

**Justification for Change Worksheet
OMB No. 0581-0125**

**Regulations Governing Inspection, Certification, Standards and Audit Services for Fresh and Processed Fruits, Vegetables, and Other Products -- 7 CFR 51, 52, and 62
April 2021**

This justification request is to modify two forms, Request for Audit Services (SC-237A) and Agreement for Participation in Audit Verification Program (SC-651), (7 CFR part 51, 52, and 62). These minor changes include updates to reflect changes in our current audit programs and payment options for audits as well as clarifying language in the forms

SC-237A, Request for Audit Services (Section 51.6, 51.7, 51.8, 52.6, 52.7, 52.8, and 62.202) – is filled out by farms, business, or other for profit, not-for-profit institutions or a Government agency on behalf of a business participating in Government procurement programs, interested in requesting a voluntary GAP or GMP audit or other type of audit service. The Commodity Procurement program is the Government program and has a mandatory requirement that businesses participating in Government procurement programs must be compliant with the USDA GAP or GMP audit program. The SCI Division will use this information to initiate audit services for the requestor in an efficient manner. These requests for services can be requested in person, by telephone, email, or facsimile to the nearest inspection office.

SC-651, Agreement for Participation in Audit Verification Programs (Section 51.6, 51.7, 51.8, 52.6, 52.7, 52.8, and 62.202) – it is necessary for all new farms, other for-profit, and not-for-profit businesses participating in the Government procurement programs, requesting an audit, to fill out the Agreement form before an audit is conducted. This is a contractual agreement between the applicant and USDA which outlines the program requirements for the applicant and lists the services provided by SCI Division upon signature. This form states it take 8.5 hours to complete. The 8.5 hours is applicable to new applicants establishing themselves in the program. This is due to the requirement that participants have a food safety plan in place before submitting this agreement._

The burden for the SC-237A and SC-651:

Form	Burden	Change	Burden After Change
SC-237A	0.0333	Added two fields to auditee information and expanded locations field under Farm/Facility Information. Reformatted and updated options under Audit Program Requested	No change
SC-651	8.5000	Removed audit program form title. Clarified language throughout the form	No change

These changes clarify and make them more transparent.