

PIEDMONT CITY BOARD OF EDUCATION
CHILD NUTRITION PROGRAM
PROCEDURES MANUAL

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INTRODUCTION

The purpose of this Procedures Manual is to provide faculty and staff with information regarding the School Breakfast, School Lunch, USDA Competitive Food Regulations, and the guidelines and procedures regarding the Child Nutrition Program (CNP) Department.

The CNP Department appreciates the assistance of all faculty and staff in following these guidelines to ensure compliance with State and Federal requirements. Please feel free to print any of the information and forms offered in this section. This document and any necessary revisions are available upon request.

We welcome all comments and suggestions. If you have questions or suggestions, please contact the Child Nutrition Program at (256) 447-2628.

SCHOOL BREAKFAST PROGRAM

The School Breakfast Program (SBP) is a federally subsidized meal program administered by Alabama State Department of Education (ALSDE) and operating in public schools. This program provides low cost nutritionally balanced meals to all students each school day. The program was established under the Food and Nutrition Act of 1966 to ensure all children have access to a healthy breakfast at school to promote learning readiness and healthy eating behaviors.

Regulations require that all meals meet the recommendations of the *2010 Dietary Guidelines for Americans*. These meals must meet dietary specifications for calories, sodium, vitamin targets, and saturated and trans fat requirements.

BREAKFAST SERVICE METHOD

Piedmont City Schools offer breakfast through a traditional Offer vs. Serve (OVS) service. The goal of OVS is to reduce food waste while allowing students to choose the foods they want to eat. Everyone plays a role. When students and cafeteria staff understand OVS, breakfast lines move smoothly, allowing students to make the most of meal time and enjoy the wholesome and appealing foods they are served. It also helps reduce overall food costs.

Under OVS at breakfast, schools must offer at least four food items from the three required food components (fruit, grains, and fluid milk*). *Water does not count as one of the three required food components and cannot be served as a substitute for milk.

- A **food component** is one of three required food groups in a reimbursable breakfast. These are fruits, grains, and fluid milk*.
- A **food item** is a specific food offered within the three food components, for example, 2 slices of whole grain-rich bread, 1 cup of grapes, and 1 cup of milk. This meal meets OVS breakfast requirements because three food components and four food items are offered.

Students must select at least three of the four offered food items under OVS at breakfast, including at least ½ cup of fruit and/or vegetable.

Optional Components at Breakfast

Vegetables

- Vegetables may be offered as a substitute for fruits.

Meats/Meat Alternates

- A meat/meat alternate may be served to meet the weekly grain requirement, as long as a 1 oz eq minimum of grains is offered daily.
- A meat/meat alternate may also be offered as an “extra” food (not credited toward meal pattern requirements) if a reimbursable meal is selected.

Piedmont City provides a Universal Free Breakfast so all students eat free regardless of their meal eligibility status.

Adults and visitors are welcome to participate in the breakfast program and will be charged based on the most recent meal price schedule, as approved by the Piedmont City Board of Education. Adults must pre-pay or pay onsite at the time of service.

NATIONAL SCHOOL LUNCH PROGRAM

The National School Lunch Program (NSLP) is a federally subsidized assisted meal program administered by ALSDE. NSLP provides nutritionally balanced lunches to students based on their eligibility status. School Food Authorities (SFAs) that choose to participate in the NSLP receive reimbursement from United States Department of Agriculture (USDA) for each lunch they serve. In return, SFAs must serve lunches that meet the meal pattern requirements. NSLP lunches must meet the regulations outlined in the final rule (77 FR 4088) titled *Nutrition Standards in the National School Lunch and School Breakfast Programs* as a result of the *Healthy, Hunger-Free Kids Act in 2010* and the *2010 Dietary Guidelines for Americans*. The meal pattern outlined in this rule is food-based and divided by age/grade groups. The meal pattern focuses on specific nutrient standards: calories, sodium, saturated fat and trans fat.

