THE PROCESS VERIFIED PROGRAM

1. INTRODUCTION

The Process Verified Program (PVP) is a voluntary, user-fee service available to producers, marketers, processors, and associated service providers of agricultural products. The program is designed to provide verification of an organization's quality management system where the organization:

a) Needs to demonstrate its ability to consistently provide product that meets customer and applicable regulatory requirements,

b) Aims to enhance customer satisfaction through the effective application of its management system, and

c) Identifies specific processing or marketing claims to be used in conjunction with the USDA Process Verified term and logo.

The program will use a "USDA Process Verified" label to enhance buyers' confidence in the product that they receive, whether they are domestic or foreign.

Following in Sections 2 through 9 are the general and specific requirements that must be addressed in the organization's quality management system. The documentation provided for verification must be in sufficient detail that the activities performed can be audited against the requirements.

2. APPLICABILITY OF THIS APPENDIX

a) The scope of this program ranges from seed purchase to a final product on grocery shelves or any segment in between.

b) All requirements are generic and are intended to be applied to all organizations providing a product or service within the grain industry regardless of type, size, and product provided.

c) Applicants must maintain a quality management system and submit their quality system documentation, commonly referred to as a "Quality Manual," for approval. Documentation submitted in writing to FMD will be reviewed in an adequacy audit as described in Section 6 of Directive 9180.79. An organization will be approved when it has successfully passed an onsite audit conducted according to procedures outlined in Section 7 of Directive 9180.79.

d) In these requirements, wherever the term "product" occurs, it can also mean "service," and the term "product" applies only to the product intended for, or required by, a customer.

3. REFERENCES

a) AMS Industry Services Audit and Accreditation Program: *USDA Process Verified Program*

b) ISO 9000:2000 Quality Management Systems - Requirements

4. QUALITY MANAGEMENT SYSTEM

4.1 General Requirements. The organization must:

a) identify the processes needed for the quality management system and their application throughout the organization;

b) determine the sequence and interaction of these processes;

c) determine criteria and methods needed to ensure that both the operation and control of these processes are effective;

d) ensure the availability of resources and information necessary to support the operation and monitor these processes;

e) monitor, measure, and analyze these processes;

f) implement actions necessary to achieve planned results and continual improvement of these processes; and

g) establish substantive, verifiable processes that add value to their product or service and substantiate marketing claims (Verification Points).

4.2 Documentation Requirements.

4.2.1 General documentation required. The quality management system documentation must include:

a) a quality manual;

b) documented statements of a quality policy and quality objectives;

c) documented procedures required by this document;

d) documents needed by the organization to ensure the effective planning, operation, and control of its processes; and

e) records required by this document.

Note 1: The term "documented procedure" means that a procedure must be established, documented, implemented, and maintained.

Note 2: The extent of the quality management system documentation can differ from one organization to another due to the size of the organization and type of activities, the complexity of the processes and their interactions, and the competence of personnel.

Note 3: The documentation can be in any form or type of medium.

4.2.2 Quality manual. The organization must establish and maintain a quality manual that includes:

a) the scope of the process, including details of, and justification for, any exclusions;

b) the specified process verification points;

c) the documented procedures established for the quality management system or reference to them;

d) a description of the interaction between the processes of the quality management system; and

e) other documents as required by the quality management system.

4.2.3 Control of documents. Documents required by the quality management system must be controlled. Records are a special type of document and must be controlled according to the requirements given in 4.2.4.

A master document list must be established that shows the most current issue of the quality management system procedures, work instructions, forms, tags, and labels used to track a product or demonstrate conformance.

A documented procedure must be established to define the controls needed to:

a) approve documents for adequacy prior to being issued;

b) review and update, as necessary, and re-approve documents;

c) ensure that changes and the current revision status of documents are identified on all pages;

d) ensure that relevant versions of applicable documents are available at points of use;

e) ensure that documents remain legible and readily identifiable;

f) ensure that documents of external origin are identified and their distribution controlled; and

g) prevent the unintended use of obsolete documents and to apply suitable identification to them if they are retained for any purpose.

4.2.4 Control of records. Records must be established and maintained to provide evidence of conformity to requirements and of the effective operation of the quality management system. Records must remain legible, readily identifiable, and retrievable. A documented procedure must be established to define the controls needed for the identification, storage, protection, retrieval, retention time, and disposition of records.

