

July 15, 2010

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**Board of Trustees**

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Honorable Kevin A. Enright  
Presiding Judge of the Superior Court  
220 W. Broadway  
San Diego, CA 92101

**Superintendent**

Timothy Baird, Ed.D.

Re: Review and Comments on San Diego County Grand Jury 2009-10 Report  
"Ethics in Government—Code of Ethics, Internal Controls, Fraud Hotlines"

Dear Judge Enright:

**Assistant  
Superintendents**

David Miyashiro, Ed.D.  
Educational Services

Daniel Grider, Ed.D.  
Administrative Services

Abdollah Saadat  
Business Services

We have reviewed the Facts, Findings and Recommendations in "Ethics in Government—Code of Ethics, Internal Controls, Fraud Hotlines" from the San Diego County Grand Jury 2009-10, Final Report. We agree with the overall findings of the Grand Jury, and agree that strong Codes of Ethics, robust internal controls and the effective use of fraud hotlines are important components for the ethical operation of governmental entities.

In the Final Report, Fact Set Four the two Findings (pp. 135-136) are most applicable to the Encinitas Union School District:

Finding 12: Excepting the San Diego Unified School District, most school districts have a Code of Ethics for various subject matters such as sports, but most have neither internal auditors nor fraud hotlines outsourced to third party providers assuring anonymity.

Finding 16: The Grand Jury finds that most of the governmental organizations within San Diego County lack either an integrated comprehensive fraud, waste, abuse and conflict of interest Code of Ethics, a consistently applied internal controls process compliant with Generally Accepted Government Auditing Standards and/or Generally Accepted Accounting Principles, or a fraud, waste, abuse and conflict of interest hotline outsourced to a third party provider assuring anonymity.

Based upon the above mentioned Fact and Findings, The Encinitas Union School District provides responses to the Recommendations of the Grand Jury as evidenced below.

**Recommendation 10-73: Bring before the governing body of each entity listed above for its consideration in a public meeting a proposal to adopt integrated comprehensive Codes of Ethics defining and prohibiting fraud, waste, abuse and conflict of interest.**

The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation as follows.

The Encinitas Union School District has an existing integrated, comprehensive Code of Ethics that includes prohibitions against fraud, waste, abuse, and conflicts of interest.

Board Policy 2300 and Exhibits 4219.21 (2)4319.21 Code of Ethics (attached), adopted February 7, 1978 and most recently revised May 16, 2000 by the Encinitas Union School District (EUSD) "presents expectations and guidance to EUSD employees for maintaining the highest ethical standards in their official activities and relationships."

The Code of Ethics establishes the expectation that employees will perform their duties responsibly and conscientiously, with honesty and integrity, and that employees' conduct will be well above the minimum standards required by law. It prohibits the violation, or appearance of a violation, of "the laws and regulations governing the Board of Trustees of the Encinitas Union School District, the Encinitas Union school District, and the schools, programs, and operations of the EUSD." It describes and addresses ethical issues that may confront employees in the performance of their official duties.

The Code of Ethics is supported by EUSD administrative regulations or Board Policies, which present more specific requirements and procedures related to each of the topics addressed; these are cited in the Code of Ethics for reference.

The Code of Ethics requires that employees report to their immediate supervisor, the Human Resources Assistant Superintendent, or the District Superintendent any improper governmental activity on the part of EUSD or its employees. Education Code section 44112(c) defines "improper governmental activity" as follows:

- (1) The activity violates a state or federal law or regulation, including, but not limited to, corruption, malfeasance, bribery, theft of government property, fraudulent claims, fraud, coercion, conversion, malicious prosecution, misuse of government property, or willful omission to perform duty.
- (2) The activity is economically wasteful or involves gross misconduct, incompetency, or inefficiency.

### Fraud

In addition to the prohibition against fraud as an improper governmental activity under Education Code section 41122(c)(1), the Code of Ethics requires that employees adhere to strict standards and follow prescribed procedures for preventing fraud when managing and handling assets and funds under the control of EUSD. These procedures are specified in the *California School Accounting Manual*, as discussed under Recommendation 10-74 below. False records and communications of any kind, both internal and external, are prohibited.

