

Standard Operating Procedure (SOP) for Pennsylvania Agriculture Conservation Stewardship (PACS) Certification Program Verifications and Submissions

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Version 1.5

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I. Roles and Responsibilities

The following summarizes the roles and responsibilities of each organization that will participate in the implementation of this SOP.

- A. PA State Conservation Commission (SCC)
 - 1. Reviews submitted PACS certification applications
 - 2. Issues PACS certifications to farms
 - 3. Manages the data submitted to the PACS PracticeKeeper module by conservation districts and technical service providers for this program
 - 4. Approves qualified verifiers and provides training for verifiers
 - 5. Does not charge any fees for applications or certifications
- B. Verifiers (including county conservation districts and private technical service providers)
 - 1. Conduct on-site verifications of farms to ensure PACS program requirements are met
 - 2. Review any required farm plans for completeness and to ensure that they are current and on schedule with implementation
 - 3. Complete the Inspection Report for Agricultural Operations (3320-FM-BWRNSM0008) and the Pennsylvania Agriculture Conservation Stewardship (PACS) Program Supplement Form (3320-FM-BWRNSM0008-B)
 - 4. Conduct on-site soil sampling
 - 5. Assist the farmer in assembling their PACS certification application
 - 6. Input the application and other required documents into PracticeKeeper
 - 7. May assist farmers in completing conservation projects in order to attain PACS status if needed
 - 8. May charge a fee to farmers for their services

II. Qualified Verifier Requirements

Those planning to conduct farm verifications for the purpose of PACS certification must first meet at least one of the following professional qualifications:

- A. Act 38 certified (Active status - [Bureau of Plant Industry](#))
- B. NRCS Certified Technical Service Providers (TSPs) ([Find a Technical Service Provider](#))
 - Conservation Planning Activities (CPA)
 - CPA 102 Comprehensive Nutrient Management Plan
 - CPA 199 Conservation Plan
 - Design and Implementation Activities (DIAs)
 - DIA 101 CNMP Design and Implementation Activity
 - DIA 157 Nutrient Management
 - DIA 157 Nutrient Management Design and Implementation Activity
- C. Conservation district agriculture staff who have completed NRCS Boot Camp Training (at least level 1, though level 2 is highly encouraged) and have at least 2 years of experience with plan review and/or development.
- D. Approved petition to have years of experience and/or professional licensure considered as an equivalent qualification to be determined by the SCC, including but not limited to:
 - a. At least 2 years of experience (as demonstrated in a resume)
 - b. Must provide at least 1 example Ag E&S and MMP written within 1 year of petition

If an individual meets at least one of these professional qualifications, they must then take the following Clean Water Academy courses, or provide proof of having taken these courses, before participating in the verifier training:

Manure Management Training:

<https://pacleanwateracademy.remote-learner.net/course/view.php?id=1308>

- Manure Management Plan Workbook Learning Activity
- MMP Short Form Learning Activity

Ag E&S Training:

<https://pacleanwateracademy.remote-learner.net/course/view.php?id=235>

- Overview of the Ag E&S Manual
- Ag E&S Plan Developers
- Ag E&S Manual for Agricultural Operations: How to Choose BMPs

Once an individual meets at least one of these professional qualifications, and completes the listed Clean Water Academy courses above, they can then participate in the required verifier training to become a PACS program verifier. This training is hosted by the Pennsylvania State Conservation Commission on a regular basis and covers the verification procedures, use of the PracticeKeeper system, and other program considerations.

Annual completion of the verifier training will be required. This training will be available either as a webinar or within Clean Water Academy as a training module.

A list of qualified verifiers will be made available to farmers via the PACS webpage on the PA Department of Agriculture/State Conservation Commission website.

<https://www.pa.gov/agencies/pda/about-pda/boards-commissions/state-conservation-commission/pacs-certification>

III. PACS Certification Requirements for Farms

- A. The farm must be operated by the owner of the land
- B. Certified farms must be reverified every 5 years
- C. Must maintain all relevant/required administratively completed farm plans, which are current and implemented as scheduled in the plan(s) (conservation, nutrient management, manure management, E&S etc.)
- D. If there is a stream present on the property, a functional, vegetative riparian buffer with livestock excluded AND/OR stream AND/OR wetland restoration with livestock excluded (if applicable)
- E. A soil health test, conducted within the past 12 months, with a mean score of all sample results between 60-100 on the Cornell Comprehensive Assessment of Soil Health (CASH) using the Standard Soil Health Analysis Package or an equivalent score from an equivalent testing package (if applicable)
- F. Prescribed grazing management in accordance with the NRCS Conservation Practice Standard (Code 528) or an equivalent (if applicable)
- G. Supplemental nutrient management in the form of at least 1 BMP implemented, if applicable: Nitrogen Rate Supplemental NM, Nitrogen Placement Supplement NM, Nitrogen Timing Supplement NM, Phosphorus Rate Supplemental NM, Phosphorus Placement Supplemental NM, Phosphorus Timing Supplemental NM

IV. Verification Forms

Two fillable forms are required for submission as part of a PACS verification. These forms are the Inspection Report for Agricultural Operations (3320-FM-BWRNSM0008) and the Pennsylvania Agriculture Conservation Stewardship (PACS) Program Supplement Form (3320-FM-BWRNSM0008-B). The verification forms are to be used for on-site verification and will be reviewed by State Conservation Commission staff for completeness as well as to determine whether all requirements have been met for a farm to become PACS certified.

