



CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION

1102 Q Street • Suite 3050 • Sacramento, CA 95811 • (916) 322-5660

October 15, 2025

Amy Frusetta
Account Manager, Keenan and Associates
Organization for Self-Insured Schools
10860 Gold Center Drive, Suite 350
Rancho Cordova, CA 95670

Re: Order Granting Exemption from Conflict of Interest Code Requirement
Our File No. E-25-002

Dear Amy Frusetta:

This letter is in response to your July 31, 2025, request on behalf of the Organization of Self-Insured Schools Joint Powers Authority (the “JPA”), a public risk sharing pool established pursuant to a Joint Powers Agreement for self-funding property and liability claims, for an exemption from the requirement to file a conflict-of-interest code pursuant to Government Code Section 87300.¹

The JPA satisfies the Fair Political Practices Commission’s (“Commission”) governing regulation criteria, and the exemption request is granted. (Regulation 18751(d).) Regulation 18751(d) states an agency that does not have a “designated employee” within the meaning of Government Code Section 82019 may be exempt from the adoption of a conflict-of-interest code required under Section 87300. A “designated employee” does not include any public official specified in Section 87200. (Gov Code Section 82019(b)(1).) All positions within the JPA are Section 87200 filers, therefore the JPA has no designated employees.

Please note that interested parties may submit a request for the Commission to reconsider this approval within 30 days after the exemption approval is posted on the Commission’s website. The Commission Chair will consider the request, and if, at the Chair’s discretion, good cause exists for reconsideration, the Chair will schedule the matter for a hearing before the Commission. (Regulation 18751(f).)

Upon being issued, an exemption remains in effect until the basis for the grant of exemption no longer exists or the expiration of two years, whichever occurs earlier. The JPA must submit an extension request if it wishes to continue the exemption. (Regulation 18751(g).)

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.



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If you have any questions on this matter, please contact me at mroeckl-navazio@fppc.ca.gov.

Sincerely,

Galena West
Executive Director

Margaret L. Roeckl-Navazio

By: Margaret L. Roeckl-Navazio
Commission Counsel, Legal Division