

NOTICE OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE OF THE CALIFORNIA PRIVACY PROTECTION AGENCY

NOTICE IS HEREBY GIVEN that the **California Privacy Protection Agency**, (CalPrivacy) pursuant to the authority vested in it by section 87306 of the Government Code, proposes amendment to its conflict of interest code. A comment period has been established commencing on May 22, 2026, and closing on July 7, 2026. All inquiries should be directed to the contact listed below.

The **California Privacy Protection Agency** proposes to amend its conflict of interest code to include employee positions that involve the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest, as set forth in subdivision (a) of section 87302 of the Government Code. The amendment carries out the purposes of the law and no other alternative would do so and be less burdensome to affected persons.

Changes to the conflict of interest code:

- Standardize hyphenation in chapter and section titles from “CONFLICT-OF-INTEREST” and “Conflict-of-Interest” to “CONFLICT OF INTEREST” and “Conflict of Interest”
- Clarify that Board Members and the Executive Director must electronically file statements of economic interests with the Fair Political Practices Commission (Commission) while all other designated positions must file with CalPrivacy
- Clarify that all statements must be available for public inspection and under Government Code Section 81008
- Add to existing Category 1 the following positions for disclosure:
 - Chief Deputy Executive Director
 - Deputy Director of Policy and Legislation
 - Senior Management Auditor
 - Information Technology Specialist III (Audits, Enforcement)
 - Staff Services Manager I (Enforcement, Legal)
- Add to existing Category 2 the following positions for disclosure:
 - Staff Services Manager III/Manager II
 - Staff Services Manager II/Supervisor II/Analyst IV (Administration)
 - Staff Services Manager I/Supervisor I (Administration)
- Establish and add to Category 3 the following positions for disclosure:
 - Deputy Director of Public and External Affairs
 - Information Officer II
- Establish and add to Category 4 and/or Category 5 the following positions for disclosure:
 - Chief Information Officer/Chief of Information Technology
 - Information Technology Manager I
 - Information Technology Specialist II
 - Assistant Deputy Director (Data Broker Unit)
 - Supervisor II (Data Broker Unit) – **Category 5 only**
- Clarify that the Executive Director may issue a written determination narrowing disclosure for limited-scope consultants and new positions
- Conform Category 1 and Category 2 disclosure provisions to Commission model language
- Propose new disclosure provisions for positions established in Categories 3, 4, and 5

Information on the code amendment is attached to this email.

Any interested person may submit written comments relating to the proposed amendment by submitting them no later than July 7, 2026, or at the conclusion of the public hearing, if requested, whichever comes later. At this time, no public hearing is scheduled. A person may request a hearing no later than June 22, 2026.

The **California Privacy Protection Agency** has determined that the proposed amendments:

1. Impose no mandate on local agencies or school districts.
2. Impose no costs or savings on any state agency.
3. Impose no costs on any local agency or school district that are required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4 of Title 2 of the Government Code.
4. Will not result in any nondiscretionary costs or savings to local agencies.
5. Will not result in any costs or savings in federal funding to the state.
6. Will not have any potential cost impact on private persons, businesses or small businesses.

All inquiries concerning this proposed amendment and any communication required by this notice should be directed to: Kevin Sabo, Staff Services Manager, (279) 278-5086, regulations@coppa.ca.gov