- A. Forms
 - 1. Inspection Report for Agricultural Operations (3320-FM-BWRNSM0008)

- a. The on-site verification by a qualified verifier is an important step in a farm's PACS certification process. The verification must be equivalent to a Phase 2 Chesapeake Bay Inspection and thus utilizes the same form as is used for DEP inspections.
 - b. If a farm is in the Act 38 program, the Manure Management Plan section does not need to be filled out and this must be indicated on the form. The most recent Act 38 status review letter ("Nutrient Management Program On-site Status Review Follow-up Report") must be attached to the application package as well.
 - c. The Water Quality and Violations sections should be left blank.
 - d. The Standard Operating Procedures for Agriculture Routine Inspections, Complaint Investigation, and Follow-up (BWRNSM-INSP-006) should be followed to complete this form.
2. Pennsylvania Agriculture Conservation Stewardship (PACS) Program Supplement Form (3320-FM-BWRNSM0008-B)
- a. In addition to the DEP inspection form, a supplement form that is specific to the PACS program must be submitted. The PACS supplement form serves as a farm's application form for the program.
 - b. All information in the report, which can be determined during the site visit, must be completed. If information is not relevant or applicable, please note those reasons.
 - c. To use the check boxes - right click, properties, and click "checked."
 - d. To use the text boxes - just click and type.
 - e. Completing the Header and General Information - The information listed below is required for all verifications:
 - i. Landowner or Operation Name
 - ii. Operation Address
 - iii. Date of Verification
 - iv. Verifier Name and Organization
 - v. Indication of if the farm is owned and operated by the same individual
 - f. Completing the PACS Certification Requirements - The information listed below is required for all verifications:
 - i. Indication that the farmer has all relevant and required conservation plans that are current
 - ii. Indication that all best management practices have been implemented according to schedule as outlined in the farm's plans
 - iii. Indication that a functional, vegetative riparian buffer, stream restoration, or wetland restoration is present with type and size listed
 - iv. Indication that soil testing has been conducted and meets program requirements (see Section V. of this document for more information)
 - v. Indication that the farm is implementing prescribed grazing management in accordance with the NRCS Conservation Practice Standard (Code 528) or an equivalent
 - vi. Indication that at least one supplemental nutrient management practice is being implemented, with details of that practice implementation, or an explanation of why this requirement is not applicable

- g. Completing the Attachments - The documents listed below are required to be attached to all verifications if and as applicable:
 - i. Agricultural Erosion & Sediment Plan- 25 Pa Code 102.4(a) (PA Chapter 102)
 - ii. Manure Management Plan- 25 Pa. Code 91.36(b) (PA Chapter 91)
 - iii. Nutrient Management Plan – PA Act 38
 - iv. Nutrient Management Program On-site Status Review Follow-up Report
 - v. NRCS Conservation Plan
 - vi. NRCS Comprehensive Nutrient Management Plan (CNMP)
 - vii. Mushroom Farm Environmental Management Plan (MFEMP)
 - viii. Soil Health Test Results
- h. Completing the Funding Section - The information listed below is required for all verifications:
 - i. Indication as to whether the landowner received any cost share funding for the implementation of best management practices in the past 15 years
 - ii. A list of best management practices as reflected in the landowner’s farm plans and the associated funding sources
- i. Completing the Footer - The information listed below is required for all verifications:
 - i. Landowner/Operation Name
 - ii. Landowner Signature
 - iii. Landowner Cell Phone Number
 - iv. Landowner Other Phone Number (if applicable)
 - v. Landowner Email Address (if applicable)
 - vi. Landowner indication of consent/no consent to have their name and PACS status being publicly viewable for verification, marketing and promotional purposes as a benefit to program certification
 - vii. Verifier Name
 - viii. Verifier Signature
 - ix. Verifier Organization Name
 - x. Verifier Cell Phone Number
 - xi. Verifier Other Phone Number (if applicable)
 - xii. Verifier Email Address
 - xiii. Verifier indication of whether they were the plan writer for the farm being verified (It is not required for the plan writer to be different from the verifier, though SCC staff will provide oversight to ensure proper verifier conduct and performance)
 - xiv. Additional Comments (if needed)

v. Soil Testing

A. Test Type

1. In order to be certified for this program, farms must have soil samples tested using the Cornell Comprehensive Assessment of Soil Health (CASH) - Standard Soil Health Analysis

Package, or an equivalent soil test. Sample results must achieve a mean score (including all samples from the farm) between 60-100. Any soil tests being considered as an equivalent to the CASH Standard Package must include the same set of indicators and meet the same values/scores for each indicator.