5. MANAGEMENT RESPONSIBILITY

5.1 Management Commitment. Top management must provide evidence of its commitment to the development and implementation of the quality management system and continually improve its effectiveness by:

a) communicating to the organization the importance of meeting customer, as well as statutory and regulatory, requirements;

b) establishing the quality policy;

c) ensuring that quality objectives are established;

d) conducting management reviews; and

e) ensuring the availability of resources.

5.2 Customer Focus. Top management must ensure that customer requirements are determined and are met with the aim of enhancing customer satisfaction (see 7.2.1 and 8.2.1).

5.3 Quality Policy. Top management must ensure that the quality policy:

a) is appropriate to the purpose of the organization;

b) includes a commitment to comply with requirements and continually improve the effectiveness of the quality management system;

c) provides a framework for establishing and reviewing quality objectives;

d) is communicated and understood within the organization; and

e) is reviewed for continuing suitability.

5.4 Planning.

5.4.1 Quality objectives. Top management must ensure that quality objectives, including those needed to meet requirements for product (see 7.1.1 a), are established at relevant functions and levels within the organization. The quality objectives must be measurable and consistent with the quality policy.

5.4.2 Quality management system planning. Top management must ensure that:

a) the planning of the quality management system is carried out in order to meet the general requirements stated in section 4, as well as the quality objectives; and

b) the integrity of the quality management system is maintained when changes to the quality management system are planned and implemented.

5.4.3 Process Verified Points Top management must ensure that the process verified points:

a) are established and stated in the quality manual and included as part of the overall quality management system; and

b) must add value to the product or service; be substantive, verifiable, repeatable; and be within the scope of GIPSA's authority.

NOTE: Process verified points may not be requirements of regulations, the USDA Process Verified Program Requirements, or standards under which organizations in the same industry generally operate.

5.5 Responsibility, Authority and Communication.

5.5.1 Responsibility and authority. Top management must ensure that responsibilities and authorities are defined and communicated within the organization.

The quality manual must include an organization chart or similar document listing all personnel assigned to managerial positions within the organization, including each person's responsibilities and authorities.

5.5.2 Management representative. Top management must appoint a member of management who, irrespective of other responsibilities, must have responsibility and authority that includes:

a) ensuring that processes needed for the quality management system are established, implemented, and maintained;

b) reporting to top management on the performance of the quality management system and any need for improvement; and

c) ensuring the promotion of awareness of customer requirements throughout the organization.

NOTE: The responsibility of a management representative can include liaison with external parties on matters relating to the quality management system.

5.5.3 Internal communication. Top management must ensure that appropriate communication processes are established within the organization and that communication takes place regarding the effectiveness of the quality management system.

5.6 Management Review.

5.6.1 General. Top management must review the organization's quality management system, at planned intervals, to ensure its continuing suitability, adequacy, and effectiveness. This review must include assessing opportunities for improvement and the need for changes to the quality management system, including the quality policy, quality objectives, and the process verified points.

Records from management reviews must be maintained (see 4.2.4).

5.6.2 Review input. The input to management reviews must include information on:

a) results of audits;

b) customer feedback;

c) process performance and product conformity;

d) status of preventive and corrective actions;

e) follow up actions from previous management reviews;

f) changes that could affect the quality management system; and

g) recommendations for improvement.

5.6.3 Review output. The output from the management review must include any decisions and actions related to:

a) improvement of the effectiveness of the quality management system and its processes;

b) improvement of product related to customer requirements; and

c) resources needs.

6. RESOURCE MANAGEMENT

6.1 Provision of Resources. The organization must determine and provide the resources needed to implement and maintain the quality management system, continually improve its effectiveness, and to enhance customer satisfaction by meeting customer requirements.

6.2 Human Resources.

6.2.1 General. Personnel performing work affecting product quality must be competent on the basis of appropriate education, training, skills, technical knowledge and experience.

6.2.2 Competence, awareness and training. The organization must document a procedure to ensure all personnel performing work affecting product quality are properly trained in relevant aspects of the quality management system. The organization must:

a) determine the necessary competence stated in a position description or similar document for personnel performing work affecting product quality;

b) provide training or take other actions to satisfy these needs;

c) evaluate the effectiveness of the actions taken;

d) ensure that its personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the quality objectives; and

e) maintain appropriate records of education, training, skills, and experience.

