



U.S. Department of Agriculture Office of Inspector General



USDA Preventative Measures and Enforcement Remedies for Child Labor Violations in USDA Contracts

Inspection Report 96801-0001-21

OIG reviewed the Office of Contracting and Procurement's procurement authority to prevent and respond to reported child labor violations in fiscal year 2023.

OBJECTIVES

Our objectives were to determine whether USDA has preventative measures in its contracts to deter child labor violations and what remedies, if any, USDA has available to respond to entities with reported child labor violations.

REVIEWED

We reviewed the Federal Acquisition Regulation, USDA's Agricultural Acquisition Regulations, the FLSA child labor provisions, and publicly available information related to our objectives. We also interviewed officials from USDA OCP.

RECOMMENDS

We are not making any recommendations in this report.

WHAT OIG FOUND

The United States Department of Agriculture (USDA) delegates its procurement authority to the Office of Contracting and Procurement (OCP). OCP provides USDA mission areas and their contracting officials with leadership on policy, guidance, and services in procurement. OCP is responsible for ensuring that USDA procurement activities comply with the Federal Acquisition Regulation (FAR) and establishing USDA-wide procurement policy and regulations, such as the Agriculture Acquisition Regulation (AGAR).

We determined that the FAR establishes policies and procedures that USDA and other Federal agencies must follow during the acquisition process. The FAR does not describe provisions and clauses that contracting officials can place in procurement solicitations and contracts as preventive measures to deter Fair Labor Standards Act (FLSA) child labor violations. However, USDA could consider (1) contract termination; and (2) suspension and debarment as remedies to respond to reported child labor violations.

USDA is not responsible for updating FAR requirements and cannot establish policies and procedures in the AGAR that are inconsistent with the FAR. Therefore, we are not issuing any recommendations to OCP.



OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



DATE: May 22, 2024

INSPECTION

NUMBER: 96801-0001-21

TO: Donald Baker, Jr.
Director
Senior Procurement Executive
Office of Contracting and Procurement

ATTN: Matthew Kopp
Agency Liaison Officer for OIG Audits
Office of Contracting and Procurement

FROM: Janet Sorensen
Assistant Inspector General for Audit

SUBJECT: USDA Preventative Measures and Enforcement Remedies for Child Labor
Violations in USDA Contracts-Final Report

This report presents the results of our inspection of USDA Preventative Measures and Enforcement Remedies for Child Labor Violations in USDA Contracts. We do not have any recommendations in the report and, therefore, no further response to this office is necessary.

We appreciate the courtesies and cooperation extended to us by members of your staff during our 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

In February 2023, the Department of Labor (DOL) published two news releases summarizing child labor violations¹ following its investigations of a meat processing plant and a food sanitation service provider. The first news release described how a meat processing plant allowed eight minor-aged employees to work outside federally allowed hours, and engage in hazardous work involving slaughterhouse operations.² In the second news release, DOL described how one of the nation’s largest food sanitation services contractors illegally employed over 100 children in hazardous jobs, such as working with hazardous chemicals, and cleaning meat processing equipment.³ In April 2023, the United States Department of Agriculture’s (USDA) Secretary acknowledged that illegal child labor had been a growing concern in the food industry.⁴

In 1938, the Fair Labor Standards Act⁵ (FLSA) established child labor provisions for the employment of young workers. These provisions seek to protect the safety, health, and well-being of young workers. When FLSA child labor provisions are violated, oppressive child labor⁶ occurs. DOL administers and enforces the child labor provisions of FLSA, and its Wage and Hour Division (WHD) is responsible for investigating compliance, and developing standards for regulations related to child labor.⁷

KEY DEFINITIONS:

OIG defines “**child labor violations**” throughout the report as violations of FLSA child labor regulations.

“**Oppressive child labor**” occurs when FLSA child labor provisions are violated.

The FLSA states that, generally, “**oppressive child labor**” includes the employment of (1) young workers under the age of 16 in any occupation; and (2) any employee between 16 and 18 years of age in any occupation which the Secretary of Labor declares to be hazardous for the employment of children. For the Secretary’s other authorities related to oppressive child labor, see footnote 6.

¹ See Key Definitions callout above.

² U.S. Department of Labor, Wage and Hour Division “*Lancaster Meat Processing Plant Endangered Minors by Allowing Them to Perform Hazardous Tasks, Work More Than the Law Permits,*” news release, Feb. 14, 2023. <https://www.dol.gov/newsroom/releases/whd/whd20230214-1> (last visited Mar. 18, 2024).

