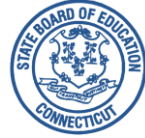





STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of the National School Lunch and School Breakfast Programs

FROM: John Frassinelli, Chief 
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: August 29, 2016

SUBJECT: Operational Memorandum No. 10-16
Written Code of Conduct and Performance of Employees Engaged in Award and Administration of Contracts

This memorandum responds to a number of recent questions and requests sent to the Food and Nutrition Service (FNS) to provide clarifying guidance to school Child Nutrition Program (CNP) operators, regarding the expectation and enforcement of ethical conduct by their employees engaged in procurement of Program goods and services. Local Education Agencies are reminded that 2 CFR 200.318(c)(1), as applicable, require entities receiving Federal funds to develop and implement a written code of conduct designed to govern the performance of employees engaged in procurement.

This code of conduct must prohibit employees from soliciting gifts, travel packages, and other incentives from prospective contractors. In addition, the code of conduct 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. The code of conduct 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. Finally, the code of conduct must provide for disciplinary actions to be applied in the event the standards are violated.

The Connecticut State Department of Education's (CSDE) oversight and monitoring of subgrantee procurement activities includes a review of the written code of conduct as well as an investigation of reported real or apparent conflicts of interest by employees involved in procurement. The review of the written code of conduct will occur for operators of the National School Lunch Program and School Breakfast Program during a school food authority's Procurement Review, at which time the written code of conduct will be submitted to the CSDE. The CSDE's goal is to ensure the performance of individuals and organizations engaged in the selection and award, and contract administration meets federal requirements. In the absence of a written code of conduct, or when it is determined that a violation of code has occurred, the CSDE must issue a finding and require corrective action for noncompliance with 2 CFR 200.318 (c) (1), as applicable.

Questions may be directed to your school nutrition consultant.

Consultants for School Nutrition Programs	
County	Consultant
<ul style="list-style-type: none"> Fairfield County (Includes Region 9) Litchfield County (Includes Regions 1, 6, 7, 12 and 14) New London County (Lebanon, Ledyard, Lisbon, Montville, New London and North Stonington) 	<p>Fionnuala Brown fionnuala.brown@ct.gov 860-807-2129</p>
<ul style="list-style-type: none"> Hartford County (Includes Region 10) New London County (Bozrah, Colchester, East Lyme, Franklin, Griswold and Groton) 	<p>Teri Dandeneau teri.dandeneau@ct.gov 860-807-2079</p>
<ul style="list-style-type: none"> Middlesex County (Includes Regions 4, 13 and 17) New London County (Preston, Salem, Sprague, Stonington, Voluntown, Waterford and Waterford Country School) Tolland County (Includes Regions 8 and 19) Windham County (Includes Region 11) 	<p>Susan Alston susan.alston@ct.gov 860-807-2081</p>
<ul style="list-style-type: none"> New Haven County (Includes Regions 5, 15 and 16) New London County (Norwich, Norwich Free Academy, Integrated Day Charter School, LEARN, Region 18 and Sacred Heart School) 	<p>Jackie Schipke jackie.schipke@ct.gov 860-807-2123</p>

JF:mSP

Important: This is a numbered Connecticut State Department of Education (CSDE) operational memorandum that contains important program information. Please read carefully and retain in a binder for future reference. All CSDE operational memoranda are posted on the CSDE's [Operational Memoranda for School Nutrition Programs](#) Web page.