



OFFICE OF INSPECTOR GENERAL
U. S. DEPARTMENT OF AGRICULTURE

COVID-19—Farmers to Families Food Box Program Administration—Interim Report



Inspection Report 01801-0001-22(1)

June 2022

COVID-19—Farmers to Families Food Box Program Administration

Inspection Report 01801-0001-22(1)

We assessed how AMS designed the Farmers to Families Food Box Program solicitation, whether AMS awarded the contracts in accordance with requirements, and what methodology AMS used to allocate funding.

OBJECTIVE

This interim report addresses the following objectives:

(1) Did AMS design the solicitation according to the requirements of the FAR and Departmental guidance?; (2) Did AMS award the contracts in accordance with the solicitation requirements?; and (3) What methodology did AMS develop and use to equitably allocate funding to the contractors?

REVIEWED

We assessed whether AMS followed procedures in accordance with the FAR and Departmental acquisition regulations, evaluated AMS' methodology to allocate funding, and assessed AMS' review and award of contracts for Round 1 of the Food Box Program.

RECOMMENDS

We recommend that AMS develop policies and procedures for performing expedited award processes during Federal emergencies, and we recommend that AMS upload all relevant Food Box Program supporting documentation for Round 1 to the agency's system of record.

WHAT OIG FOUND

The United States Department of Agriculture's (USDA) Agricultural Marketing Service (AMS) administers programs that create domestic and international marketing opportunities for United States producers of food, fiber, and specialty crops. In response to the coronavirus disease 2019 pandemic, the Department—under AMS—established the Farmers to Families Food Box Program (Food Box Program) to connect food to non-profits through regional and local distributors. As the responsible agency, AMS released a solicitation requesting proposals from regional and local distributors to supply the following food box types: fresh fruits and vegetables; pre-cooked meat (chicken and pork); dairy products; and fluid milk. On May 8, 2020, AMS announced awards for the first round of purchases—totaling up to \$1.2 billion—for the period of performance May 15, 2020, through June 30, 2020 (hereafter referred to as “Round 1”).

We found that AMS designed the solicitation for the Food Box Program according to the requirements of the Federal Acquisition Regulation (FAR) and Departmental guidance. Additionally, we found that AMS substantially adhered to the funding allocation decisions described in the solicitation.

Finally, while AMS established a panel to evaluate the Food Box Program proposals, we found that the agency did not always award Round 1 contracts in accordance with the specified requirements of the solicitation. As a result, some proposals were accepted and awarded contracts despite not meeting the specified requirements of the solicitation.

AMS agreed with our finding and recommendations, and we accepted management decision on one of two recommendations. Further action from the agency is needed before management decision can be reached for the remaining recommendation.



OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



DATE: June 24, 2022

INSPECTION

NUMBER: 01801-0001-22(1)

TO: Bruce Summers
Administrator
Agricultural Marketing Service

ATTN: Wing Padilla
Acting Branch Chief
Internal Audits Branch

FROM: Gil Harden
Inspector General for Audit

SUBJECT: COVID-19—Farmers to Families Food Box Program Administration

This report presents the results of the subject review. Your written response to the official draft is included in its entirety at the end of the report. We have incorporated excerpts from your response, and the Office of Inspector General's (OIG) position, into the relevant sections of the report. Based on your written response, we are accepting management decision for Recommendation 2. However, we are unable to accept management decision for Recommendation 1. The information needed to reach management decision is set forth in the OIG Position section following the recommendation.

In accordance with Departmental Regulation 1720-1, please furnish a reply within 60 days describing the corrective actions taken or planned, and timeframes for implementing the recommendations for which management decisions have not been reached. Please note that the regulation requires management decision to be reached on all recommendations within 6 months from report issuance, and final action needs to be taken within 1 year of each management decision to prevent being listed in the Department's annual Agency Financial Report. Please follow your internal agency procedures in forwarding final action correspondence to Office of the Chief Financial Officer.

We appreciate the courtesies and cooperation extended to us by members of your staff during our inspection fieldwork and subsequent discussions. This report contains publicly available information and will be posted in its entirety to our website (<https://usdaoig.oversight.gov>) in the near future.