³ U.S. Department of Labor, Wage and Hour Division *More Than 100 Children Illegally Employed in Hazardous Jobs, Federal Investigation Finds; Food Sanitation Contractor Pays \$1.5m in Penalties,*” news release, Feb 17, 2023. <https://www.dol.gov/newsroom/releases/whd/whd20230217-1> (last visited Aug. 7, 2023).

⁴ Secretary Vilsack, Letter to Members of the Meat and Poultry Industry (Apr 12, 2023).

⁵ 29 U.S.C. §§ 201-219.

⁶ See Key Definitions callout above. Further, the Secretary of Labor can issue orders or regulations permitting the employment of children 14 and 15 years of age, in nonmanufacturing and non-mining occupations, where the Secretary determines that such employment is confined to periods which will not interfere with a child’s schooling, and to conditions which will not interfere with a child’s health and well-being. The FLSA further provides for the issuance of age certificates pursuant to regulations of the Secretary which will protect an employer from unwitting employment of oppressive child labor. 29 C.F.R. § 570.117(b).

⁷ WHD has responsibility to enforce FLSA’s child labor provisions related to hazardous occupations, employment of 14-and 15-year-old children, and age certificates. 29 C.F.R. § 570.101(a).

WHD performs investigations based on business types, industries, or complaints. Any violation of the child labor provisions described in the FLSA is unlawful and, if willful, subjects the offender to criminal and civil money penalties.⁸

According to DOL’s website, DOL WHD closed 955 cases that found child labor violations in fiscal year (FY) 2023, a 14 percent increase from FY 2022.⁹ DOL WHD found nearly 5,800 children employed in violation of the law, an 88 percent increase since 2019. Additionally, it assessed more than \$8 million in penalties, an 83 percent increase from the previous year.¹⁰



Figure 1: FY 2023 DOL Enforcement Data. Graphic by DOL WHD.¹¹

In response to increasing child labor violations, DOL, along with the Department of Health and Human Services, formed the “Interagency Taskforce to Combat Child Labor.”¹² This task force aims to further collaboration, improve information sharing among agencies, and hold employers

⁸ Any violation of the provisions of sections 12(a) or 12(c) is unlawful, and such unlawful act or practice, if willful, will subject the offender to criminal penalties. “[A]ny person who violates the provisions of FLSA sections 12 or 13(c) relating to child labor, or any regulations issued under those sections, shall be subject to a civil penalty not to exceed (1) \$15,629 for each employee who was the subject of such a violation; or (2) \$71,031 with regard to each such violation that causes the death or serious injury of any employee under the age of 18 years, which penalty may be doubled where the violation is repeated or willful.” 29 C.F.R. §570.140(a)(b).

⁹ DOL WHD reported a 69 percent increase in findings of illegal child labor between FY 2018 and FY 2022. The news release is available at U.S. Department of Labor, “Department of Labor, Interagency Task Force Announce Recent Actions to Combat Exploitative Child Labor with New Partnerships, Innovative Tactics, Ramped Up Enforcement,” news release, Jan. 19, 2024, <https://www.dol.gov/newsroom/releases/ossec/ossec20230727> (last visited Nov. 15, 2023).

¹⁰ U.S. Department of Labor, *Child Labor Enforcement: Keeping Young Workers Safe*, DOL Blog (Aug. 7, 2023), <https://www.dol.gov/agencies/whd/data/child-labor>.

¹¹ *Id.*

¹² U.S. Department of Labor, “Department of Labor, Health and Human Services Announce New Efforts to Combat Exploitative Child Labor,” news release, Feb. 27, 2023, <https://www.dol.gov/newsroom/releases/ossec/ossec20230227> (last visited Feb. 27, 2024).

accountable throughout the supply chain. As part of this task force’s efforts, many Federal agencies, including USDA, have worked on initiatives to prevent and address illegal child labor. USDA, for example, issued a letter encouraging meat and poultry industry members to take precautionary steps toward eliminating child labor in their supply chains, and stated it would use its procurement and regulatory authorities to provide attention, and increased oversight to deter illegal child labor.¹³

USDA delegates its procurement authority to the Office of Contracting and Procurement (OCP).¹⁴ OCP provides USDA mission areas and contracting officials with leadership on policy, guidance, and services in procurement.¹⁵ OCP is responsible for ensuring procurement activities at USDA comply with the Federal Acquisition Regulation (FAR).¹⁶ OCP is also responsible for following procurement-related Departmental Regulations establishing USDA-wide procurement policy and regulations, including the Agriculture Acquisition Regulation (AGAR)¹⁷ and the USDA Contracting Desk Book. (see Figure 2).¹⁸

Federal and Departmental Policies and Procedures Used as Guidance in the Acquisition Process



Figure 2: Graphic by Office of Inspector General (OIG).

