DATE:  February 27, 2015
TO:  Child and Adult Care Food Program (CACFP) Center Organizations
FROM:  Robin Holz, Lead CACFP Consultant - Centers
        Bureau of Nutrition and Health Services
SUBJECT:  Written Codes of Conduct and Performance of Employees Engaged in
          Award and Administrations of Contracts

Organizations receiving Federal funds, including CACFP reimbursement, must develop
and implement a written code of conduct designed to govern the performance of
employees engaged in purchasing CACFP food, equipment and services.

This written code of conduct must:
- Prohibit employees from soliciting gifts, travel packages, and other incentives
  from prospective vendors and contractors.
- Prohibit an employee from participating in the selection, award, and
  administration of any contract to which an entity or anyone connected to the
  employee, have financial interest.
- Set standards that define the threshold when the financial interest becomes
  substantial and when a gift is an unsolicited item of nominal value and may be
  acceptable.
- Provide for disciplinary actions to be applied in the event the standards are
  violated.

It is recommended to include the code of conduct in the employee handbook and/or job
descriptions.  It is a good practice to include the date the policy was adopted.
Compliance will be evaluated by State agency consultants at the time of application
renewal and/or on reviews.

If you have questions, please contact robin.holz@iowa.gov, (515)281-3484.