



Washington
State Department of
Agriculture

Food Assistance – Contractor Review

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- The Emergency Food Assistance Program (TEFAP) – Section E
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- Summary of Findings and Recommendations – Section F
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Contractor's Name:

Review Date:

Reviewer:

Purpose

Food Assistance (FA) has the responsibility to monitor the contractor's performance, compliance and assurance that services funded by FA are being delivered properly to help alleviate hunger in local communities. If the contractor also provides direct client services then they must follow all subcontractor requirements.

FA does this by assisting the contractor in complying with the terms and conditions of the contract(s), applicable laws, regulations, and policies. Our objectives for this review are:

- To verify program and financial management.
- To verify agency and administration compliance.
- To test if program costs and services are allowable and eligible.
- To ensure qualifying eligible client requirements and services are being met.
- To verify other contract compliance including subcontractor compliance.
- To share with other partners the results of this review.

To accomplish the objectives of the program reviews, FA may conduct an on-site review as required. Please have the documents highlighted in **yellow**, ready for the FA staff to review on-site. Financial backup documentation for the month selected is required for the review.

Please look at the Contractor Pre-Review Checklist on the next page for information on what to send to your FA Regional Representative prior to the review as well as what to have available for your on-site review.

FA Staff Pre-Review Checklist:

If information is inaccurate or missing, please ask the contractor to provide the most current record:

- Insurance expiration date and all additional insured endorsements
- Secretary of State nonprofit registration expiration date
- Date of last audit on file (single/exemption form/verification form/other)
- Federal Funding Accountability and Transparency Act (FFATA) (Has their financial situation changed and they need to fill out a new form?)
- IRS Form 990 (including suspension/debarment)

Contractor Pre-Review Checklist:

Items needed prior to the review:

- Fill in the Contractor Information for all applicable programs, located in Section A. FA staff will fill in the remaining responses.
- Send FA staff all contractor policies, not previously submitted, and/or any updated policies prior to review date (Sect. B/Q3)
- If contractor does not provide full financial backup documentation with each report, please have ready or provide in advance, all backup documentation for the month and quarter indicated by FA staff. Please provide backup for the period of _____ (Sect. B/Q25)
- Additional Information Needed – Please send FA staff

Items to have available for the on-site review:

- Current signed contract (Sect. B/Q1)
- Reviews from other organizations (Health Dept., Food Lifeline, etc.) (Sect. B/Q6)
- Current signed subcontracts (Sect. B/Q7)
- Civil rights training records (Sect. B/Q19)
- Have on file ALL subcontractor documents referenced in Worksheet 3, and Section B, C, D, E, as applicable.



Food Assistance (FA) – Contractor Review
Section A – Contractor Information

Contractor Information:	
Agency Name:	
Agency Physical Address:	
Agency Mailing Address:	
Warehouse Address: (if different than agency)	
Offsite/Other Address:	
Board Chair or Equivalent:	
Name:	Email:
Address:	Phone:
City/State/ZIP	
Executive Director:	
Name:	Phone:
Email:	
Fiscal Director:	
Name:	Phone:
Email:	
Comments: (other contacts or information)	

Commodity Supplemental Food Program (CSFP)		
Contract Number(s):	Contract Amount(s):	Fiscal Year:
CSFP Fiscal Program Staff:		
Name:	Phone:	
Email:		
CSFP Program Manager/Coordinator:		
Name:	Phone:	
Email:		
Warehouse Manager/Coordinator:		
Name:	Phone:	
Email:		
24-Hour Emergency Contact Warehouse/Food Recalls/Disaster:		
Name:	Email:	
Phone:	Cell:	
Home:		
Emergency Food Assistance Program (EFAP)		
Contract Number(s):	Contract Amount(s):	Fiscal Year:
EFAP Fiscal Program Staff:		
Name:	Phone:	
Email:		
EFAP Program Manager/Coordinator:		
Name:	Phone:	
Email:		
Warehouse Manager/Coordinator:		
Name:	Phone:	
Email:		
24-Hour Emergency Contact Warehouse/Food Recalls/Disaster:		
Name:	Email:	
Phone:	Cell:	
Home:		

The Emergency Food Assistance Program (TEFAP)		
Contract Number(s):	Contract Amount(s):	Fiscal Year:
TEFAP Fiscal Program Staff:		
Name:	Phone:	
Email:		
TEFAP Program Manager/Coordinator:		
Name:	Phone:	
Email:		
Warehouse Manager/Coordinator:		
Name:	Phone:	
Email:		
24-Hour Emergency Contact Warehouse/Food Recalls/Disaster:		
Name:	Email:	
Phone:	Cell:	
Home:		



