




**Los Angeles County
Office of Education**

Enclosure 1

August 12, 2010

TO: Ms. Jan Isenberg
Project Director III
Charter School Office

FROM: Paul Landry 
Director
Division of Internal Audit & Analysis

SUBJECT: Overview of LACOE's Conflict of Interest Filing Requirements for Charter Schools Authorized by the Los Angeles County Board of Education

This is to provide an overview of LACOE's conflict of interest (also commonly referred to as the Form 700 Statement of Economic Interests) filing requirements for charter schools authorized by the Los Angeles County Board of Education. Category 6 of Exhibit "A" of LACOE's Conflict of Interest Code effective December 16, 2009 (attached) states:

Persons in this category, are those that perform under a charter school agreement, authorized by the Los Angeles County Board of Education the duties of any position similar to that of any designated position on Los Angeles County Office of Education's Conflict of Interest Code and shall be required to file Statements of Economic Interest disclosing reportable interests in the categories assigned to that designated position.

In addition, individuals who, under an agreement with the charter school, participate in decisions by providing information, advice, recommendations to his or her charter school(s) which could affect financial interest shall be required to file Statements of Economic Interests. The level of disclosure shall be determined by the Los Angeles County Superintendent of Schools (or designee).

To clarify the above requirements, Charter School Board Members, Superintendents, Chief Executive Officers (CEOs), Chief Financial Officers (CFOs), Fiscal Directors and other required filers that have "duties similar to those" of LACOE positions identified in Exhibit "B" of LACOE's Conflict of Interest Code (attached) shall be required to file Statements of Economic Interests and disclose/report at the same level (i.e., same disclosure categories/level) as LACOE Board Members, Superintendent, Assistant Superintendents, etc.

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Since LACOE Board Members, Superintendent and others at the executive level have full disclosure reporting requirements (i.e., disclosure categories 1, 2 and 3) similar positions in the charter schools will also have full disclosure reporting requirements (i.e., disclosure categories 1, 2 and 3). Additionally, since the jurisdiction of LACOE's jurisdiction is county-wide (i.e., covers all of Los Angeles County), the jurisdiction reporting requirements for charter school Board Members, Superintendents, CEOs, CFOs, Fiscal Directors and other required filers is also county-wide.

Questions regarding Statement of Economic Interest Filing requirements can be directed to me at landry_paul@lacoed.edu or (562) 922-6109.

PL:br
Attachment