¹³ Secretary Vilsack, Letter to Members of the Meat and Poultry Industry (Apr. 12, 2023).

¹⁴ AGAR § 401.601(a), *General*.

¹⁵ USDA has eight mission areas focused on the Nation’s farmers, food and nutrition security, food safety, marketing, natural resources, rural communities, agricultural research, and international trade policy.

¹⁶ The FAR system is established for the codification and publication of uniform policies and procedures for the acquisition process by all executive agencies. The U.S. General Services Administration is responsible for establishing and operating the FAR Secretariat to publish and distribute the FAR. FAR §1.201-2.

¹⁷ The AGAR is a USDA-specific acquisition regulation that implements or supplements the FAR, and incorporates agency policies, procedures, contract clauses, and solicitation provisions that govern the contracting process between USDA and its contractors.

¹⁸ The USDA Contracting Desk Book provides acquisition regulations, policies, procedures, guidance, and information for USDA sub-agencies and Mission Areas. It is a supplement to the FAR and the AGAR. USDA personnel are instructed to always use the USDA Contracting Desk Book, with the FAR and AGAR, to ensure all guidance is considered during the acquisition process.

The FAR provides USDA with procurement and regulatory guidance in the acquisition process between USDA and its contractors and sets standard contract language that USDA shall include in its procurement solicitations and contracts. The FAR also establishes the standards for USDA to determine if a contractor is eligible and qualified to obtain a contract. Additionally, the FAR provides remedies, such as suspension and debarment,¹⁹ that agencies can use to protect the Government's interest when a contractor violates the terms and conditions of a contract.

The FAR requires contracting officials to place specific terms and conditions in procurement contracts, depending on the contract's acquisition value and product type, to address (1) forced or indentured child labor; and (2) trafficking of persons as defined by Executive Order (E.O.) 13126, *Prohibition of Acquisition of Products Produced by Forced or Indentured Child Labor*, (June 12, 1999), the Victims of Trafficking and Violence Protection Act of 2000, Pub. L. No. 106-386, 114 Stat. 1470, and E.O. 13627, *Strengthening Protections Against Trafficking in Persons on Federal Contracts* (Sept. 25, 2012). However, the aforementioned requirements do not relate to violations of FLSA regulations. The focus of this inspection is on the preventative measures and remedies USDA has available to respond to FLSA child labor violations.

Objectives

Our objectives were to determine whether USDA has preventative measures in its contracts to deter child labor violations and what remedies, if any, USDA has available to respond to entities with reported child labor violations.

¹⁹ FAR §9.4.

Section 1: Determine Whether USDA Has Preventative Measures in Its Contracts to Deter Child Labor Violations

We determined that the FAR does not provide USDA with preventative measures that it can place in USDA contracts to deter FLSA child labor violations. This is because the FAR does not describe FLSA-related provisions or clauses that contractors should adhere to when fulfilling the terms and conditions of procurement contracts. However, OCP officials stated that USDA contracting officials must perform certain actions before and after awarding a contract that can prevent USDA from doing business or continuing to do business with non-responsible contractors, which could include contractors that violate FLSA regulations.²⁰ These actions include the following:

1. Verification of contractor eligibility to receive a Federal award;
2. Evaluation of contractor's performance and integrity before awarding a new contract; and
3. Inclusion of provisions and clauses in procurement solicitations and contracts that help USDA determine if a contractor is responsible.

Verification of Eligibility: Before awarding a contract, the FAR requires USDA's contracting officials to verify that the contractor is registered in the System for Award Management (SAM).²¹ ²² USDA contracting officials are required to review SAM to ensure that the contractor is not excluded from receiving a Federal award.²³ ²⁴ OCP officials stated that SAM verification is intended to prevent USDA from doing business with an excluded party, which could include a contractor with a child labor violation.