2. At the time of drafting this document, the following guidelines apply for the Cornell CASH - Standard Soil Health Analysis Package:
 - a. Cost: \$130 per sample
 - b. Required sample size: 4 cups per acre
 - c. Submission forms must be included with the soil samples when shipped. Failure to include submission forms may result in delays and/or denial of requested soil analyses.
 - d. The Standard Soil Health Analysis Package includes the following tests:
 - i. Soil pH, Organic Matter, Modified Morgan Extractable P, K, additional nutrients: Mg, Fe, Mn, Zn, Al, Ca, Cu, S, B
 - ii. Soil Texture
 - iii. Active Carbon
 - iv. Wet Aggregate Stability
 - v. Soil Respiration
 - vi. Soil Organic Carbon, Total Carbon, Total Nitrogen
 - vii. Predicted Autoclave-Citrate Extractable (ACE) Protein
 - viii. Predicted Available Water Capacity
 - ix. Surface, sub-surface hardness interpretation (the person conducting sampling must provide the penetrometer readings.)
3. Please refer to the Cornell Soil Health Laboratory for more information:
 - a. [Soil Health Manual Fact Sheets | Cornell Soil Health Laboratory](#)
 - b. [Soil Health Analysis Packages | Cornell Soil Health Laboratory](#)
 - c. [Simple guide for submitting samples | Cornell Soil Health Laboratory](#)

B. PACS Sampling Requirement Guidelines

1. Soil testing is only required for farms that have actively cropped land and/or actively pastured land
2. Soil testing must be completed within 1 year (12 months) prior to PACS application
3. Samples should be representative of the field in which they were taken from (i.e. must not be taken from the far edge of a field/pasture)
4. New samples for PACS reverification must be taken from the same field as the prior sample used for PACS verification
5. One composite soil sample is required per active field management type, as listed below (minimum of two samples per farm regardless of the number of active management types on that farm)
6. Active field management types include:
 - a. Pasture (regardless of livestock species) and Hay
 - b. Conventional Tillage: Any tillage routine that does not achieve 15 percent crop residue coverage immediately after planting
 - c. Low Residue Tillage: A conservation tillage routine that involves the planting, growing and harvesting of crops with minimal disturbance to the soil in an effort to

maintain 15 to 29 percent crop residue coverage immediately after planting each crop

- d. Conservation Tillage: A conservation tillage routine that involves the planting, growing and harvesting of crops with minimal disturbance to the soil in an effort to maintain 30 to 59 percent crop residue coverage immediately after planting each crop
- e. High Residue, Minimum Soil Disturbance Tillage: A conservation tillage routine that involves the planting, growing and harvesting of crops with minimal disturbance to the soil in an effort to maintain at least 60 percent crop residue coverage immediately after planting each crop

VI. Application Submission

Once a farm has a complete application package, the application can be submitted to the State Conservation Commission for review and issuance of the PACS certification if all requirements are met.

Applications and decisions for PACS certification will be reviewed by SCC staff on a rolling basis. Applications may be submitted at any time and the farm's 5-year certification cycle shall begin in the calendar year in which they are certified (i.e. if a farm is certified within the calendar year 2025, they must be recertified by the end of 2030 to maintain their PACS certification).

- A. Documents Required as part of the Application Package
 - 1. Inspection Report for Agricultural Operations (3320-FM-BWRNSM0008)
 - 2. Pennsylvania Agriculture Conservation Stewardship (PACS) Program Supplement Form (3320-FM-BWRNSM0008-B)
 - 3. Soil Test Results
 - 4. Copies of all relevant and required conservation plans that are current, including:
 - a. Agricultural Erosion & Sediment Plan - 25 Pa Code 102.4(a) (PA Chapter 102)
 - b. Manure Management Plan - 25 Pa. Code 91.36(b) (PA Chapter 91)
 - c. Nutrient Management Plan - PA Act 38
 - d. Most recent Act 38 status review letter ("Nutrient Management Program On-site Status Review Follow-up Report")
 - e. NRCS Conservation Plan
 - f. NRCS Comprehensive Nutrient Management Plan (CNMP)
 - g. Mushroom Farm Environmental Management Plan (MFEMP)
- B. Email Submission
 - a. As this program does not yet have a dedicated module in PracticeKeeper, application packages should be submitted to the State Conservation Commission via email or by postal mail if necessary.
 - b. Please send completed application packages to Colleen Limbert at:
 - i. Email: colimbert@pa.gov
 - ii. Phone number: 717-783-5320
 - iii. Address: 2301 North Cameron Street, Harrisburg, PA 17110

C. PracticeKeeper Submission

- a. Instructions for PracticeKeeper submission will be added here once a formal module is established.

VII. Resources for Certified Farmers

- A. SCC will be providing a Farmer's Guide to PACS Benefits.
- B. Farmers that are not yet PACS certified but are completing a project in order to become PACS certified may also be eligible for certain funding benefits. Farmers must indicate on their application for grants that they are completing the project with the intention to become PACS certified in order to access those benefits.