

OSPI CNS Child and Adult Care Food Program Reference Sheet

Outside Employment Policy for Sponsoring Organizations

Application

Sponsoring organizations, Sponsors with more than 1 site, must submit an outside employment policy upon initial application to operate the Child and Adult Care Food Program (CACFP). The policy must restrict other employment by employees that interfere with an employee's performance of Program-related duties and responsibilities, including outside employment that constitutes a real or apparent conflict of interest 7 CFR 226.6(b)(1)(xvi). Additionally, Sponsoring Organizations must attest in their Management Plan in WINS that their organization has a written Outside Employment Policy that follows these requirements [(7 CFR 226.16(b)(7)].

Renewal

OSPI must ensure that renewing sponsoring organizations certify their outside employment policy most recently submitted to OSPI remains current and in effect. If changes have occurred, the Sponsor must provide OSPI a copy of their updated policy. Updated outside employment policies must be uploaded to the "Documents" section in WINS at the time of renewal 7 CFR 226.6(b)(2)(iii)(G).

OSPI Outside Employment Policy Template

Sponsoring Organizations may choose to use OSPI's Outside Employment Policy Template or create their own. All outside employment policies must be reviewed by assigned Program Specialists upon application and thereafter during renewal when changes have been made.

Reference

- [7 CFR 226](#)
- [Guidance for Management Plans and Budgets- A CACFP Handbook](#)



Outside Employment Policy- Sample Template

(Facility name) employees may be allowed outside employment provided such employment:

1. in no way interferes with the performance of the employee's duties, including CACFP-related duties or responsibilities; and
2. is performed outside the employee's approved work schedule and off **(facility name)** premises.

Scope

The Policy applies to all employees of **(facility name)**.

Information

For purposes of this Policy, "outside employment" includes self-employment, consulting activities and volunteer activities that, if compensated, could be considered outside employment. An example of a volunteer would be a bookkeeper who volunteers as a treasurer for his/her church.

1. The outside employment policy is to be reviewed with all **(facility name)** employees at least once annually. New employees are to be instructed on the outside employment policy during their first month of employment.
2. Employees are not required to notify their supervisor of outside employment if it is conducted outside of regular work hours, off premises, and does not require the job skills and/or qualifications used in his/her employment at **(facility name)**.
3. Employees are required to request approval for outside employment if the outside employment is conducted during regular work hours, on premises, or if it requires the same job skills and/or qualifications used in his/her employment at **(facility name)**, includes activities regulated by CACFP, or if it presents a real or perceived conflict of interest.
4. When required, requests for approval of outside employment are to be submitted to a supervisor prior to beginning that employment.
5. Each employee's request for outside employment is to be reviewed and decided on its own merits, considering such factors such as the type of work to be done, the type of business and the duration of employment.
6. Approval for outside employment is valid for one calendar year or until the outside employment changes. Each change in outside employment meeting the guidelines outlined in 3, above, requires specific prior approval.
7. If the outside employment negatively impacts on the employee's work at **(facility name)**, a supervisor may withdraw approval for that outside employment. The employee and Human Resources office are to be notified if approval for outside employment is withdrawn. This notification should provide the reason(s) for this action.
8. Failure to obtain prior approval for outside employment, or engaging in outside employment when such approval has been denied, may result in disciplinary action.
9. The decision to approve or deny the outside employment rests with the **(facility name)** not with CACFP.
10. The **(facility name)** is to maintain documentation of outside employment requests on file, but does not send them to CACFP. This documentation may be reviewed during on-site CACFP administrative reviews.