

## **REMOTE GRADING PILOT FOR BEEF PROGRAM REQUIREMENTS AND PROCEDURES**

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### **1. Purpose**

This document defines the U.S. Department of Agriculture (USDA), Agricultural Marketing Service-Livestock and Poultry Program (AMS-LP) policies and procedures for the official grading and certification of beef carcasses under the **Remote Grading Pilot for Beef (RGP Pilot)** in accordance with applicable Federal regulations and the official U.S. Standards for Grades of Carcass Beef. The scope, references, and Applicant and Grader responsibilities, as well as the processes and procedures detailed in this document, ensure that activities under RGP Pilot generate outcomes which are consistent across AMS-LP’s Meat Grading Service activities.

### **2. Scope**

- 2.1. Unless amended by this Procedure, Applicants utilizing the RGP Pilot option must adhere to the reference documents listed below.
- 2.2. Unless amended by this Procedure, the AMS-LP Quality Assessment Division (QAD) personnel (USDA Grader) must adhere to the reference documents listed below.
- 2.3. To simplify, the terms “carcass” and “carcasses” also mean “side” or “sides.” The term “meat” under this Procedure refers to “beef.”

### **3. References**

The following referenced documents are used in the application of this Procedure. The latest version of the referenced documents applies, including amendment.

- 3.1. [Code of Federal Regulations \(CFR\), Title 7, Subtitle B, Chapter I, Subchapter C, Part 54 Meats, Prepared Meats, and Meat Products \(Grading, Certification and Standards\)](#)
- 3.2. [United States Standards for Grades of Carcass Beef](#)

- 3.3. [QAD 106 Procedure: \*Grading Exemptions\*](#)
- 3.4. [QAD 112 Procedure: \*Official Marbling Photographs\*](#)
- 3.5. [QAD 500 Appendix A: \*Official Maturity Card\*](#)
- 3.6. [QAD 506 Procedure: \*Removal of Incorrect Grademarks\*](#)

#### **4. Pilot Participation: Initial Plant Visit**

- 4.1. After the Applicant is approved for Meat Grading Service and prior to initiating such service, QAD will conduct an Initial Plant Visit to review the RGP Pilot requirements and complete a Plant Survey for Meat Grading (QAD 100C Form).
- 4.2. QAD will review the AMS Fee for Service structure and billing procedures with the Applicant and discuss estimated costs for RGP Pilot participation.
- 4.3. QAD will consult with establishment personnel on proper carcass preparation and presentation, image capture and submission, required product identification, control, and recordkeeping.
- 4.4. QAD and the Applicant will review any Standard Operating Procedures (SOPs) as described below prior to implementation of Meat Grading Service. This review will also be performed during any subsequent RGP Pilot surveillance visits (refer to Section 10).
- 4.5. QAD may issue prototypes and other grading equipment to the facility for utilization in the RGP Pilot.
- 4.6. QAD will provide the Applicant a temporary password and instructions to access the QAD Cloud Vault for uploading carcass images and downloading official results.
- 4.7. QAD and the Applicant will discuss the RGP Pilot processes and procedures with the USDA-Food Safety Inspection Service (FSIS) personnel at the participating facility.

#### **5. Beef Carcass Requirements for Grading**

- 5.1. All carcasses must bear the required food safety inspection mark(s) prior to submission for official grading or certification.
- 5.2. Except when an exemption is granted by QAD in advance, only carcasses in establishments where the animals are harvested or initially chilled may be graded.
- 5.3. Retained carcasses shall not be graded without specific authorization from the USDA-FSIS personnel.
- 5.4. When both sides of a carcass are ribbed, the final grade will reflect the "highest" quality grade as determined from either qualifying side. *All quality factors shall be determined from the same ribeye.*
- 5.5. When applicable, carcasses must maintain appropriate "Over Thirty Months" (OTM) identification from dentition process by FSIS.
- 5.6. Refer to the resources in Section 3 for additional information on carcass eligibility and requirements for Grading (7 CFR Part 54, and the U.S. Standards for Grades).