### Waste

In addition to the prohibition against waste as an improper governmental activity under Education Code section 41122(c)(2), the Code of Ethics requires employees to use good judgment and receive good value when authorized to spend EUSD funds or when required to incur reimbursable personal expenses. Employees are required to ensure that EUSD funds and other assets are safeguarded and used responsibly.

### Abuse

In addition to the prohibition against misuse of government property as an improper governmental activity under Education Code section 41122(c)(1), the Code of Ethics addresses abuse by including the requirement that EUSD funds and all other assets, such as fleet vehicles, supplies, and equipment, be used only for official business and not for personal benefit. Also included is the requirement that employees follow state and federal laws and EUSD policies and administrative regulations related to the protection of confidential records, using such records only for legitimate business purposes. Employees are required to maintain the highest ethical standards in protecting intellectual property owned by EUSD, as well as to make clear distinctions between personal views and official statements on behalf of EUSD. The potential for abuse of employees' official positions that involves conflicts of interest is discussed below.

### Conflicts of Interest

The Code of Ethics addresses circumstances involving conflicts of interest as defined in the California Government Code.

Employees are prohibited from engaging in any employment, activity, or enterprise for compensation that is inconsistent, incompatible, or in conflict with their duties, functions, or responsibilities as employees of a local agency. Employees are required to make judgments that are free from the influence of personal considerations and are in the best interests of EUSD. Employees are prohibited from making, participating in making, or influencing any decision that may have a material financial effect on their personal financial interests. The Code of Ethics describes specific prohibited activities, such as entering into contracts on behalf of EUSD in which employees have a financial interest and the acceptance of kickbacks.

**Recommendation 10-74: Bring before the governing body of each entity listed above for its consideration in a public meeting a proposal to adopt and apply internal controls compliant with Generally Accepted Government Auditing Standards and/or Generally Accepted Accounting Principles as applicable.**

The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation as follows.

Encinitas Union School District is required to conduct annual independent audits of internal controls, among other financial issues.

California Education Code section 41020/84040 requires:

Not later than the first day of April of each fiscal year, schools and community college districts contract for an audit of their books and accounts. The same code sections require the County Superintendent provide an auditor for K-12 districts, or the Board of Governors for community college districts, that fail to contract with a firm by that date.

AB 2834 (Migden) amended Section 41020 of the Education Code, making it “unlawful for public accounting firm to provide audit services to a local education agency if the lead auditor partner, or coordinating audit partner... has performed audit services for that local education agency in each of the six pervious fiscal years.” Additionally, the local educational agency would be required to select the certified public accountants or licensed public accountants from a directory approved by the Controller, which is to be published no later than December 31<sup>st</sup> of each year. This directory of accountants can be accessed on the Controller’s web site at:

<http://www.sco.ca.gov/cpads/main/CPADSList.aspx>.

The Encinitas Union School District shall provide funds for an audit of all income and expenditures by source funds annually.

The Education Code also states in section 41020(b) (4) that “An audit conducted pursuant to this section shall comply fully with the Government Auditing Standards issued by the Comptroller General of the United States.” The Education Audit Appeals Panel for the State of California issues an Audit Guide, named the *Standards and Procedures for Audits of California*

K-12 Local Education Agencies: In the Audit Guide it states that one component of all audit reports is a “Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with *Government Auditing Standards*” (section 19815).

Specifically concerning fraud, the *Government Auditing Standards* incorporates the provisions of the Statement on Auditing Standards published by the Auditing Standards Board of the American Institute of Certified Public Accountants (AICPA). As illustrated in *Consideration of Fraud in a Financial Statement Audit – SAS No. 99* (AICPA), Statement on Auditing Standards No. 99 includes:

- Description and characteristics of fraud.
- The importance of exercising professional skepticism.
- Discussion among engagement personnel regarding the risks of material misstatement due to fraud.
- Obtaining the information needed to identify risks of material misstatement due to fraud.
- Identifying risks that may result in a material misstatement due to fraud.
- Assessing the identified risks after taking into account an evaluation of the entity's programs and controls.
- Responding to the results of the assessment.
- Evaluating audit evidence.
- Communicating about fraud to management, the audit committee, and others.
- Documenting the auditor's consideration of fraud.

