

NOTICE OF INTENTION TO ADOPT

THE CONFLICT OF INTEREST POLICY OF INNER CITY EDUCATION FOUNDATION

NOTICE IS HEREBY GIVEN that Inner City Education Foundation, pursuant to the authority vested in it by section 87306 of the Government Code proposes to adopt a conflict of interest policy. A comment period has been established for a forty-five (45) day period commencing on Thursday, November 15, 2018 and closing on December 30, 2018. All inquiries should be directed to the contact listed below.

Inner City Education Foundation's proposed conflict of interest policy includes employee positions that involve the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest, as set forth in subdivision (a) of section 87302 of the Government Code. The policy adoption carries out the purposes of the law and no other alternative would do so and be less burdensome to affected persons.

Information on the policy adoption is attached to this email.

Any interested person may submit written comments relating to the proposed policy by submitting them no later than December 15, 2018, or at the conclusion of the public hearing, if requested, whichever comes later. At this time, no public hearing is scheduled. A person may request a hearing no later than fifteen days prior to the expiration of the comment period as stated herein, or December 15, 2018.

Inner City Education Foundation has determined that the proposed policy adoption:

1. Imposes no mandate on local agencies or school districts.
2. Imposes no costs or savings on any state agency.
3. Imposes no costs on any local agency or school district that are required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4 of Title 2 of the Government Code.
4. Will not result in any nondiscretionary costs or savings to local agencies.
5. Will not result in any costs or savings in federal funding to the state.
6. Will not have any potential cost impact on private persons, businesses or small businesses.

All inquiries concerning this proposed policy adoption and any communication required by this notice should be directed to: Richard J. Hansberger, General Counsel to Inner City Education Foundation, 909-744-8775 or 800-577-0663, rhansberger@hkschoollaw.com

INNER CITY EDUCATION FOUNDATION CONFLICT OF INTEREST POLICY

The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest policies. 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 policy, which can be incorporated by reference in an agency's policy. 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 policy for the Inner City Education Foundation ("ICEF").

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

INNER CITY EDUCATION FOUNDATION

APPENDIX A DESIGNATED POSITIONS

Designated Positions	Disclosure Category
Members of the Governing Board & Alternates	1, 2
Chief Executive Officer	1, 2
Chief Schools Officer	3
Chief Academic Officer	3
Director of School Operations & Legal Services	3
Principals	3

**Consultants/New Positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the policy, subject to the following limitation: The Chief Executive Officer 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 Chief Executive Officer’s 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 policy (Government Code § 81008).

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APPENDIX B DISCLOSURE CATEGORIES

Category 1

Designated positions assigned to this category must report:

- a. Interests in real property within the boundaries of ICEF that are used by ICEF or are of the type that could be acquired by ICEF as well as real property within two miles of the property used or the potential site.
- 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 ICEF.

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. For purposes of this category, a principal's department is his or her entire school.