



# COUNTY OF SAN DIEGO

## AGENDA ITEM

### BOARD OF SUPERVISORS

NORA VARGAS  
First District

JOEL ANDERSON  
Second District

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Third District

MONICA MONTGOMERY STEPPE  
Fourth District

JIM DESMOND  
Fifth District

**DATE:** October 22, 2024

# 18

**TO:** Board of Supervisors

### SUBJECT

**BIENNIAL REVIEW OF CONFLICT OF INTEREST CODES – APPROVAL OF SECOND BATCH OF CONFLICT OF INTEREST CODE AMENDMENTS RECEIVED THROUGH OCTOBER 1, 2024: VARIOUS AGENCIES (DISTRICTS: ALL)**

### OVERVIEW

The Board of Supervisors (Board) serves as the Code Reviewing Body for any local agency, other than cities, with jurisdiction wholly within the County, pursuant to Government Code Section 82011. Pursuant to Government Code Section 87306.5, the Clerk of the Board of Supervisors coordinated, on behalf of the Board, the Biennial Review of Conflict of Interest Codes for all County departments and local agencies. The recommended action would approve the proposed amendments to the Conflict of Interest codes as received through October 1, 2024 from the listed agencies as part of the Biennial Review of Conflict of Interest Codes.

### RECOMMENDATION

#### CHIEF ADMINISTRATIVE OFFICER

Approve the amended Conflict of Interest Codes adopted by the following agencies (Attachment A):

- Buena Sanitation District
- Coronado Unified School District
- Escondido Union High School District
- Fallbrook Public Utility District
- Gompers Preparatory Academy
- Grossmont Healthcare District
- Helix Water District
- Julian Union High School District
- Lakeside Union School District
- Metropolitan Transit System
- Pacific View Charter School
- Ramona Municipal Water District
- San Diego Association of Governments (SANDAG)
- San Diego County Water Authority
- Santa Fe Irrigation District
- The Classical Academy

**SUBJECT:** BIENNIAL REVIEW OF CONFLICT OF INTEREST CODES – APPROVAL OF SECOND BATCH OF CONFLICT OF INTEREST CODE AMENDMENTS RECEIVED THROUGH OCTOBER 1, 2024: VARIOUS AGENCIES (DISTRICTS:ALL)

**EQUITY IMPACT STATEMENT**

Boards, commissions and committees provide an inter-relationship between the residents and local public agencies within the County and as such must provide transparent, bias-free decision-making. The Board of Supervisors serves as the Code Reviewing Body for any local agency, other than cities, with jurisdiction wholly within the County, pursuant to Government Code Section 82011. Under the California Political Reform Act, a public official has a disqualifying conflict of interest in a governmental decision if it is foreseeable that the decision will have a financial impact on their personal finances or other financial interests. In such cases, there is a risk of biased decision-making that could sacrifice the public’s interest in favor of the official’s private financial interests. To avoid actual bias or the appearance of possible improprieties, the public official is prohibited from participating in the decision.

The recommended action would approve the amended Conflict of Interest codes. The Conflict of Interest codes in this Board Letter enables the County of San Diego to provide transparency and accountability to all individual residents, ensuring equitable operations of the government that are free from undue influence.

**SUSTAINABILITY IMPACT STATEMENT**

Under the Political Reform Act, all public agencies are required to adopt a Conflict of Interest code that designates positions that are required to file the Statement of Economic Interests (Form 700). Conflict of Interest codes must be maintained as updated and accurate to ensure that necessary public officials report their personal financial interests. These required filings provide public transparency about possible conflicts of interest and to ensure governmental decisions are made in the best interest of the public. This Board Letter supports the County of San Diego’s sustainability goal of, “Engaging the community to partner and participate in decisions that impact their lives and communities and transparently share results of outcomes.”

**FISCAL IMPACT**

There is no fiscal impact associated with this recommendation. There will be no change in General Fund cost and no additional staff years.

**BUSINESS IMPACT STATEMENT**

N/A

**ADVISORY BOARD STATEMENT**

N/A

**BACKGROUND**

The Board of Supervisors (Board) serves as the Code Reviewing Board for all County departments and some local agencies. Pursuant to Government Code Section 87306.5, the Clerk of the Board coordinated, on behalf of the Board of Supervisors, the Biennial Review of Conflict of Interest Codes for all County departments and local agencies.

**SUBJECT:** BIENNIAL REVIEW OF CONFLICT OF INTEREST CODES – APPROVAL OF SECOND BATCH OF CONFLICT OF INTEREST CODE AMENDMENTS RECEIVED THROUGH OCTOBER 1, 2024: VARIOUS AGENCIES (DISTRICTS:ALL)

County departments and local agencies were required to review their Conflict of Interest Codes, including designated employees and disclosure categories. These departments and agencies were required to complete the Biennial Review Reply Form indicating if any amendments were necessary and return it to the Clerk of the Board by October 1, 2024. If amendments were required, the department/agency was to submit the necessary amendment documentation to the Clerk of the Board by October 18, 2024.

The recommendation above involves 16 agencies that indicated amendments were required to their Codes, such as the addition of new designated positions, changes to the reportable sources of income, investments, business position or real property, changes or additional provisions required by Section 87302, or adoption of the standard Conflict of Interest Code.

**LINKAGE TO THE COUNTY OF SAN DIEGO STRATEGIC PLAN**

Today’s proposed action to approve the Conflict of Interest Code supports the Transparency and Accountability Strategic Initiative in the County of San Diego’s 2024-2029 Strategic Plan by promoting a culture of ethical leadership and decision making across the enterprise.

Respectfully submitted,



EBONY SHELTON  
Chief Administrative Officer

**ATTACHMENT(S)**

- Attachment A: Conflict of Interest Codes – Updated Versions
- Attachment B: Conflict of Interest Codes – Supporting Documents