



Environmental Charter Schools **Conflict of Interest Code**

Adopted by Environmental Charter Schools Board of Directors

APPROVED

I. ADOPTION

To ensure compliance with the Political Reform Act of 1974, California Government Code Section 87100, *et seq.*, the Environmental Charter Schools Board of Directors hereby adopts this Conflict of Interest Code Bridge Policy (“COI Code Bridge Policy”) in order to align with the provisions of the Conflict of Interest Code of the Los Angeles County Office of Education (“LACOE Code”), as may be subsequently modified during the term of its charters, (incorporated herein by reference) as applied to the designated employees of Environmental Charter Schools (“ECS” or “Charter School”).

This COI Bridge Policy shall apply to all governing board members, corporate officers, and designated positions of the Charter School.

II. STATEMENT OF ECONOMIC INTERESTS

This COI Bridge Policy aligns the titles of persons at the Charter School, including governing board members, who hold positions that involve the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest (“Designated Position”) to those Designated Positions listed in Exhibit B to the LACOE Code.

This COI Bridge Policy also includes the relevant financial disclosure categories for each Designated Position as reflected in Exhibits A and B to the LACOE Code.

III. FILING

Each person in a Designated Position shall file a Form 700 Statement of Economic Interest (“Statement”) at the time and manner prescribed by the LACOE Code, disclosing reportable investments, interests in real property, business positions, and income required to be reported under the category or categories to which the Designated Position is assigned in Exhibit A to the LACOE Code.

IV. DISQUALIFICATION

The Corporation shall not enter into a contract or transaction in which a director directly or indirectly has a material financial interest (nor any other corporation, firm, association, or other entity in which one or more of the Corporation’s directors are directors and have a material financial interest).

EXHIBIT A

Financial Disclosure Categories from the LACOE Code

CATEGORY 1

Persons in this category shall disclose all interest in real property within the jurisdiction. Real property shall be deemed to be within the jurisdiction if the property or any part of it is located within or not more than two miles outside the boundaries of the jurisdiction or within two miles of any land owned or used by the agency.

Persons are not required to disclose property used primarily as their residence or for personal recreational purposes.

CATEGORY 2

Persons in this category shall disclose all investments and business positions.

CATEGORY 3

Persons in this category shall disclose all Income (including loans, gifts and travel payments) and business positions.

CATEGORY 4

Persons in this category shall disclose all business positions, investments in, or income (including loans, gifts and travel payments) received from business entities that manufacture, provide or sell service and/or supplies of a type utilized by the agency and associated with the job assignment of designated positions assigned to this disclosure category.

CATEGORY 5

Persons in this category shall disclose all income (including loans, gifts and travel payments) from any Office of Education employee, any representative or association of such employee; and business positions or income (including loans, gifts and travel payments) from any entity owned or controlled by such employee or his/her spouse or other financial dependent.

CATEGORY 6

Persons in this category, are those who perform under a charter school agreement, authorized by the Los Angeles County Board of Education the duties of any position similar to that of any designated position on Los Angeles County Office of Education's Conflict of Interest Code and shall be required to file Statements of Economic Interest disclosing reportable interests in the categories assigned to that designated position.

In addition, individuals who, under an agreement with the charter school, participate in decisions by providing information, advice, recommendations to his or her charter school(s) which could affect financial interests shall be required to file Statements of Economic Interests. The level of disclosure shall be as determined by the Los Angeles County Superintendent of Schools (or designee).

CATEGORY 7

Individuals who perform under contract the duties of any designated position shall be required to file Statements of Economic Interests disclosing reportable interest in the categories assigned to that designated position.

In addition, individuals who, under contract, participate in decisions which affect financial interests by providing information advice, recommendation or counsel to the agency which could affect financial interest shall be required to file Statements of Economic Interests, unless they fall within the Political Reform Act's exceptions to the definition of consultant. The level of disclosure shall be as determined by the Los Angeles County Superintendent of Schools (or designee).

EXHIBIT B

Alignment of Charter School Designated Positions to LACOE Code

CHARTER SCHOOL DESIGNATED POSITION	SIMILAR LACOE DESIGNATED POSITION	FINANCIAL DISCLOSURE CATEGORIES
Charter School Board Member	Board Member, Office of Education	1, 2, 3
Executive Director	Superintendent	1, 2, 3
Director of Curriculum & Instruction, Director of Strategic Initiatives	Director-Student Programs	4
Chief Operating Officer	Chief Financial Officer	1, 2, 3
Principal	Principal	4
Consultant/Contractor ¹	Non-Employee Filer: Consultant/ Independent Consultants/and New Positions	7

¹ Consultant/Contractor is included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation: ECS may determine in writing that a particular consultant, 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 duties and, based upon that description, a statement of the extent of disclosure requirements. ECS' determination is a public record and shall be retained for public inspection in the same manner and location as this conflict-of-interest code. (Gov. Code § 81008.)