6.3 Infrastructure. The organization must determine, provide, and maintain the infrastructure needed to achieve conformity to product requirements. Infrastructure includes, as applicable, buildings, workspace, associated utilities, process equipment (both hardware and software), and supporting services (such as transport or communication).

6.4 Work Environment. The organization must determine and manage the work environment needed to achieve conformity to product requirements.

7. PRODUCT REALIZATION

7.1 Planning of Product Realization. The organization must plan and develop the processes needed for product realization. Planning of product realization must be consistent with the other processes of the quality management system.

7.1.1 In planning product realization, the organization must determine the following, as appropriate:

a) quality objectives and requirements for the product;

b) the need to establish processes, documents, and provide resources specific to the product;

c) required verification, validation, monitoring, inspection, and test activities specific to the product and the criteria for product acceptance; and

d) records needed to provide evidence that the realization processes and resulting product meet requirements (see 4.2.4).

7.1.2 The output of this planning must be in a form suitable for the organization's method of operations.

Note 1: If any requirements of this section (Section 7) cannot be applied due to the nature of an organization and its product, then these requirements may be considered for exclusion. Exclusions may not affect

the organization's ability to provide a conforming product nor do exclusions affect the organization's responsibility to provide a conforming product.
NOTE 2. The organization may also apply the requirements given in 7.3 to the development of product realization processes.

7.2 Customer-Related Processes.

7.2.1 Determination of requirements related to the product. The organization must determine:

a) requirements specified by the customer, including the requirements for delivery and post-delivery activities;

b) requirements not stated by the customer, but necessary for specified or intended use, where known;

c) statutory and regulatory requirements related to the product; and

d) any additional requirements determined by the organization.

7.2.2 Review of requirements related to the product. The organization must review the requirements related to the product. This review must be conducted prior to the organization's commitment to supply the product to the customer (e.g., submission of tenders, acceptance of contracts or orders, acceptance of changes to contracts or orders) and ensure that:

a) product requirements are defined;

b) contract or order requirements differing from those previously expressed are resolved; and

c) the organization has the ability to meet the defined requirements.

Records of the results of the review and actions arising from the review are maintained (see 4.2.4).

Where the customer provides no documented statement of requirements, the customer requirements must be confirmed by the organization before acceptance.

Where product requirements are changed, the organization must ensure that relevant documents are amended and that relevant personnel are made aware of the changed requirements.

NOTE: In some situations, such as internal sales, a formal review is impractical for each order. Instead, the review can cover relevant product information such as categories or advertising material.

7.2.3 Customer communication. The organization must determine and implement effective arrangements for communicating with customers in relation to:

a) product information;

b) inquiries, contracts or order handling, including amendments; and

c) customer feedback, including customer complaints.

7.3 Design and Development.

7.3.1 Design and development planning. The organization must plan and control the design and development of product.

During the design and development planning, the organization must determine:

a) the design and development stages;

b) the review, verification and validation that are appropriate to each design and development stage; and

c) the responsibilities and authorities for design and development.

The organization must manage the interfaces between the different groups involved in design and development to ensure effective communication and clear assignment of responsibility.

Planning output must be updated, as appropriate, as the design and development progresses.

7.3.2 Design and development inputs. Inputs relating to product requirements must be determined and records maintained (see 4.2.4). These inputs must include:

a) functional and performance requirements;

b) applicable statutory and regulatory requirements;

c) where applicable, information derived from previous similar designs; and

d) other requirements essential for design and development.

These inputs must be reviewed for adequacy. Requirements must be complete, unambiguous, and not in conflict with each other.

7.3.3 Design and development outputs. The outputs of design and development must be provided in a form that enables verification against the design and development input and must be approved prior to release. Design and development outputs must:

a) meet input requirements for design development;

b) provide appropriate information for purchasing, production, and for service provision;

c) contain or reference product acceptance criteria; and

d) specify the characteristics of the product that are essential for its safe and proper use.

7.3.4 Design and development review. At suitable stages, systematic reviews of design and development must be performed in accordance with planned arrangements (see 7.3.1):

a) to evaluate the ability of the results of design and development to meet requirements; and

b) to identify any problems and propose necessary actions.

Participants in such reviews must include representatives of functions concerned with the design and development stage(s) being reviewed. Records of the results of the reviews and any necessary actions must be maintained (see 4.2.4).