Adopting the meal pattern results in the following changes:

- Required daily servings of fruit
- Required daily servings of vegetables plus a weekly requirement for *Dark Green*, *Red/Orange*, *Beans/Pea* (legumes), *Starchy*, and *Other Vegetable* subgroups.
- Increased quantities of fruits and vegetables.
- Weekly meat/meat alternate ranges plus a daily requirement.
- Weekly grain ranges plus daily minimum requirements. All grains offered are whole-grain rich.
- Fat-free (unflavored or flavored) milk only.
- Under Offer versus Serve (OVS), the student must select at least ½ cup of the fruit and/or the vegetable component to be considered a reimbursable meal.
- Calorie minimum and maximum levels based on age/grade groups.
- Sodium limits.
- Limit on saturated fat, elimination of trans fat.

Piedmont City Schools operates OVS for all grades, PK-12th. Under OVS, students must select three meal components to ensure they get the nutritional benefits of a meal. OVS is not required for meals offered as part of field trips or for any other meals served away from the school campus.

Schools must offer all five food components in at least the minimum required quantities:

- A **food component** is one of five required food groups in reimbursable lunches. These are meats/meat alternates, grains, fruits, vegetables, and fluid milk*. *Water does not count as one of the three required food components and cannot be served as a substitute for milk.
- A **food item** is a specific food offered within the five food components. For example, spaghetti (whole grain-rich pasta with tomato sauce) is one food item that contains a grain and a vegetable component.

The required five food components must be offered for school lunch. Students must select at least three of the five required food components, including at least ½ cup of fruit and/or vegetable, to have a reimbursable lunch. See the *Required Food Components* table for a listing of required food components and their minimum quantities that must be offered. Meats/meat alternates and grains are measured in ounce equivalents (oz eq is considered the amount of food product that is equal to 1 ounce).

| Required Food Components | | | | |
|--------------------------|---|---------|---------|---------|
| Required Food Component | Daily Minimum Requirements for Each Grade Level | | | |
| | K-5 | 6-8 | K-8 | 9-12 |
| Vegetables | ¾ cup | ¾ cup | ¾ cup | 1 cup |
| Fruits | ½ cup | ½ cup | ½ cup | 1 cup |
| Grains | 1 oz eq | 1 oz eq | 1 oz eq | 2 oz eq |
| Meats/Meat Alternates | 1 oz eq | 1 oz eq | 1 oz eq | 2 oz eq |
| Fluid Milk* | 1 cup | 1 cup | 1 cup | 1 cup |

Students are charged based on their meal eligibility status.

Adults and visitors are welcome to participate in the lunch program and will be charged based on the most recent meal price schedule, as approved by the Piedmont City Board of Education. Adults must pre-pay or pay onsite at the time of service. Charging is not allowed for adult meals.

HOUSEHOLD SCHOOL MEAL APPLICATION PROCEDURE

Regardless of prior school year meal status, each year, parents and/or guardians must complete the necessary household school meal application to apply for free or reduced-price meals unless a person in the household meets the criteria for categorical eligibility. Failure to submit a new school year application by the beginning of year 30-Day grace period could result in loss of free or reduced priced meal status. When a household submits a household school meal application, all the students in the household are included in that school meal application. It is not required that parents or guardians complete a household school meal application or a separate household school meal application for each student or by eligibility category.

Household School Meal Application Distribution

Household school meal applications are provided to every student. Household school meal applications and letters may be distributed by mail, email, or sent home with students. Meal applications may be completed and submitted online or by paper.

Required Applicant Income Information

For households that apply for free or reduced-price meals based on household income, the household must provide the following information in order for the SFA to determine eligibility:

1. Names of all household members.
2. Amount, frequency, and source of current income for each household member reported in whole dollars.
3. Last 4 digits of the Social Security number of the adult household member who signs the household school meal application or another adult member of the household or an indication that no adult household member has a social security number.
4. Signature of an adult household member attesting that the information provided is correct.