Evaluation of Contractor Performance and Integrity: Before awarding a new contract, a contracting official is required to review the Contractor Performance Assessment Reporting System (CPARS) and consider a contractor's past performance assessment when making award decisions.²⁵ Past performance information is relevant information regarding a contractor's

²⁰ According to FAR § 9.104-1, a contractor is determined responsible if it (1) has adequate financial resources, (2) can comply with the delivery or performance schedule, (3) has a satisfactory performance record, (4) has a satisfactory record of integrity and business ethics, (5) has the necessary experience, controls, and skills, (6) has the necessary equipment and facilities, and (7) is qualified and eligible for a contract.

²¹ SAM (SAM.gov) is an official website of the U.S. Government, administered by the U.S. General Services Administration. This site is used to: register to do business with the Government; update, renew, or check the status of an entity registration; search for entity registration, exclusion records, assistance listings, wage determinations, contract opportunities, and contract data reports; view and submit contract reports; and access award data. System for Award Management, <https://sam.gov/content/about/this-site> (last visited Mar. 6, 2024).

²² The SAM registration is not required for all offerors. For a list of exceptions, see FAR § 4.1102 (a)1-7.

²³ Following a discretionary action, such as suspension and debarment, OCP's Senior Procurement Official is required to update SAM with an exclusion record. This record, among other information, should describe what caused suspension and debarment.

²⁴ An *exclusion* identifies a party excluded from receiving Federal contracts, certain subcontracts, and certain types of Federal financial and non-financial assistance and benefits. If an entity or any of its principals are subject to an active exclusion, this implies that the entity may be currently debarred, suspended, proposed for debarment, or declared ineligible for the award of contracts by any Federal agency.

²⁵ A contracting official reviews CPARS for contracts that are more than the simplified acquisition threshold. The simplified acquisition threshold is \$250,000. FAR § 9.104-6(a)(1); FAR § 2.101.

actions under previously awarded contracts or orders. It includes the contractor’s record of conforming to requirements and standards of integrity and business ethics. The information documented about a contractor’s integrity and business ethics is significant because, if documented properly, it could contain information on a contractor’s criminal, civil, and administrative proceedings, suspensions, debarments, and other data a contracting official could use to evaluate a contractor’s demonstrated ability to act in a manner which maintains the public’s trust.²⁶

After awarding a contract, the FAR requires USDA contracting officials to evaluate and document a contractor’s performance and integrity in CPARS at least annually, and after the completion of the contract. OCP officials stated that evaluations in CPARS can be a valuable tool to prevent USDA from doing business with non-responsible contractors.

Inclusion of Provisions and Contract Clauses: The FAR directs USDA contracting officials to add specific provisions²⁷ and clauses²⁸ in the acquisition solicitations and contracts it awards depending on the contract’s acquisition value and product type.²⁹ We determined that the FAR requires contracting officials to include provisions and clauses in contracts to determine whether the contractor is responsible. We detail these FAR provisions and clauses in Figure 3 below.

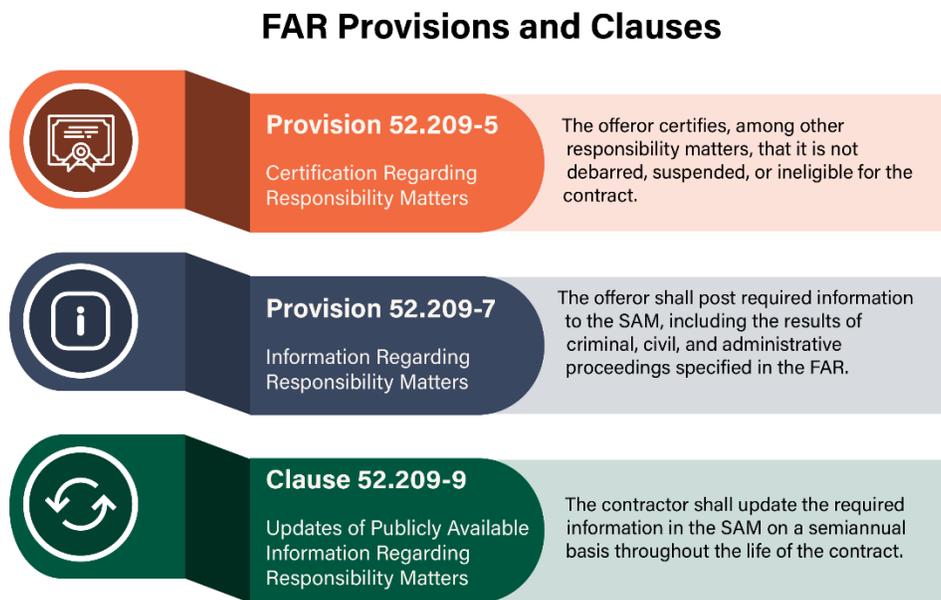


Figure 3: FAR provisions that OIG concluded could be useful to help USDA determine if a contractor is responsible. Graphic by OIG.