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Background and Objectives

Background

The United States Department of Agriculture's (USDA) Agricultural Marketing Service (AMS) administers programs that create domestic and international marketing opportunities for United States producers of food, fiber, and specialty crops. AMS' mission is to facilitate marketing agricultural products in domestic and international markets, while ensuring fair trading practices and promoting a competitive and efficient marketplace for producers, traders, and consumers of United States food, fiber, and specialty crops.

In response to the coronavirus disease 2019 (COVID-19) pandemic, Congress enacted the Families First Coronavirus Response Act¹ and the Coronavirus Aid, Relief, and Economic Security Act.² These acts provided more than \$35.8 billion to USDA to use for relief efforts through its agencies and programs. On April 17, 2020, the Secretary of Agriculture announced that USDA was exercising its authority under the Families First Coronavirus Response Act to purchase and distribute agricultural products to people impacted by the COVID-19 pandemic. In order to purchase and distribute these products, the Department established the Farmers to Families Food Box Program (Food Box Program) under AMS. According to AMS, the Food Box Program sought to address three critical needs simultaneously: to provide markets for farmers faced with declining demand and the crisis of food rotting in fields and animals being euthanized; to provide for the food needs of newly unemployed Americans; and to help put suppliers and distributors back to work. The purpose of the Food Box Program was to connect food—which would have otherwise been sold to restaurants, hotels, schools, and other food service entities—to regional and local distributors (contractors) for them to purchase and deliver \$3 billion in fresh produce, dairy, and meat products to non-profit and governmental organizations.³ Through partnerships with regional and local distributors, AMS anticipated purchasing \$100 million per month for each of the following food box types: fresh fruits and vegetables; pre-cooked meat (chicken and pork); dairy products; and fluid milk.

The Federal Acquisition Regulation (FAR) Part 18, *Emergency Acquisitions*, provides agencies with flexibilities to streamline the acquisition process under certain circumstances, such as when the President of the United States issues an emergency declaration. The former Secretary of Agriculture used this authority to procure commodities to deliver to non-profit and governmental organizations to assist with distributing food to Americans during the pandemic. The Department created the Food Box Program and released a solicitation requesting proposals that would supply food boxes from a pre-approved portfolio of fresh fruit, vegetables, dairy, and/or meat products.⁴ AMS established an evaluation panel to review received proposals and, on May 8, 2020, AMS issued awards for the first round of purchases—totaling up to \$1.2 billion—for the period of performance May 15, 2020, through June 30, 2020 (hereafter referred to as “Round 1”).

¹ Families First Coronavirus Response Act, Pub. L. No. 116-127 (Mar. 2020).

² Coronavirus Aid, Relief, and Economic Security Act, Pub. L. No. 116-136 (Mar. 2020).

³ Throughout this report, we refer to distributors as “contractors.”

⁴ Solicitation AG-12-3J14-20-R-0377, dated Apr. 24, 2020, and amendment 1, dated Apr. 29, 2020.

AMS required contractors to submit Food Box Program proposals in four parts: technical information, offeror capability, past performance, and price. According to AMS' solicitation, the agency evaluated these proposals on the technical information, past performance, and offeror capability submitted; these three evaluation factors, when combined, were significantly more important than the price of the proposals. AMS also required that contractors submit specific standard forms (SF), including complete and signed copies of Form SF-1449, *Solicitation Contract*, and SF-30, *Amendment of Solicitation*, in which the contractor acknowledged AMS' amendment to the solicitation.

As part of the Food Box Program, AMS required contractors to perform food distribution supply-chain processes to get the procured food to people impacted by the COVID-19 pandemic through non-profits. Specifically, each contractor had to construct a commodity supply-chain to obtain the products and a network of non-profit and governmental recipient entities, distribute the food to organizations within the network, and track and maintain evidence of the food delivered to those recipients. The following image illustrates the Food Box Program's food distribution process.