Unpaid Meal Charges

The Alabama State Department of Education Child Nutrition Programs Division has provided guidance for unpaid meals. Piedmont City Schools' policies and procedures are developed in accordance with this guidance, along with pertinent state and federal regulations.

As communicated to parents, guardians, and children in our school system through the annual Student-Parent Handbook, Uncollected cafeteria charges constitute a bad debt and are not allowed. Extra servings and à la carte purchases are not allowed when a meal account has a negative balance. The parent/guardian of any student who purchases foods and beverages from the Child Nutrition Program is required to provide funds through the meal account and is responsible for resolving all negative balances immediately.

All parents in the school system are encouraged to create a user account in our online payment system. Within the online payment system, parents have the option to create low balance notifications in order to resolve low balance issues before a student's account reaches a negative balance. Parents can set low balance notification thresholds based on personal preference.

Parents may provide their own child with breakfast, lunch or snacks.

BAD DEBT

The Child Nutrition Program will not incur a bad debt as a result of an uncollectible worthless check or unpaid meal charges. In the event worthless checks or unpaid meal charges are presented to the Child Nutrition Program are uncollectible, the individual schools will be responsible for the reimbursement.

At the end of each school year, all unpaid meal charges will be reconciled by the individual schools to close out any bad debt expenses incurred. Evidence is to be maintained at the school level demonstrating efforts made attempting to collect unpaid meal charges throughout the school year, results of those efforts whether successful or unsuccessful, financial documentation showing when the unpaid meal charges became an operating loss, and documentation of nonfederal funds being used to close out bad debt for the Child Nutrition Program.

SACK LUNCHES

PROCEDURE FOR ORDERING SACK LUNCHES:

We receive many requests for sack meals to be prepared for field trips and special activity days at school. Students are charged meals based on their eligibility status. Proper record keeping is required for sack meals as with any other type of meal service. Documentation required includes accurate meal counts taken at the point of service and food production records.

The main objective is to ensure that each student served receives a high quality, safe, reimbursable sack meal. The need for continued safe food handling practices after the meals leave the food service area of operation must be emphasized.

Two Weeks in Advance

Teacher in charge will communicate with the cafeteria manager from the cafeteria that will be providing the meals two weeks in advance. The manager will determine how many meals are needed and document how many students will be off campus this day to avoid food waste. This request should be submitted two weeks prior to event to guarantee availability of menu items requested.

Day of Field Trip

Sack meals will be available for pick up the morning of the field trip. Sack lunches will be packed in coolers. The coolers are to be returned to the cafeteria upon return to school.

Morning of the Request

The teacher responsible for the field trip will come to the cafeteria with the children needing meals and pick up sack meals. Those students will then be charged for their meals.

SPECIAL DIETS

CHILDREN WITH SPECIAL DIETARY NEEDS

In recent years, we have seen increasing emphasis on the importance of ensuring children with disabilities have the same opportunities as other children to receive an education and education related benefits, such as school meals.

Congress first addressed this concern in The Rehabilitation Act of 1973, which prohibits discrimination against qualified persons with disabilities in the programs or activities of any agency of the Federal Government's Executive Branch or any organization receiving Federal financial assistance.

Subsequently, Congress passed the Education of the Handicapped Act (now, the Individuals with Disabilities Education Act), which requires a free and appropriate public education be provided for children (ages 3 through 21) with disabilities, and the Americans with Disabilities Act, a comprehensive law that broadens and extends civil rights protections for Americans with disabilities.

One effect of these laws has been an increase in the number of children with disabilities who are being educated in regular school programs. In some cases, the disability may prevent the child from eating meals prepared for the general school population.

The U.S. Department of Agriculture's (USDA) nondiscrimination regulation, as well as the regulations governing the National School Lunch Program (NSLP) and School Breakfast Program (SBP), make it clear that substitutions to the regular meal must be made for children who are unable to eat school meals because of their disabilities when that need is certified by a licensed physician.

