

TITLE 10. CALIFORNIA DEPARTMENT OF REAL ESTATE

CONFLICT OF INTEREST CODE FOR THE DEPARTMENT OF REAL ESTATE INITIAL STATEMENT OF REASONS

This document is the written explanation for the amendments to the Department of Real Estate's ("DRE") Conflict of Interest Code, Title 10, California Code of Regulations, Section 3200. This explanation is provided in accordance with the expressed terms of the proposed action. DRE has determined that the following position types are subject to DRE's Conflict of Interest Code and are added to the list of designated positions:

- All Career Executive Assignment positions, Level A and above (redesignation).
- Supervising Special Investigators I and II in Enforcement, Licensing, and Subdivisions positions.
- Managing Deputy Commissioners I and II in Subdivisions positions.
- Associate Governmental Program Analysts in Subdivisions positions.
- Deputy Commissioners in Subdivisions positions.
- Special Investigators in Subdivisions positions.
- All Information Technology Managers, Supervisors, and Specialists.

The following position types are no longer in use, and are eliminated from the list of designated positions:

- Senior Deputy Commissioners.
- All Appraisers.
- All Data Processing Managers.
- All Staff and Senior Information System Analysts.
- All Staff and Senior Programmer Analysts.
- All System Software Specialists I, II, and III.

Other amendments to the Conflict of Interest Code were made for the following reasons:

1. The reporting requirement language was updated to conform with the Fair Political Practices Commission's ("FPPC") updated standard language.
2. Language related to Prohibition of Honoraria and Limits on Gifts were removed as redundant with other law.
3. The Appendix' listing of positions was reorganized to reflect the organizational structure of DRE. This change also served to allow specific reporting designations for positions in DRE divisions where employee responsibilities necessitate inclusion in specific reporting categories.
4. In consultation with the FPPC, the language designating reporting categories was updated and clarified to be more easily understood.
5. The addresses of both DRE's headquarters office and the FPPC's office were updated.