



Code of Conduct Fact Sheet

Applicable to all Child Nutrition Programs

School Nutrition Programs (SNP), the Special Milk Program (SMP), the Summer Food Service Program (SFSP), and the Child and Adult Care Food Program (CACFP)

What is a Code of Conduct?

- 2 CFR 200, as applicable, currently require entities receiving Federal funds to develop and implement a written code of conduct designed to govern the performance of employees engaged in procurement.
- Each School Food Authority (SFA)/Sponsoring Organization is required to have written standards of conduct covering conflicts of interest that prohibit officers, employees and agents from soliciting or accepting gratuities, favors or anything of monetary value from contractors or parties of subcontracts that adhere to the standards set forth in 2 CFR 200.318(c)(1) and as applicable 7 CFR 210, 7 CFR 215, 7 CFR 225, and 7 CFR 226)..

What must be included in a Code of Conduct?

- Must prohibit employees from soliciting gifts, travel packages, and other incentives from prospective contractors.
- Must prohibit an employee from participating in the selection, award, and administration of any contract to which an entity or certain persons connected to them, have financial interest.
- Must also provide for CNP operators to set standards when financial interest is not substantial, or the gift is an unsolicited item of nominal value and may be acceptable.
- Must provide for disciplinary actions to be applied in the event the standards are violated by officers, employees, or agents.

Resources

- ISBE Nutrition Financial Management <https://www.isbe.net/Pages/Nutrition-Financial-Management.aspx>
- USDA Procurement Regulations <https://www.fns.usda.gov/cfs/usda-procurement-regulations>

For all questions concerning procurement, please contact ISBE at nutritionprocurement@isbe.net.