In most cases, children with a special diet request can be accommodated with offer vs serve. The nature of the child's disability, the reason the disability prevents the child from eating the regular school meal and the specific substitutions needed must be specified in a statement signed by a licensed physician.

PROVIDING SPECIAL MEALS TO CHILDREN WITH DISABILITIES

Prior to making any diet substitutions or diet changes for any child with a disability, school officials **must** ensure that the following two steps are completed:

The parent/guardian must obtain a statement from the child's physician and provide it to school officials. The statement must state the following:

- The child's disability

- An explanation of why the disability restricts the child's diet
- The major life activity affected by the disability; and
- The food or foods to be omitted from the child's diet and the food or choice of foods that must be substituted.

Evaluate the physician's statement to see if it includes the required information above and meets Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA).

SERVING THE SPECIAL DIETARY NEEDS OF CHILDREN WITHOUT DISABILITIES

Children without disabilities but with special dietary needs (such as lactose intolerance, allergies, cultural dietary restrictions) requiring food substitutions or modifications, will be approved on a case by case basis.

The Child Nutrition Program, in conjunction with the school nurse, will decide these situations on a case by case basis. Documentation with accompanying information must be provided by a recognized medical authority.

FLUID MILK GUIDELINE

Upon request, lactose free milk will be available to a student with a disability (504) when a licensed physician submits a statement that the substitution is necessary due to a disability.

PROCEDURE FOR REQUESTING SPECIAL DIET MODIFICATIONS

- Parents of children requiring special diet modifications, will submit a medical statement to the campus nurse's office.
- The campus nurse will forward signed medical form to the Child Nutrition Program office.
- CNP staff shall make food substitutions or accommodations for students with those disabilities as outlines in the medical order form.
- Substitutions for students with disabilities shall be based on a prescription written by a licensed physician.
- Under no circumstances is school CNP staff to revise or change a diet prescription or medical order.
- The CNP manager shall ensure that children with Special Dietary Needs are served the appropriate diet.
- When uncertainty arises or the diet cannot be located, the manager shall notify the Child Nutrition Director and the school nurse so that a diet plan may be formulated.
- If the parents or students cannot provide CNP with a current physician statement, a special diet shall not be provided.

- In accordance with USDA's regulations for substitutions or modifications in school meals for children whose disabilities restrict their diet, all diets orders must be updated every year.
- This documentation is required to justify that the modified meal is "reimbursable", as defined by federal guidelines, and to ensure any meal modifications meet nutrition standards that are medically appropriate for the student.

OTHER OPERATIONAL ISSUES

EQUAL ACCESS FOR ALL STUDENTS

When planning for special functions, parties, field trips, etc. The Child Nutrition Program should be involved in the process to ensure that students are not denied meals and that meals claimed for reimbursement meet requirements. For instance, when field trips are planned, the Child Nutrition Program can provide sack lunches for those students that request one. By allowing all students to request a lunch if desired, overt identification by income status is prevented. All cafeterias must have available Justice for All Posters.

DENIAL OF MEALS AS A DISCIPLINARY ACTION

USDA policy prohibits the denial of meals as a disciplinary action against any student who is enrolled in a school participating in the Food and Nutrition program. Disciplinary action which indirectly results in the loss of meals is allowable (e.g., a student is suspended from school). When the withholding of meals is the disciplinary action or if the disciplinary action directly results in the loss of meals (e.g. lunch detention), it is inconsistent with the law and is not allowable. Teachers must be trained that students must be allowed access to all meal items offered regardless of behavior or conduct. Students in ISS eating in a different location or during a different time as the rest of the student population, may receive an alternate menu meeting all Federal meal requirements but may not be denied meals.

USDA Nondiscrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, American Sign Language, etc.), should contact

the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture

Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov.