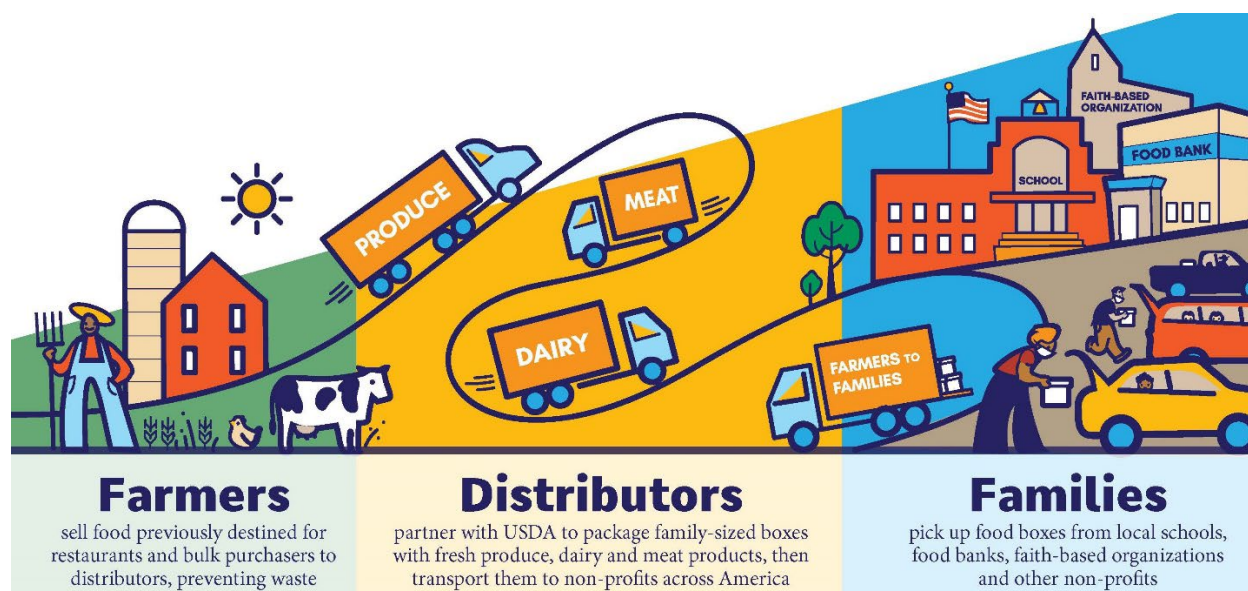


Figure 1: Infographic from AMS' website:

<https://www.ams.usda.gov/sites/default/files/media/FarmersToFamiliesFoodBox.pdf>. Last accessed Jan. 6, 2022.

Objectives

Our objectives for this interim inspection report were to address the following questions:⁵

⁵ During the course of our inspection, we decided to issue interim reports as we completed the objectives. In this report, we are addressing three of our four objectives. The fourth objective is to answer the question: *What controls did AMS develop and implement to ensure awardees fulfilled the obligations of the contract?*

1. Did AMS design the solicitation according to the requirements of the FAR and Departmental guidance?
2. Did AMS award the contracts in accordance with the solicitation requirements?
3. What methodology did AMS develop and use to equitably allocate funding to the contractors?

Objective 1: Did AMS design the solicitation according to the requirements of the FAR and Departmental guidance?

We found that AMS designed the solicitation for the Food Box Program according to the requirements of the FAR and Departmental guidance.⁶ In response to the COVID-19 pandemic, AMS used the *AMS Master Solicitation for Commodity Procurements—Domestic Programs* as the basis to create an Emergency-Master Solicitation for Commodity Procurement (E-MSCP). In the E-MSCP, AMS included solicitation provisions and contract clauses—from both the FAR and Departmental guidance—that the agency deemed appropriate for the Food Box Program solicitation. In addition, AMS applied the emergency provision flexibilities allowed under FAR Part 18, *Emergency Acquisitions*, for the Food Box Program solicitation.⁷ These flexibilities allowed the agency to reduce the time it needed to develop and issue the Food Box Program solicitation, thereby potentially increasing the number of proposals the agency received, and expediting AMS' contract awarding process. The Food Box Program solicitation sought potential contractors to supply a pre-approved portfolio of fresh fruit, vegetable, dairy, and/or meat products that would be distributed to Americans impacted by the COVID-19 pandemic through the use of non-profits and governmental organizations.

