Conflict of Interest Code for:

San Diego Association of Governments (SANDAG)

COUNTY OF SAN DIEGO
2016 JAN 26 PM 1:05
CLERK OF THE BOARD
OF SUPERVISORS

SANDAG

CONFLICT OF INTEREST CODE

The Political Reform Act, Government Code Sections 81000, et seq., requires SANDAG to adopt and promulgate a Conflict of Interest Code. The Fair Political Practices Commission has adopted a regulation, 2 Cal. Code of Regs. Section 18730, which contains the terms of a standard model Conflict of Interest Code, which can be incorporated by reference, and which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings. Therefore, the terms of 2 Cal. Code of Regs. Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission along with the attached Appendices in which officials, consultants and employees are designated and disclosure categories are set forth, are hereby incorporated by reference and constitute the Conflict of Interest Code of SANDAG.

The persons holding positions listed in the Appendix are designated employees, consultants, or officials. It has been determined that these persons make or participate in the making of decisions that may foreseeably have a material effect on financial interests. Designated persons shall file statements of economic interests with SANDAG when assuming or leaving their position and annually while holding the position. SANDAG will make the statements available for public inspection and reproduction (Gov. Code Section 81008). Statements for all designated employees will be retained by SANDAG and provided to the Code Reviewing Body, the County of San Diego.

Approved and/or authorized by the
Board of Supervisors of the County of San Diego.
Meeting Date: 3/15/16 Minute Order No. 11
By: D. Lopez Date: 3/18/16
Deputy Clerk of the Board Supervisors

APPENDIX A

Table 1

Designated Positions	Disclosure Categories (see Appendix B)
Members and alternate members of the Board of Directors	1, 2, 4
Members and alternate members of the Policy Advisory Committees	1, 2, 4
Members and alternate members of committees or working groups making decisions influencing expenditure of public funds	1, 2, 4
Accountant (I, II, Associate, Staff, Senior)	3, 4
Accounting Analyst	3, 4
Administrative Analyst (Associate, Senior)	3, 4
Administrative Office Specialist III	3, 4
Borders Program Manager	3, 4
Budget Program Manager	2, 4
Business Development Manager	3, 4
Business Services Manager and Supervisor	2, 4
Capital Development Project Manager	1, 3, 4
Chief Deputy Executive Director	1, 2, 4
Chief Economist	2, 4
Chief Technology Officer	3, 4
Contracts and Procurement Analyst (I, II, Associate, Senior)	1, 2, 4
Contracts Engineer (Associate, Senior)	1, 2, 4
Counsel (Associate, Deputy, Senior, Special)	1, 2, 4
Creative Services Manager	3, 4
Customer Services Manager	3, 4
Customer Services Representative III	3, 4
Database Administrator	3, 4
Department Director	1, 2, 4
Division Directors (Communications, Criminal Justice Research, Engineering & Construction, Public Safety, Rail Operations)	1, 2, 4

Designated Positions	Disclosure Categories (see Appendix B)
Economic Research Analyst (I, II, Associate, Senior, Principal)	3, 4
Engineer (Assistant I, Assistant II, Associate, Senior, Principal)	1, 3, 4
Executive Assistant/Clerk of the Board	1, 2, 4
Executive Director	1, 2, 4
Facilities and Operations Coordinator	3, 4
Finance Manager	1, 2, 4
Financial Analyst (I, II, Associate, Senior)	3, 4
Financial Programming Manager	1, 2, 4
Goods Movement Policy Manager	1, 3, 4
Human Resources Analyst (I, II, Associate, Senior)	3, 4
Information Systems Administrator	3, 4
Information Systems Engineer	3, 4
Information Systems Manager	3, 4
Information Systems Analyst (I, II, Associate, Senior)	3, 4
Information Systems Specialist (I, II, III)	3, 4
Landscaping Supervisor	3, 4
Legislative Analyst (I, II, Associate, Senior, Principal)	1, 2, 4
Maintenance and Facilities Supervisor	3, 4
Maintenance Field Technician (Senior)	3, 4
Manager of Contracts and Procurement	1, 2, 4
Manager of Financial Planning and Project Control	1, 2, 4
Manager of Human Resources	3, 4
Manager of Small Business Development	2, 4
Marketing Analyst (I, II, Associate, Senior)	3, 4
Marketing Specialist	3, 4
Marketing Communications Manager	3, 4
Network Administrator	3, 4