REGULATIONS REGARDING DISCIPLINARY ACTION

When considering a disciplinary action against any student, school officials must ensure that such action is consistent with the above policy and must make a reimbursable meal available to any child attending school who, for disciplinary reasons, is not allowed to eat in the cafeteria.

OFFER VERSUS SERVE IN DISCIPLINARY SITUATIONS

If the meal is prepackaged, the offer versus serve provision does not apply. However, students must be allowed to choose from a selection of either flavored or unflavored milk.

ADEQUATE MEAL SERVICE PERIODS

USDA encourages schools to make every effort to establish meal periods that are long enough for children to fully consume their meals and to provide an environment conducive to eating those meals. It is important, both nutritionally and socially, to give children sufficient time, a conducive atmosphere, and a safe environment to eat nutritious meals. At a minimum students must be given 10 minutes after meal service to consume breakfast and 20 minutes after meal service to consume lunch.

MEAL TIMES FOR BREAKFAST AND LUNCH

Regular times specified in regulations for the NSLP have been identified as 10 a.m. to 2 p.m. Breakfast hours would be identified as meal service prior to 10 a.m. in most circumstances. Campuses are encouraged to allow students to eat breakfast when they are late arriving at school. However, this is not a requirement.

EQUIPMENT USE

Equipment used for the Child Nutrition Programs shall be used by the SFA in the program(s) that it was acquired for as long as needed. When equipment is no longer needed for the program, the equipment may be used in other USDA programs, provided the use will not interfere with the work/program for which the equipment was originally acquired. First preference shall be given to other USDA programs for use. If acquiring replacement equipment, the SFA may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property.

SECOND SERVINGS OR MEALS TO STUDENTS

Federal regulations governing the National School Lunch and Breakfast Programs prohibit the reimbursement for second meals. The regulation states that production and participation records must be planned with the objective of providing one reimbursable breakfast and lunch per child per day. Therefore, all students may purchase a second tray at the full price or purchase second servings at the a la carte prices.

LEFTOVER FOOD

Employees, students, school personnel, and parents shall not consume leftover prepared food from another person's tray. Consumption is prohibited to prevent spread of infection or disease through served leftover food from one person to another.

ADULT MEAL PRICING

Federal commodities and federal reimbursement funds are designated to provide meals for students only. The federal government sets reimbursement rates for student meals only. It does not provide funds or USDA Food Commodities for adult meals. Therefore, we must charge adults in order not to compromise food and nutrition program funds.

WELLNESS PLAN

Our Comprehensive Wellness Plan consists of three major areas focusing on nutrition, physical fitness/health, and health services and is posted on our website under the documents section of the Child Nutrition Department.

FINANCIAL OPERATIONS

Cash Management for Federal Funds

The Chief School Financial Officer will maintain financial records that account for the receipt, obligation, and expenditure of each federal program fund. Cash balances for each federal program fund and for the aggregate of all federal program funds will be monitored by the Chief School Financial Officer or designee.

Determination of Allowable Costs

Before instituting a financial transaction that will require the expenditure of federal funds the federal program director and the Chief School Financial Officer or designee will determine that the proposed transaction meets the requirements for allowable costs for the federal program. Actions to determine allowable costs will assure that:

- The proposed expenditure is reasonable and necessary for the federal program;
- The proposed expenditure is consistent with procedures for financial transactions of the board including:
 - o Purchase order approval procedures; o Contract
 - review and approval procedures; o Applicable
 - competitive purchasing procedures and; o

Documentation supports allowability of transaction.

Before payments are made from federal funds the federal program director and the Chief School Financial Officer or designee will determine that the federal program expenditure complies with generally accepted accounting principles and complies with state, local, and federal laws, rules, and regulations.

Travel Policy

Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by board employees who are in travel status on official business of the board. The

board's travel policy provides for reimbursement and payment for travel costs of employees paid from federal funds that is consistent with the travel costs for board employees paid from state or local funds.