Food Assistance (FA) – Contractor Review

Section B – General FA Questions

Contracts and Paperwork – Contractor:		Comments
<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>1. Does the contractor have a current signed contract(s) with the state on file?</p> <ul style="list-style-type: none"> • For CSFP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A • For EFAP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A • For TEFAP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <p style="background-color: yellow;">Contractors: have available for review on-site.</p> <p><i>(Good practice for FA is to have the contract available for reference.)</i></p>	
<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>2. Does the contractor retain all of its program related paperwork and records for a period of six years following the date of the final payment under the specific funding program year?</p> <p>If no, please explain:</p>	
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No	<p>3. Have any of the contractor’s policies, listed below, changed since the last review or submittal to WSDA?</p> <p style="background-color: yellow;">Contractors: If policies or policy revisions were not previously submitted to WSDA please send those to the reviewer prior to review date.</p> <ul style="list-style-type: none"> • Client Privacy Standards, if providing direct services • Corrective Action for Subcontractors • Dispute Resolution Process for Subcontractors • Equipment Procurement and Inventory • Fiscal Management • Travel 	
<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>4. Did the contractor have any organizational changes in administration, fiscal, program or warehouse staff in the last year?</p> <p>If yes, please describe in the “comments” column.</p>	

<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>5. Does the contractor submit the required paperwork in a timely manner?</p> <p><i>(Expenditure Reports with backup, Inventory Reports, Bills of Lading, Demographics, Closeout Reports, Risk Assessments, etc.)</i></p>	
<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>6. Has another agency that provides funding or food or that regulates the contractor's activities done a review in the last year?</p> <p><i>(Such as the city, county, Health Dept., Northwest Harvest, Second Harvest, Food Lifeline or others.)</i></p> <p>Contractors: have reviews available for FA staff to review on-site if applicable.</p> <p>Were there any deficiencies noted? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A If yes, please explain in the "comments" column.</p> <p>If deficiencies were noted, have they been corrected? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A If no, please explain in the "comments" column.</p>	
Administration – Subcontractors:		Comments
	<p>7. Does the contractor have an agreement in-place with all subcontractors/sites?</p> <ul style="list-style-type: none"> • For CSFP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A • For EFAP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A • For TEFAP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <p><i>If not using the WSDA subcontract templates then retain a copy of the agreement in place. Discuss changes in federal contracting/subcontracting that will become effective Oct. 1, 2019.</i></p>	
	<p>8. Does the contractor have any contractor operated or contractor sponsored sites?</p> <ul style="list-style-type: none"> • For CSFP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A • For EFAP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A • For TEFAP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A 	

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>9. Are subcontractor/site files complete?</p> <p><i>Complete Worksheet 3: Response to Subcontractor Compliance Questions, and explain verification results.</i></p> <p>Contractors have all subcontractor documents referenced in Worksheet 3 available on-site for FA staff.</p>	
		<p>10. Does the contractor have a review schedule in-place and is performing reviews per the prescribed schedule for the programs it runs as required under the contract?</p> <p>CSFP: <input type="checkbox"/> Yes <input type="checkbox"/> No (every 2 years required) <input type="checkbox"/> N/A EFAP: <input type="checkbox"/> Yes <input type="checkbox"/> No (every 2 years required) <input type="checkbox"/> N/A TEFAP <input type="checkbox"/> Yes <input type="checkbox"/> No (10% minimum annually) <input type="checkbox"/> N/A</p> <p>Contractors have reviews available on-site for FA staff.</p> <p><i>FA will check list of subcontractors to be reviewed and spot-check completed reviews.</i></p>	
		<p>11. Were there any significant corrective actions identified?</p> <p>CSFP: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A EFAP: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A TEFAP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><i>Check for findings, including any reference to SS# and inconsistencies in client counts. For TEFAP and CSFP if any findings that need corrective action, instruct contractor to send reviews with resolution.</i></p>	
		<p>12. Is the contractor using the WSDA templates (or sample) for subcontractor reviews?</p> <p>CSFP: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A EFAP: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A TEFAP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><i>If no, retain a copy of the review form being used for each program and complete the question below. EFAP doesn't have a template but FA has provided a sample.</i></p>	

	<p>13. If using an alternate review form, does it include the following:</p> <ul style="list-style-type: none"> • Verifies that subcontractors comply with the policy of not allowing payment from clients for food, materials or services, or in connection with, the receipt of any food whether donated, including federal commodities, and/or purchased with state funding? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Using WSDA Form • Verifies that subcontractors comply with the policy of not requiring participation in a religious activity as a condition for receiving emergency food assistance? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Using WSDA Form • Verifies that subcontractors comply with the policy of not distributing food as a means for furthering the political interest of any person or party? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Using WSDA Form • Verifies that subcontractors do not request social security numbers for all applicable WSDA Food Assistance programs? CSFP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A EFAP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A TEFAP <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Other <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <p><i>Reminder, agencies cannot deny services for any of the FA programs for not giving identifying information.</i></p>		
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>14. Does the contractor provide technical assistance to subcontractors to assist them in carrying out FA policies and procedures and subcontract compliance? Please describe in comments section.</p>	

