



NOTICE OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE OF THE SPECIAL DISTRICT RISK AMANGEMENT AUTHORITY

NOTICE IS HEREBY GIVEN that the **Special District 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 September 18, 2026 and closing on November 2, 2026. All inquiries should be directed to the contact listed below.

The **Special District 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: new positions that must be designated, revisions of disclosure categories, deletes titles of positions that have been abolished and/or positions that no longer make or participate in making governmental decisions, and also makes other technical changes.

The proposed amendment and explanation of the reasons can be obtained from the agency's contact, Candice Richardson, Management Analyst & Clerk of the Board at crichardson@sdrma.org and/or the authority's website <https://www.sdrma.org/board-meetings>.

Any interested person may submit written comments relating to the proposed amendment by submitting them no later than November 2, 2026, 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 October 18, 2026.

The **Special District 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 Candice Richardson, Management Analyst & Clerk of the Board of Directors at the Special District Risk Management Authority, 1112 I Street, Suite 300, Sacramento, CA 95814, (800) 537-7790 or via email crichardson@sdrma.org.

Candice Richardson
Clerk of the Board of Directors

Posted: September 18, 2026

CONFLICT OF INTEREST CODE

SPECIAL DISTRICT RISK MANAGEMENT AUTHORITY

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, ~~Section-~~ 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 ~~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 Appendices designating positions and establishing disclosure categories shall constitute the conflict-of-interest code of **Special District Risk Management Authority (SDRMA)**.

Members of the Board of Directors, consultants that manage public investments, and the Chief Financial Officer must file their statements of economic interests electronically with the **Fair Political Practices Commission**. All other individuals holding designated positions must file their statements with **SDRMA**. All statements must be made available for public inspection and reproduction under Government Code Section 81008.

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

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APPENDIX A DESIGNATED POSITIONS

Disclosure Categories

Chief Executive Officer	1, 2, 3, 4, 5
Chief Operating Officer	1, 2, 3, 4, 5
Chief Financial Officer	1, 2, 3, 4, 5
Chief Member Services Officer	1, 2, 3, 5
Chief Risk Officer	1, 2, 3, 5
Chief Underwriting Officer	1, 2, 3
Claims Manager	2, 3, 5 , 6 <u>5</u>
<u>Finance Manager</u>	<u>1, 2, 3</u>
<u>Health Benefits Manager</u>	<u>2, 3, 5</u>
<u>Underwriting & Program Manager</u>	<u>2, 3, 5</u>
Manager of Member Services	2, 3, 5, 6
<u>Risk Control Manager</u>	<u>2, 3, 5</u>
<u>Data Architect</u>	<u>2, 3, 5</u>
<u>Senior Claims Examiner – Supervisor</u>	<u>2, 3, 5</u>
Senior Claims Examiner	2, 3, 5, 6
General Counsel	1, 2, 3, 4, 5
Insurance Broker	2, 3, 5, 6
Consultants/ <u>New Positions</u> *	<u>*</u>

Note: The position of General Counsel is an outside consultant, but acts in a staff capacity.

* 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 limitations:

The Chief Executive Officer may determine in writing that a particular consultant ~~or~~ new position, although a "designated position," is hired to perform a range of duties that are limited in scope and thus is not required to ~~fully~~ comply fully with the disclosure requirements described 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 the disclosure requirements. The Chief Executive Officer'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 Sec. 81008).

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Officials Who Manage Public Investments

The following positions are ~~NOT~~ covered by the conflict of interest code because they must file under Government Code Section 87200. Those who file under Government Code Section 87200 are required to file electronically with the Fair Political Practices Commission ~~and~~, therefore, these positions are listed for informational purposes only:

- Members of the Board of Directors
- Consultants that manage public investments
- Chief Financial Officer

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

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APPENDIX B

DISCLOSURE CATEGORIES

- Category 1: Investments and business positions in business entities, and sources of income (including receipt of loans, gifts, and travel payments), if the business entity or source provides leased facilities, products, equipment, vehicles, machinery or services (including training or consulting services) of the type utilized by the Agency. ~~from sources of the type that contract with SDRMA to supply goods, services, materials, or supplies.~~
- Category 2: Investments and business positions in business entities, and sources of income (including receipt of loans, gifts, and travel payments), from sources that are engaged in the performance of work or services of the type utilized by SDRMA, including insurance companies, carriers, holding companies, underwriters, brokers, solicitors, agents, adjusters, claims managers, and actuaries.
- Category 3: Investments and business positions in business entities, and sources of income (including receipt of loans, gifts, and travel payments), if the business entity or source has, during the reporting period, filed a claim or ~~have~~ has a claim pending ~~that are reviewed and administered by~~ before SDRMA.
- Category 4: Interests in real property located within SDRMA's jurisdiction of the type purchased or leased by SDRMA for its use. Real property located within the jurisdiction as well as real property within two miles of the real property owned or used by SDRMA or the potential site.
- ~~Category 5: Investments and business positions in business entities, and income (including receipt of loans, gifts, and travel payments), which are financial institutions including banks, savings and loan associations, and credit unions.~~
- Category ~~6~~5: ~~Designated position in the category must disclose all~~ Investments and business positions in business entities, and sources of income (including receipt of loans, gifts,

and travel payments), if the business entity or source provides lease facilities, products, equipment, vehicles, machinery or services (including training or consulting services) ~~services, supplies, materials, machinery, vehicles, or equipment~~ of a the type purchased or leased utilized by the designated position's department, ~~unit, or division.~~