7.3.5 Design and development verification. Verification must be performed in accordance with planned arrangements (see 7.3.1) to ensure that the design and development outputs have met the design and development input requirements. Records of the results of the verification and any necessary actions must be maintained (see 4.2.4).

7.3.6 Design and development validation. Design and development validation must be performed in accordance with planned arrangements (see 7.3.1) to

ensure that the resulting product is capable of meeting the requirements for the specified application or intended use, where known. Wherever practical, validation must be completed prior to delivery or implementation of the product. Records of the results of validation and any necessary actions must be maintained (see 4.2.4).

7.3.7 Control of design and development changes. Design and development changes must be identified and records maintained. The changes must be reviewed, verified, validated, as appropriate, and approved before implementation. The review of design and development changes must include evaluation of the effect of the changes on the constituent parts and product already delivered. Records of the results of the review of changes and any necessary actions must be maintained (see 4.2.4).

7.4 Purchasing.

Where organization outsourcers any of their processes, supplies, ingredients, or services, it must identify them and specify how it plan to control the items or activities.

7.4.1 Purchasing process. The organization must ensure that purchased product or product received from an outside establishment for use in the product conforms to specified purchase requirements. The type and extent of control applied to the supplier and the purchased product or received product must be dependent upon its effect on subsequent product realization or the final product.

The organization must evaluate and select suppliers based on their ability to supply product in accordance with the organization's requirements. Criteria for selection, evaluation, and re-evaluation must be established and documented. Records of the results of evaluations and any necessary actions arising from the evaluation must be maintained (see 4.2.4).

7.4.2 Purchasing information. Purchasing information must describe the product to be purchased or received, including, where appropriate:

a) requirements for approval of product, procedures, processes, and equipment;

b) requirements for qualifications of personnel; and

c) quality system requirements.

The organization must ensure the adequacy of specified purchase requirements prior to their communication to the supplier.

7.4.3 Verification of purchased or received product. The organization must establish and implement the inspection or other activities necessary for ensuring that purchased or received product meets specified purchase requirements.

Where the organization or its customer intends to perform verification at the supplier's premises, the organization must state the intended verification arrangements and method of product release in the purchasing information.

7.4.4 Documented Procedure Requirements. The organization must have a documented procedure addressing the following:

a) all products or services received from outside establishments that affect the quality management system or the product;

b) the receiving requirements for approval of products to be used in the product;

c) the criteria and process for selection, evaluation and re-evaluation of the supplier; and

d) the process used to ensure that products or services purchased or received from outside establishments and used in the product conform to specific requirements.

7.5 Production and Service Provision.

7.5.1 Control of production and service provision. The organization must plan and carry out production and service provision under controlled conditions. Controlled conditions must include, as applicable:

a) the availability of information that describes the characteristics of the product;

b) the availability of work instructions, as necessary;

c) the use of suitable equipment;

d) the availability and use of monitoring and measuring devices;

e) the implementation of monitoring and measurement; and

f) the implementation of release, delivery, and post-delivery activities.

7.5.2 Validation of processes for production and service provision. The organization must validate any processes for production and service provision where the resulting output cannot be verified by subsequent monitoring or measurement. This includes any processes where deficiencies become apparent only after the product is in use or the service has been delivered.

Validation must demonstrate the ability of these processes to achieve planned results.

The organization must establish arrangements for these processes including, as applicable:

a) defined criteria for review and approval of the processes;

b) approval of equipment and qualification of personnel;

c) use of specific methods and procedures;

d) requirements for records (see 4.2.4); and

e) revalidation.

7.5.3 Identification and traceability. The organization must have a documented procedure to:

a) identify the product by suitable means throughout the product realization, where appropriate;

b) identify the product status with respect to monitoring and measurement requirements;

c) control and record the unique identification of the product (see 4.2.4), when tracking is a requirement; and

d) control and record the use of the "USDA Process Verified" shield or the term "USDA Process Verified", if applicable.

The organization must maintain records of all products and/or ingredients as they are handled through out product realization.

7.5.4 Customer property. The organization must exercise care with customer property while it is under the organization's control or being used by the organization. The organization must identify, verify, protect, and safeguard customer property provided for use or incorporation into the product. If any customer property is lost, damaged, or otherwise found to be unsuitable for use, this must be reported to the customer and records maintained (see 4.2.4).