<input type="checkbox"/> Yes	<input type="checkbox"/> No	15. Does the contractor provide FA information to subcontractors on a regular basis? Please describe in the comments section.	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	16. Does the contractor ensure that subcontractors have a client confidentiality policy in-place? <i>Retain a copy, if available.</i>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	17. Does the contractor ensure that subcontractors use a client information release form? <i>Retain a copy, if available.</i>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	18. Does the contractor ensure that subcontractors have a client eligibility policy in-place? <i>Retain a copy, if available.</i>	
Civil Rights & Faith Based: <input type="checkbox"/> N/A EFAP Only Contractor – Skip to Fiscal and Internal Controls Section			Comments
<input type="checkbox"/> Yes	<input type="checkbox"/> No	19. Is Civil Rights training conducted annually? <ul style="list-style-type: none"> • Do all staff/volunteers who interact directly with clients or handle personal client information read and sign the Civil Rights training materials? <input type="checkbox"/> Yes <input type="checkbox"/> No • Do all subcontractors staff/volunteers who interact directly with clients or handle personal client information read and sign the Civil Rights training materials? <input type="checkbox"/> Yes <input type="checkbox"/> No • Are Civil Rights training verifications being maintained on file? <input type="checkbox"/> Yes <input type="checkbox"/> No <p style="background-color: yellow;">Contractors have your training records available for FA staff review.</p> <p><i>This training is required per FNS Policy Memo FD-113</i></p>	

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>20. Are civil rights complaints being handled in accordance with the procedures outlined in the Food Assistance Civil Rights Training and the procedures manuals by the contractor and their subcontractors?</p> <p><i>Verify that the contractor and their subcontractors are aware of changes in our federal civil rights complaints process. Add notes in the comment section.</i></p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>21. Is the USDA Nondiscrimination Statement being included on all printed materials such as applications, pamphlets, forms or any other materials distributed to the public, for both the contractor and their subcontractors?</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>22. Are subcontractors informed that the full USDA Nondiscrimination Statement must be posted and available at the point of client intake?</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>23. Is the “And Justice for All” poster displayed by the contractor and their subcontractors for clients to view in the client intake area?</p> <ul style="list-style-type: none"> • Is it an original and not a copy? <input type="checkbox"/> Yes <input type="checkbox"/> No 	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>24. Is the contractor a faith-based or religious organization?</p> <ul style="list-style-type: none"> • If yes, and is a TEFAP site, is it operating in accordance with 7 CFR Part 16.4(f), faith-based or religious organizations that receive USDA Foods or administrative funds for TEFAP must display the TEFAP Written Notice of Beneficiary/Client Rights poster (AGR PUB 609-565), so that all beneficiaries and prospective beneficiaries are informed of their right to be referred to an alternate provider when available? <input type="checkbox"/> Yes <input type="checkbox"/> No • If yes, and a CSFP Site, is it operating in accordance with 7 CFR Part 16.4(f), faith-based or religious organizations that receive USDA Foods or administrative funds for CSFP must display the CSFP Written Notice of Beneficiary/Client Rights (AGR PUB609-632), so that all beneficiaries and prospective beneficiaries are informed of their right to be referred to an alternate provider, when available. <input type="checkbox"/> Yes <input type="checkbox"/> No 	

		<ul style="list-style-type: none"> Are the TEFAP/CSFP Beneficiary/Client Referral Request Forms (AGR-2239) being retained? <input type="checkbox"/> Yes <input type="checkbox"/> No <p><i>Prior to the review, verify on the TEFAP Risk Assessment or CSFP Subcontract if the site is a faith-based or religious organization.</i></p>	
Fiscal and Internal Controls:			Comments
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>25. Does the contractor send in full backup documentation with reports?</p> <p>Documents must include the following:</p> <ul style="list-style-type: none"> The EFAP, TEFAP, & CSFP detailed general ledgers. <input type="checkbox"/> Yes <input type="checkbox"/> No All receipts/invoices for purchases for contractor and subcontractor. <input type="checkbox"/> Yes <input type="checkbox"/> No Staff timesheets for contractor and subcontractor. <input type="checkbox"/> Yes <input type="checkbox"/> No If contractor has a federally approved indirect rate, a copy of the letter from the identified federal agency. <input type="checkbox"/> Yes <input type="checkbox"/> No <p>If contractor doesn't send in full backup, please have ready for FA staff to review the original backup documentation for all expenditures directly charged to the program funds for the month of:</p>	
		<p>26. For the month expenses were selected for review, the following applies to both contractor and subcontractor's expenditures billed to FA programs:</p> <ul style="list-style-type: none"> Are costs charged allowable, and have sufficient back-up? Including Items such as: <ul style="list-style-type: none"> Salaries: Are there signed time sheets to support the breakout by program? <input type="checkbox"/> Yes <input type="checkbox"/> No Benefits: Does the percentage charged to the program correspond with the salaries that are charged to the program? <input type="checkbox"/> Yes <input type="checkbox"/> No Staff Travel: (including mileage and per diem) Do amounts requested correspond with the rates allowed by the state? <input type="checkbox"/> Yes <input type="checkbox"/> No 	