²⁶ According to FAR § 42.1503 (b)(2)(vi), contracting officials shall include suspension and debarments, as applicable, in CPARS evaluations.

²⁷ A *solicitation provision* means a term or condition used only in solicitations and applying only before a contract is awarded. FAR § 2.101.

²⁸ A *clause* is a term or condition used in a contract that can apply before or after a contract is awarded. FAR § 2.101.

²⁹FAR § 52.1.

Although the FAR provisions and clauses described in Figure 3 could help USDA determine if a contractor is responsible, the FAR does not include provisions or clauses related to FLSA regulations.

USDA officials recognized this, and in February 2022, USDA proposed a new rule in the Federal Register to update the AGAR to insert two additional clauses in USDA contracts.³⁰ The proposed clauses required contractors and subcontractors to certify that they are compliant with all labor laws and with required corrective actions for past labor law violations. However, after public comments closed in March 2022, USDA did not pursue a final rule and update its AGAR.

In July 2014, E.O. 13673³¹ on Fair Pay and Safe Workplaces was issued and required agencies to include provisions in solicitations that required an offeror³² to disclose labor violations before and after a contract is awarded. In August 2016, the FAR Council issued a final rule amending the FAR to implement E.O. 13673. In March 2017, Congress disapproved of E.O. 13673 nullifying the effect of the rule the FAR Council established.^{33 34} This disapproval requires that a new rule that is substantially the same to the nullified rule be authorized by law.³⁵ On the same day, E.O. 13782 revoked E.O. 13673, preventing agencies from implementing its requirements.

Overall, USDA must follow the policies and procedures set forth by the FAR. The FAR does not describe provisions and clauses that contracting officials can place in procurement solicitations and contracts as preventive measures to deter FLSA child labor violations. Because USDA is not responsible for updating FAR requirements and USDA can only update the AGAR with policies and procedures that are consistent with the FAR, we are not issuing any recommendations to OCP.

³⁰ 87 Fed. Reg. 9,005, 9017 (Feb. 17, 2022).

³¹ E.O. 13673 (July 31, 2014) amended by E.O. 13683 (Dec. 11, 2014) and E.O. 13738 (Aug. 23, 2016) and revoked by E.O. 13782 (Mar. 27, 2017).

³² *Offeror* means bidder. FAR § 2.101.

³³ E.O. 13782 (Mar. 27, 2017).

³⁴ *Guidance for Executive Order 13673, "Fair Pay and Safe Workplaces,"* 82 Fed. Reg. 51,358 (Nov. 6, 2017).

³⁵ 5 U.S.C. § 801(b)(2).

Section 2: Determine What Remedies, If Any, Are Available to USDA to Respond to Entities with Reported Child Labor Violations

As noted in Objective 1, the FAR establishes policies and procedures that USDA must follow during the acquisition process. We determined that the FAR does not describe specific remedies to respond to reported FLSA child labor violations, because the FAR does not contain specific provisions or clauses that contracting officials can place in procurement solicitations and contracts related to FLSA child labor regulations. However, USDA officials could consider (1) terminating a contract if it is in the Government's best interest; and (2) suspending or debarring a contractor as a remedy once notified of FLSA child labor violations, if USDA determines evidence from an investigation met the requirements in the FAR³⁶ for suspending and debarring a contractor. During this inspection, OIG asked OCP if it had terminated, suspended, or debarred any contractors in the last five years. OCP informed OIG that USDA procurement officials had not terminated, suspended, or debarred any contractors in the last five years in response to reported child labor violations, or any other violation.

