

STAFF REPORT

DATE: September 12, 2022
TO: Sacramento Regional Transit Board of Directors
FROM: Olga Sanchez-Ochoa, General Counsel
SUBJ: AMENDING TITLE II (CONFLICT OF INTEREST AND CODE OF ETHICS) OF SACRAMENTO REGIONAL TRANSIT DISTRICT'S ADMINISTRATIVE CODE TO REVISE APPENDIX A

RECOMMENDATION

Adopt the Attached Resolution.

RESULT OF RECOMMENDED ACTION

Amending Appendix A of Title II of SacRT's Administrative Code will update the list of positions that are required to complete the Fair Political Practices Reporting Form 700.

FISCAL IMPACT

There is no fiscal impact associated with this action.

DISCUSSION

The Political Reform Act (the Act) requires SacRT to review its Conflict of Interest Code every two years. The Act further requires that the Code be amended whenever a newly-created job classification would be subject to the Act's reporting requirements.

SacRT has added several such job classifications since the last amendment to the Conflict of Interest Code. The proposed amendment adds newly-created job classifications and eliminates or renames other job classifications to conform to SacRT's adopted job descriptions as set out in Attachment 1. The newly-created jobs are set out in italics in Attachment 1. The eliminated and renamed jobs are identified with strike-through in Attachment 1.

Staff recommends that the Board approve this revision to Title II of the Administrative Code as set out in the attached Resolution and Exhibit A.

**Attachment 1
APPENDIX A**

**CONFLICT OF INTEREST CODE OF THE
SACRAMENTO REGIONAL TRANSIT DISTRICT**

<u>Designated Positions</u>	<u>Disclosure Categories</u>
<i>ADA Compliance Officer</i>	2, 3
Assistant Paratransit Operations Manager	2, 3
Assistant Vice President, Finance & Treasury	1
Assistant Vice President, Human Resources & Labor Relations	1
Assistant Vice President, Innovative and Contract Services	1
Assistant Vice President, Light Rail Operations	1
Assistant Vice President, Bus Operations	1
Assistant Vice President, Planning, Scheduling & Assessment	1
Assistant Vice President, Technology, Innovation & Performance Monitoring	1
Attorney I	2-6
Attorney II	2-6
Attorney III	2-6
Chief Communications Officer	3, 4
Chief, Environmental Health & System Safety	3, 4
Consultant (not those involved in the investment of public funds)	*
<i>Deputy Chief of Staff / Special Assistant to the General Manager</i>	2, 3
Director, Accessible Services	2, 3
Director, Bus Maintenance	2, 3
Director, Bus Operations	2, 3
Director, Community & Contract Bus Services	2, 3
Director, Customer Satisfaction	2, 3
Director, Engineering and Construction	2, 3
Director, Facilities Maintenance	2-6
<i>Director, Grants and Capital Programming</i>	2, 3
<i>Director, Human Resources</i>	2, 3
Director, Light Rail Maintenance	2, 3
Director, Light Rail Operations	2, 3
Director, Marketing, Communications & Public Information	2, 3
Director, Office of Management and Budget	2, 3
Director, Operations Projects	2, 3
Director, Planning	2, 3
<i>Director, Police Services</i>	2, 3, 5
Director, Procurement Services	2, 3
Director, Scheduling	2, 3
Disadvantaged Business Enterprise Liaison Officer	3