We also found that the agency used other provisions from FAR Part 12, *Acquisition of Commercial Items*; Part 15, *Contracting by Negotiation*; and Part 52, *Solicitation Provisions and Contract Clauses*, to prepare the solicitation.

⁶ The USDA's Acquisition Regulation (AGAR) contains basic policies and general information about USDA guidance. The AGAR provides for USDA to codify and publish acquisition policies and procedures that supplement the FAR in instances when the FAR does not cover a subject matter. FAR Chapter 4 codifies the AGAR.

⁷ FAR Part 18, *Emergency Acquisitions*.

Objective 2: Did AMS award the contracts in accordance with the solicitation requirements?

While AMS established a panel to evaluate the Food Box Program proposals, the agency did not always award Round 1 contracts in accordance with the specified requirements of the solicitation. Specifically, AMS' evaluation panel inconsistently reviewed proposals and did not maintain complete contract documentation. This occurred because AMS did not have policies and procedures to implement the program in a short timeframe with limited personnel to ensure a consistent review of a large volume of proposals and contract actions. This also occurred because AMS did not adequately store documentation in its system of record. As a result, some proposals were accepted and awarded contracts despite not meeting the specified requirements of the solicitation.

The FAR requires agencies to establish an evaluation panel to ensure a comprehensive evaluation of proposals.⁸ Further, agencies are required to ensure consistency among the evaluation factors.⁹ The panel shall evaluate the proposals based on the factors contained in the solicitation.¹⁰ Finally, agencies shall establish files containing all contractual actions¹¹ and maintain files that are readily accessible.¹²

On April 24, 2020, AMS issued the Food Box Program solicitation for the first round of purchases with a proposal submission deadline of May 1, 2020.¹³ In response to the solicitation, AMS received 553 proposals. AMS established a technical evaluation panel to review these proposals and—7 days later, on May 8, 2020—announced that the agency had awarded contracts to 198 contractors. For contractors AMS did not select, the agency sent written notification listing the most common factors for a non-award.¹⁴

The technical evaluation panel evaluated each proposal's technical information, offeror capability, past performance, and price sections using the applicable requirements outlined in the solicitation. The solicitation required that each contractor submit specific documentation, for example, SF-30, *Amendment to Solicitation*; a registration form for AMS' Web-Based Supply Chain Management System (WBSCM) if the contractor was not already registered in the system;

⁸ FAR § 15.303(b)(1).

⁹ FAR § 15.303(b)(3).

¹⁰ FAR § 15.303(b)(4).

¹¹ FAR § 4.801(a).

¹² FAR § 4.802(c)(2).

¹³ Solicitation AG-12-3J14-20-R-0377, dated Apr. 24, 2020.

¹⁴ These factors included not submitting the SF-30, *Amendment to Solicitation*, and not submitting all required attachments and affirmations, including the WBSCM registration form and nonmanufacturer information, if applicable.

and, if applicable, a copy of written agreements between a nonmanufacturer and an approved supplier.^{15, 16, 17}

In order to assess AMS' awarding process, we statistically selected and evaluated 143 of the 553 proposals AMS received for Round 1.¹⁸ We found that AMS inconsistently applied solicitation requirements when reviewing and awarding contract proposals. For example:

- AMS awarded contracts to seven contractors that were missing the SF-30, *Amendment to Solicitation*, in their proposals, while AMS removed nine contractors from consideration for missing the SF-30.
- AMS awarded contracts to 3 contractors that did not submit the WBSCM registration form, while AMS removed 11 contractors from consideration for not having the WBSCM form.
- AMS awarded contracts to 25 contractors that did not provide supplier information in the nonmanufacturers section of the vendor capability checklist, while AMS removed 13 from consideration for not providing supplier information in the nonmanufacturers section.