	<ul style="list-style-type: none"> ○ Other: Office and warehouse supplies, telephone & postage, office and warehouse rent, utilities, equipment maintenance and repairs, and/or food purchases. <input type="checkbox"/> Yes <input type="checkbox"/> No <p><i>Spot check expenditures for the month requested; if issues are identified in the spot check, then conduct a full month review at the time of the review or request copies for the full month to complete in the office.</i></p> <p><i>For TEFAP contractors: Review for compliance with FD-126 and FNS Instruction 716-3 (R 1).</i></p>	
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A No other programs	27. Does the contractor, if administering other programs, have a cost allocation plan or other method to accurately allot expenses between programs?	
FA has audit on file for period of: <input type="checkbox"/> Yes: Current <input type="checkbox"/> No: Due <input type="checkbox"/> N/A: No Audit	28. What kind of audit does the contractor receive? <input type="checkbox"/> Single Audit (< \$750,000) <input type="checkbox"/> Financial (> \$750,000) <input type="checkbox"/> Accounting System Verification Form (> \$20,000 in state funding and < \$750,000 in federal funding) <input type="checkbox"/> Single Audit Exemption Form (> \$750,000 in federal funding) Please provide audit if FA does not have the most current one on file.	
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A: No Audit	29. Were there any audit findings? If yes, did the contractor submit to FA its response sent to the auditor? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – no findings Please provide FA with a copy of your response if not sent.	
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A: No Audit	30. Are all funding sources identified in the audit? Name of programs, WSDA included?	

<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A EFAP only <input type="checkbox"/> N/A: No Audit	31. Does the audit apply the correct CFDA numbers? <ul style="list-style-type: none"> • TEFAP: 10.568 Admin; 10.569 Food • CSFP: 10.565 • TMP: 10.178 	
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A: No FA purchases	32. Does the contractor and its' subcontractors adhere to the WSDA Procurement and Disposition policy? <ul style="list-style-type: none"> • Pre-approval by FA for equipment costing \$5,000 or more purchased with FA program funds. <input type="checkbox"/> Yes <input type="checkbox"/> No • Equipment listed on the FA Annual Inventory Report Form, is it still in use? <input type="checkbox"/> Yes <input type="checkbox"/> No • New equipment added to the list. <input type="checkbox"/> Yes <input type="checkbox"/> No <p style="background-color: yellow;">Contractors have inventory records available for FA staff to review.</p>	
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A: No FA purchases	33. Does the contractor conduct a physical inventory and inventory report form reconciliation, including subcontractor equipment, at least every two years for FA purchased equipment? <p style="background-color: yellow;">Contractors have inventory records available for FA staff to review.</p>	
Inventory and Commodity Delivery:		Comments
<input type="checkbox"/> Yes <input type="checkbox"/> No	34. Does the contractor operate any kind of food storage? <input type="checkbox"/> Contracted <input type="checkbox"/> Contractor Operated	
<input type="checkbox"/> Yes <input type="checkbox"/> No	35. Does the contractor maintain an inventory of all USDA foods by individual programs (TEFAP, CSFP, TMP)?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	36. Is the contractor practicing the FIFO "first in, first out" inventory guidance as outlined in FA procedures manuals?	

Warehouse and Storage: <input type="checkbox"/> N/A No storage		Comments
<input type="checkbox"/> Yes <input type="checkbox"/> No	37. Frozen: Does contractor have frozen (0°) storage? <ul style="list-style-type: none"> • Current Temperature • Thermometer Accurate (±1°) <input type="checkbox"/> Yes <input type="checkbox"/> No • Approximate square footage • Pallets can be stacked high 	
<input type="checkbox"/> Yes <input type="checkbox"/> No	38. Cold: Does contractor have refrigerated (33° - 40°) storage? <ul style="list-style-type: none"> • Current Temperature • Thermometer Accurate (±1°) <input type="checkbox"/> Yes <input type="checkbox"/> No • Approximate square footage • Pallets can be stacked high 	
<input type="checkbox"/> Yes <input type="checkbox"/> No	39. Is a temperature log being maintained for frozen and cold storage? <i>(Logs required in order to adhere to good food safety practices so that foods are stored in a manner to protect them from spoilage, infestation, damage or other condition that may jeopardize the wholesomeness or safety of the food.)</i>	
<input type="checkbox"/> Yes <input type="checkbox"/> No	40. Dry: Does contractor have dry storage? <ul style="list-style-type: none"> • Current Temperature • Thermometer Accurate (±1°) <input type="checkbox"/> Yes <input type="checkbox"/> No • Approximate square footage • Pallets can be stacked high 	
<input type="checkbox"/> Yes <input type="checkbox"/> No	41. Does the food stored in the warehouse meet storage requirements? (i.e. food stored off the floor and 4"-6" away from all walls; adequate air circulation)	
<input type="checkbox"/> Yes <input type="checkbox"/> No	42. Are fertilizers, toxic chemicals, and other potential adulterants adequately separated from human food storage areas?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	43. Is storage area free of evidence of current insect, rodent, bird, etc., activity?	

