

**COMPLIANCE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**APPENDIX A  
DESIGNATED POSITIONS, DUTIES, AND CATEGORIES**

| <b><u>Position</u></b>                           | <b><u>Duties</u></b>  | <b><u>Category</u></b> |
|--|---|------------------------|
| Chief Compliance Officer/<br>Department Director | Directs, provides oversight and manages the Compliance Department. Recommends policies and courses of action to the Mayor, Chief Operating Officer, Executive Team and Department Directors. Provides appropriate enforcement pertaining to City wage laws and labor standards, monitoring of the City's Project Labor Agreement program (with the exception of Pure Water), compliance with the City's Privacy Technology Ordinance, City responses to internal and external audits, facilitation of the City's Title VI program, and compliance with external agency regulations. Also supervises the Department's Deputy Director who provides oversight to the City's Administrative Hearing and Occupational Safety and Health programs. | 1                      |
| Deputy Director                                  | Assists the Chief Compliance Officer/Department Director in administrative operations of the Compliance Department and serves as support and back up on appropriate enforcement pertaining to City wage laws and labor standards, the City's Project Labor Agreement program (with the exception of Pure Water), City responses to internal and external audits, compliance with the City's Privacy Technology Ordinance, facilitation of the City's Title VI program, and compliance with external agency regulations. This position supervises the Occupational Safety and Health and the City's Administrative Hearing programs.   | 1                      |
| Program Manager<br>Administrative Hearings       | Supports the Chief Compliance Officer/Department Director and Deputy Director in managing programs and projects and ensuring that City policies, and federal and State rules and regulations are being followed. Provides oversight for departmental programs including supervising program staff and ensures that program requirements are met. Assists in negotiating contracts as needed.  | 2                      |
| Program Manager<br>Audits and Title VI           | Supports the Chief Compliance Officer/Department Director, Deputy Director, and other City departments in managing programs and projects and ensuring that City policies, and federal and State rules and regulations are being followed. Provides oversight for departmental programs and ensures that program requirements are met. Assists in negotiating contracts as needed.   | 2                      |

**COMPLIANCE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**APPENDIX A  
DESIGNATED POSITIONS, DUTIES, AND CATEGORIES**

| <b><u>Position</u></b>                                | <b><u>Duties</u></b>   | <b><u>Category</u></b> |
|---|--|------------------------|
| Program Manager Occupational Safety and Health        | Supports the Chief Compliance Officer/Department Director and Deputy Director in managing programs and projects and ensuring that City policies, and federal and State rules and regulations are being followed. Provides oversight for departmental programs including supervising program staff and ensures that program requirements are met. Assists in negotiating contracts as needed.   | 2                      |
| Program Manager Office of Labor Standards Enforcement | Supports the Chief Compliance Officer/Department Director and Deputy Director in managing programs and projects and ensuring that applicable City, State, and federal labor laws are being followed by City contractors and City of San Diego businesses. Provides oversight for departmental programs including supervising program staff and ensures that program requirements are met. Assists in negotiating contracts as needed.                        | 2                      |
| Program Manager Project Labor Agreement               | Supports the Chief Compliance Officer/Department Director as the primary point of contact for the public and City staff for the City's Project Labor Agreement, works with City contractors and Trade Council representatives ensuring that City policies, and federal and State rules and regulations are being followed. This position supervises program staff and ensures that program requirements are met. Assists in negotiating contracts as needed. | 2                      |
| Program Manager Privacy Technology Ordinance          | Supports the Chief Compliance Officer/Department Director as the primary point of contact for the public and City staff for the City's Surveillance Ordinance Compliance program, works with departments to ensure that the City's technology is in compliance with the Surveillance Ordinance, assists with drafting policies as needed, communicates with City departments and members of the Privacy Board.   | 2                      |
| Program Coordinator                                   | Supports the Chief Compliance Officer/Department Director, Deputy Director, and Program Managers in managing programs and projects and ensuring that City policies, and federal and State rules and regulations are being followed. Provides oversight for departmental programs and ensures that program requirements are met.  | 2                      |

**COMPLIANCE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**APPENDIX A  
DESIGNATED POSITIONS, DUTIES, AND CATEGORIES**

| <b><u>Position</u></b>                              | <b><u>Duties</u></b>   | <b><u>Category</u></b> |
|---|--|------------------------|
| Supervising Compliance Officer                      | Assists the Compliance Officer/Department Director, and Program Manager; plans, assigns, supervises, review and evaluate the work of subordinate staff; administers programs and conducts administrative, organizational, and programmatic analyses. Develops negotiation plans and strategies, and prepares reports.  | 2                      |
| Senior Compliance Officer/Senior Management Analyst | Assists the Compliance Officer/Department Director, Deputy Director, and Program Manager; plans, assigns, supervises, review and evaluate the work of subordinate staff; administers programs and conducts administrative, organizational, and programmatic analyses. Develops negotiation plans and strategies, and prepares reports.   | 2                      |
| New Positions and Consultants                       | <p>Consultants and New Positions shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category in the code subject to the following limitation:</p> <p>The Chief Compliance Officer/Department Director or Deputy Director may determine in writing that a particular consultant or new position, although a “designated position,” is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant’s or new position’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Department Director’s or Deputy Director’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.</p> | 3                      |

**COMPLIANCE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**APPENDIX A  
DESIGNATED POSITIONS, DUTIES, AND CATEGORIES**

**CATEGORY 1**

1. All reportable investments, business positions, and income (including gifts) from any firm or business entity located in or doing business with the City of San Diego.
2. All reportable interests in real property located in the City of San Diego, including property located within a two-mile radius of any property owned or used by the City.
3. All reportable interests in real property owned or used by any person or business entity that supplies goods or services to the City of San Diego, is a tenant of the City of San Diego, or is granted authority by the City of San Diego to use City facilities.
4. All reportable income, including gifts, from any person or business entity that supplies goods or services to the City of San Diego or is granted authority by the City of San Diego to use City facilities.

**CATEGORY 2**

1. All reportable investments and business positions in any firm or business entity that supplies goods or services to the City, is a tenant of the City, is an adverse party to the City in a legal proceeding, or is granted authority by the City to use City facilities.
2. All reportable income, including gifts, from any person or business entity that supplies goods or services to the City, is a tenant of the City, is an adverse party to the City in a legal proceeding, or is granted authority by the City to use City facilities.
3. All reportable interests in real property owned or used by any person or business entity that supplies goods or services to the City, is a tenant of the City, is an adverse party to the City in a legal proceeding or is granted authority by the City of San Diego to use City facilities.

**CATEGORY 3**

Consultants/new positions shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The Director may determine in writing that a particular consultant/new position, although a “designated person,” is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the consultant’s/new position’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Director’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.