Verified Program ensures that the specific program requirements are supported by a documented quality management system.

The USDA Process Verified Program for Seed is a voluntary, user-fee audit program. It is available to seed laboratories, seed samplers or sampling entities, seed conditioners, and field inspectors. Services are provided by the Seed Regulatory and Testing Division (SRTD).

SRTD is part of the United State Department of Agriculture (USDA), Agricultural Marketing Service (AMS), Science and Technology Program (S&T).

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2 Scope

The provisions of the document applies to all accredited seed entities administered by S&T. It applies to seed entities seeking to apply or maintain status as a USDA Accredited Seed Entity. S&T provides due notice of any changes to its requirements.

3 Reference Documents

3.1 *S&T 1001 Procedure Process Verified Program*
3.2 USDA Process Verified Program Web site: [Process Verified Program | Agricultural Marketing Service]
3.3 *AASCO Seed Sampling Handbook*, as amended
3.4 *US OECD Procedures Guide*
3.5 *OECD Seed Schemes, Appendix 8*
3.6 *Association of Official Seed Analysts (AOSA) Rules of Testing Seed*
3.7 *Federal Seed Act*
3.8 *ISO/IEC 19011. Guidelines for auditing management systems*

4 Responsibilities

4.1 Applicants and S&T must meet all applicable requirements outlined in this document.

4.2 Applicants are required to maintain and implement their programs as described in their approved program documentation. Applicants must inform S&T, without delay, of significant changes relevant to program approval.

4.3 Audit documentation is retained by S&T in an electronic format. S&T does not consult with applicants regarding the development, implementation, and maintenance of programs.

4.4 S&T provides due notice of any changes to its requirements, and verifies that applicants carry out any necessary adjustments.

5 Auditor Requirements for the USDA Process Verified Program for Seed

5.1 The auditor must be a Registered Seed Technologist (RST) in good standing with the AOSA-SCST.

5.2 The auditor must have a minimum of three (3) years of experience in seed testing.

5.3 The auditor must have successfully completed a recognized ISO 9001 Lead Auditor training course.

5.4 The auditor must have participated in at least three (3) onsite audits as a trainee, under the supervision of an experienced auditor approved by the organization.

6 Application for Service

6.1 To request service, submit the following information to SeedService@usda.gov:

(1) AMS New Customer Application form. Applicants who have a customer information form on file do not need to resubmit the document unless the information must be updated. To receive the current version of AMS New Customer Application form email SeedService@usda.gov.

(2) A complete copy (hard copy or in electronic form) of the applicant's program documentation as described in the individual program procedure, as applicable. Email the documentation to SeedService@usda.gov.

6.2 An applicant may cancel the application process at any time. Applicants are responsible for fees accrued prior to canceling their application.

7 Receiving Applications for Service

7.1 The Program Manager, or designee, notifies the applicant upon receiving the application for service. If the submitted application is inadequate, the Program Manager, or designee, contacts the applicant to request additional documentation. The application is withheld from further processing until the necessary documentation is received.

7.2 Once the application is complete, the Program Manager, or designee, assigns an auditor to conduct the desk audit and forwards the application to the auditor.

7.3 The Program Manager, or designee, notifies the applicant of the assigned auditor. The applicant has 5 business days from receipt of notification to submit written objections regarding the auditor to the Program Manager.

7.4 When applicable, the Program Manager, or designee, also notifies the Program Review Committee.

8 Use of the Program Review Committee

8.1 The final decision authority regarding program status for the USDA Process Verified Program; is transferred from the Program Manager to the Program Review Committee.

(1) Program status includes the following: program inquiries (including process points), new applications, approvals, denials, suspensions, withdrawals, reinstatements, and significant changes.

(2) The Program Review Committee makes the final decision regarding program status, except for decisions regarding reduction of scope; which may be made by the Program Manager.

8.2 The Program Manager retains final decision authority regarding program status; however, they may use the Program Review Committee when determined appropriate.

8.3 The Program Review Committee may also be used to address complaints.

9 Desk Audit

The applicant may request to forego a desk audit for audit programs. This request must be submitted in writing to the Program Manager and must be approved. If the request is approved, an on-site audit must be conducted prior to approval of the program or any significance change.

9.1 The auditor conducts a desk audit of the applicant's program documentation to ensure that all program requirements, as outlined in the individual program procedure, are fully addressed. The auditor uses the appropriate program checklist to conduct the desk audit.

(1) If the program documentation is adequate and the majority of the program requirements are met, then the auditor notifies the Program Manager that the initial on-site audit may be scheduled.