Contract Termination: USDA contracting officials could consider terminating a contract for default³⁷ ³⁸ for actions related to the performance of the contract and for convenience,³⁹ if they determine it is in the Government's best interest. The FAR requires contracting officials to, depending on the contract's acquisition value and contract type, include specific clauses in contracts that provide contracting officials with the authority and responsibility to terminate contracts in whole or in part for default, or for the convenience of the Government.⁴⁰

Suspension and Debarment: Suspension and debarment⁴¹ are remedies available to Federal agencies to protect the Federal Government from doing business with non-responsible contractors.⁴² USDA may, in the public interest, suspend or debar a contractor if the contractor's

³⁶ FAR § 9.4.

³⁷ FAR § 49.4.

³⁸ USDA contracting officials could also consider terminating for cause for actions related to performance of the contract. FAR § 12.403. The term "*termination for cause*" applies to contracts related to commercial products and commercial services.

³⁹ FAR § 49.502.

⁴⁰ FAR § 49.100.

⁴¹ When a contractor is debarred or suspended, the contractor is excluded from receiving contracts, and agencies shall not solicit offers from, award contracts to, or consent to subcontracts with these contractors. Contractors debarred or suspended are also excluded from conducting business with the Government as agents or representatives of other contractors. *Suspension* prohibits a person from participating in these transactions temporarily, while *debarment* excludes a person from participating in these transactions for up to three years. A debarment shall be for a period commensurate with the seriousness of the cause but, in general, should not exceed three years.

⁴² Agency heads can determine that there is a compelling reason to award contracts to a debarred or suspended contractor per FAR §§ 9.405-1(a)(2), 9.405-2, 9.406-1(c), 9.407-1(d), 23.506(e).

actions meet any of the causes the FAR requires agency contracting officials to consider to suspend or debar a contractor,⁴³ including but not limited to the causes described in Figure 4.

Considerable Causes for Suspension and Debarment from the Federal Acquisition Regulations

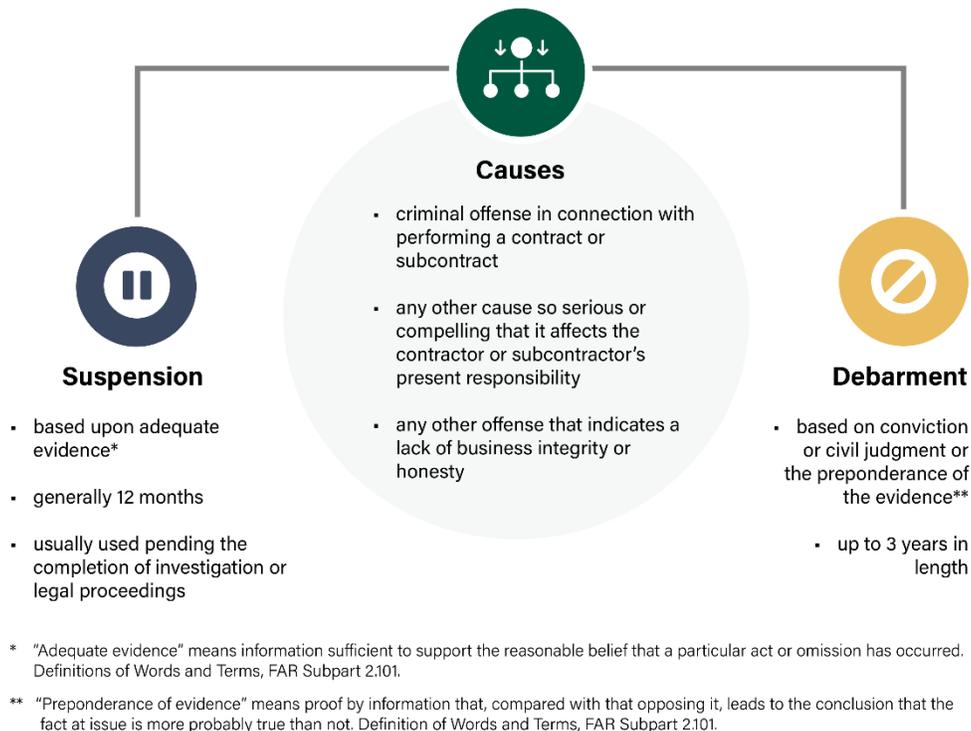


Figure 4: Causes listed in the FAR that OIG concluded USDA can consider to debar and suspend a contractor. Graphic by OIG.

