



## United States Department of Agriculture

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Agricultural Marketing Service, Specialty Crops Program, Specialty Crops Inspection Division

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### REMOTE AUDITS

#### Policy

Remote audits are defined, for the purpose of this document, as audits that are conducted wholly through off-site activities, such as a combination of interactive audit sessions using platforms like Zoom or Skype, time spent by the auditor to review documentation, and phone calls. All this time is considered billable audit time.

Remote audits may be appropriate when the performance of an on-site audit is prohibitive. Some reasons for a remote audit are:

- Geographical area is under emergency protocols/travel restrictions,
- Auditors are not available (for example, state funding lapse resulting in auditor furloughs), and/or
- Facility requests a distance audit due to need for social distancing or facility security.

A remote audit is initiated by a formal request by either the auditee or the auditor/audit office. The request can be made using the SC-237A by indicating “Remote Audit” in the “Other” block, in addition to selecting the audit service.

All requests for a remote audit must be approved by the appropriate Audit Services Branch (ASB) Program Coordinator. The auditor/audit office should submit the SC-237A requests to [SCAudits@usda.gov](mailto:SCAudits@usda.gov) (or other program specific email address), with the term “Remote Audit Request” in the subject line. The Program Coordinator will return a decision within 5 business days.

In general, remote audits will be considered appropriate for auditees who have established a good quality history through previous USDA audit activity. Remote audits will not be allowed for new auditees.

A remote audit is conducted just like an on-site audit, with the same expectations for an opening and closing meeting, document or record review, and interviews. There will be some activities that would normally be best addressed during an on-site audit, such as the observation of harvest activities. Guidance on how to identify these portions of the audit for later, on-site activity will be provided to auditors during training and/or by the ASB Program Coordinator.

An on-site audit is required as soon as possible after the issue which justified a remote audit has been resolved. The on-site audit will focus on those areas that were not included in the remote

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Page 2 of 8

audit, verification that established systems are fully implemented, and review of corrective actions that might have been taken as the result of previous audits.

USDA, ASB will bill the applicant for the initial, remote audit, as appropriate for their review and certification time. ASB will not bill the applicant for any review time associated with the later on-site audit report.

## Procedure

### Pre-audit

1. Auditee or auditor/audit office submits a formal request for a remote audit to [SCAudits@usda.gov](mailto:SCAudits@usda.gov) (or program specific email address).
2. ASB Program Coordinator reviews and approves or disapproves the request based on an established risk assessment.
3. Auditor confirms with the auditee their understanding that an on-site audit is required as soon as possible after the issue which justified a remote audit has been resolved.
4. Auditor establishes with the auditee how the documents will be shared and the meeting platform that will be used. Auditor should check access prior to the scheduled audit time.

Document sharing might be through:

- a) Hard copies via delivery
- b) Digital copies via email
- c) Digital copies via auditee's established cloud storage, such as OneDrive, Dropbox, or Google Docs (not currently available for federal auditors)
- d) Online screen sharing via the meeting platform

Example meeting platforms are Zoom, Facetime, Blackboard, and Skype. The auditee should be given the opportunity to establish the platform of their choice.

5. Auditor establishes with the auditee that documentation and personnel will need to be available for review and interview.
6. If documents are to be provided by the auditee in advance of the interactive portion of the audit, the auditor establishes with the auditee what documents to provide and when these documents should be provided.
7. Auditor establishes an [audit plan](#) which is appropriate for the audit service. Interactive activities/meetings should go no longer than a total of 4 hours per day. Breaks should be scheduled. This may require an audit to be conducted over multiple days but should be completed within a period of five business days, if possible. See [Attachment 1](#) for the audit plan template.
8. Auditor should review the food safety or quality management system manual, as well as any additional documentation provided by the auditee, prior to the interactive audit session, to be as prepared as possible prior to the interactive portion of the audit.

9. Auditor sends the auditee and the audit team the audit plan and [cost estimate](#) at least 48 hours prior to the audit. The cost estimate should be based on one auditor's (usually the lead auditor) time, and not include any additional auditor's time due to training or evaluations. See [Attachment 2](#) for a cost estimate template.

### Audit

1. During the opening meeting, in addition to the standard items that are reviewed, the auditor confirms:
  - a) That an on-site audit will be performed, covering any elements that were not covered during the off-site audit, as appropriate for the audit service. If unannounced audits are required, the on-site audit may replace one of these.
  - b) That any received documents will be returned to the auditee or destroyed. If returned, the auditor will bill for postage.
2. The auditor conducts the audit following ~~the~~ similar protocols as an on-site audit. It is understood that it will not be possible to address certain items which would be covered during an on-site audit, such as observations of harvest, receipt and shipping, and processing practices. However, what can be covered might be a deeper dive into the documented procedure, review of records that show compliance with the procedure, and interviews with the personnel responsible for carrying out the procedure.