SACRAMENTO REGIONAL TRANSIT DISTRICT

<u>Designated Positions</u>	<u>Disclosure Categories</u>
Equal Employment Opportunity Officer	3, 4
General Counsel	2, 3, 5, 6
Internal Accountability Auditor	2, 3
<i>Internal (Accountability & Compliance) Auditor</i>	2, 3
Manager, Accounting	2, 3
Manager, Capital and Project Control	2, 3
Manager, Customer Service	2, 3
Manager, Grants	2, 3
Manager, Labor Relations	2, 3
Manager, Network & End User Operations	2, 3
Manager, Pension and Retirement Services	2, 3
Manager, Quality Assurance & Transit Asset Management	2, 3
Manager, Risk	3
Manager, Security and Fare Inspection Services	3
<i>Manager, Training & Workforce Development</i>	3
Material Materials Management Superintendent	3
Paratransit Operations Manager	2, 3
Principal Civil Engineer	2, 3
Principal Planner	2, 3
Principal Systems Engineer	2, 3
Procurement Analyst I	3
Procurement Analyst II	3
Real Estate Administrator, Asset Management	2, 3, 5, 6
Senior Attorney	2- 6
Senior Community Relations Officer	2, 3
<i>Senior Manager, Budget</i>	2, 3
<i>Senior Manager, Data Center & Network Operations</i>	2, 3
Senior Manager, Enterprise Resources and Databases	2, 3
<i>Senior Manager, Enterprise Business Solutions</i>	3
Senior Manager, Environmental Health and System Safety	2, 3
Senior Manager, Grants	2, 3
Senior Manager, Human Resources	2, 3
Senior Manager, IT Project Management and Cybersecurity	2, 3
<i>Senior Manager, Cybersecurity and IT Project Management</i>	2, 3
Senior Manager, Labor Relations	2, 3
Senior Manager, Network & End User Operations	2, 3
Senior Manager, Procurement Services	2, 3
Senior Manager, Revenue & Analytics	2, 3
Senior Manager, Strategic Projects and Performance	2, 3
Senior Manager, Transit Oriented Development/Real Estate	2, 3, 5, 6
Senior Procurement Analyst	3
Special Assistant, Office of the General Manager	2, 3
<i>Vice President, Bus Operations</i>	1

SACRAMENTO REGIONAL TRANSIT DISTRICT

<u>Designated Positions</u>	<u>Disclosure Categories</u>
Vice President, Communications and Partnerships	1
Vice President, Integrated Services & Strategic Initiatives/ Chief of Staff	4 1-3
<i>Vice President, Light Rail Operations</i>	1
Vice President, Operations	1
Vice President, Planning & Engineering	4 1-3
Vice President, Safety, Security & Customer Satisfaction	1
<i>Vice President, Security, Safety & Customer Satisfaction</i>	1

*Consultants shall be included in the list of designated positions and shall disclose pursuant to the disclosure requirements in this code subject to the following limitation:

The General Manager/CEO may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to comply fully with the disclosure requirements in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The General Manager/CEO'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.

SACRAMENTO REGIONAL TRANSIT DISTRICT

DISCLOSURE CATEGORIES

Disclosure Requirements

Individuals holding designated positions must report their interests according to the following corresponding disclosure category(ies) to which their position has been assigned.

Disclosure Category 1

Interests in real property located within the jurisdiction or within two miles of the boundaries of the jurisdiction or within two miles of any land owned or used by the District; and investments and business positions in business entities, and income, including loans, gifts, and travel payments, from all sources.

Disclosure Category 2

Interests in real property located within the jurisdiction or within two miles of the boundaries of the jurisdiction or within two miles of any land owned or used by the District.

Disclosure Category 3

Investments and business positions in business entities, and income, including loans, gifts, and travel payments, from sources that provide services, supplies, materials, machinery, or equipment of the type utilized by the department or division to which the filer is assigned duties.

Disclosure Category 4

Investments and business positions in business entities, and income, including loans, gifts, and travel payments, from sources that filed a claim against the District during the previous two years, or have a claim pending.

Disclosure Category 5

Investments and business positions in business entities, and income, including loans, gifts, and travel payments, from sources that are of the type to request an entitlement to use District property or facilities, including, but not limited to:

- a license
- utility permit
- station vendor permit.

Disclosure Category 6

Investments and business positions in business entities, and income, including loans, gifts, and travel payments, from sources that sought to acquire an interest in real property owned in whole or in part by the District during the previous two years, or have such a proposal pending.

SACRAMENTO REGIONAL TRANSIT DISTRICT

87200 FILERS

Public Officials Who Manage Public Investments

The following positions are not covered by this conflict of interest code because those individuals holding these positions must file under Government Code Section 87200. These positions are listed for informational purposes only:

- Board Members
- Retirement Board Members
- Vice President, Finance/Chief Financial Officer
- General Manager/CEO
- Consultants (those involved in the investment of public funds)

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.