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>44. Is there a pest control in place?</p> <p><input type="checkbox"/> Self-applied <input type="checkbox"/> Professional</p> <ul style="list-style-type: none"> • Has there been any issues with pests? <input type="checkbox"/> Yes <input type="checkbox"/> No • If yes, have those problems been corrected? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – No Issues Please explain under “Comments” • If professional services are used, did the last inspection indicate any problems with pests? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – No Issues <p><i>(check for traps if self-applied, or 2 months records for professional)</i></p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>45. Is the building of suitable construction and generally in good physical repair?</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>46. Are food products and processing areas protected against contamination from breakage of light bulbs and other glass fixtures?</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>47. Are floors, walls and ceiling constructed of easily cleanable materials?</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>48. Is interior lighting sufficient to allow adequate inspection and cleaning of premises?</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>49. Are facilities clean?</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>50. Are windows screened?</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>51. Are doors and loading doors kept closed when not in use?</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>52. Are outside premises free from spillage, trash, brush, etc., that may attract or harbor rodents or other pests?</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>53. Is refuse/garbage properly stored and protected from insects, rodents and other pests and disposed of in an adequate manner?</p>	

<input type="checkbox"/> Yes	<input type="checkbox"/> No	54. Is cleaning of facilities done in such a manner as to avoid contamination of food products?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	55. Are restrooms and dressing rooms in good repair, clean, properly ventilated and adequately separated from storage area?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	56. Are hand-washing facilities clean and supplied with soap, hot water and sanitary towels?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	57. Does contractor have a Continuity of Operations Plan (COOP)?	
		58. If contractor does not have a COOP plan, what plans or actions are in place to ensure the continued distribution of food in the case of a natural disaster, power outage, freezer breakdown, etc.?	



Food Assistance (FA) – Contractor Review
Section C - Commodity Supplemental Food Program (CSFP)

Subcontractor/Site Roles:		Comments:
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>1. Does the contractor delegate any program functions to any site or subcontractor? If yes, which one's:</p> <ul style="list-style-type: none"> • Accepts applications <input type="checkbox"/> Yes <input type="checkbox"/> No • Verifies applicant's ID and age <input type="checkbox"/> Yes <input type="checkbox"/> No • Determines eligibility, certification <input type="checkbox"/> Yes <input type="checkbox"/> No • Packs boxes <input type="checkbox"/> Yes <input type="checkbox"/> No • Stores CSFP food on a regular basis <input type="checkbox"/> Yes <input type="checkbox"/> No • Other:
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>2. Does the contractor provide any CSFP funding to any subcontractor or site?</p> <p><i>If yes, FA staff will spot check financial back-up provided by the subcontractor to receive payment from the contractor..</i></p>
Application Process:		Comments:
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>3. Is the Eligibility Application (AGR-2244) being used? <i>If no, retain a copy of the form being used.</i></p> <p><i>Verify that the contractor has issued the correct form to subcontractors if applicable.</i></p>
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>4. Is the Participant Agreement (AGR-2247) being used? <i>If no, retain a copy of the form being used.</i></p> <p><i>Verify that the contractor has issued the correct form to subcontractors if applicable.</i></p>
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>5. Are current CSFP Income Guidelines (AGR PUB 609-444) posted for clients to view at the point of client intake?</p>

Notification Process:		Comments:
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>6. Is the Notification of Eligibility Determination (AGR-2246) being used?</p> <p><i>If not, retain a copy of the form being used and verify that the form has received WSDA approval.</i></p>
<input type="checkbox"/> Yes	<input type="checkbox"/> No	7. Are applicants notified of their eligibility determination within 10 days?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	8. Are applicants notified of their placement on a waiting list within 10 days?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>9. Does the wait list include the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Date placed on the list <input type="checkbox"/> Date applicant was notified of being placed on the list <input type="checkbox"/> Address and phone number of applicant
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>10. Is the Notification of Eligibility Status Change (AGR-2245) being used?</p> <p><i>If not, retain a copy of the form being used and verify that the form has received WSDA approval.</i></p>
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>11. Did any participant get terminated for participating in CSFP under false circumstances?</p> <p>If yes, what was the circumstance?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Participant made false statements either orally or in writing in order to obtain CSFP benefits to which they would not otherwise be eligible. <input type="checkbox"/> Participated in CSFP at two or more locations. <input type="checkbox"/> Participant concealed information in order to obtain CSFP benefits for which they would otherwise not be eligible. <input type="checkbox"/> Participant altered program documents for the purpose of receiving increased benefits for which they would not be eligible for the purpose of transferring benefits to an unauthorized individual. <input type="checkbox"/> Participant used the CSFP foods in an unauthorized manner such as trading or selling the food.