(2) If the program documentation requires minimum clarification or additional information, then the auditor obtains the clarification or additional information. Once the program documentation is adequate and the majority of the program requirements are met, the auditor notifies the Program Manager that the initial on-site audit may be scheduled.

(3) If the applicant's program documentation does not meet the majority of the program requirements or if the auditor identifies that the applicant would not pass the initial on-site audit, then the auditor prepares and submits a desk audit report itemizing the deficiencies to the Program Manager, or designee. The Program Manager sends the report to the applicant discussing the action that the applicant must take before continuing the audit process.

10 On-site Audit

10.1 The Program Manager, or designee, appoints an auditor(s) to conduct the on-site audit. After the auditor(s) is appointed, the program documentation is forwarded to the auditor, if necessary.

10.2 The Program Manager, or designee, notifies the applicant of the assigned auditor(s). The applicant has 5 business days from receipt of notification to submit written objections regarding any auditor(s) to the Program Manager.

10.3 Once the date and schedule are arranged between the applicant and the auditor(s), the auditor(s) prepares an audit plan and cost estimate. The documents are submitted to the applicant prior to the scheduled on-site audit.

10.4 The on-site audit is conducted in accordance with *ISO 19011:2011 Section 6 Audit Activities*. The frequency of on-site audits is outlined in the individual program procedures. The objective of an on-site audit is to verify the applicant's conformance to the audit criteria.

10.5 The on-site audit is conducted at the premises of the applicant from which one or more key activities are performed. Where relevant, the on-site audit includes other selected locations where the applicant operates to gather objective evidence that the applicant is competent and conforms to the requirements of the audit criteria. Additionally, the auditor(s) reviews the performance of a representative number of staff of the applicant to gather objective evidence.

11 Audit Findings and Audit Report

11.1 All audit findings, including identified non-conformances and recommendations are discussed with the applicant at the conclusion of the on-site audit

11.2 The audit findings are submitted to the Program Manager for final review and disposition. The Program Manager, or designee, has the discretion to modify the audit findings; however, changes must be shared with the auditor(s). S&T is responsible for the content of the audit report.

12 Correcting Identified Non-conformances

12.1 Applicants must address all non-conformances and respond to all requests for corrective actions and corrections, as applicable, within the time frame specified in the audit report. An acceptable time frame is 90 days.

12.2 Requests are based on non-conformances identified during the audit. Applicants must identify the cause(s) of the non-conformance, determine the necessary corrective action, and implement the corrective actions. Additionally, if the non-conformance resulted in the use or delivery of non-conforming product, the applicant must identify the non-conforming product and make corrections appropriate to the non-conformance. Written corrective action responses must be submitted in hard copy or electronic form.

13 Corrective Action Audit

13.1 The auditor conducts a corrective action audit to ensure that the applicant's responses are sufficient in addressing the non-conformance(s). If the responses are found not to be sufficient, further information is requested. Evidence of effective implementation of actions taken may be requested. Corrective action audits are normally conducted via a document review. However, an on-site corrective action audit may be conducted to verify effective implementation of the corrective actions.

13.2 The findings of the corrective action audit are outlined in an audit report. The report is submitted to the Program Manager, or designee, for final review and disposition. The Program Manager, or designee, has the discretion to modify the audit findings; however, changes must be shared with the auditor(s).

14 Program Approval

14.1 Program approval is based upon the audit findings and the recommendation of the auditor(s). The approval is issued for the appropriate time period in accordance to the individual program procedure. The Program Manager maintains authority regarding program approval.

14.2 Program approval status is applicable to all services and may be one of the following:

(1) *Approval:* No non-conformances were identified during the audit. No actions are necessary by the applicant.

(2) *Approval with Conditions*: Non-conformances were identified during the audit. Applicants must submit corrective actions and corrections as applicable within the time frame specified in the audit report. Additional desk audits and/or on-site audits may be conducted at the applicant's expense.

(3) *Denied Approval*: Denied approval may be issued prior to the initial program approval for any of the reasons outlined below. Applicants must submit corrective actions and corrections as applicable to address any identified non-conformances before approval may be issued. Additional desk audits and/or on-site audits may be conducted at the applicant's expense.

14.3 Upon reaching a decision, the Program Manager, or designee, sends the applicant the audit report and any additional documentation. The audit report includes the "Notification of Audit Results" section, which details the approval status and any terms and conditions, as appropriate.

14.4 When appropriate, the Program Manager, or designee, adds the applicant's program to the official listing on the S&T Web site in accordance with the individual program procedure.