NOTE: Customer property can include intellectual property.

7.5.5 Preservation of product. The organization must preserve the conformity of product during internal processing and delivery to the intended destination. This preservation must include identification, handling, packaging, storage, and protection. Preservation must also apply to the constituent parts of a product.

7.6 Control of Monitoring and Measuring Devices.

7.6.1 The organization must determine the monitoring and measurement to be undertaken and the monitoring and measuring devices needed to provide evidence of conformity of product to determined requirements (see 7.2.1).

7.6.2 The organization must establish processes to ensure that monitoring and measurement can be carried out and are carried out in a manner that is consistent with the monitoring and measurement requirements.

7.6.3 Where necessary to ensure valid results, measuring equipment must:

a) be calibrated or verified at specified intervals, or prior to use, against measurement standards traceable to international or national measurement standards. Where no such standards exist, the basis used for calibration or verification must be recorded;

b) be adjusted or re-adjusted as necessary;

c) be identified to enable the calibration status to be determined;

d) be safeguarded from adjustments that would invalidate the measurement results; and

e) be protected from damage and deterioration during handling, maintenance, and storage.

7.6.4 In addition, the organization must assess and record the validity of the previous measuring results when the equipment is found not to conform to

requirements. The organization must take appropriate action on the equipment and any product affected. Records of the results of calibration and verification must be maintained (see 4.2.4).

7.6.5 When used in the monitoring and measurement of specified requirements, the ability of computer software to satisfy the intended application must be confirmed. This must be undertaken prior to initial use and reconfirmed as necessary.

8. MEASUREMENT, ANALYSIS, AND IMPROVEMENT

8.1 General. The organization must plan and implement the monitoring, measurement, analysis, and improvement processes needed:

a) to demonstrate conformity of product;

b) to ensure conformity of the quality process system; and

c) to continually improve the effectiveness of the quality management system.

This must include determination of applicable methods, including statistical techniques and the extent of their use.

8.2 Monitoring and Measurement.

8.2.1 Customer satisfaction. As one of the measurements of the performance of the quality process system, the organization must monitor information relating to customer perception as to whether the organization has met customer requirements. The methods for obtaining and using this information must be determined.

The organization must take appropriate actions to address customer complaints regarding conformance to the quality management system or the resulting products or service. Records of customer complaints and any actions taken to address them must be maintained.

8.2.2 Internal audits. The organization must conduct internal audits at planned intervals to determine whether the quality management system conforms to the planned arrangements (see 7.1), to the general requirements of this document, and to the quality management system requirements established by the organization, and is effectively implemented and maintained.

The organization must have a documented procedure which addresses:

a) planning the audit program taking into consideration the status and importance of the processes and areas to be audited as well as the results of previous audits;

b) the audit criteria, scope, frequency, and methods used;

c) selection of auditors and conduct of auditors to ensure objectivity and impartiality of the audit process (Auditors may not audit their own work.);

d) the responsibilities and requirements for planning and conducting audits;

e) reporting audit results;

f) following up on activities, including the verification of actions taken and the reporting of the verification results(see 8.5.2); and

g) maintaining records.

Management responsible for the area being audited must ensure that actions are taken without undue delay to eliminate detected nonconformities and their causes.

Note: See ISO 19011:2002 for guidance.

8.2.3 Monitoring and measurement of processes. The organization must apply suitable methods for monitoring and, where applicable, measurement of quality management system processes. These methods must demonstrate the ability of the processes to achieve planned results. When planned results are not achieved, correction and corrective action must, as appropriate, to ensure conformity of the product.

8.2.4 Monitoring and measurement of product. The organization must monitor and measure the characteristics of the product to verify that product requirements have been met. This must be carried out at appropriate stages of the product realization process in accordance with the planned arrangements (see 7.1).

Evidence of conformity with the acceptance criteria must be maintained. Records must indicate the person(s) authorizing release of product (see 4.2.4).

Product release and service delivery must not proceed until the planned arrangements (see 7.1) have been satisfactorily completed, unless

otherwise approved by a relevant authority and, where applicable, by the customer.

8.3 Control of Nonconforming Product.

8.3.1 The organization must ensure that product that does not conform to product requirements is identified and controlled to prevent its unintended use or delivery. The identification of non-conforming product, the controls used to prevent the unintended use or delivery of non-conforming product, and the related responsibilities and authorities for dealing with nonconforming product must be defined in a documented procedure.

