

**FINAL STATEMENT OF REASONS  
PROPOSED AMENDMENTS TO THE CONFLICT OF INTEREST CODE  
FOR THE FAIR POLITICAL PRACTICES COMMISSION**

**Cover Page**

No changes to any cover pages.

**Executive Office**

The positions of Communications Director and Legislative Coordinator have moved to the External Affairs and Education Division and have been retitled. These positions are deleted from this part of the code to reflect the Commission's current organization.

The position of External Affairs has been eliminated. This position is deleted from the code to reflect the Commission's current organization. The primary duties of this position have transferred to the Legislative and External Affairs Coordinator.

**External Affairs and Education Division**

The Commission has created a new division called the External Affairs and Education Division. The division performs functions and implements programs previously undertaken by the Executive Office and the former Technical Assistance Division.

The position of Division Chief has moved from the Technical Assistance Division. This position is added to this part of the code to reflect the Commission's current organization. The job duties of this position have not significantly changed and do not affect the disclosure category applicable to this position.

The position of Communications Director has moved from the Executive Office and has been renamed Information Officer. This position is added to this part of the code to reflect the Commission's current organization. The job duties of this position have not changed.

The position of Legislative Coordinator has moved from the Executive Office and has been renamed Legislative and External Affairs Coordinator. This position is added to this part of the code to reflect the Commission's current organization. The job duties of this position have expanded to include the job duties of the External Affairs Coordinator. This change in job duties does not affect the disclosure category applicable to this position.

The position of Manager of Filing Officer Programs has moved from the former Technical Assistance Division and has been renamed Staff Services Manager I. This position is added to this part of the code to reflect the Commission's current organization. The job duties of the Manager of Filing Officer Programs from the former Technical Assistance Division have been split between two positions—Staff Services Manager I in the External Affairs and Education Division and Staff Services Manager I in the Administration and Technology Division. The change in job duties does not affect the disclosure category applicable to this position.

The position of Political Reform Consultant has moved from the former Technical Assistance Division. This position is added to this part of the code to reflect the current organization of the Commission. The job duties of this position have not changed.

### **Legal Division**

The position of Assistant Chief has moved from the former Technical Assistance Division and has been renamed Staff Services Manager II. This position is added to this part of the code to reflect the Commission's current organization. The job duties of this position have not changed.

The position of Political Reform Consultant has moved from the former Technical Assistance Division. This position is added to this part of the code to reflect the Commission's current organization. The job duties of this position have not changed.

### **Enforcement Division**

For clarity purposes, the position of Assistant Enforcement Chief is added to the code. This position was previously covered by the code under the general position of FPPC Counsel.

The position of Staff Services Manager I is added to this part of the code. This position supervises Political Reform Consultants and oversees the intake of complaints affecting persons regulated by the Commission, including candidates, committees, lobbyists, etc. This position is assigned disclosure Category 2, which is the disclosure category assigned to Enforcement staff, other than Category 1 filers. This disclosure category is narrowly tailored to real property and economic interests relating to candidates, campaign committees, lobbyists and other persons regulated by the Commission.

A Political Reform Consultant position has been renamed Staff Services Analyst/Assistant Political Reform Consultant. The job duties of this position have not changed.

The position of Associate Government Program Analyst has been eliminated. This position is deleted from the code to reflect the Commission's current organization.

The position of Staff Services Analyst (Procurement Position) was renamed Staff Services Analyst (subpoena services). The job duties of this position have not changed.

### **Administration and Technology Division**

The Administration Division has been renamed the Administration and Technology Division.

The position of Data Processing Manager has been renamed Chief Information Officer. The job duties of this position have not changed.

The position of Personnel Officer was upgraded to Division Manager. This position works closely with the Division Chief by participating in the making of contracts with private vendors and oversees the filing of economic interest disclosure forms affecting persons regulated by the Commission. This position is assigned disclosure Category 3, which is the disclosure category assigned to other Commission managers with similar duties. Category 3 is narrowly tailored to

economic interests relating to candidates, campaign committees, lobbyists and other persons regulated by the Commission. This position is also assigned to Category 4. Category 4 is narrowly tailored to economic interests that provide services, equipment or supplies to the Commission.

The position of Staff Services Manager I is added to this part of the code. The job duties of the Manager of Filing Officer Programs in the former Technical Assistance Division has been split between two positions—Staff Services Manager I in the External Affairs and Education Division and Staff Services Manager I in the Administration and Technology Division. This position oversees the filing of economic interest disclosure forms affecting persons regulated by the Commission. This position is assigned disclosure Category 3, which is the disclosure category assigned to other Commission managers with similar duties. This disclosure category is narrowly tailored to economic interests relating to candidates, campaign committees, lobbyists and other persons regulated by the Commission.

The position of Project Manager has been eliminated. This position is deleted from the code to reflect the Commission's current organization.

### **Former Technical Assistance Division**

The Commission has eliminated the Technical Assistance Division and has transferred its functions and programs to the Legal Division, the Administration and Technology Division, and the newly created External Affairs and Education Division.

The position of Division Chief has moved to the External Affairs and Education Division. This position is deleted from this part of the code to reflect the Commission's current organization.

The position of Assistant Chief has moved to the Legal Division. This position is deleted from this part of the code to reflect the Commission's current organization.

The position of Manager of Filing Officer Programs has moved to the External Affairs and Education Division. The job duties of the Manager of Filing Officer Programs from the former Technical Assistance Division have been split between two positions—Staff Services Manager I in the External Affairs and Education Division and Staff Services Manager I in the Administration and Technology Division. This position is deleted from this part of the code to reflect the Commission's current organization.