		<p>12. Are program benefits based upon certifications established in accordance with the following timeframes:</p> <ul style="list-style-type: none"> • Are informal certifications being conducted every 12 months to ensure that none of the information in the initial formal certification has changed and that the participant wishes to continue to participate in CSFP? <input type="checkbox"/> Yes <input type="checkbox"/> No • Are formal certifications being conducted once every 36 months? <input type="checkbox"/> Yes <input type="checkbox"/> No 	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>13. Do participants receive the Welcome to the Commodity Supplemental Food Program (AGR PUB 609-739) resource handout?</p> <p>What other referrals are given to participants?</p>	
Participation:			Comments
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>14. Does the contractor and their subcontractors check the identification of each participant or proxy at point of pick-up?</p>	
Transfer of Certification:			Comments
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>15. When a participant is relocating to another CSFP area, does the contractor have a method in place to verify certification to ensure that the participant's benefits will not be interrupted?</p>	
Commodity Distribution Procedures:			
Ordering:			Comments
		<p>16. What method is used by the contractor to determine the amount of products needed for monthly ordering? Describe to FA staff the process.</p>	

Commodity Distribution and Issuance:		Comments
<input type="checkbox"/> Yes	<input type="checkbox"/> No	17. Does the contractor have a system in place to deliver the CSFP food package to homebound recipients? Describe to FA staff the process.
		18. How many CSFP drop sites do you currently distribute through?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	19. Do you use the current CSFP Food Package Rate to ensure CSFP boxes are packed in accordance with the regulations and FNS food package instructions? Verify contractor is using the current CSFP Monthly Distribution Rate (AGR PUB 609-506)
Inventory Control:		Comments
<input type="checkbox"/> Yes	<input type="checkbox"/> No	20. Is the correct Contractor Inventory Report (AGR-2249) being used? <ul style="list-style-type: none"> • Review the last 3 Contractor Inventory Reports • Verify bills of lading • If loss, verify the loss was reported <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – no loss • Complete Worksheet 2: Inventory Spot Check, and explain verification results:
<input type="checkbox"/> Yes	<input type="checkbox"/> No	21. Is the contractor using the correct CSFP USDA Receiving Document (AGR-2257)?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	22. Does the contractor submit receiving documents within 24 hours of receipt?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	23. Is the correct Commodity Loss/Adjustment Report for Contractors (AGR-2256) being used?

Nutrition Education:		Comments
<input type="checkbox"/> Yes	<input type="checkbox"/> No	24. Do participants receive information on the use of supplemental foods, nutrition, and related senior resources at least once every quarter?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	25. Does the contractor provide the subcontractor with participant nutrition information?
		26. If using nutrition education materials from other sources, please identify other sources used.
<input type="checkbox"/> Yes	<input type="checkbox"/> No	27. Does the contractor provide other types of participant nutrition education? (classes, food demonstrations, etc)
<input type="checkbox"/> Yes	<input type="checkbox"/> No	28. Does the contractor review the nutrition education information and resources available on the FA website? <i>WSDA will be producing a quarterly senior newsletter (should be available Fall of 2019)</i>
<input type="checkbox"/> Yes	<input type="checkbox"/> No	29. Does the contractor conduct the annual Participant Survey (AGR-2248)? If yes, are there any recommendations for improvement?



Food Assistance (FA) – Contractor Review

Section D – Emergency Food Assistance Program (EFAP)

Administration and Program General – Contractor		Comments
<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>1. Are funds being distributed to each food pantry based on the formula that was decided on at the biennial community meeting?</p> <p>Describe this formula:</p>	
<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>2. Does the contractor share information on the food procurement policy and process for obtaining product from resources?</p> <p><i>(Food pantries have an obligation to be good stewards of public funds, procuring food in the most cost-effective manner possible. FA monitors for compliance with this policy.)</i></p> <p>Food pantries should attempt to acquire food in the following order when utilizing state funds:</p> <ol style="list-style-type: none"> 1. Donations 2. Not-for-profit distributors 3. Wholesalers or food brokers 4. Discount retailers 5. Local retailers <p><i>FA staff discuss proposed changes to include focus on nutritious foods</i></p>	
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A: FP does not receive EFAP funding to procure food	<p>3. Does the contractor monitor the subcontractors regarding compliance with the food procurement policy?</p> <p><i>A best practice is reviewing the back-up documentation to see where the food pantries purchase food.</i></p> <p>If yes, do the subcontractors meet the food procurement system requirements? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>If not, explain why:</p>	

Client Information and Systems:		Comments
<input type="checkbox"/> Yes <input type="checkbox"/> No	4. Are the subcontractor's consistently applying their client eligibility policies/standards?	
Fiscal:		Comments
	5. How does the contractor determine the in-kind value for labor and food? Please explain to FA staff.	
	6. How does the contractor keep track of all donated goods and services? Please explain to FA staff.	
<input type="checkbox"/> Yes <input type="checkbox"/> No	7. Based on the contractor's application and invoices, does the contractor take the allowable amount of admin and/or indirect? <i>10% is allowed if contractor only. 15% if they are the contractor plus food bank and/or food pantry.</i>	
	8. Does the contractor provide any EFAP funding to any subcontractor or site? <i>If yes, FA staff will spot check financial back-up provided by the subcontractor to receive payment from the contractor.</i>	