Regarding auditors and their adherence to Generally Accepted Government Auditing Standards (GAGAS), the California State Controller publishes a list of approved auditors that Local Education Agencies may use, however the State Controller does not require certification of adherence to GAGAS for its auditor recommendations. That being said, the State Controller conducts periodic quality reviews of audit firms as required by California Education Code section 41020(f)(3)(B), and part of these quality reviews includes a check for auditor adherence to GAGAS as evidenced in auditing industry-required Peer Reviews of each auditing firm.

Additionally, California Education Code section 41010 requires that each school district shall operate its accounting system within the guidelines of the *California School Accounting Manual (CSAM)*. Direct communication with the California Department of Education confirmed that the *CSAM* compiles with GAAP, with minor exceptions typically due to the time lag involved in adopting new *CSAM* policies to reflect new GAAP requirements.

Finally, Encinitas Union School District performs periodic internal control audits as resources are allowed. Segregation of duties have been established and implemented to assure the internal controls within the District. In addition, the District is also subject to periodic audit of at least 10% of its Commercial Warrants. Periodic audits on payroll and retirement reporting are performed by San Diego County Office of Education, and State Retirement Systems or their agents.

**Recommendation 10-75: Bring before the governing body of each entity listed above for its consideration in a public meeting a proposal to adopt and implement fraud, waste, abuse and conflict of interest hotlines outsourced to third party providers, assuring anonymity.**

The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation as follows.

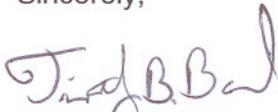
As noted in the third Fact of Fact Set Four (p.134), "The Encinitas Union School District utilizes the WeTip crime hotline."

WeTip is a toll-free, anonymous, third party 24-hour hotline that is being used to report fraud or crime. In the case of the Encinitas Union School District, anonymous tips are reported to the San Diego and/or Carlsbad Police Department, which then contacts the District to begin investigation of the complaint. This service is available through San Diego County of Education Risk Management Joint Powers Authority (JPA). The District is one of the members of the JPA.

The Encinitas Union School District agrees with the Grand Jury that disseminating knowledge of the WeTip program is a useful action, and we will increase the visibility of our participation in that program to EUSD employees.

On behalf of the District and the Board of Trustees, I share your interest in ensuring that governmental agencies adhere to the highest ethical standards. The District will continue to diligently meet statutory requirements as to the ethical discharge of our duties.

Sincerely,

A handwritten signature in blue ink that reads "Timothy B. Baird". The signature is written in a cursive style with a large initial 'T'.

Timothy B. Baird, Ed.D.  
Superintendent

## **Bylaws of the Board**

BP 9270 (a)

### **CONFLICT OF INTEREST**

#### **Incompatible Activities**

Board of Trustees members shall not engage in any employment or activity which is inconsistent with, incompatible with, in conflict with or inimical to the Board member's duties as an officer of the district.

#### **Conflict of Interest Code**

Designated employees of the district, including Board members, shall adhere to the district's conflict of interest code.

The district's conflict of interest code shall comprise the terms of the California Code of Regulations, Title 2, Section 18730 and any amendments to it adopted by the Fair Political Practices Commission, together with a district attachment specifying designated positions and the specific types of disclosure statements required for each position.

When a change in the district's conflict of interest code is necessitated by changed circumstances such as the creation of new positions, amendments or revisions shall be submitted to the code reviewing body within 90 days.

Upon receiving the statements of employees designated in Category 1, the district shall make and retain copies and shall forward the originals to the code reviewing body. Statements for all other designated employees shall be retained by the district.

The Board shall review the district's conflict of interest code in even-numbered years and send the code reviewing body either an amended code or, by October 1 of that year, a statement to the effect that no change is necessary.

#### **Financial Interest**

Board members and designated employees shall not be financially interested in any contract made by the Board or in any contract they make in their capacity as Board members or designated employees.

**CONFLICT OF INTEREST** (continued)

A Board member shall not be considered to be financially interested in a contract if any of the exceptions set forth in Government Code 1091.5 apply.

A Board member shall not be deemed to be financially interested in a contract if he/she has only a remote interest in the contract and if the remote interest is disclosed during a Board meeting and noted in the official Board minutes. The affected Board member shall not vote or debate on the matter or attempt to influence any other Board member to enter into the contract. Remote interests are specified in Government Code 1091(b); they include the interest of a parent in the earnings of his/her minor child.

If a Board member or designated employee determines that he/she has a financial interest in a decision, this determination shall be disclosed and made part of the Board's official minutes. In the case of a designated employee, this announcement shall be made in writing and submitted to the Board.

