
CALIFORNIA PRIVACY PROTECTION AGENCY

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Meeting of August 6-7, 2026

To: California Privacy Protection Agency Board

From: Philip Laird, General Counsel
Kevin Sabo, Staff Services Manager
California Privacy Protection Agency

Subject: Agenda Item 4 – Amendment of Agency’s Conflict of Interest Code

At its May 1, 2026 meeting, the Board authorized staff to initiate formal rulemaking to amend the Agency’s conflict of interest code (11 Cal. Code Regs. § 7500). The Political Reform Act (Government Code section 81000 et seq.) obligates state agencies to adopt and maintain a conflict of interest code that precisely identifies those officials and employees whose responsibilities involve making or participating in governmental decisions.

The proposed amendments update designated positions and revise disclosure categories to reflect expanded Agency responsibilities and organizational changes since the code’s initial adoption in 2021. These updates ensure officials and employees whose duties involve making or participating in governmental decisions are properly identified, consistent with the Political Reform Act and Fair Political Practices Commission guidance.

Amendments to the code as originally proposed by staff include:

- (1) additions and updates to designated positions created since 2021
- (2) revisions introducing three new disclosure categories and further refining existing disclosure categories
- (3) other minor, technical and conforming edits to ensure internal consistency

Following Board approval, staff submitted the Notice of Proposed Action and commenced the required 45-day staff comment period on May 22, 2026. The comment period concluded on July 7, 2026. No comments were received.

During final review of the rulemaking text, staff identified one minor typographical issue in Category 2 and corrected an inadvertent duplication of the word “that” (indicated in the final text in double-strikethrough). No other changes were made. The text presented for adoption reflects the amendments previously approved for notice, with this minor clarification incorporated.

Recommendation

Staff recommends that the Board adopt the proposed amendments to the Agency’s conflict of interest code, including the typographical issue noted by staff above, and authorize staff to proceed with final submission to the Office of Administrative Law.