Food Assistance (FA) – Contractor Review
Section E – The Emergency Food Assistance Program (TEFAP)

Bonus Redistribution:			Comments
<input type="checkbox"/> Yes	<input type="checkbox"/> No	1. Is the contractor being notified of bonus availability?	
		2. Does the contractor: <input type="checkbox"/> pick up commodities <input type="checkbox"/> have commodities delivered	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	3. Does the contractor accept all products offered? If not, please explain?	
Intake Process: Applies only to food pantries			Comments
<input type="checkbox"/> Yes	<input type="checkbox"/> No	4. Is the contractor reviewing subcontractor client intake systems, forms, and processes to ensure compliance with federal regulations? <i>Refer to Policy Memo No. FD-036. This applies to manual, electronic, and combination. Discuss approval process and Approval of Alternate Language Form (AGR-2325) - this is new. TEFAP Household Intake Form (AGR-2271) - other formats are being developed for use next year.</i>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	5. Does the contractor review food pantry subcontractor's client intake forms for compliance with the requirement of requesting but not requiring more than self-declaration of income, service area? <i>Review contractor reports to show they monitored subcontractors for this. Resource TEFAP Minimum Requirement Sign (AGR PUB 609-721?)</i>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	6. Does the contractor have a standardized client intake system that all subcontractors must use? If yes, please describe the system:	

		<p>7. What client information is required at the time of intake?</p> <ul style="list-style-type: none"> • • • • • <p>List any additional requested information in the comments.</p> <p><i>Discuss if this is standardized or does it vary from site to site? Discuss requiring the least amount of information versus the risk of collecting personal data.</i></p>	
		<p>8. Regardless of the type of client intake system/processing used, how does the contractor ensure that subcontractors are updating (recertifying) clients on at least an annual basis? Please describe:</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>9. Is the contractor requiring that subcontractors only use FA forms?</p> <p>If no, is the contractor aware that they should be using the Approval of Alternate Language Form (AGR-2325) for approval of alternate formats?</p> <input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>10. Have all subcontractors been given the current TEFAP Income Guidelines (AGR-445)?</p>	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>11. Have all subcontractors been informed that the TEFAP Income Guidelines (AGR-445) must be posted at the point of client intake?</p>	

Fiscal:		Comments
<input type="checkbox"/> Yes	<input type="checkbox"/> No	12. Are Trade Mitigation Program expenses being tracked separately?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	13. Does the contractor provide any TEFAP or TMP funding to any subcontractor or site? <i>If yes, FA staff will spot check financial back-up provided by the subcontractor to receive payment from the contractor.</i>
<input type="checkbox"/> Yes	<input type="checkbox"/> No	14. Has the contractor submitted their 5% plan to WSDA?
Distribution:		Comments
		15. How is the TEFAP food split among food pantries and meal programs? Describe to FA staff how percentages are determined. Food Pantries: Meal Programs:
<input type="checkbox"/> Yes	<input type="checkbox"/> No	16. Has there been any significant change in the way TEFAP is being distributed during this last year? Please explain:
		17. Average number of clients/members served each month: <u>Food Pantries:</u> Household Members (all): <u>Meal Programs</u> - Client Meals:
<input type="checkbox"/> Yes	<input type="checkbox"/> No	18. Do all food pantries offer TEFAP commodities to clients more than once a month? <ul style="list-style-type: none"> • If no, how often do you offer TEFAP commodities to clients?

Inventory Control:		Comments
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>19. Is the Contractor Inventory Report (AGR-2321) being used?</p> <ul style="list-style-type: none"> • Review the last 3 Contractor Inventory Reports • Verify Bills of Lading • If loss, was it reported? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – no loss • Complete Worksheet 2: Inventory Spot Check, explain verification results:
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>20. Is the correct Commodity Loss/Adjustment Report for Contractors (AGR-2256) being used?</p>
<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A	<p>21. If the contractor receives USDA direct shipments, are they using the correct USDA Receiving Document (AGR-2258) <i>Discuss upcoming changes to receipting processes for USDA direct shipments</i></p>
<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A	<p>22. Does the contractor submit receiving documents within 24 hours of receipt?</p>
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>23. Are the contractor's subcontractors using the current TEFAP Subcontractor Inventory Report (AGR-2272)?</p>
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>24. Are the contractor's subcontractors using the current TEFAP Commodity Loss/Adjustment Report for Subcontractors (AGR-2279)</p>
		<p>25. Explain how the contractor ensures that they do not have a greater than 3-month supply of USDA food on hand.</p>

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>26. Does the contractor review subcontractor inventory reports to ensure that they don't have more than a 3-month supply of USDA food on hand?</p> <ul style="list-style-type: none"> • If no, how do they ensure that the subcontractors don't have more than a 3-month supply of USDA food on hand? 	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<p>27. Does the contractor maintain adequate insurance to cover the average monthly value of USDA food from the previous fiscal year?</p> <p><i>If not an EFAP contractor, verify that the contractor has adequate insurance by completing the following formula:</i></p> <p><i>Total value of USDA food received last year:</i></p> <p><i>Total divided by 12 = Average monthly value:</i></p> <p><i>Insurance coverage amount needed:</i></p>	



Food Assistance (FA) – Contractor Review

Section F – Summary of Findings and Recommendations

Summary: General FA Questions – Section B

Check Applicable Box:

Satisfactory May include recommendations.