15 Program Suspension

15.1 Program suspension is the temporary removal of an applicant's approved program, or a portion of it, pending corrective action by the applicant or formal program withdrawal by S&T. The applicant must cease all activities upon notification of program suspension. However, agricultural products or services verified under the program prior to suspension remain verified.

15.2 Program suspension may occur for any of the following reasons:

(1) Failure to adequately address any program requirement, including audit findings that compromise the integrity of the program or product to the extent that program approval should be suspended

(2) Failure to demonstrate capability to meet any program requirement

(3) Failure to follow the applicant's approved program

(4) Failure to maintain the applicant's approved program

(5) Failure to provide corrective actions and correction as applicable in the timeframe specified

(6) Persistently failing to meet the requirements of the program or to abide by S&T policies and procedures

(7) Implementing significant changes to an approved program without prior written notification to and approval by (if applicable) the Program Manager

(8) Failure to pay S&T fees

NOTE: The applicant may request suspension.

15.3 The Program Manager maintains authority regarding program suspension.

15.4 Upon reaching a decision, the Program Manager, or designee, notifies the applicant in writing of the suspension and the details of actions required to be reinstated. The details of actions do not include specific remedies to barriers of reinstatement.

15.5 The official listing on the S&T Web site is updated to reflect the status of the applicant's program.

15.6 Recurring suspension of an applicant's program may result in program withdrawal or a reduction in the scope of the approval to exclude those parts where the applicant has persistently failed to meet the requirements of the program, including competence.

16 Reinstatement of a Suspended Program

16.1 Reinstatement of a suspended program is applicable to all services. The Program Manager maintains authority regarding reinstatement of a suspended program.

(1) A program suspended due to the applicant failing to adequately address any program requirement is reinstated immediately upon receipt of appropriate corrective actions and corrections, as applicable. Additional desk audits and/or on-site audits may be conducted at the applicant's expense.

(2) A program suspended due to the applicant failing to demonstrate capability to meet any program requirement is reinstated immediately upon receipt of appropriate corrective actions and corrections, as applicable. Additional desk audits and/or on-site audits may be conducted at the applicant's expense.

(3) A program suspended due to the applicant failing to follow the applicant's approved program is reinstated immediately upon receipt of appropriate corrective actions and corrections, as applicable. Additional desk audits and/or on-site audits may be conducted at the applicant's expense.

(4) A program suspended due to the applicant failing to maintain the applicant's approved program is reinstated immediately upon receipt of appropriate corrective actions and corrections, as applicable. Additional desk audits and/or on-site audits may be conducted at the applicant's expense.

(5) A program suspended due to the applicant failing to provide corrective actions and/or corrections within the timeframe specified is reinstated upon submission of acceptable corrective actions and corrections, as applicable. Additional desk audits and/or on-site audits may be conducted at the applicant's expense.

(6) A program suspended due to the applicant persistently failing to meet the requirements of the program or to abide by S&T policies and procedures is reinstated immediately upon receipt of appropriate corrective actions and corrections, as applicable. Additional desk audits and/or on-site audits may be conducted at the applicant's expense.

(7) A program suspended due to the applicant implementing significant changes to the approved program without prior written notification and approval, if applicable, is reinstated immediately upon receipt of appropriate corrective actions and corrections, as applicable. Additional desk audits and/or on-site audits may be conducted at the applicant's expense.

(8) A program suspended due to the applicant failing to pay S&T fees is reinstated upon notification that all outstanding fees and interest have been paid in full. Additional restrictions may be put in place to ensure future payments for services.

17 Program Withdrawal

17.1 Program withdrawal is the removal of an applicant's approved program, or a portion of it. Partial withdrawal may apply where an applicant is approved for multiple scopes that may be treated individually for approval purposes. The applicant must cease all activities upon notification of program withdrawal. In addition, agricultural products or services verified under the program prior to the withdrawal are no longer verified.

17.2 An applicant’s program may be permanently withdrawn if the applicant deliberately misrepresented the eligibility of agricultural products or services, introduced prohibited compounds or substances, or used program approval in a manner that brings S&T into disrepute. S&T will not provide service to the applicant during the timeframe that the permanent withdrawal is in effect.

17.3 Program withdrawal applies to all services.

17.4 Program withdrawal may occur for any of the following reasons:

(1) Audit findings that compromise the integrity of the program or product to the extent that program approval should be withdrawn

(2) Deliberate misrepresentation of the eligibility of agricultural products or services distributed under an approved program

(3) Confirmed finding of any prohibited compounds or substances or other violations as described in the individual program procedure. Upon confirming the violation, S&T withdraws all approvals for applicants in the product’s chain of custody pending a complete investigation in cooperation with appropriate regulatory agencies

(4) Denying access to applicant's facilities and records within the scope of the program

(5) Use of program approval in such a manner as to bring S&T into disrepute

NOTE: The applicant may request withdrawal.

