

**SUMMIT PUBLIC SCHOOLS**

**CONFLICT OF INTEREST CODE**

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 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 Appendices, designating positions and establishing disclosure categories, shall constitute the conflict of interest code of the **Summit Public Schools (SPS)**.

Individuals holding designated positions shall file their statements of economic interests with **SPS**, which will make the statements available for public inspection and reproduction. (Gov. Code Sec. 81008.) All statements will be retained by **SPS**.

**SUMMIT PUBLIC SCHOOLS**

**CONFLICT OF INTEREST CODE**

**APPENDIX A  
DESIGNATED EMPLOYEES**

<u>Designated Employees</u>	<u>Disclosure Category</u>
Members of the Governing Board	1, 2
Superintendent	1, 2
Head(s) of Schools	1, 2
Executive Director(s)	1,2
Assistant Director(s)	1, 2
Senior Director of Facilities	1, 2
Chief Operating Officer	2
Chief Program Officer	2
Senior Director of Talent	2
Director of Human Resources	2
Controller	2
Dean of Operations	2
Chief Academic Officer	3
Chief Technology Officer	3
Chief External Officer	3
Consultants/New Positions	*

---

\* Consultants/New Positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The SPS Chief Executive Officer 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 in this section. 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 Chief Executive Officer'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).

**SUMMIT PUBLIC SCHOOLS**

**CONFLICT OF INTEREST CODE**

**Public Officials Who Manage Public Investments:**

The following positions are not covered by the conflict of interest code because they must file a statement of economic interests pursuant to Government Code Section 87200 and, therefore, are listed for informational purposes only:

Chief Financial Officer

Chief Executive Officer

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 if they believe their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

**SUMMIT PUBLIC SCHOOLS**

**CONFLICT OF INTEREST CODE**

**APPENDIX B  
DISCLOSURE CATEGORIES**

**CATEGORY 1**

Designated Employees assigned to Category 1 ***must report***:

- (A) Interests in real property located in whole or in part within a two-mile radius of:
  - any school district that has authorized an SPS charter school, or
  - any facility utilized by SPS's charter schools, or
  - a proposed site for an SPS facility; and
  
- (B) Investments and business positions in business entities, and sources of income (including gifts, loans, and travel payments) of the type that engage in the purchase or sale of real property or are engaged in building construction or design.

**CATEGORY 2**

Designated Employees assigned to Category 2 ***must report***:

Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) that are contractors engaged in the performance of work or services, or sources that manufacture, sell, repair, rent or distribute school supplies, books, materials, school furnishings or equipment of the type to be utilized by SPS.

**CATEGORY 3**

Designated Employees assigned to Category 3 ***must report***:

Investments and business positions in business entities or sources of income (including receipt of gifts, loans, and travel payments) that are contractors engaged in the performance of work or services, or sources that manufacture, sell, repair, rent or distribute school supplies, books, materials, school furnishings or equipment of the type to be utilized by the Designated Employee's department.

This is the last page of the conflict of interest code for the **Summit Public Schools**.



**CERTIFICATION OF FPPC APPROVAL**

Pursuant to Government Code Section 87303, the conflict of interest code for the **Summit Public Schools** was approved on 3/15/ 2021. This code will become effective on 4/14/ 2021.

---

John M. Feser, Jr.  
Senior Commission Counsel

Fair Political Practices Commission