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San Diego Housing Commission (SDHC) SDHC Conflict of Interest Code Policy and Related Provisions

Presentation to SDHC Board of Commissioners
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Introduction

- California Government Code Section 87206.5 requires:
 - By July 1 of each even-numbered year, “code reviewing bodies” must direct each local agency under their jurisdiction to review its previously adopted conflict-of-interest code.
 - The San Diego City Council is the “code reviewing body” for the City’s local agencies, including SDHC.
- City Council Resolution 316787
 - Passed May 19, 2026
 - Directs all City departments, agencies and appropriate Boards and Commissions, including SDHC, to review their conflict-of-interest codes.
 - If an amendment is necessary, it must be provided to the Office of the City Clerk by August 7, 2026.
- Municipal Code Section 98.0301(d)(8)
 - Requires SDHC to present its policies to the Housing Authority of the City of San Diego for review, consideration and potential approval.



Summary of Proposed Amendments

- Updated position titles and alphabetized position lists.
- Updated language related to filing deadlines (Appendix C).
- Updated definition of “Jurisdiction” (Appendix D).
- Added definition of “Agreement” in Section 2.4(B)(iv).
- Expanded contractor Statement for Public Disclosure requirements in Section 2.5(C).
- No substantive changes to policy intent or structure.



Staff Recommendations

That the SDHC Board of Commissioners recommend that the City Council and Housing Authority take the following actions:

City Council

- 1) Adopt the amended Conflict of Interest Code for SDHC.

Housing Authority

- 1) Approve proposed revisions to SDHC Policy PO101.000 “Conflict of Interest Code and Related Provisions.”
- 2) Authorize the SDHC’s President and CEO, or designee to execute all documents and instruments as are necessary and/or appropriate to implement this approval in a form approved by general counsel, and to take such actions as necessary and/or appropriate to implement the approved policy.



Questions & Comments