

**Richland School District 2020-2021**  
**OSPI Child Nutrition Procurement Review – Results and Findings**

**LEA: Richland School District**

**WINS No.: 160034**

	Reviewed Y/N?		Technical Assistance Provided	Corrective Action Required
Procurement Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Code of Conduct	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Micro Purchases	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Small/Informal Purchases	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Formal Purchases - FSMC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Processing Contracts	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Resources and Results**

The procurement of goods and services is a responsibility of Local Education Agencies (LEAs). Federal, state and local regulations specify the methods LEA’s must follow when procuring goods and services. Child Nutrition Services (CNS) is required to ensure that LEA’s comply with applicable provisions.

This report covers the procurement review conducted covering expenditures for the 2019-2020 school year.

**Corrective action is required as a result of this Procurement Review. Please complete the “Procurement Corrective Action Plan” included in this email and submit a copy to [stacie.boyd@k12.wa.us](mailto:stacie.boyd@k12.wa.us).**

**Corrective Action Due Date: January 8, 2021**

**NOTE:** It is the expectation of OSPI and USDA that changes made as a result of the Procurement Review will be carried forward throughout all Child Nutrition Programs.

Resources for procurement may be found in the Procurement Section of the OSPI Child Nutrition Services website at <http://www.k12.wa.us/ChildNutrition/Procurement.aspx>

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**Review of Procurement Procedures and Code of Conduct:**

Sponsors must show that they have documented Procurement Procedures and a Code of Conduct per federal procurement regulations. [2 CFR 200.318, 7 CFR 210.21]

**Procurement Procedures:**

**Comments:** Reviewed Board Policy 6220.

**Finding:** The Procurement Policy is not in compliance with 2 CFR 200.321. **This is a repeat finding.**

**Technical Assistance:** Procurement policy must include a requirement for the sponsors to ensure that steps are taken to assure that small businesses, minority businesses, women's business enterprises and labor surplus area firms are used when possible. [2 CFR 200.321]

Additional information may be found on the OSPI CNS website.

<https://www.k12.wa.us/sites/default/files/public/childnutrition/pubdocs/ProcurementProceduresReferenceSheet.pdf>

**Corrective Action Required:** Update the Procurement Policy to include required language outlined in 2 CFR 200.321. Submit updated Procurement Policy to OSPI Procurement Specialist.

**Code of Conduct:**

**Comments:** Reviewed Board Policy 6220.

**Finding:** Code of Conduct is not in compliance with 2 CFR 200.318(c)(1).

**Technical Assistance:** Sponsors must have a written Code of Conduct that:

- Prohibits real or apparent conflicts of interest for employees engaged in the selection, award and administration of contracts.
- Prohibit officers, employees and agents from soliciting or accepting gratuities, favors or anything of monetary value from contractors.
- Includes disciplinary actions to be applied in the event the standards are violated.  
[2 CFR 200.318(c)(1)]

Additional information may be found on the OSPI CNS website.

<https://www.k12.wa.us/sites/default/files/public/childnutrition/pubdocs/writtencodeofconductreferencesheet.pdf>

**Corrective Action Required:** Update policy to include required language outlined in 2 CFR 200.318(c)(1). Submit updated Code of Conduct to OSPI Procurement Specialist.

**Note:** *The Washington State School Directors' Association has updated Board Policy 6220 to reflect the requirements for the Procurement Procedures and Code of Conduct.*

# Richland School District 2020-2021

## OSPI Child Nutrition Procurement Review – Results and Findings

### Review of Procurement for Goods and Services:

Sponsors must provide copies of all purchases, invoices, receipts, contracts, and any other documentation needed to complete the School Meal Programs Procurement Review. Child Nutrition Services uses these documents to determine compliance with all procurement regulations.

#### Micro Purchases:

**Comments:** Purchases from Amazon and Heritage Food Service were reviewed and met all regulatory requirements.

#### Small/Informal Purchases:

**Comments:** Purchases from Bargreen Ellingson were reviewed and met all regulatory requirements.

#### Technical Assistance:

The sponsor must verify that all vendors receiving \$25,000 or more in federal funds have not been suspended or debarred from participating in federal programs. [2 CFR 200.213] This can be accomplished by:

- Collecting a written certification from the vendor
- Adding a clause or condition into the contract
- Checking the federal Excluded Parties List System (EPLS) on sam.gov

Note: this is not included as a corrective action item because the district checked sam.gov for Bargreen Ellingson in October 2020 for the 20-21 school year.

#### Formal Purchases:

**Comments:** Purchases from Sodexo were reviewed, using the Food Service Management Company (FSMC) contract, and met all regulatory requirements.

#### Technical Assistance:

- The sponsor should continue to establish an advisory board composed of parents, teachers, and students to assist in menu planning. [7 CFR 210.16(a)(8)]
- The sponsor must monitor the FSMC through periodic on-site monitoring. [7 CFR 210.16(a)(3)]

Please continue to develop the advisory board and conduct periodic on-site monitoring to ensure compliance with federal requirements outlined in the FSMC contract.