We also found that AMS did not maintain complete contract documentation. Specifically, AMS awarded one of our sampled contractors more than \$5.9 million, but could not provide the Office of Inspector General (OIG) with any documentation to support the contractor's proposal.

With the 1-week timeframe to award contracts, and the urgency to respond to the COVID-19 pandemic, AMS did not conduct secondary reviews of the proposals' evaluation factors, which could have ensured a more consistent review of proposals had AMS established these procedures for performing an expedited award process. Additionally, due to limited personnel, the speed of program implementation, and the volume of contracts awarded, AMS did not utilize WBSCM, its usual system of record, to store Food Box Program documentation related to procurement.¹⁹ While we acknowledge the urgency the COVID-19 pandemic caused, we believe the timeframe for review of 553 proposals was too short given AMS' limited contracting resources and given that the agency had not previously utilized a similar solicitation and contracting process.

AMS' Food Box Program purchased fresh produce, dairy, and meat products—which were in surplus due to pandemic-related closures of food service businesses—by contracting the packaging of these products into family-sized boxes and transporting them to non-profits serving Americans in need during a national emergency. OIG acknowledges AMS' extraordinary efforts to help reduce food waste and feed Americans during the COVID-19 pandemic by awarding contracts totaling up to \$1.2 billion for Round 1. However, AMS' need to expedite the award

¹⁵ AMS required contractors to acknowledge AMS' April 29, 2020, amendment to the solicitation by completing the SF-30, *Amendment of Solicitation*, form.

¹⁶ WBSCM is a fully integrated, web-based ordering and procurement system that AMS personnel use to document the agency's contract activities. We did not assess WBSCM information system controls, as they were not relevant to our inspection objectives.

¹⁷ Nonmanufacturer means a concern that furnishes a product it did not manufacture or produce.

¹⁸ See Exhibit B of this report.

¹⁹ In September 2021, AMS stated it was in the process of consolidating and storing its procurement documentation in WBSCM.

process during this emergency response demonstrates the necessity for AMS to develop policies and procedures to prepare for future emergencies. Furthermore, AMS should complete uploading relevant supporting documentation to the agency's system of record.

Recommendation 1

Develop policies and procedures for performing expedited award processes during Federal emergencies. These policies and procedures should include ensuring a consistent review of contracting actions and timeframes for storing documentation in its system of record.

Agency Response

Through the Farmers to Families Food Box Program, AMS found that the use of Basic Ordering Agreements (BOA) allowed the Government to establish Agreements with vendors so that contract terms and pricing formulas were in place, allowing future purchases to be processed more quickly. AMS determined that the Contracting Officers, in conjunction with the acquisition team, should consider using BOAs in future emergency procurements. An internal guidance on the use of BOAs was developed and shared with the Commodity Procurement Program staff.

OIG Position

We do not accept management decision for this recommendation. While AMS agreed with our recommendation explaining how using BOAs to award vendors during future Federal emergencies could expedite its process, the agency did not specify how it plans to address ensuring a consistent review of contracting actions and timeframes for storing documentation in its system of record. To reach management decision, AMS needs to clearly define how it will address these areas and document this as part of its internal guidance.

Recommendation 2

AMS should upload all relevant Food Box Program supporting documentation for Round 1 in the agency's system of record.

Agency Response

To address this recommendation, AMS will implement a two-phased approach uploading all source selection decision documents to WBSCM, and uploading all proposals/award summary into an accessible system linked to WBSCM.

OIG Position

We accept management decision on this recommendation.

Objective 3: What methodology did AMS develop and use to equitably allocate funding to the contractors?

We found that AMS developed a methodology to allocate funds by awarding contractors 100 percent of the amount of boxes requested at the prices each contractor submitted in their proposals. AMS officials stated that they funded these contractors at these prices and quantities the contractors requested because they believed that the contractors would soon return to their normal, commercial customers. Additionally, an AMS official stated the agency developed the contracts where the contractor would not be in default on the contract if they could not deliver their requested maximum quantity of food boxes, as stated in their proposal.

