



Iowa Great Lakes Lutheran School

School Nutrition Department

School Food Authority (SFA)

## **Code of Conduct for Iowa Great Lakes Lutheran School Food Service Department**

### **I. Purpose**

- The purpose of this Code of Conduct is to establish ethical standards and expectations for all individuals involved in the administration and operation of the Iowa Great Lakes Lutheran School Nutrition Department and its federally funded child nutrition programs. This policy ensures compliance with all applicable federal and state regulations governing procurement, financial management, and stewardship of USDA funds, while reflecting the Christian values and mission of Iowa Great Lakes Lutheran School.

### **II. Scope**

- This Code of Conduct applies to all individuals involved in School Food Authority operations, including but not limited to:
  - School Nutrition Department employees
  - School administrators involved in nutrition program oversight
  - Governing board members with authority over financial or procurement decisions
  - Volunteers or contractors involved in procurement or program administration

### **III. Standards of Conduct**

- All individuals covered by this policy shall conduct School Food Authority business with honesty, integrity, fairness, and accountability. Specifically, individuals shall:
  - Administer all school nutrition programs in compliance with USDA regulations, Iowa Department of Education requirements, and local governing board policies.
  - Conduct procurement and financial activities in a manner that ensures free and open competition.

- Avoid both actual and perceived conflicts of interest.
- Maintain confidentiality of procurement, pricing, vendor, and contract information.
- Refrain from soliciting or accepting gifts, favors, gratuities, or anything of monetary value from vendors, contractors, or potential contractors.
- Use School Food Authority funds solely for allowable program purposes.
- Promptly report suspected violations of this Code of Conduct.

#### **IV. Conflict of Interest**

- A conflict of interest exists when an individual involved in School Food Authority operations has a personal, financial, or business interest that could compromise—or appear to compromise—their impartiality or judgment.
- Examples include, but are not limited to:
  - Financial ownership or employment with a vendor or contractor
  - Family or close personal relationships with vendors or contractors
  - Acceptance of gifts, incentives, or favors related to School Food Authority business
- All actual or potential conflicts of interest must be disclosed in writing to the School Nutrition Director and School Administrator. Individuals with a disclosed conflict shall be removed from all related decision-making activities.

#### **V. Disciplinary Actions**

- Failure to comply with this Code of Conduct may result in disciplinary action consistent with Iowa Great Lakes Lutheran School personnel policies and governing board procedures. Disciplinary actions may include, but are not limited to:
  - Verbal or written warning
  - Mandatory retraining
  - Reassignment or suspension of duties related to School Food Authority operations
  - Termination of employment or volunteer service
  - Legal or financial remedies, when applicable
- Disciplinary actions shall be administered in accordance with applicable school personnel and governance policies, as adopted by the Iowa Great Lakes Lutheran School governing authority.

## VI. Reporting and Enforcement

- Any individual who becomes aware of a potential or actual violation of this Code of Conduct shall report the concern promptly to the School Nutrition Director or School Administrator. Reports may be made without fear of retaliation.
- All reported concerns shall be reviewed and addressed in a timely and appropriate manner.

## VII. Training and Acknowledgment

- All School Nutrition Department staff and individuals involved in procurement or financial management shall receive training on this Code of Conduct. Documentation of training and acknowledgment of understanding shall be maintained and made available for administrative review.

## VIII. Approval, Review, and Maintenance

- This Code of Conduct shall be:
- Formally approved by the Iowa Great Lakes Lutheran School governing authority
- Reviewed periodically and updated as necessary to ensure continued compliance with federal and state requirements
- Maintained on file and available for review during Iowa Department of Education administrative reviews

Approved by: Angela Friedrich \_\_\_\_\_

Title: \_\_\_IGLLS Nutrition Director \_\_\_\_\_

### USDA Nondiscrimination Statement

(Revised 2-15-23)

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in

sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**

U.S. Department of Agriculture

Office of the Assistant Secretary for Civil Rights

1400 Independence Avenue, SW

Washington, DC 20250-9410; or

2. **fax:** (833) 256-1665 or (202) 690-7442; or

3. **email:** [Program.Intake@usda.gov](mailto:Program.Intake@usda.gov)

This institution is an equal opportunity provider.

**Iowa Nondiscrimination Statement**

It is the policy of this CNP provider not to discriminate on the basis of race, creed, color, sex, national origin, disability, or age, in its programs, activities, or employment practices as required by the Iowa Code 216.6, 216.7, and 216.9. If you have questions or grievances related to compliance with this policy by this CNP Provider, contact the Iowa Civil Rights Commission, 6200 Park Ave, Suite 100, Des Moines, IA 50321; phone number 515-281-4121 or 800-457-4416; website: <https://icrc.iowa.gov/>.