

## Conflict of Interest Code Updates

### Overview

The California Political Reform Act requires every state and local agency to adopt a Conflict of Interest Code (COI) that identifies all officials and employees within the agency who make or influence governmental decisions within the scope of the position they hold in their agency. The individuals in these positions must disclose their financial interests as specified in the agency's COI. Every two years, or as-needed, based upon modifications to positions in the Board of Directors-approved budget, staff reviews the COI to determine if updates are needed.

### Action: **Approve**

The Board of Directors is asked to approve the updated SANDAG Conflict of Interest Code.

### Fiscal Impact:

None.

### Schedule/Scope Impact:

None.

### Key Considerations

In October 2025, Governor Newsom signed Senate Bill 852, which updated Statement of Economic Interest (Form 700) filing requirements that "public officials who manage public investments" e-file a Form 700 directly with the California Fair Political Practices Commission (FPPC) (not their local agency), via the FPPC's e-filing system. Staff reviewed the positions listed in its COI and are proposing updates to comply with SB 852, recent changes to [Board Policy No. 003](#), and administrative edits suggested by the County of San Diego.

The proposed amendments to the COI are reflected in Attachment 1. These revisions are consistent with the adopted FY 2026 Program Budget and the updates to the FY 2026 Position Classification and Salary Range Table approved on December 12, 2025. The Board most recently approved amendments to its COI in September 2025.

### Next Steps

The proposed amendments will implement updates to the list of designated employee and consultant positions subject to filing annual economic disclosure statements. Impacted positions will receive future filing communications from the FPPC.

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Attachment: 1. Conflict of Interest Code with Proposed Amendments in Red Line