OSPI Child and Adult Care Food Program Reference Sheet

Written Code of Conduct Policy

Institutions operating the Child and Adult Care Food Program (CACFP) are required to develop and implement a written code of conduct designed to govern the performance of employees engaged in procurement.

Requirements

- ✓ Sponsors must implement a written code of conduct policy that applies to all employees that purchase goods on behalf of the sponsor.
    - May be referred to as the "Conflict of Interest."
- ✓ The Code of Conduct must:
    - Prohibit employees from soliciting or accepting gifts, travel packages, and other incentives from prospective contractors.
    - Prohibit an employee from participating in the selection, award, or administration of any contract to which an entity or certain persons connected to them have a real or apparent conflict of interest.
    - Set standards when financial interest is not substantial or the gift is an unsolicited item of nominal value.
    - Include employee disciplinary actions to be applied in the event the policy is violated.
- ✓ Participating institutions must provide inform employees of the policy and the consequences for violating the policy.

References

- 7 CFR 226.22(b), 2 CFR 200.300(a), 2 CFR 400.0, 2 CFR Part 415 Subpart A
- 2 CFR 200.318
- Written Codes of Conduct and Performance of Employees Engaged in Award and Administration of Contracts | Food and Nutrition Administration

Resources

- OSPI Procurement Reference
- OSPI Procurement Procedure and Code of Conduct Template

Acronyms

- CNS – Child Nutrition Services
- OSPI – Office of Superintendent of Public Instruction