### Post-audit

1. Auditor completes and submits the audit report following established protocols for the audit service. There must be an indication on the report that the audit was conducted remotely, for example, a comment such as "Remote audit conducted at the request of (requestor's name), due to (reason for remote audit) ." in the general comment area.
2. Auditor disposes of any proprietary materials, either returning them to the auditee or shredding them (hard copies), or deleting from computer (digital).
3. Auditor schedules on-site audit as appropriate for the audit service.

### On-site audit

1. The auditor must document the on-site audit activity using the appropriate audit checklist for the chosen audit service. Guidance and/or training will be provided by ASB on how to use the checklist for this purpose.
2. In the general comment area, the auditor should state "On-site audit performed as a follow-up to a previous remote audit."
3. The auditor must submit the report for review to [SCAudits@usda.gov](mailto:SCAudits@usda.gov) (or program specific email address), following the formal protocols for audit report reviews.

**ATTACHMENT I - AUDIT PLAN**

[Link to the electronic copy of the Audit Plan template.](#)

Guidance on how to complete the Audit Plan:

<b>Name of Company (Auditee):</b>	<b>Address (Audited Site):</b>			
<i>Put the name(s) of the producer/processor who has requested the audit.</i>	<i>Put the address(es) of the producer/processor who has requested the audit.</i>			
<b>Purpose/Products/Scope of Audit:</b>	<b>Dates and Time of Audit</b>			
<i>State the audit service, including the parts or sections to be included, the commodities, and other information needed to fully describe the scope of the audit.</i>	<i>Put the established dates and times for the audit.</i>			
<b>Lead Auditor's Name (Print Name)</b>	<b>Additional Audit Team Members (Print Name(s))</b>			
<i>Put the name of the lead auditor in this space.</i>	<i>List the name(s) of the personnel who will be joining the audit, indicating observer(s), evaluator(s), or auditor(s).</i>			
<b>Type of Audit:</b>	<input type="checkbox"/> On-site	<input type="checkbox"/> Remote*	<b>Platform:</b>	<input type="checkbox"/>
*In order to maintain certification, remote audits will require an additional on-site audit as soon as possible, after the issue which justified a remote audit has been resolved and as appropriate for the audit.				

Indicate whether the audit was conducted on-site or remote, and if remote, the platform used.

The "Remarks" area may be used to take notes or record information needed for the audit.

<b>Date and Time</b> (adjustments may be made as the audit proceeds)	<b>Audit Activities</b>	<b>Remarks</b>
<i>State the date and time for each of the agenda items.</i>	1. Opening meeting <i>Adjust the agenda items to match your plan for conducting the audit.</i>	<i>Put any explanations or notes needed here to further describe the audit activity. For example, list the staff/positions that you wish to interview.</i>
	2. Walk-through facility to verify implementation of procedures	
	3. Verify applicable procedures related to customer and regulatory requirements	
	4. Verify applicable records related to the required procedures and policies	
	5. Review status of corrective actions related to previously identified audit findings	

	6. Prepare summary of deficiencies	
	7. Closing meeting	

**ATTACHMENT II – COST ESTIMATE**

[Link to the electronic copy of the Remote Audit Cost Estimate template.](#)

Guidance on how to complete the Remote Audit Cost Estimate:

Auditee Name	<i>Put the name(s) of the producer/processor who has requested the audit.</i>	
Location	<i>Put the location of the auditee.</i>	
Audit Dates	<i>This would be the proposed dates for the audit.</i>	
Lead Auditor	<i>Put the name of the auditor that will be conducting the audit.</i>	
	Estimated Time or Cost	Remarks
Interactive Audit Time (remote audit)	<i>This would be a rough estimate of the time for the remote/interactive portion of the audit.</i>	<i>Put any explanatory comments in these spaces.</i>
Pre-audit Time (audit preparations and document review)	<i>This would be an estimate of the time needed to prepare for the audit, including time for review of the submitted documentation.</i>	
Post-audit Time (report preparation)	<i>This would be your rough estimate on how much time it will take to prepare the audit report.</i>	
Review and Certification Time	<i>This would be our standard estimate on how much time it will take for ASB review, certification, and billing time. Please use 3 hours.</i>	
On-site Audit Time (as a follow-up to a remote audit - includes travel and audit time)	<i>This would be a rough estimate of the time for the on-site audit, including associated travel time.</i>	
Other Time (Audit Upload, etc.)	<i>If the auditee has requested upload of their audit report into Azzule, please add 1 hour.</i>	
<b>Total Hours</b>	<b>0.00</b>	
Audit Cost @\$115.00/per hour	\$0.00	<i>These are self-calculating boxes. Please check to make sure the calculations are correct.</i>
Travel Cost (air flight, etc.)	<i>Input your travel cost, as appropriate. Currently you should only charge for airfare associated with the audit.</i>	

Other Charges (GFSI, postage, etc.)	<i>Input other charges, as appropriate. Currently, the GFSI fee is \$250.</i>	
<b>Final Amount</b>	<b>\$0.00</b>	

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