



*Chico Country Day School provides a safe, joyful environment where all learners are inspired to achieve their personal best.*

**Chico Country Day School (CCDS)  
Board Policy #104**

**CONFLICT OF INTEREST CODE**

**Adoption**

In compliance with the Political Reform Act of 1974, California Government Code Section 87100, et seq., Chico Country Day School hereby adopts this Conflict of Interest Code (“Code”), which shall apply to all governing board members, candidates for member of the board, and all other designated employees of the Chico Country Day School (“School”), as specifically required by California Government Code Section 87300.

**Definition of Terms**

“Designated Persons” are board members, officers and employees of the School who hold positions that involve the making or participation in making decisions that may foreseeably have a material effect on any financial interest of that individual. Designated positions within the School are listed in Appendix A attached to this Code and incorporated herein by reference.

“Disclosure Categories” are the descriptions of the types of financial interests Designated Persons in one or more job classifications must disclose on their Form 700. The categories must be tailored to the financial interests affected, and must not require public officials to disclose private financial information that does not relate to their School employment. The Disclosure Categories are listed in Appendix B.

“Form 700” is the Statement of Economic Interest, Form 700 disclosing the reportable investments, interests in real property, business positions, and income required to be reported under the category or categories to which the Designated Person’s position is assigned in Appendix A.

**Disclosure Statements**

Designated Persons designated positions shall file their Form 700 with the School, which will make the statements available for public inspection and reproduction. Upon receipt of the statements for designated members and employees, the School shall make and retain copies and forward the originals to the appropriate agency. All other statements will be retained by the School.

Adopted: March 10, 2021

Amended:

APPENDIX A  
Designated Positions

- I. Persons occupying the following positions are designated employees and must disclose financial interests in all categories defined in Appendix B (i.e. categories 1, 2, and 3).
- A. Members of the Governing Board
  - B. Candidates for Member of the Governing Board
  - C. Members of Committees of the Governing Board
  - D. Director of Education
  - E. Chief Business Officer
  - F. Director of Student Affairs
  - G. Director of Student Support Services
  - H. Consultants
  - I. Other Employees

APPENDIX B  
Disclosure Categories

Category 1 Reporting:

- A. Interest in real property which is located in whole or in part within the geographical service area of the School, including any leasehold, beneficial or ownership interests or option to acquire such interest in real property, if the fair market value of the interest is greater than \$2,000.

(Interests in real property of an individual include a business entity's share of interest in real property of any business entity or trust in which the designated employee or his or her spouse owns, directly, indirectly, or beneficially, a ten percent interest or greater.)

- B. Investments in or income from persons or business entities (including gifts, loans and travel payments) which are contractors or sub-contractors which are or have been within the previous two-year period engaged in the performance of building construction or design within the geographical service area of the School.

- C. Investments in or income from persons or business entities engaged in the acquisition or disposal of real property within the geographical service area of the School.

(Investment includes any financial interest in or security issued by a business entity, including but not limited to common stock, preferred stock, rights, warrants, options, debt instruments and any partnership interest or other ownership interests.)

(Investments of any individual include a pro rata share of investments of any business entity or trust in which the designated employee or his or her spouse owns, directly, indirectly or beneficially, a ten percent interest or greater.)

(Investment does not include a time or demand deposit in a financial institution, shares in a credit union, any insurance policy, or any bond or other debt instrument issued by any government or government agency.)

(No investment or interest in real property is reportable unless its fair market value exceeds \$2,000. No source of income is reportable unless the income received by or promised to the public official aggregates \$500 or more in value or \$50 or more in value if the income was a gift during the preceding 12-month reporting period.

Category 2 Reporting:

- A. Investments in or income from persons or business entities (including gifts, loans and travel payments) which manufacture or sell supplies, books, machinery or equipment of the type utilized by the department for which the designated employee is Manager or Director. Investments include interests described in Category 1.

Category 3 Reporting:

- A. Investments in or income from persons or business entities (including gifts, loans and travel payments) which are contractors or sub-contractors engaged in the performance of work or services of the type utilized by the department for which the designated employee is Manager or Director. Investments include the interests described in Category 1.