To determine whether AMS fully funded contractors' requested amounts of boxes, we reviewed 55 awarded contracts, then compared the pricing exhibits contractors submitted in their proposals to AMS' purchase orders.^{20, 21} When we compared the contractors' proposed pricing exhibits to AMS' purchase orders, we found that AMS fully funded 51 of the 55 awarded contracts.²² When we asked AMS officials about the four remaining contracts, the officials stated that—because AMS personnel had left and because time had passed since the contract actions—the agency could not provide a clear reason as to why AMS did not fully fund those four remaining contracts.

Although AMS did not fully fund 4 of the 55 sampled contracts, AMS intended to fully fund contracts and substantially adhered to its allocation decisions by funding contractors as described in the solicitation. Therefore, we do not make any recommendations related to this inspection objective.

²⁰ According to AMS, the technical evaluation panel rated 257 submitted proposals as “acceptable.” We statistically sampled 70 of the 257 “acceptable” rated proposals of which only 56 of the 70 had received contracts. OIG did not receive the proposal for one contract awarded as previously discussed in Inspection Objective 2. We discuss our statistical sample in Exhibit B.

²¹ Purchase orders specify the quantity of products ordered.

²² The 51 proposals AMS fully funded in our sample totaled more than \$171.4 million. The four proposals AMS did not fully fund in our sample were awarded more than \$57.8 million out of a requested \$73 million.

Scope and Methodology

Our inspection scope covered AMS' contracts awarded for Round 1 of the Food Box Program—totaling up to \$1.2 billion—for the period of performance May 15, 2020, through June 30, 2020. We conducted our fieldwork with AMS' Commodity Procurement Program officials from July 2020 through May 2022.

To accomplish our inspection objectives, we:

- Interviewed agency officials (through video conferencing and email communication);
- Reviewed laws, regulations, written policies, procedures, and other guidance to gain sufficient knowledge and understanding of the program and the award process;
- Evaluated the solicitation design, award process, and contract selection procedures AMS used to solicit request for proposals and to issue awards to eligible and capable contractors for the Food Box Program;
- Assessed whether AMS followed procedures, in accordance with the FAR and AGAR, in soliciting proposals and selecting contractors;
- Evaluated AMS' methodology to allocate funding to contractors in an equitable manner; and
- Reviewed a statistical sample of 143 proposals submitted by contractors to assess AMS' review and awarding of contracts for Round 1 of the Food Box Program. (See Exhibit B).

We acquired data from AMS, which included the proposals submitted by contractors, results of the technical evaluation panels, and award information. We assessed the reliability of these data by reviewing spreadsheets created by the agency and source documentation submitted by the contractors, and interviewing agency officials knowledgeable about the data. From these efforts, we believe the information we obtained is sufficiently reliable for this report.

We conducted this inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation. Those standards require that we obtain sufficient, competent, and relevant evidence to provide a reasonable basis for our findings, conclusions, and recommendations based on our inspection objectives. We believe that the evidence obtained provides a reasonable basis for our findings, conclusions, and recommendations based on our review.

Abbreviations

AGAR	USDA Acquisition Regulation
AMS	Agricultural Marketing Service
BOA	Basic Ordering Agreements
COVID-19.....	coronavirus disease 2019
E-MSCP	Emergency-Master Solicitation for Commodity Procurement
FAR.....	Federal Acquisition Regulation
OIG	Office of Inspector General
SF	Standard Form
USDA.....	United States Department of Agriculture
WBSCM.....	Web-Based Supply Chain Management System

Exhibit A: Summary of Monetary Results

Exhibit A summarizes the monetary results for our inspection report by finding and recommendation number.

Finding	Recommendation	Description	Amount	Category
Objective 2	2	AMS did not retain any documentation for an awarded contract.	\$5,928,922	Questioned Costs, No Recovery Recommended
Total			\$5,928,922	

Exhibit B: Sampling Methodology and Projections

Objective

OIG conducted an inspection of AMS' Farmers to Families Food Box Program. The objectives of our inspection were to address the following questions:²³

1. Did AMS design the solicitation according to the requirements of the FAR and Departmental guidance?
2. Did AMS award the contracts in accordance with the solicitation requirements?
3. What methodology did AMS develop and use to equitably allocate funding to the contractors?