Designated Positions	Disclosure Categories (see Appendix B)
Office Administrator	3, 4
Office Services Specialist II and III	3, 4
Paralegal	1, 2, 4
Principal Management Internal Auditor	1, 2, 4
Programmer Analyst (I, II, Associate, Senior)	3, 4
Project Control Manager	1, 2, 4
Project Coordinator	3, 4
Project Development Program Manager	1, 2, 4
Public Information Officer (I, II, Associate, Senior)	3, 4
Quality Assurance Engineer (Senior)	3, 4
Regional Economist (I,II, Associate, Senior, Principal)	3, 4
Regional Planner (Assistant I, Assistant II, Associate, Senior, Principal)	1, 3, 4
Research Analyst (I, II, Associate, Senior, Principal)	3, 4
Roadway Operations Manager	3, 4
Senior Management Internal Auditor	1, 2, 4
Systems Engineer (I, II, Associate Senior)	3, 4
Technology Program Analyst (I, II, Associate, Senior, Principal)	3, 4
Toll Operations Supervisor	3, 4
Transportation Modeler (I, II, Associate, Senior, Principal)	3, 4

Pursuant to California Government Code section 82019, SANDAG consultants who pursuant to a contract with SANDAG, perform the same functions that would otherwise be performed by the persons designated in Table 1 of this document; who manage public investments; who grant agency approval to a contract or to the specifications for such a contract; or who decide whether the policies, standards, or guidelines for SANDAG have been met, also are required to fill out and submit a disclosure of financial interests. Those consultants are required to report in accordance with the disclosure categories shown in Table 2. Consultants will be designated and informed of their obligation to file disclosures whenever any person who, in the opinion of SANDAG, may reasonably be expected to make, participate in making, or in any way attempt to use his/her position as a "consultant" to influence a governmental decision in which the person might reasonably be expected to have a financial interest or perform services that entail the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest.

Table 2

Type of Consultant	Designated Position Title	Disclosure Categories (see Appendix B)
Bond Counsel	Consultant	2, 4
Disclosure Counsel	Consultant	2, 4
Lobbying	Consultant	1, 2, 4
Project Oversight	Consultant	1, 2, 4
Disadvantaged Business Enterprise Advisor	Consultant	2, 4
Labor Compliance Advisor	Consultant	2, 4

Public Officials Who Manage Public Investments

The following positions also are listed below because the individuals holding these positions must file under Government Code Section 87200 as they are involved in the investment of public funds. These positions are listed here for informational purposes only:

Table 3

Public Official Description
Members and alternate members of the Board of Directors
Members and alternate members of the Policy Advisory Committees
Members and alternate members of committees or working groups making decisions influencing expenditure of public funds
Executive Director
Chief Deputy Executive Director
Director of Finance
General Counsel
Public Financial Management, Project Managers

APPENDIX B

When a designated person is required to disclose investment and sources of income, he or she need to disclose investments in business entities and sources of income that do business in SANDAG's jurisdiction, plan to do business in the jurisdiction, or have done business in the jurisdiction in the past two years. In addition to other activities, a business entity is doing business within the jurisdiction if it owns real property within the jurisdiction. Persons designated in Appendix A shall disclose their financial interests pursuant to the appropriate disclosure categories described in the table below.

Table 4

Disclosure Category	Description
1	Interests in real property located within the jurisdiction or within two miles of the boundaries of the jurisdiction or within two miles of any land owned or used by SANDAG.
2	Investments and business positions in business entities, and income, including loans, gifts,* and travel payments, from sources that provide services, supplies, materials, machinery, or equipment of the type utilized by SANDAG.
3	Investments and business positions in business entities, and income, including loans, gifts,* and travel payments, from sources that provide services, supplies, materials, machinery, or equipment of the type utilized by the department or division to which the filer is assigned duties.
4	Investments and business positions in business entities, and income, including loans, gifts,* and travel payments, from sources that have filed a claim against SANDAG in the previous two years, or have a claim pending.

* Gifts with a value of less than $50 aggregate per year are not reportable financial interests at SANDAG

Amended January 2010
Amended March 2012
Amended December 2013
Amended March 2015
Amended January 2016