17.5 The Program Manager maintains authority regarding program withdrawal.

17.6 Upon reaching a decision, the Program Manager, or designee, notifies the applicant in writing of the withdrawal and the details of actions required to be reinstated. The details of actions do not include specific remedies to barriers of reinstatement.

17.7 The official listing on the S&T Web site is updated to reflect the status of the applicant's program. Reference to the applicant's program is removed from the official listing after a period of 60 calendar days or the end of the appeals process, whichever is longer.

Note: Withdrawal has the same meaning as revocation.

18 Reinstatement of a Withdrawn Program

Reinstating a Withdrawing Program is applicable to all services. The Program Manager maintains authority regarding Reinstatement of a Withdrawn Program.

18.1 Reinstatement of a withdrawn program may be granted only after the applicant has successfully completed an on-site audit. Additionally, a program may be withdrawn:

(1) Due to the audit findings - must provide corrective actions and correction, as applicable, which specifically address the audit findings that resulted in the program withdrawal.

(2) Due to deliberate misrepresentation - must provide corrective actions and correction, as applicable, which specifically address the deliberate misrepresentation.

(3) Where the applicant's program is within the chain of custody of products identified as containing or having been treated with any prohibited substance is reinstated only upon revalidation of the integrity of the program in cooperation with appropriate regulatory agencies.

(4) Where the applicant is found to be responsible for the introduction of prohibited substances into the affected products remains withdrawn until such a time as (1) the applicant provides objective evidence that the program has been completely purged of all potentially affected products, and (2) an on-site audit verifies that effective corrective action and corrections, as applicable, have been taken.

(5) Due to the denial of access - must provide access.

19 Significant Changes

19.1 Any significant changes, in any aspect of status or operation to the applicant's approved program must be submitted in writing to the Program Manager. Such changes include the following:

(1) Legal, commercial, ownership, or organizational status

(2) Organization, top management, and key personnel

(3) Policies and procedures

(4) Resources and premises

(5) Addition or reduction of the scope of the program

(6) Other matters that may affect the ability of the applicant to fulfill requirements for the program

19.2 The Program Manager maintains authority regarding significant changes to an approved program. The significant changes may require approval by the Program Review Committee or the Program Manager depending upon the nature and extent of the changes. A complete or partial on-site audit of the program may be required prior to approval of the significant changes. In situations where an additional on-site audit is required, a new approval is issued for an appropriate time period based on the findings of the audit.

20 Surveillance

20.1 All approved programs are audited on an on-going basis as listed in the individual program procedures unless the program is suspended, withdrawn, or cancelled.

20.2 All approved programs are subject to unannounced audits. The auditor(s) documents the findings of unannounced audits in an audit report and submits the report to the Program Manager. Findings of unannounced audits are considered when determining conformance of the program for continued approval or may provide the basis for suspending or withdrawing approval.

21 Extension of Scope

Extension of scope is considered a significant change to an approved program. Applicants with approved programs may request to extend the scope of their programs at any time by submitting an application to the Program Manager. When an application is received, S&T undertakes the necessary activities to determine whether or not the extension may be granted. The Program Manager maintains authority regarding extension of scope to an approved program. Upon acceptance, the official listing is updated to reflect the scope on the S&T Web site.

22 Reduction of Scope

Reduction of Scope is considered a significant change to an approved program. Applicants with approved programs may request to reduce the scope of their programs at any time by submitting a written request to the Program Manager. Upon acceptance, the official listing is updated to reflect the scope on the S&T Web site.

23 Cancellation

23.1 Applicants with approved programs may cancel service at any time by submitting a written notification to the Program Manager. When applicable, applicants who cancel service are removed from the listing on the S&T Web site.

23.2 Applicants who cancel service must reapply to regain program approval. When an application is received, S&T undertakes the necessary activities before program approval may be re-granted.

23.3 Applicants are responsible for fees accrued prior to cancellation of the approved program.

24 Reference to Approval

24.1 Applicants with approved programs may make reference to approval by S&T in communication media, such as the internet, documents, brochures, or advertising, and including product labels.

24.2 Applicants must submit communication media for review by S&T prior to its use.

24.3 Applicants must ensure that references are complete and not misleading or ambiguous.

24.4 Applicants are responsible for correcting erroneous references in a sufficient manner that is appropriate to the situation.

24.5 If a program is suspended, withdrawn, or cancelled, the applicant must discontinue its use of all communication media that contains any reference to their approved status.