Satisfactory With Follow-up Required

All Required Follow-up Listed Below: Yes No If No, then a follow-up letter or email will be sent

Corrective Action A corrective action letter or email will be sent

List Follow-Up Required:

List Recommendations or Notes:

Summary: Commodity Supplemental Food Program – Section C

Check Applicable Box:

N/A – Does Not Participate in CSFP

Satisfactory May include recommendations.

Satisfactory With Follow-up Required

All Required Follow-up Listed Below: Yes No If No, then a follow-up letter or email will be sent

Corrective Action A corrective action letter or email will be sent

List Follow-Up Required:

List Recommendations or Notes:

Summary: Emergency Food Assistance Program (EFAP) – Section D

Check Applicable Box:

N/A – Does Not Participate in EFAP

Satisfactory May include recommendations.

Satisfactory With Follow-up Required

All Required Follow-up Listed Below: Yes No If No, then a follow-up letter or email will be sent

Corrective Action A corrective action letter or email will be sent

List Follow-Up Required:

List Recommendations or Notes:

Summary: The Emergency Food Assistance Program (TEFAP) – Section E

Check Applicable Box:

N/A – Does Not Participate in TEFAP

Satisfactory May include recommendations.

Satisfactory With Follow-up Required

All Required Follow-up Listed Below: Yes No If No, then a follow-up letter or email will be sent

Corrective Action A corrective action letter or email will be sent

List Follow-Up Required:

List Recommendations or Notes:



Food Assistance (FA) – Contractor Review

Section G – Review Participants

Signatures of Review Participants:	
Contractor Representative Name & Title	Date
Contractor Signature	
Food Assistance Reviewer Name & Title	Date of Review
Food Assistance Reviewer Signature	Reviewer's Phone Number



Food Assistance (FA) – Contractor Review

Worksheet 1 – Participant File Review

Case file number or participant's name:		
Application date:		
Application signed?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Participant agreement signed?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Eligibility based on participation in another program?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Name of other program:		
Address verified? <i>Mail, Driver's License, Utility Bill, Private Insurance Card, Rent/Lease Agreement, Rent Receipt, Other</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Racial data collected? <i>American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Ethnic data collected? <i>Hispanic or Latino, Not Hispanic or Latino</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
ID verified? <i>Birth Certificate, Driver's License, ID Card, Other</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Date of birth:		
Age:		
Self-declared household size:		
Did they self-declare income?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Certification decision indicated on application?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Certification date:		

Correct certification period assigned?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Number of days from application to certification decision?		
Were they placed on a waiting list?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were the required notifications sent on time?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Comments/Suggestions:		



Food Assistance (FA) – Contractor Review

Worksheet 2 – Inventory Spot Check

To complete this chart, use inventory records, shipping receipts, and distribution records and commodity loss forms. No need for physical inventory. Review two commodities in inventory for each program under review.

Program:	<input type="checkbox"/> CSFP <input type="checkbox"/> TEFAP			
Commodity Description:				
Month/Year:				
Beginning Inventory:				
Amount Received: <i>View bills of lading/receiving docs</i>				
Amount Issued:				
Loss/Adjustment:				
Ending Book Inventory:				
Agree with Inventory Reports?	<input type="checkbox"/> Yes <input type="checkbox"/> No			
Comments/Suggestions:				



Food Assistance (FA) – Contractor Review

Worksheet 3 – Responses to Subcontractor Compliance Questions

Instructions: FA Staff to spot check a minimum of 10 subcontracts or 25%, whichever is greater. (Add rows as needed) If issues are found, check all subcontract files for compliance.

FA Program - Subcontractors										
	Current EFAP, TEFAP, and/or CSFP Subcontract	501c3 Issue Date (N/A churches)	Expiration Date for WA Secretary of State Registration (N/A churches)	Expiration Date of Liability Insurance	Audit Requirement Form for Subcontractors	Date Last Audit Completed, (if Required)	Accounting Verification Date, (if Required)	Review Date Completed	Date: Check IRS Revocation List	Registered in 211?
Food Pantry Name	E, T, or C	Put dates where required or "N/A" where not required								Yes / No
ABC Food Pantry Example Only	E & T	7/5/85	5/1/10	12/31/09	7/01/13	12/31/12	5/25/13	10/29/13	1/1/19	Yes

