



June 18, 2024

Board of Supervisors
County of Ventura
800 S. Victoria Avenue
Ventura, CA 93009

Subject: Delegate Authority to the Clerk of the Board to Direct All Local Agencies to Review and Update Their Conflict of Interest Codes which is Required Biennially Prior to July 1; Direct the Clerk of the Board to Act as the Filing Officer for All Public Officials Designated to File Form 700 in the Conflict of Interest Codes of All County-Related Agencies, Departments, Boards and Commissions; All Supervisorial Districts.

Recommended Actions:

1. Delegate authority to the Clerk of the Board to direct every County-related agency, department, board and commission, and every other local agency for which your Board is the code reviewing body to review its Conflict of Interest Code and submit the requisite 2024 Local Agency Biennial Notice form (Exhibit 1) and, if required, an updated Conflict of Interest Code, to the Clerk of the Board no later than October 1, 2024.
2. Direct the Clerk of the Board to act as the Filing Officer for all public officials designated as filing Statements of Economic Interests (Form 700) in the Conflict of Interest Codes of all County-related agencies, departments, boards and commissions (Exhibit 6).

Fiscal/Mandates Impact:

There is no fiscal impact associated with these actions. All costs will be absorbed by current Clerk of the Board's Office operations.

Discussion:

Government Code section 82011(b) identifies the Board of Supervisors as the code reviewing body of the Conflict of Interest Codes for all County-related agencies, departments, boards and commissions and every other local agency with jurisdiction wholly within Ventura County, except for any agency of the judicial branch of government and any city or city-related agency.

Government Code section 87306.5 provides that (a) No later than July 1 of each even-numbered year, the code reviewing body shall direct every local agency which has adopted a Conflict of Interest Code in accordance with this title to review its Conflict of Interest Code and, if a change in its code is necessitated by changed circumstances, submit an amended Conflict of Interest Code in accordance with subdivision (a) of Section 87302 and Section 87303 to the code reviewing body, and (b) Upon review of its code, if no change in the code is required, the local agency head shall submit a written statement to that effect to the code reviewing body no later than October 1 of the same year.

The Clerk of the Board's Office utilizes a paperless eDisclosure system. Centralizing Form 700 filings with the office and utilizing the eDisclosure system has significantly streamlined the filing process for the filers and County. The system has reduced the amount of duplicate forms for some filers and has reduced the use of resources, such as paper and staff time, that were previously necessitated by the decentralized process.

To date, your Board has adopted Conflict of Interest Codes for 130 boards, commissions, agencies and entities (Exhibit 7). As of May 31, 2024, 93.91 percent of the 2,730 Form 700 statements (Annual, Assuming Office and Leaving Office) filed for the 2023 filing period with the Clerk of the Board's Office pursuant to these Conflict of Interest Codes were completed online (Table 1). The eDisclosure system is designed to reduce amendment requests resulting from incomplete statements, missing signatures and the filing of incorrect forms. The eDisclosure system also randomly selects the required 20 percent of the statements filed on time, and 100 percent of the late filings, for a full review, allowing the Clerk of the Board to efficiently and effectively perform its oversight duties as the Filing Officer.

Table 1

Form 700 Filings (2023)	Filed Manually	% Filed Manually	Filed Electronically	% Filed Electronically	Total Filings
Annual	96	4.92%	1834	95.08%	1930
Assuming Office	32	7.48%	396	92.52%	428
Leaving Office	41	10.54%	331	89.46%	372
Totals	169	6.09%	2561	93.91%	2730

When Conflict of Interest Codes are submitted to the Clerk of the Board's Office they are reviewed by the Form 700 Clerk and County Counsel for sufficiency as to form. To avoid a multiplicity of Board letters, the Clerk of the Board's Office will present all amended codes that are recommended for approval by your Board in one item in the fall of 2024. Other Board letters may follow as proposed amendments are submitted, which is routine. The Clerk of the Board's Office will retain the amended Conflict of Interest Codes and related forms on behalf of your Board.

Attached is a proposed memorandum containing instructions that will be distributed to all County-related departments, agencies, boards and commissions (Exhibit 2) to assist in identifying whether they need to amend their respective Conflict of Interest Codes, and a proposed letter to other local agencies (Exhibit 3) with instructions to complete the 2024 Local Agency Biennial Notice and to review and update (if necessary) their respective Conflict of Interest Codes. Template Conflict of Interest Codes will also be provided to help entities revise their codes (Exhibits 4 & 5).

This item has been reviewed by the County Executive Office, County Counsel, and Auditor-Controller's Office. If you should have any questions regarding this item, please contact me at 654-2251.

Sincerely,



MIA MARTINEZ
Chief Deputy Clerk of the Board



SEVET JOHNSON, PsyD
County Executive Officer

Exhibit 1 – 2024 Local Agency Biennial Notice

Exhibit 2 – Memo to County Agencies and Departments

Exhibit 3 – Letter to Other Local Agencies

Exhibit 4 – Example Conflict of Interest Code Template for County-related Agencies and
Departments

Exhibit 5 – Example Conflict of Interest Code Template for Other Local Agencies

Exhibit 6 – All County-Related Agencies, Departments, Boards and Commissions

Exhibit 7 – Conflict of Interest Codes Adopted by the Board of Supervisors