Note: Reference to program approval is distinctly separate from approval of promotional materials associated with the USDA Process Verified Program.

25 Appeals

25.1 An appeal is a request from the applicant for reconsideration of any adverse audit findings, assessment findings, or decisions issued by the Program Manager related to the applicant's program.

25.2 Applicants have the right to appeal any adverse audit findings, assessment findings, or decisions issued by the Program Manager.

25.3 Appeals must be submitted in writing to the Program Manager within 30 days of the date of the official report or letter rendering the findings or decisions.

25.4 Appeals dealing with objections of the auditor(s) must be submitted in writing to the Program Manager within 5 business days of the date of the decision notification.

25.5 Appeals must include:

(1) The basis for the appeal
(2) The requested alternative decision or actions

25.6 For appeals other than those described, the Program Manager reviews any appeal and notifies the applicant of the final decision within 30 calendar days from receipt of the appeal. If the final decision cannot be determined within this timeframe, the applicant is provided with a progress report.

25.7 For appeals dealing with Objections to Auditors, the Program Manager reviews the appeal and notifies the applicant of the final decision within 5 business days from receipt of the appeal.

25.8 Suspensions, withdrawals, and/or denied approvals remain in effect pending the outcome of the appeal.

26 Complaints

26.1 A complaint is an objection to the policies, procedures, and/or performance of S&T. A complaint may also be an objection to the performance or activities of an approved Program submitted to S&T by a third party.

26.2 Applicants have the right to submit a complaint regarding S&T policies, procedures, and/or performance, including performance of S&T officials. Any third party also has the right to submit a complaint regarding the performance or activities of applicants with approved Programs.

26.3 Complaints may be submitted in any format to the Program Manager. Complaints should provide enough information to allow S&T to investigate the complaint.

26.4 The Program Manager provides the complainant with progress reports and the outcome, as applicable.

27 Objections of the Auditor(s)

27.1 Applicants have the right to object to any auditor(s).

27.2 Objections must be submitted in writing to the Program Manager within 5 business days after notification of the auditor(s).

27.3 Objections must include:

(1) The basis for the objection
(2) The requested alternative decision or actions

27.4 The Program Manager reviews any objections and notifies the applicant of the final decision within 5 business days from receipt of the objection.

27.5 The applicant has the right to appeal the decision issued by the Program Manager.

27.6 The appeal must be submitted in writing to the Program Manager within 5 business days of the date of the official report or letter rending the decision.

27.7 Appeals must include:

(1) The basis for the appeal
(2) The requested alternative decision or actions

27.8 The Program Manager reviews the appeal and notifies the applicant of the final decision within 5 business days from receipt of the appeal.

28 Fees for Services

28.1 These are user-fee programs. The fees for service are the responsibility of the applicant requesting service. Fees are charged according to the approved hourly rate published in applicable parts of 7 CFR Parts 56, 62, and 70.

28.2 Program fees for the include the following:

(1) *Audit preparation*: Time to review the approved program documentation and records from previous audits, and to prepare checklists.

(2) *Audit time*: Time to conduct the audit, report the results of the audit, and conduct the corrective action audit, if applicable.

(3) *Travel*: Travel time and expenses to and from the assigned auditor's official duty location and between audit sites. When traveling to provide services to multiple applicants, charges will be prorated between the applicants.

(4) *Review of Promotional Materials*: Time associated with the review of USDA Process Verified

Program promotional materials, including labels, packaging, and other marketing materials.

(5) Other expenses related to providing services.

28.3 Auditors document all hours of service charged to applicants. Charges are submitted to the S&T office for billing purposes.

29 Confidentiality

29.1 Documentation submitted by applicants and maintained by S&T is subject to disclosure under the Freedom of Information Act (FOIA) (5 USC §552). FOIA applies to documents that are in the control of or maintained by a government agency.

29.2 Any portion of the program documentation that the applicant considers proprietary must be identified to S&T at the time the information is submitted. S&T makes appropriate provisions to protect the information from disclosure to the fullest extent possible under existing federal laws.

29.3 S&T officials must have a signed *S&T Conflict-of-Interest and Confidentiality Statement* and appropriate disclosure agreement on file prior to assignment to provide service to applicants.

REVISION HISTORY

Version #	Revision	Initial/Date
June 2026	- Updated header to current USDA approved letterhead. - Updated website links and contact information - Added Section (5) to state the requirements of a qualified auditor for the USDA PVP program for seed. - Removed the phrase “audit team” - Removed the use of minor, major, and PII findings. - Added a recommendation of 90 days for applicants to respond to nonconformances	ETS & EA 6/9/2026