## 6. Applicant Responsibilities- Grading

Applicants utilizing the RGP Pilot option must:

- 6.1. Ensure secure internet connectivity is available for reliable upload and download of carcass images for grading, receipt of official results, and submission of monthly reports.
- 6.2. Provide and utilize only FSIS-approved meat branding ink and food-safe materials and packaging for use on officially graded beef carcasses and parts.
- 6.3. Safeguard any USDA grading equipment provided to the Applicant via secure (locked) location and through control methods recorded in a plant SOP. "Grading equipment" includes technology as well as grading tools and devices (e.g., imaging devices and technology, official identification tags or stamps).
- 6.4. Provide written documentation describing how carcasses over 30 months of age (MOA) are identified and segregated within the plant. QAD will review these procedures either during the plant QSA audits or during routine RGP Pilot surveillance visits.
  - 6.4.1. If the plant has an approved USDA Quality Systems Assessment (QSA) program in place (e.g., for a USDA Export Verification Program), they may provide the applicable section from their Quality Manual which details this process.
  - 6.4.2. If the plant does not have an approved USDA QSA in place, they must document this process through an SOP or similar document.
- 6.5. Carcass Preparation
  - 6.5.1. Split carcasses into two sides in a manner which allows bone maturity evaluations in the sacral, lumbar, and thoracic regions. Improperly split carcasses may not be eligible for grading if an accurate maturity evaluation cannot be made from the images presented.
  - 6.5.2. Properly rib carcasses or sides a minimum of 10 minutes prior to image capture. Improperly ribbed carcasses reoffered for grading must first be properly ribbed and rested for at least ten minutes bloom time before new images are captured.
  - 6.5.3. Position the carcass tags such that the tags and the unique carcass ID number are clear and easily readable in the images captured. Note: If submitting the carcass for a Certified Meat Program (refer to Section 6, below) with a specified weight requirement, the carcass weight tag must also be legible in the images.
- 6.6. Image Capture
  - 6.6.1. Adequately illuminate the area used to stage the carcasses for image capture or official grading.
  - 6.6.2. Capture images using device acceptable to QAD, and email or upload the images to the specified Cloud Vault location, as directed.
  - 6.6.3. For each carcass, capture ribeye image along with the required carcass identification tags.
  - 6.6.4. The carcass image must capture the top 3 to 4 thoracic vertebrae indicating the carcass skeletal maturity factors.
- 6.7. Graded Product Handling and Identification
  - 6.7.1. Positive grade identity must be maintained at all times.

- 6.7.2. Upon receiving the official grading results from QAD, be responsible for grade identification of carcass and derived products throughout fabrication, packaging, and labeling, using methods approved in advance by AMS-LP and recorded in the Applicant's SOP.
- 6.7.3. Utilize one of the following options for grade identification:
- 6.7.3.1. Option 1: Final identification of carcass with method approved by the AMS-LP (requires an approved FSIS grade label program and grade-labeled protective covering if cuts are marketed with a grade).
- 6.7.3.2. Option 2: Grade-labeled package inserts in lieu of grade-labeled protective coverings (bags). Label inserts must be food-grade quality and the applicable USDA shield depicted clearly and without distortion.

## **7. Applicant Responsibilities- USDA Certified Meat Programs**

- 7.1. All cattle qualifying for a Certified Meat Program (CMP) will be identified in the holding pen or harvest floor per the applicable Live Animal Specification.
- 7.2. All carcasses identified as for the CMP can be documented on the FSIS weekly form, with a hot weight tag including the CMP-specific carcass identification, or by other means previously approved by AMS-LP and detailed in the Applicant's SOP.
- 7.3. All cattle and carcasses presented to QAD for certification to breed characteristics must be associated with and follow the published procedures for a breed association recognized by the National Pedigreed Livestock Council (NPLC).
- 7.4. All carcasses must maintain applicable "Over Thirty Months" (OTM) identification from dentition process by FSIS.

## **8. USDA Grader Responsibilities- Remote Grading and Certification**

- 8.1. Upon opening the file(s), notify the Applicant as soon as possible of issues which prevent grading, e.g., poor image quality, omission of required information, errors with the electronic files or file formats.
- 8.2. *Do Not Quality Grade*
- 8.2.1. If the cut surface of the ribeye appears dried, aged, frozen, or distorted by sawing or ribbing, to the extent that the true color, texture, and/or marbling cannot be determined from the images submitted.
- 8.2.2. If more than a small amount of bloodshot (equal to the minimum slight marbling picture) or calloused tissue (1/2 square inch or more) is in the ribeye.
- 8.2.3. If the images indicate the application of pressure, combing, or any other influences which alter characteristics of the ribeye such that an accurate grade determination cannot be made.
- 8.3. Special Circumstances for Quality Grading
- 8.3.1. Dentition as monitored by USDA-FSIS: carcasses determined to be less than 30 months of age (MOA) will be classified as A maturity and, with the exception of dark cutting lean characteristics, the final quality grade will be determined by the degree of marbling.

