## CONFLICT OF INTEREST CODE FOR THE

## **KIPP Bay Area Schools**

The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 Cal. Code of Regs. Section 18730) which contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing it may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendices designating officials and employees and establishing disclosure categories shall constitute the conflict of interest code of the KIPP Bay Area Schools.

Individuals holding designated positions shall file their statements of economic interest with KIPP Bay Area Schools, which will make the statements available for public inspection and reproduction. (Gov. Code Section 81008.) All statements will be retained by KIPP Bay Area Schools.

# APPENDIX "A"

## **DESIGNATED PERSONS**

Designated Positions	Disclosure Category
Members of the Board of Directors	1, 4
Chief Executive Officer	1, 2
Chief of Schools	1, 2
Chief People Officer	1, 2
Chief of Growth, Real Estate, Advocacy and Community Engagement Officer	1, 2
Chief External Affairs and Communications Officer	1, 2
Chief Operating Officer	1, 2
Director of Finance	2
Director of Technology	3
Director of Special Education	3
Director of School Operations	3
School Leaders	3
Consultant/New Position	*

\*The CEO may determine in writing that a particular consultant or new position, although a "designated position", is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements above. Such written determination shall include a description of the consultant's or new

position's duties and, based upon that description, a statement of the extent of disclosure

requirements. The CEO's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interestcode.

# PUBLIC OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

The following positions are NOT covered by the conflict-of-interest code because they must file under Government Code Section 87200 and, therefore, are listed for informational purposes only:

Members of the Finance Committee

Chief Financial Officer (CFO)

Consultants that Manage Public Investments

An individual holding one of the above listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations they believe that their position has been categorized incorrectly. The Fair Politica Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

#### **APPENDIX "B"**

### **DISCLOSURE**

### **CATEGORIES**

Category 1. Designated positions assigned to this category must report:

Interests in real property of the type and legal designation that can be utilized for public school use within the jurisdiction.

Category 2. Designated positions assigned to this category must report:

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) from sources of the type that are contractors engaged in the performance of work, training, consulting or services, or are sources that manufacture or sell supplies, instructional materials, machinery, equipment, or vehicles ofthe type utilized by KIPP Bay Area Schools.

Category 3. Designated positions assigned to this category must report:

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) from sources of the type that are contractors engaged in the performance of work, training, consulting or services, or are sources that manufacture or sell supplies, instructional materials, machinery, equipment, or vehicles ofthe type utilized by the designated position's department.

Category 4. Designated positions assigned to this category must report:

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) from sources of the type that provide financial accounting auditing services.

This is the last page of the conflict of interest code for the KIPP Bay Area Schools



# **CERTIFICATION OF FPPC APPROVAL**

Pursuant to Government (	Code Section 8	7303, the	conflict of interest	code for th	ne KIPP	Bay	Area
Schools was approved on	100/15	2021	This and will have		4:		

11/14 2021

John M. Feser, Jr.

Senior Commission Counsel

Fair Political Practices Commission