Inspection Universe

Overall, there were 553 proposals submitted for AMS to evaluate. We used two populations of records for this inspection work:

1. The first population we used to determine if AMS properly awarded the contracts to those proposals the agency rated as "Acceptable" for the offeror capability evaluation factor (257).
2. The second population we used to evaluate the review of the proposals submitted, but that AMS did not rate as "Acceptable" for the offeror capability evaluation factor (296).

Sample Design

The sample sizes were determined based on the following factors:

- Number in universe eligible for selection: 257 and 296 proposals;
- Confidence level: We used a two-tailed 95 percent confidence intervals (CI);
- Precision: We used a CI no wider than 20 percent (for example, precision is ± 10 percent if CI is symmetrical around point estimate) and anticipating the need to estimate several proportions simultaneously; and
- Expected exception rate: We did not have reliable historical information to help estimate exception rates, and, as anticipated, these rates varied significantly, so we assumed an error rate of 50 percent for the most conservative approach.

This resulted in choosing a random sample size of 70 from the first universe of 257.

This resulted in choosing a random sample size of 73 from the second universe of 296.

Overall, this resulted in a total random sample size of 143 proposals.

Results

Since AMS' technical evaluation panel reviewers did not consistently review the proposals, exception rates varied significantly. Because these exception rates depend so heavily on which

²³ During the course of our inspection, we decided to issue interim reports as we completed the objectives. In this report, we are addressing three of our four objectives. The fourth objective is to answer the question: *What controls did AMS develop and implement to ensure awardees fulfilled the obligations of the contract?*

reviewer conducted the review of the proposal, we decided not to statistically project average exception rates for the universe.

**Agricultural Marketing Service
Response to Inspection Report**

Subject: Agricultural Marketing Service's Response to Office of Inspector General Inspection #01801-0001-22: COVID-19 – Farmers to Families Food Box Program Administration

To: Gil H. Harden, Gil.Harden@oig.usda.gov
Assistant Inspector General for Audit, Office of Inspector General

From: Bruce Summers /s/, Bruce.Summers@usda.gov
Administrator, Agricultural Marketing Service

The U.S. Department of Agriculture's (USDA) Agricultural Marketing Service (AMS) Commodity Procurement Program agrees with the Office of Inspector General (OIG) recommendations in the COVID-19 – Farmers to Families Food Box Program Administration inspection report, #01801-0001-22.

Please find AMS' responses to OIG's recommendations below.

Objective 2: Did AMS award the contracts in accordance with the solicitation requirements?

Recommendation 1

Develop policies and procedures for performing expedited award processes during Federal emergencies. These policies and procedures should include ensuring a consistent review of contracting actions, and timeframes for storing documentation in its system of record.

Agency Response:

Through the Farmers to Families Food Box Program, AMS found that the use of Basic Ordering Agreements (BOA) allowed the Government to establish Agreements with vendors so that contract terms and pricing formulas were in place, allowing future purchases to be processed more quickly. AMS determined that the Contracting Officers, in conjunction with the acquisition team, should consider using BOAs in future emergency procurements. An internal guidance on the use of BOAs was developed and shared with the Commodity Procurement Program staff.

Completion Date: April 2022

Recommendation 2

AMS should upload all relevant Food Box Program supporting documentation for Round 1 in the agency's system of record.

Agency Response:

To address this recommendation, AMS will implement a two-phased approach:

- 1) Upload all source selection decision documents to WBSCM:
 - a. Acceptance Letter
 - b. TEB Report/Award Decision
 - c. D&F evaluating options
 - d. Debriefing Letters
- 2) Upload all proposals/award summary into an accessible system linked to WBSCM. We plan on implementing one or both of the following options:
 - a. Load proposals into a cloud storage location with a "pointer document" to the location
 - b. Via a USB drive work with USDA data management division to load into a central repository.

Estimated Completion Date: May 2023



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