

NOTICE OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
OF THE CALIFORNIA STATE UNIVERSITY RISK MANAGEMENT AUTHORITY

NOTICE IS HEREBY GIVEN that the California State University Risk Management Authority, pursuant to the authority vested in it by section 87306 of the Government Code, proposes amendment to its conflict of interest code. A comment period has been established commencing on April 26, 2018 and closing on June 10, 2018. All inquiries should be directed to the contact listed below.

The California State University Risk Management Authority proposes to amend its conflict of interest code to include 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 amendment carries out the purposes of the law and no other alternative would do so and be less burdensome to affected persons.

Changes to the conflict of interest code include:

- Because the FPPC has implemented electronic filing, we updated our place of filing paragraph and inserted page numbers,
- Consultant/New Positions – FPPC wanted restored their usual and customary language, this section is FPPC boilerplate.

Information on the code amendment is available on the CSURMA.org site and attached to this email.

Any interested person may submit written comments relating to the proposed amendment by submitting them no later than **June 10, 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 **May 26, 2018**.

The California State University Risk Management Authority has determined that the proposed amendments:

1. Impose no mandate on local agencies or school districts.
2. Impose no costs or savings on any state agency.
3. Impose 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 amendment and any communication required by this notice should be directed to: Tevea Him, JPA Administrator, (415) 403-1416, thim@alliant.com

CONFLICT OF INTEREST CODE FOR THE CALIFORNIA STATE UNIVERSITY RISK MANAGEMENT AUTHORITY

The Political Reform Act (Cal. Gov. Code Sect. 81000, *et seq.*) requires that state and local government agencies adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulations Section 18730) which 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 it 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 Appendix designating officials and employees and establishing disclosure categories, shall constitute the conflict of interest code of the **California State University Risk Management Authority (CSURMA)**.

Individuals holding designated positions must file their statements of economic interests electronically with the **Fair Political Practices Commission**. All statements must be made available for public inspection and reproduction under Government Code Section 81008.

Note: CSURMA cited: Sections 81008, 87300, 87306, Government Code. Reference: Section 87302, Government Code.

**APPENDIX TO
CONFLICT OF INTEREST CODE OF THE
CALIFORNIA STATE UNIVERSITY RISK MANAGEMENT AUTHORITY**

<u>Designated Positions**</u>	<u>Disclosure Category:</u>
Members of the AORMA Committee	All
Attorney	All
Risk Management Consultant***	All
Secretary-Auditor	All
Claims Administrators***	All
Other Consultants/New Position	All **

Note: The positions of Risk Management Consultant, Claims Administrators, and Program Director are filled by an outside consultant, but act in a staff capacity.

Officials who manage public investments**:

It has been determined that the positions listed below manage public investments and will file a Statement of Economic Interest pursuant to California Government Code Section 87200:

Members of Board of Directors
Alternate Members of Board of Directors
Members of Executive Committee
Chair
Vice-Chair
Program Director***
Treasurer

**Certain CSURMA employees and officers may hold more than one position. In the case of an employee or officer who holds two designated positions, that person need file only one Form 700 Statement of Economic Interest covering both/all designated positions. In the case of an employee or official who holds a designated position or positions and is also classified as an official who manages public investments, that person need file only the Form 700 Statement of Economic Interest required under California Government Code Section 87200 for both/all of his or her positions.

***With respect to Consultants/New Position, the Chair of the CSURMA may determine in writing whether a particular Consultant or New Position is hired to perform a range of duties which are limited in scope, and thus, is not required to comply with the disclosure requirements described in these categories. Such determination shall include a description of the consultant's or New Position's duties, and, based on that description, a statement of the extent of disclosure requirements. The Chair of the CSURMA'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.)

Nothing herein excuses any such consultant from any other provisions of this Conflict of Interest Code. (Government Code Section 81008.) If these positions are held by business firms, the statement shall be filed by the individual in the firm who has primary responsibility for conducting the firm's business activities for the CSURMA.

Disclosure Categories

Persons designated to report in any of the following categories shall disclose relevant information concerning:

Category 1. Investments and business positions in business entities, and income (including the receipt of loans, gifts, and travel payments), from sources of the type to contract with the CSURMA to supply materials, goods, products, supplies, services, commodities or equipment, or lease space utilized by the CSURMA.

Category 2. Investments and business positions in business entities, and income (including the receipt of loans, gifts, and travel payments), from contractors engaged in the performance of work or services of the type utilized by the CSURMA, including professional services.

Category 3. Investments and business positions in business entities, and income (including the receipt of loans, gifts, and travel payments), from contractors engaged in the business of insurance including, but not limited to, insurance companies, carriers, holding companies, underwriters, brokers, solicitors, agents, adjusters, claims managers and actuaries.

Category 4. Investments and business positions in financial institutions, and income (including the receipt of loans, gifts, and travel payments) including, but not limited to, banks, savings and loans associations and credit unions in which the CSURMA has deposited or invested funds during the year preceding the filing of the statement.

Category 5. Investments and business positions in business entities, and income (including the receipt of loans, gifts, and travel payments) from which either have claims pending or during the year preceding the filing of the statement, filed a claim against the CSURMA or any member of the CSURMA.