USDA can obtain evidence of a potential cause for suspension and debarment through sources including, but not limited to, USDA OIG and Department of Justice investigations; civil or criminal court actions; hotline complaints; and media reports.⁴⁴

USDA can also obtain evidence from a DOL child labor investigation, to potentially suspend and debar a contractor. The FLSA authorizes and delegates DOL the responsibility to enforce FLSA child labor provisions by conducting investigations.⁴⁵ Specifically, DOL WHD investigates whether employers violate FLSA child labor regulations. After a DOL WHD investigation, DOL has the authority to (1) litigate, (2) recommend criminal prosecution; and (3) enforce remedies, such as civil money penalties.

⁴³ FAR § 9.406-2; FAR § 9.407-2.

⁴⁴ USDA Departmental Regulation 2280-001, *Suspension and Debarment* (Sept. 7, 2022).

⁴⁵ 29 C.F.R. § 570.101.

According to OCP, when a DOL investigation results in an FLSA violation, DOL notifies the Interagency Suspension and Debarment Committee (ISDC).⁴⁶ OCP officials stated that ISDC is responsible for identifying the Federal agencies that have procurement contracts with the contractor, and then collectively identifying a lead agency to consider suspension and debarment proceedings. OCP officials further stated that if ISDC determines, for example, that an USDA agency is the lead agency following a DOL child labor investigation, USDA agency contracting officials can use DOL WHD investigative information to decide whether it should recommend suspension and debarment proceedings to protect the Government's interest.⁴⁷ However, OCP's Suspension and Debarment official determines whether a USDA agency's contracting official's recommendation to suspend or debar meets the causes required to suspend or debar a contractor.

Before suspending or debarring, USDA agency contracting officials are required to consider other mitigating factors, such as a contractor's cooperation during a Government investigation, before deciding to recommend such actions.⁴⁸ Further, the FAR states that suspension and debarment are both discretionary actions, and should be imposed only for the Government's protection, and not for purposes of punishment.

In summary, USDA contracting officials could consider terminating a contract and initiating suspension or debarment actions as remedies to respond to FLSA child labor violations, if it is in the Government's best interest.

⁴⁶ The ISDC serves as a Federal forum to (1) discuss Government-wide non-procurement and procurement suspension and debarment-related issues; (2) facilitate lead agency coordination; and (3) assist in developing unified Federal policy, <https://www.acquisition.gov/isdc-home> (last visited February 6, 2024).

⁴⁷ OCP officials stated that OCP had not received DOL investigative evidence from any child labor investigations in FY 2023.

⁴⁸ FAR § 9.406-1 (1)-(10) provides a list of factors agency officials should consider.

Scope and Methodology

Our inspection scope was October 1, 2022, to September 30, 2023. To achieve our inspection objectives, OIG reviewed the FAR and interviewed OCP officials to identify if there were specific provisions, clauses, and remedies that contracting officials could place in USDA procurement solicitations and contracts to prevent and respond to child labor violations. We conducted our fieldwork virtually from October 2023 through April 2024. This report does not contain any findings or recommendations. It was prepared using information obtained from OCP during this inspection and from public sources.

To accomplish our inspection objectives, we:

- Conducted interviews with OCP officials;
- Reviewed the applicable FAR;
- Reviewed USDA’s AGAR; and
- Reviewed the FLSA and publicly available information related to our objectives.

We discussed the results of our inspection with agency officials on April 30, 2024, and included their responses, as appropriate.

We conducted our inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency’s *Quality Standards for Inspection and Evaluation*. These standards require that we obtain sufficient, competent, and relevant evidence to provide a reasonable basis for our conclusions based on our inspection objectives.

The evidence obtained provides a reasonable basis for our conclusions based on our inspection objectives.

Abbreviations

| | |
|-------------|----------------------------------------------------|
| AGAR..... | Agriculture Acquisition Regulation |
| C.F.R..... | Code of Federal Regulations |
| CPARS..... | Contractor Performance Assessment Reporting System |
| DOL..... | U.S. Department of Labor |
| E.O. | Executive Order |
| FAR..... | Federal Acquisition Regulation |
| FLSA..... | Fair Labor Standards Act |
| FY..... | fiscal year |
| ISDC..... | Interagency Suspension and Debarment Committee |
| SAM..... | System for Award Management |
| OCP..... | Office of Contracting and Procurement |
| OIG..... | Office of Inspector General |
| U.S.C. | United States Code |
| USDA..... | United States Department of Agriculture |
| WHD..... | Wage and Hour Division |

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