

## NAVIGATOR 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 §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 for the **Navigator Schools**.

Individuals holding designated positions shall file statements of economic interests with **Navigator Schools** which will make the statements available for public inspection and reproduction (Government Code § 81008). All statements will be retained by **Navigator Schools**.

**APPENDIX A**  
**DESIGNATED POSITIONS**

<u>Designated Positions</u>	<u>Disclosure Category</u>
Corporate Officers (e.g., President, CFO/Treasurer, Secretary)	1, 2
Chief Executive Officer	1, 2
Chief Academic Officer	2
Principal	1, 2
Director of Human Resources	2
Director of Engagement and Partnerships	2
Director of Information Technology and Operations	3
Director of Student Services	3
Manager of Information Technology	2
Director of Business and Finance	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 CEO or designee 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 CEO or designee’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 § 81008).

Officials Who Manage Public Investments

It has been determined that the position(s) listed below manage public investments and will file a statement of economic interests pursuant to Government Code Section 87200.

- Members of the Governing Board

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

**APPENDIX B**  
**DISCLOSURE CATEGORIES**

Category 1

Designated positions assigned to this category must report:

- a) Interests in real property that are located in whole or in part within a two-mile radius:
  - of any school district that has authorized a **Navigator Schools** charter school, or
  - of any facility utilized by **Navigator Schools**' charter schools, or
  - of a proposed site for a **Navigator Schools** facility.
  
- 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 positions assigned to this category must report:

- a. 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 **Navigator Schools**.

Category 3

Designated positions assigned to this category must report:

- a. 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 the designated position's department.