8.3.2 The organization must deal with nonconforming product by one or more of the following ways:

a) by taking action to eliminate the detected nonconformity;

b) by authorizing its use, release, or acceptance under concession by a relevant authority and, where applicable, by the customer; and

c) by taking action to preclude its original intended use or application.

8.3.3 Records of the nature of nonconformities and any subsequent actions taken, including concessions obtained, must be maintained (see 4.2.4).

8.3.4 When nonconforming product is corrected, it must be subject to re-verification to demonstrate conformity to the requirements.

8.3.5 When nonconforming product is detected after delivery or use has started, the organization must take action appropriate to the effects, or potential effects, of the nonconformity.

8.4 Analysis of Data. The organization must determine, collect, and analyze appropriate data to demonstrate the suitability and effectiveness of the quality management system and to evaluate where continual improvement of the effectiveness of the quality management system can be made. This must include data generated as a result of monitoring and measurement and from other relevant sources.

The analysis of data must provide information relating to:

a) customer satisfaction (see 8.2.1);

b) conformity to product requirements (see 7.2.1);

c) characteristics and trends of processes and products including opportunities for preventive action; and

d) suppliers.

8.5 Improvement.

8.5.1 Continual improvement. The organization must continually improve the effectiveness of the quality management system through the use of the quality policy, quality objectives, audit results, analysis of data, corrective and preventive actions, and management review.

8.5.2 Corrective action. The organization must take action to eliminate the cause of nonconformities in order to prevent reoccurrence. Corrective actions must be appropriate to the effects of the nonconformities encountered.

A documented procedure must be established to define requirements for:

a) reviewing nonconformities (including customer complaints);

b) determining the causes of nonconformities;

c) evaluating the need for action to ensure that nonconformities do not recur;

d) determining and implementing action needed;

e) records of the results of actions taken (see 4.2.4); and

f) reviewing corrective action taken.

8.5.3 Preventive action. The organization must determine action to eliminate causes of potential nonconformities in order to prevent their occurrence. Preventive actions must be appropriate to the effects of the potential problems.

A documented procedure must be established to define requirements for:

a) determining potential nonconformities and their causes;

b) evaluating the need for action to prevent occurrence of nonconformities;

c) determining and implementing action needed;

d) records of results of action taken (see 4.2.4); and

e) reviewing preventive action taken.

9. CONTROL OF THE USDA PROCESS VERIFIED TERM AND SHIELD

9.1 Use of Term and Shield. The organization may use the term "USDA Process Verified" and the USDA Process Verified Shield in promotional and advertising materials which include labels, packaging, websites, brochures, and other marketing materials.

The organization must request the use of the term and shield.

A documented procedure for the use of promotional materials must be established to:

a) identify a person or persons with responsibility for the development, review, distribution approval and control of promotional materials;

b) ensure that the specified process verification points are accurately represented in the materials;

c) ensure that the USDA Process Verified shield and the term "USDA Process Verified" are placed on product labels, promotional material, or advertising in a manner directly associated with a clear description of the specified process verification points;

d) ensures the use of the term and shield are not misrepresented and are not used in association with any company claims;

e) ensures that promotional materials reference the GIPSA Process Verified Program website, when possible; and

f) provides for the proper control and use of the term and shield on materials by:

(1) ensuring that promotional materials are supplied to and used only by approved entities;

(2) providing for a system of surveillance to prevent unauthorized use of process verification points, the term "USDA Process Verified" or the USDA Process Verified shield; and

(3) ensuring that materials are submitted to the Process Verified Program Manager for approval prior to use.

Records of all approved materials must be maintained to show conformance to the documented procedure.

9.2 Placement of the "USDA Process Verified" Term and Shield. Placement of the USDA Process Verified term and shield must meet one of the following conditions:

a) the specified process verified points are printed immediately adjacent to the USDA Process Verified Shield; or

b) an asterisk referring the consumer to the information panel for further information about the specified process verified points is printed with the USDA Process Verified Shield; or

c) an asterisk referring the consumer to point of sale information is printed with the USDA Process Verified Shield. In this situation, the organization must ensure that the point of sale information is readily available and within close proximity of the display counter containing the product.