

Anita Lopez

From: Hancock, Kelley <khancock@fresnocountyca.gov>
Sent: Wednesday, May 16, 2018 2:25 PM
To: Sheli Klein
Subject: COI Code - Info to Consider during the 2018 Biennial Review
Attachments: Model COI Code.docx; Central Unified.pdf

Hello,

As we are entering into the conflict of interest code biennial review period for 2018, we wanted to address issues in your agency's conflict of interest code that should be considered during the 2018 biennial review. Your agency's COI Code is attached with notes indicating the issues specific to your agency.

When amending your COI Code, please use the updated version of the model COI Code that is attached.

Please note, the most common issues that have been found in the majority of the COI Codes include:

- Incorrect positions listed as being forwarded to the Clerk of the Board's office
- Clerk's office is to receive the top executive and board members of each agency. Make sure to use position titles specific to your agency in the COI Code.
- Positions listed on Appendix A and as positions who "manage public investments"
- Position titles should be listed as designated positions **or** positions who manage public investments, but not both.
- Additional information in a COI Code that should be removed to prevent unnecessary amendments
- The model COI Code is written to incorporate all laws and amendments to the laws
- Don't use specific dollar amounts, dates, etc.
- COI Code should stand alone from board policies or procedures

Thank you,

Kelley Hancock

Deputy Clerk
Clerk of the Board of Supervisors

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