Conflict of Interest Policy

Generally, a conflict of interest exists when a board member, board employee, or agent of the board participates in a matter that is likely to have a direct effect on his or her personal and financial interests. A financial interest may include, but is not limited to, stock ownership, partnership, trustee relationship, employment, potential employment, or a business relationship with an applicant, vendor, or entity. A board member, board employee, or agent of the board may not participate in his or her official capacity in a matter that is likely to have direct and predictable effects on his or her financial interests.

A board member, board employee, or agent of the board will abide by the federal and state laws and regulations that address conflict of interest standards. In general, the federal rules provide that:

No employee, officer, or agent of the board shall participate in selection, or in the award or administration of a contract supported by federal funds if he or she has a real or apparent conflict of interest. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs, or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from the firm considered for a contract. The board's officers, employees, or agents will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to subcontracts.

The board's conflict of interest policies include adherence to the Alabama Ethics Law, which defines conflict of interest as:

A conflict on the part of a public official or public employee between his or her private interests and the official responsibilities inherent in an office of public trust. A conflict of interest involves any action, inaction, or decision by a public official or public employee in the discharge of his or her official duties which would materially affect his or her financial interest or those of his or her family members or any business with which the person is associated in a manner different from the manner it affects the other members of the class to which he or she belongs.

A board member, board employee, or agent of the board may not review applications, proposals, or participate in the evaluation or selection process where his or her participation in the review process would create the appearance that he or she is: (a) giving preferential

treatment; (b) losing independence and impartiality; (c) making decisions outside official and appropriate channels; or (d) harming the public's confidence in the integrity of the board.

Situations and circumstances presenting an actual conflict of interest or the appearance of a conflict of interest should be brought to the immediate attention of the superintendent. A board employee, board member, or agent of the board who has knowledge of a possible conflict of interest should identify the conflict and notify the superintendent. The superintendent will document his or her actions related to the reported conflict of interest. Resolution can consist of disqualification, recusal, waiver, or other appropriate measures. Appropriate measures may include reporting a conflict of interest to the State Ethics Commission, the Alabama State Board of Education, or the appropriate federal agency.

Procurement Policy

The board will follow state laws for the procurement of property and services. The primary state procurement laws for Alabama school boards are:

- Alabama Competitive Bid Laws (*Chapter 13B of Title 16, Code of Alabama 1975*);
- Joint Information Technology Purchasing Agreement (*Chapter 13B of Title 16, Code of Alabama 1975*); and,
- Public Works Law (*Title 39, Code of Alabama 1975*).

To the extent allowed by state laws, the board will utilize state, local, regional, and national purchasing agreements where appropriate for the procurement or use of goods and services. All procurement transactions are subject to the board's Conflict of Interest Policy and the procurement decisions of the board will:

- Avoid acquisition of unnecessary or duplicative goods and services;
- Use the most economical and efficient approach for acquisitions;
- Award acquisition contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of the proposed procurement;
- Consider contractor integrity, compliance with public policy, record of past performance, and financial and technical resources prior to awarding procurement contracts;
- Maintain records sufficient to document the history of the procurement; and,
- Conduct procurement transactions in a manner that provides full and open competition.

Procurement transactions for federal programs and child nutrition programs that are not subject to the state procurement laws, but exceed the aggregate amount of the federal micro-purchase threshold, will be obtained by utilizing price or rate quotes from two or more qualified sources. State procurement laws include requirements that comply with the other Uniform Administrative Requirements for procurement of property and services.

The board will request proposals for those professional service contracts (excluding architectural and engineering services) that are exempt under state procurement laws if the contracts exceed \$150,000 and will be paid from federal or child nutrition program funds. The board will utilize a team of three or more qualified individuals to conduct a technical evaluation of proposals received and for selecting recipients. As a part of the evaluation, the individuals on the evaluation team will sign an assurance that each of the individuals is in compliance with the board's conflict of interest policy.