A Board member shall abstain from voting on personnel matters that uniquely affect a relative of the Board member. A Board member may vote, however, on collective bargaining agreements and personnel matters that affect a class of employees to which the relative belongs.

**Gifts**

Designated employees shall not accept from any single source in any calendar year any gifts in excess of the prevailing gift limitation specified in law if the employee would be required to report the receipt of income or gifts from that source on his/her statement of economic interests.

The above limitations on gifts do not apply to wedding gifts and gifts exchanged between individuals on birthdays, holidays and other similar occasions, provided that the gifts exchanged are not substantially disproportionate in value.

Gifts of travel and related lodging and subsistence shall be subject to the above limitations except as described in Government Code 89506.

A gift of travel does not include travel provided by the district for Board members and designated employees.

**CONFLICT OF INTEREST** (continued)**Honoraria**

Designated employees shall not accept any honorarium as defined above if the employee would be required to report the receipt of income or gifts from that source on his/her statement of economic interests.

The term "honorarium" does not include:

1. earned income for personal services customarily provided in connection with a bona fide business, trade or profession unless the sole or predominant activity of the business, trade or profession is making speeches
2. any honorarium which is not used and, within 30 days after receipt, is either returned to the donor or delivered to the district for donation into the general fund without being claimed as a deduction from income for tax purposes.

**Designated Position/Disclosure Categories**

1. Persons occupying the following positions are designated employees in

**Category 1:**

Governing Board Members  
 Superintendent  
 Assistant/Associate Superintendents

Designated persons in this category must report:

- a) Interest in real property located entirely or partly within district boundaries, or within two miles of district boundaries or of any land owned or used by the district. Such interests include any leasehold, beneficial or ownership interest or option to acquire such interest in real property.
- b) Investments or business positions in or income from sources which:
  - are engaged in the acquisition or disposal of real property within the district
  - are contractors or subcontractors which are or have been within the past two years engaged in work or services of the type used by the district or
  - manufacture or sell supplies, books, machinery or equipment of the type used by the district

**CONFLICT OF INTEREST** (continued)

2. Persons occupying the following positions are designated employees in

**Category 2:**

Director  
Principal  
Assistant Principal  
Maintenance and Operations Supervisor

Designated persons in this category must report investments or business positions in or income from sources which:

- a. are contractors or subcontractors engaged in work or services of the type used by the department which the designated person manages or directs,
  - b. manufacture or sell supplies, books, machinery or equipment of the type used by the department which the designated person manages or directs. For the purposes of this category, a principal's department is his/her entire school.
3. Consultants are designated employees who must disclose financial interests as determined on a case-by-case basis by the Superintendent or designee. The Superintendent or designee's written determination shall include a description of the consultant's duties and a statement of the extent of disclosure requirements based upon that description. All such determinations are public records and shall be retained for public inspection along with this conflict of interest code.

A consultant is an individual who, pursuant to a contract with the district, makes a governmental decision whether to:

- a) approve a rate, rule or regulation
- b) adopt or enforce a law
- c) issue, deny, suspend or revoke a permit, license, application, certificate, approval, order or similar authorization or entitlement

**CONFLICT OF INTEREST** (continued)

- d) authorize the district to enter into, modify or renew a contract that requires district approval
- e) grant district approval to a contract or contract specifications which require district approval and in which the district is a party
- f) grant district approval to a plan, design, report, study or similar item
- g) adopt or grant district approval of district policies, standards or guidelines.

A consultant is also an individual who, pursuant to a contract with the district, serves in a staff capacity with the district and in that capacity participates in making a governmental decision as defined in 2 CCR 18702.2 or performs the same or substantially all the same duties for the district that would otherwise be performed by an individual holding a position specified in the district's Conflict of Interest Code.

