SAN DIEGO HOUSING COMMISSION

REPORT TO THE HOUSING AUTHORITY OF THE CITY OF SAN DIEGO

DATE ISSUED: July 2, 2026 **REPORT NO**: HAR26-009

ATTENTION: Chair and Members of the Housing Authority of the City of San Diego
For the Agenda of November 10, 2026

SUBJECT: Approve Proposed Revisions to San Diego Housing Commission Policy PO101.000, "Conflict of Interest Code and Related Provisions"

COUNCIL DISTRICT: Citywide

REQUESTED ACTION

Approve the proposed revisions to San Diego Housing Commission Policy PO101.000 "Conflict of Interest Code and Related Provisions."

STAFF RECOMMENDATION

That the Housing Authority of the City of San Diego (Housing Authority) take the following actions:

1) Approve the proposed revisions to San Diego Housing Commission (SDHC) Policy PO101.000 "Conflict of Interest Code and Related Provisions."

1) Authorize SDHC's President and Chief Executive Officer (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.

SUMMARY

SDHC establishes and maintains written policies related to its method of operations. San Diego Municipal Code 98.0301(d)(8)(D) requires SDHC to present its policies to the Housing Authority for review, consideration and potential approval.

California Government Code section 87306.5 requires that, 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. California Government Code 82011(c) identifies the City Council as the "code reviewing body" for the City's local agencies, including boards and commissions, such as SDHC.

On May 19, 2026, the City Council passed Resolution No. 316787, directing all City departments, agencies and appropriate boards and commissions, including SDHC, to review their previously approved conflict-of-interest codes and if an amendment is necessary, provide the proposed amendment to the Office of the City Clerk by August 7, 2026, for presentation to the City Council for consideration and potential approval.

SDHC’s conflict-of-interest code has been updated to include minor revisions to contractor disclosure requirements, positions (including updating and alphabetizing the lists of positions), updated filing deadline language, and SDHC’s jurisdiction, as outlined in Appendix A (Attachment 2) and Appendices B – E (Attachment 3) of SDHC Policy PO101.000 “Conflict of Interest Code and Related Provisions” (Attachment 1). In a separate item being presented to the City Council, SDHC is recommending City Council approval of the updated conflict-of-interest code.

Additionally, the following sections of Policy PO101.000 are proposed to be amended:

- Section 2.4(B)(iv): Adds the definition of “Agreement.”

- Section 2.5(C): Updates the requirements for contractors to submit a Statement for Public Disclosure.

Other than these minor adjustments, the wording of the policy remains unchanged.

PREVIOUS COUNCIL, COMMITTEE and/or SDHC BOARD OF COMMISSIONERS ACTIONS
On July 9, 2026, the SDHC Board of Commissioners (Board) voted 4-0 to recommend that the Housing Authority take the staff-recommended actions in this report.

The SDHC Board approved an update to SDHC’s conflict-of-interest code on October 10, 2024 (Report No. HCR24-076). The City Council subsequently approved SDHC’s amended conflict-of-interest code on October 29, 2024 (Resolution No. 315849).

FISCAL CONSIDERATIONS
These actions do not have any fiscal impact.

NONDISCRIMINATION ASSURANCE
At SDHC, we’re about people. We are committed to ensuring a compassionate, person-centered approach to SDHC’s programs, policies, projects and activities and to serving our community impartially, fairly and without bias. We are also committed to ensuring compliance with all applicable federal, state and local laws and protections to the extent that they affect this action relative to nondiscrimination.

SDHC STRATEGIC PLAN
This item relates to the Core Value “Commit to transparency and being strong financial stewards” in SDHC’s Strategic Plan for Fiscal Year (FY) 2026-2030.

ENVIRONMENTAL REVIEW
The conflict-of-interest code amendment is not a project as defined by the California Environmental Quality Act Section 21065 and State CEQA Guidelines Section 15378(b) (5), as it is an administrative activity of government that will not result in direct or indirect physical changes in the environment. The determination that this activity is not subject to CEQA, pursuant to Section 15060(c)(3), is not appealable and a Notice of Right to Appeal the Environmental Determination (NORA) is not required. The provision of any federal funds as the result of this action is conditioned on the City of San Diego’s final NEPA review and approval.

Processing under the National Environmental Policy Act is not required as no federal funds are

involved in the activities.

Respectfully submitted by,

Debra Fischle-Faulk

Debra Fischle-Faulk
Senior Vice President
San Diego Housing Commission

Approved by,

Lisa C. Jones

Lisa C. Jones
President and Chief Executive Officer
San Diego Housing Commission

Attachments:

1. Conflict of Interest Code and Related Provisions
2. Designated Employees and Designated Positions – Appendix A
3. Disclosure Categories – Appendix B through E
4. Strikeout Version – Conflict of Interest Code and Related Provisions

A printed copy is available for review during business hours at the information desk in the main lobby of SDHC’s offices at 1122 Broadway, San Diego, CA 92101. Docket materials are also available in the “Governance & Legislative Affairs” section of SDHC’s website at www.sdhc.org.