



Date: October 13, 2022
To: Board of Directors
From: Ann Danforth, General Counsel
Subject: Amendment to Conflict of Interest Code (Policy 1035)

Recommendation and Rationale:

Adopt Resolution No. 2022-24 Adopting a new Appendix A to Policy 1000, to comply with State Law requirement to biennially review and update as necessary the District's list of officials required to disclose their financial interests.

Background:

The Political Reform Act (Government Code §§ 81000, et seq., the "Act") requires state and local government agencies to adopt conflict of interest codes. The Fair Political Practices Commission ("FPPC") has published a model Conflict of Interest Code at 2 California Code of Regulations § 18730 that public agencies can incorporate into their codes by reference. The Act further requires that each agency add to their individual codes a current list of positions that must file financial disclosures. The agency must review this list at least every two years and update it as needed.

The full text of Section 18730, together with any amendment thereto, may be found at:

<https://www.fppc.ca.gov/the-law/fppc-regulations/regulations-index.html> .

The District adopted its current Conflict of Interest Code on December 12, 2019, as part of Policy 1000. Policy 1035 adopts the FPPC's model code. On December 10, 2020, the Board adopted a new Appendix A, updating the list of required filers.

Discussion and Analysis:

Since 2020, the District's organization has experienced the following changes that affect the positions named in the current List of Required Filers:

1. In 2021, the Board eliminated the Finance Committee
2. The District recently changed the name of the "Business and Finance Manager" position to "Finance Director."

The attached draft Resolution would update the Appendix A to reflect these changes

Fiscal Impact:

None.

Exhibits:

- Draft Resolution No. 2022-24