*Legal Reference:*EDUCATION CODE

1006 Qualifications for holding office

35107 School district employees

35230-35240 Corrupt practices

35233 Prohibitions applicable to members of governing boards

GOVERNMENT CODE

1090-1098 Prohibitions applicable to specified officers

1125-1129 Incompatible activities

81000-91015 Political Reform Act of 1974, especially:

82011 Code reviewing body

82019 Definition of "Designated Employee"

82028 Definition of "Gifts"

82030 Definition of "Income"

87100-87013.6 General prohibitions

87200-87210 Disclosure

87300-87313 Conflict of interest code

87500 Statements of economic interests

89501-89503 Honoraria and gifts

91000-91014 Enforcement

COURT DECISIONSThorpe v. Long Beach Community College District, (2000) 83 Cal.App.4<sup>th</sup> 655Kunec v Brea Redevelopment Agency (1997) 55 Cal.App. 4<sup>th</sup> 511CODE OF REGULATIONS, TITLE 2

18100 et seq. Regulations of the Fair Political Practices Commission

82 Ops.Cal.Atty.Gen. 83(1999)

81 Ops.Cal.Atty.Gen 317 (1998)

**CONFLICT OF INTEREST** (continued)

*Legal References continued:*

- 80 Ops. Cal. Atty. Gen. 320 (1997)
- 69 Ops. Cal. Atty. Gen. 255 (1986)
- 68 Ops. Cal. Atty. Gen. 171 (1985)
- 65 Ops. Cal. Atty. Gen. 606 (1982)

Bylaw  
Adopted: December 20, 1977  
Revised: July 16, 2002  
Reviewed: September 16, 2008

**ENCINITAS UNION SCHOOL DISTRICT**  
Encinitas, California

## Administration

BP 2300(a)

### CODE OF ETHICS

A Statement of Principles Amplifying the Code of Ethics of the Education Profession:

Preamble:

The educator employed in an administrative position recognizes and adheres to the laws of the State of California, the policies of the district in which he is employed, and to these standards of personnel administration in order to fulfill his special responsibilities to pupils, parents, the community, and the profession as an executor of Board policies, as advisor to the Board on school policies and procedures, and as a professional leader in the school district:

1. In the selection and employment of personnel:
  - a. (S)he spares no effort to maintain and increase professional standards, and (s)he recommends only professionally qualified personnel for any position.
  - b. (S)he provides opportunities to employees to make known their desires for transfer or advancement and gives consideration to their wishes.
  - c. (S)he considers no position vacant and seeks no applicants for it before the present employee has resigned or has been notified that he will not be re-employed.
  - d. (S)he makes no offer of employment for a period of time concurrent to that covered by a contract to another district unless that district has first notified him/her of its willingness to release the employee.
  - e. (S)he adheres strictly to adopted salary schedules and policies.
  - f. (S)he describes accurately the conditions, employment, and the assignment for which the candidate is being considered.
2. In the supervision of his staff:
  - a. (S)he assumes responsibility for providing opportunities for further advancement of employees.
  - b. (S)he sees that significant weaknesses are called to the attention of the employee and that assistance toward their correction is made available.

**CODE OF ETHICS**

- c. (S)he makes no formal criticism of any employee to his/her superiors or to the Board without having first discussed this criticism with the employee involved.
  - d. (S)he provides opportunity for employees to discuss problems freely with him/her and assists in the use of channels for reporting and discussing these problems.
  - f. (S)he provides clearly defined administrative policies and areas of responsibility for his/her administrative subordinates and supports their efforts to adhere to these policies.
3. In recommending re-employment or dismissal of employee:
- a. (S)he establishes a systematic procedure for periodic written evaluation of probationary teachers. All teachers are kept informed of their employment status as it affects reemployment, tenure, or dismissal.
  - b. (S)he recommends reemployment unless the employee has been notified regarding his/her weaknesses and has been given time for and assistance toward their correction.
  - c. (S)he does not jeopardize the educational welfare of children in order to avoid unpleasant dismissal relationship.
4. In respect to recommendations for employees:
- a. (S)he responds to requests for recommendations and renders accurate appraisals in accordance with his/her best professional judgment.
  - b. (S)he does not suggest to an employee that a letter of recommendation will be affected by submission of his/her resignation or failure to resign.
  - c. (S)he records no negative criticism in a letter of reference or in direct conversation with potential employers except that which has been called to the employee's attention during appraisal conference.
  - d. (S)he keeps confidential the content of confidential professional papers.

Policy  
adopted: February 7, 1978  
Reviewed: February 25, 1992  
Revised: May 16, 2000

**ENCINITAS UNION SCHOOL DISTRICT**  
Encinitas, California

**CODE OF ETHICS  
CLASSIFIED EMPLOYEES**

School employees who are in daily contact with many phases of educational work should be persons whose conduct is beyond reproach and who sincerely believe in the advancement of education and the betterment of working conditions; therefore, the California School Employees' Association proposes this Code of Ethics as a standard for its members.