RESOLUTION NO. 2022-09-098

Adopted by the Board of Directors of the Sacramento Regional Transit District on this date:

September 12, 2022

**AMENDING TITLE II (CONFLICT OF INTEREST AND CODE OF ETHICS) OF
SACRAMENTO REGIONAL TRANSIT DISTRICT'S ADMINISTRATIVE CODE TO
REVISE APPENDIX A**

WHEREAS, the Political Reform Act of 1974 is set out as Title 9 (beginning with Section 81000) of the California Government Code; and

WHEREAS, pursuant to Section 87300 of the Political Reform Act, each state and local government agency must adopt and promulgate a Conflict of Interest Code; and

WHEREAS, each agency's Conflict of Interest Code must list each job classification that includes responsibilities involving the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest, and for each listed job classification, the specific types of investments, business positions, interest in real property, and sources of income that are reportable; and

WHEREAS, each agency must amend its Conflict of Interest Code to revise the listing of job classifications and reportable interest for which a conflict of interest statement must be filed whenever job classification changes are made affecting responsibilities involving the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest; and

WHEREAS, SacRT has adopted a Conflict of Interest Code pursuant to Government Code section 87300; and

WHEREAS, SacRT has added, revised and/or deleted certain job descriptions for salaried classifications and must update the listing of job classifications for which a conflict of interest statement must be filed and the reportable interests therefor.

NOW THEREFORE, BE IT HEREBY RESOLVED BY THE BOARD OF DIRECTORS OF THE SACRAMENTO REGIONAL TRANSIT DISTRICT AS FOLLOWS:

Section 1: Appendix A of Title II of Sacramento Regional Transit District Administrative Code is hereby amended to read in its entirety as set out in Exhibit A.

Section 2: Section 1 will be effective 30 days after Sacramento County, as the code reviewing body, approves Exhibit A.

STEVE MILLER, Chair

A T T E S T:

HENRY LI, Secretary

By: _____
Tabetha Smith, Assistant Secretary

**Exhibit A
APPENDIX A**

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Director, Community & Contract Bus Services	2, 3
Director, Customer Satisfaction	2, 3
Director, Engineering and Construction	2, 3
Director, Facilities Maintenance	2-6
Director, Grants and Capital Programming	2, 3
Director, Human Resources	2, 3
Director, Light Rail Maintenance	2, 3
Director, Light Rail Operations	2, 3
Director, Marketing, Communications & Public Information	2, 3
Director, Planning	2, 3
Director, Police Services	2, 3, 5
Director, Procurement Services	2, 3
Director, Scheduling	2, 3
Disadvantaged Business Enterprise Liaison Officer	3
Equal Employment Opportunity Officer	3, 4
General Counsel	2, 3, 5, 6
Internal (Accountability & Compliance) Auditor	2, 3
Manager, Accounting	2, 3
Manager, Capital and Project Control	2, 3
Manager, Customer Service	2, 3
Manager, Pension and Retirement Services	2, 3
Manager, Quality Assurance & Transit Asset Management	2, 3
Manager, Risk	3
Manager, Training & Workforce Development	3
Materials Management Superintendent	3

SACRAMENTO REGIONAL TRANSIT DISTRICT

<u>Designated Positions</u>	<u>Disclosure Categories</u>
Paratransit Operations Manager	2, 3
Principal Civil Engineer	2, 3
Principal Planner	2, 3
Principal Systems Engineer	2, 3
Procurement Analyst I	3
Procurement Analyst II	3
Senior Attorney	2- 6
Senior Community Relations Officer	2, 3
Senior Manager, Budget	2, 3
Senior Manager, Data Center & Network Operations	2, 3
Senior Manager, Enterprise Business Solutions	3
Senior Manager, Environmental Health and System Safety	2, 3
Senior Manager, Cybersecurity and IT Project Management	2, 3
Senior Manager, Labor Relations	2, 3
Senior Manager, Revenue & Analytics	2, 3
Senior Manager, Strategic Projects and Performance	2, 3
Senior Manager, Transit Oriented Development/Real Estate	2, 3, 5, 6
Senior Procurement Analyst	3
Vice President, Bus Operations	1
Vice President, Communications and Partnerships	1
Vice President, Integrated Services & Strategic Initiatives/ Chief of Staff	1-3
Vice President, Light Rail Operations	1
Vice President, Planning & Engineering	1-3
Vice President, Security, Safety & Customer Satisfaction	1

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Disclosure Category 6

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