- 8.3.2. Any carcasses under 30 MOA exhibiting advanced skeletal maturity traits (as described for D and E maturity), will not be eligible for the Prime, Choice, Select or Standard grades and will be graded according to their skeletal, lean, and marbling traits accordingly.
- 8.4. Grading Volume Data Reporting: On a weekly basis, record grade volume as described in QAD 1606 Procedure: *AMS Billing & Information System (ABI) Meat Grade Volume Entry Processes*.

## **9. Remote Grading and Certification Procedure**

### **9.1. Applicant**

- 9.1.1. Applicant captures still images of the animal/carcass with clear and unique animal/carcass identification and uploads the images to the QAD CloudVault.
- 9.1.2. Applicant allows 24 hours for QAD to receive, review, process, and communicate the official grading/certification results to the Applicant.
- 9.1.3. Upon receipt, Applicant downloads results and retains records for subsequent QAD surveillance and compliance reviews. Applicant must make these records available to the USDA Grader or authorized AMS-LP representative upon request.
- 9.1.4. Applicant must identify each graded carcass with the applicable USDA Quality Grade via a method approved in advance by AMS-LP and described in the Applicant's Standard Operating Procedure (SOP) for the facility.
- 9.1.5. A video recording of the process may be required to ensure QAD of this positive grade identification. Video recording will only be accessible to QAD employees.
- 9.1.5.1. Should video be required, Applicant must provide the video equipment (e.g., GoPro™, or alternative) needed to ensure grade integrity throughout processing. The video monitoring equipment must be approved by AMS-LP.

### **9.2. USDA Grader**

- 9.2.1. Upon receipt of image submission, USDA Grader reviews and assigns the official quality grade and Certified Meat Program certification(s), as applicable.
- 9.2.2. USDA Grader records results and returns the official report to the Applicant for download from the CloudVault. When necessary, the USDA Grader may provide the results via email, followed by submission in the Cloud Vault.
- 9.2.3. USDA Grader maintains a turnaround of no more than 24 hours from time of acceptable image upload to the database and return of official grading results to Applicant.
- 9.2.4. Images rejected due to distortion, inadequate carcass/ribeye presentation or appearance, or illegible markings, will be returned to the Applicant with No Grade. Applicant will be charged for the time taken to evaluate the submission, as well as any subsequent resubmission of the same carcass. AMS-LP has processes in place to ensure specific images are not utilized for official grades more than once.



## 10. RGP Pilot Surveillance and Compliance

### 10.1. Monthly Records Review

10.1.1. Applicant must upload monthly plant production reports to the Cloud Vault within 10 days of the end of each month during which grading or certification activities took place.

These include, as applicable:

10.1.1.1. Total Slaughter Beef Volume Presented to Grade

10.1.1.2. Total Graded Carcass IDs and weights

10.1.1.3. Total Graded Carcass Processing Volume

10.1.1.4. In lieu of some of the above, Applicant may substitute a report generated from their scale system indicating the graded and labeled product.

### 10.2. On-Site Compliance Visits

10.2.1. At least once annually, AMS-LP will conduct an on-site visit to the packing facility to review the program requirements, applicable SOPs, grading records and plant volume reports, and compliance with Public Law 272, as applicable. AMS-LP reserves the right to perform additional for-cause visits at participating plants.

10.2.2. All facility documents pertaining to grading equipment, grading technology, graded volume, and production will be made available to AMS-LP for visual review during normal business hours.

## 11. Cost of Service

11.1.1. The cost of USDA's voluntary grading service under the RGP Program option will be assessed at the Unscheduled rates, based on the time required to render the service, calculated to the nearest 15-minute period, including USDA official's travel and time in-plant, when applicable, and the certificate, memorandum, and/or report preparation time performed in connection with the performance of grading and certification services.

11.1.2. A minimum charge of one-half hour shall be made for service pursuant to each grading request, notwithstanding that the time required to perform service may be less than 30 minutes.

11.1.3. USDA uses standardized formulas to calculate fees charged by AMS for user-funded voluntary grading and certification services. Current rates are posted on the AMS website [www.ams.usda.gov/services/grading/fees](http://www.ams.usda.gov/services/grading/fees).

11.1.4. Prior to requesting service under the RGP Pilot, AMS-LP recommends Applicants review the program requirements, fees involved, and explore all options—both in-person Scheduled and Unscheduled as well as the remote Unscheduled grading service—to ascertain which is most effective and economical for the Applicant.

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