



Conflict of Interest Code Policy

JPAB Policy #103
Approved: 2015
Last Revised: 05/2025
Review Schedule: 05/2027

CONFLICT OF INTEREST CODE - SANTA CRUZ PUBLIC LIBRARIES JOINT POWERS AUTHORITY

Appendix A Schedule of Designated Positions and Their Disclosure Categories

Appendix B List of Disclosure Categories

(Originally Adopted by Resolution: 2015-001)

CONFLICT OF INTEREST CODE
FOR THE
SANTA CRUZ PUBLIC LIBRARIES JOINT POWERS AUTHORITY

1. 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 (FPPC) has adopted a regulation (2 California Code of Regulations Section 18730) that 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, the standard code 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 **Appendix A (Schedule of Designated Positions and their Disclosure Categories)** and **Appendix B (List of Disclosure Categories)**, designating positions and establishing financial disclosure categories, shall constitute the conflict of interest code of the Santa Cruz Public Libraries Joint Powers Authority.
2. Individuals holding designated positions referenced in **Appendix A**, including temporary employees, consultants, and those in newly created positions who are required to disclose their financial interests pursuant to the California Political Reform Act, shall file their Statements of Economic Interests (FPPC Form 700) in compliance with the provisions of California Code of Regulations Section 18730.
3. Designated public officials and employees are required to file an Assuming Office Statement when they assume a designated position, an Annual Statement each year by April 1, and a Leaving Office Statement within thirty days of leaving office.

APPENDIX A

Schedule of Designated Positions and Their Disclosure Categories

DESIGNATED POSITIONS	DISCLOSURE CATEGORY
BOARD OF DIRECTORS	1 (Govt. Code §87200 filer)
ADVISORY COMMISSIONERS	1
DIRECTOR OF LIBRARIES	1 (Govt. Code §87200 filer)
ASSISTANT DIRECTOR OF LIBRARIES	1
TREASURER-CONTROLLER	1 (Govt. Code §87200 filer)
LEGAL COUNSEL	1 (Govt. Code §87200 filer)
LIBRARIAN III - COLLECTION MANAGMENT SERVICES	3
LIBRARIAN III - OUTREACH MANAGER	3
LIBRARIAN III - ADULT PROGRAMS & SERVICES MANAGER	3
LIBRARIAN III - YOUTH PROGRAMS & SERVICES MANAGER	3
LIBRARIAN II - SELECTION /CATALOGING	3
LIBRARY SPECIALIST	3
INFORMATION TECHNOLOGY MANAGER	3
PRINCIPAL MANAGEMENT ANALYST	3
MANAGEMENT ANALYST	3
COMMUNITY RELATIONS SPECIALIST	3
FACILITIES MAINTENANCE SUPERVISOR	3
<p>SPECIFIED CONSULTANTS</p> <p>Those consultants defined as a “consultant” by the Fair Political Practice Commission (Gov’t Code section 81000 et seq.) and who is likely to participate in the making of a governmental decision as determined by the Library Director in writing.</p> <p>For purposes of this Code, " making a governmental decision" means to make a decision whether to: (a) approve a rate, rule, or regulation, (b) adopt or enforce a law, (c) issue, deny, suspend, or revoke any permit, license, application, certificate, approval, order, or similar authorization or entitlement, (d) authorize the agency to enter into, modify, or renew a contract, (e) grant the agency approval to a contract or to the specifications for such a contract, (f) grant the agency approval to a plan, design, report, study, or similar item, or(g) adopt, or grant agency approval of policies, standards, or guidelines for the agency.</p> <p>(FPPC Regulation Section 18700.3)</p>	1

<p>Consultants who serve in a capacity that is the functional equivalent of a designated position shall disclose pursuant to the disclosure category required by this Code for the comparable designated staff position. The Library Director may determine in writing that a particular consultant, although serving in a capacity that is the functional equivalent of 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 in this section. Such written determination shall include a description of the consultant' s duties and, based upon that description, a statement of the extent of disclosure requirements. The Library Director' s determination is a public record and shall be retained for public inspection in the same manner and location as this Conflict of Interest Code. (Government Code Section 81008).</p>	<p>Depends on category of equivalent designated position.</p>
<p>TEMPORARY EMPLOYEES</p> <p>Retired annuitants and temporary employees may be included in the list of designated employees when the Library Director, or their designee, determines that they are performing work that is the functional equivalent of a designated position. If such a determination is made, then disclosure shall be pursuant to the disclosure category required by this Code for the comparable designated staff position.</p>	<p>Depends on category of equivalent designated position.</p>
<p>NEWLY CREATED POSITION</p> <p>Library Director to work with Legal Counsel to determine appropriate disclosure category for any newly created position.</p>	<p>Depends on job duties.</p>

Updated: May 2025

APPENDIX B

List of Disclosure Categories

1. FULL DISCLOSURE

What to report? All investments and business positions in business entities, sources of income including gifts, loans and travel payments, and interests in real property located in the Library System.

What Form 700 schedules? All Schedules (A through E)

2. ALL INCOME, EXCLUDING INTERESTS IN REAL PROPERTY

What to report? All investments and business positions in business entities, and sources of income including gifts, loans and travel payments.

What Form 700 schedules? A, C, D, E

3. LIBRARY SYSTEM/DEPARTMENT-RELATED INCOME

What to report? All investments and business positions in business entities and sources of income including gifts, loans and travel payments if the source is of a type which provides, manufactures, or supplies goods, materials, equipment, machinery or services, including training or consulting services, of the type utilized by or subject to the review or approval by the Library System or the department in which that person is employed.

What Form 700 schedules? A, C, D, E

4. LIBRARY SYSTEM/DEPARTMENT-RELATED INCOME, REAL PROPERTY

What to report? All investments and business positions in business entities and sources of income including gifts, loans and travel payments, and all interests in real property, if the source is of a type which provides, manufactures, or supplies goods, materials, equipment, machinery or services, including training or consulting services, of the type utilized by or subject to the review or approval of the Library System or the department in which that person is employed.

What Form 700 schedules? All Schedules (A through E)

5. REGULATORY, LAND DEVELOPMENT RELATED INCOME, REAL PROPERTY

What to report? All investments and business positions in business entities and sources of income including gifts, loans and travel payments, and interests in real property, if the source is of the type that is subject to the regulatory permit or licensing authority by the Library System or department in which that person is employed or the source of income is from land development, construction or the acquisition or sale of real property by the Library.

What Form 700 schedules? All Schedules (A through E)