**AS A SCHOOL EMPLOYEE I WILL:**

1. Be proud of my vocation in order that I may use my best endeavors to elevate the standards of my position so that I may merit a reputation for high quality of service -- to the end that others may emulate my example.
2. Be a person of integrity, clean speech, desirable personal habits, and physical fitness.
3. Be just in my criticism and be generous in my praise; to improve and not destroy.
4. At all times be courteous in my relations with students, parents, teachers and others.
5. Be a resourceful person who readily adapts himself to different kinds of work and changed conditions and finds better ways to do things.
6. Conduct myself in a spirit of friendly helpfulness to my fellow employees to the end that I will consider no personal success legitimate or ethical which is secured by taking unfair advantage of another.
7. Associate myself with employees of other districts for the purpose of discussing school problems and cooperating in the improvement of public school conditions.
8. Always uphold my obligations as a citizen to my nation, my state, my school district and my community, and give them unswerving loyalty.
9. Always bear in mind that the purpose of CSEA is to promote the efficiency and raise the standards of all school employees and that I shall be equally obligated to assist all my fellow workers.

**SOURCE: CALIFORNIA SCHOOL EMPLOYEES' ASSOCIATION**

**PROFESSIONAL STANDARDS**

**Code of Ethics  
MANAGEMENT, SUPERVISORY AND CONFIDENTIAL EMPLOYEES**

A management, supervisor or confidential school employee's behavior must conform to an ethical code. The code must be idealistic and at the same time practical, so that it can apply reasonably to all. The professional acknowledges that the schools belong to the public they serve for the purpose of providing educational opportunities to all and provides professional leadership in the school and community. This responsibility requires standards of exemplary professional conduct. It must be recognized that the professional's actions will be viewed and appraised by the community, associates and students. To these ends, the professional subscribes to the following statements of standards.

The management, supervisory, confidential school employee:

1. Makes the well-being of students the fundamental element in all decision-making and actions.
2. Fulfills professional responsibilities with honesty and integrity.
3. Supports the principle of due process and equal treatment under the law.
4. Obeys local, state and national laws and does not knowingly join or support organizations that advocate, directly or indirectly, the overthrow of the government.
5. Implements the Board of Trustees of Education's policies and administrative rules and regulations.
6. Pursues appropriate measures to correct those laws, policies and regulations that are not consistent with sound educational goals.
7. Avoids using positions for personal gain through political, social, religious, economic or other influence.
8. Accepts academic degrees or professional certification used in relationship with professional responsibilities only from duly accredited institutions.
9. Maintains the standards and seeks to improve the effectiveness of the profession through research and continuing professional development.
10. Honors all contracts until fulfillment or release.
11. Seeks to involve the public and keep them honestly informed.
12. Recommends the employment, development, promotion and retention of the best possible personnel to assure a quality educational program.

SOURCE: ASSOCIATION OF CALIFORNIA SCHOOL ADMINISTRATORS

**PROFESSIONAL STANDARDS**

**CALIFORNIA PROFESSIONAL STANDARDS FOR  
EDUCATIONAL LEADERS**

**Preamble**

The administrator(s) at a school site have numerous responsibilities that ultimately lead to the improvement of the performance of all students in the school. By acquiring the skills, attitudes and behaviors as outlined in the following Professional Standards for School Leaders, students have the best opportunity to achieve the mission and vision of the district and to meet the expectations of high standards for student learning.

**Standards**

A school administrator is an educational leader who promotes the success of all students by:

1. Facilitating the development, articulation, implementation, and stewardship of a vision of learning that is shared and supported by the school community
2. Advocating, nurturing, and sustaining a school culture and instructional program conducive to student learning and staff professional growth
3. Ensuring management of the organization, operations, and resources for a safe, efficient and effective learning environment
4. Collaborating with families and community members, responding to diverse community interests and needs, and mobilizing community resources
5. Modeling a personal code of ethics and developing professional leadership capacity
6. Understanding, responding to, and influencing the larger political, social, economic, legal, and cultural context

*Source: California Professional Standards for Educational Leaders, 2001*