



# EXECUTIVE DECISION DOCUMENT

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|--|--|---|--|---|--|
| <b>GENERAL MANAGER APPROVAL:</b>   |  | DocuSigned by:<br><i>Michael Jones</i><br>47000790F2D7463...            |  | <b>GENERAL MANAGER ACTION REQ'D:</b>  |  |
| DATE: 4/28/2026  |  | 5/7/2026  |  | BOARD INITIATED ITEM: Yes   |  |
| <b>Originator/Prepared by: Pamela Herhold</b><br><b>Dept: AGM - Performance &amp; Budget</b> | <b>General Counsel</b>   | <b>Chief Financial Officer</b>  | <b>District Secretary</b>  | <b>BARC</b>   |  |
| Signature/Date:<br>DocuSigned by:<br><i>Pamela Herhold</i><br>3BB24D65B8724F5...<br>5/4/2026 | DocuSigned by:<br><i>Amelia Sandoval-Smith</i><br>2528C067C44147D...<br>5/4/2026 [ ] | Signed by:<br><i>Joseph Beach</i><br>7D9A7C6E7348456...<br>5/4/2026 [ ] | DocuSigned by:<br><i>Robert Franklin</i><br>AFF4529E1F0D45C...<br>5/7/2026 [ ] | DocuSigned by:<br><i>Pamela Herhold</i><br>3BB24D65B8724F5...<br>5/4/2026 [ ] |  |

## SB 827 Mandatory Ethics Training Plan for Employees

### PURPOSE:

Designate employee positions to receive mandatory biennial ethics training under Senate Bill (SB) 827.

### DISCUSSION:

SB 827, passed and signed by the Governor in 2025, requires certain local government employees to receive ethics training every two years. The statute permits the governing body of the local government agency to identify and designate the positions required to receive ethics training. Staff recommends that the Board designate all positions that are required to file an annual Statement of Economic Interests (Form 700), including committee members subject to this requirement. These positions have already been identified as those that make, participate in, or influence governmental decisions as defined by the California Political Reform Act and regulations promulgated by the California Fair Political Practices Commission (FPPC). Governmental decisions generally include those related to procurement and contracting, budgets, financial matters, and District policies. Designated employees will receive biennial training covering topics required by SB 827, including conflict-of-interest rules, gift and travel restrictions, financial interest disclosure, open government laws, due process, competitive bidding requirements, and nepotism.

### FISCAL IMPACT:

There is no anticipated fiscal impact. The FPPC offers a free, self-paced ethics training that is compliant with SB 827 and District staff will develop a short supplemental recorded training to cover BART-specific ethics policies.

### ALTERNATIVE:

Direct staff to identify a different set of employees to receive mandatory ethics training.

**RECOMMENDATION:**

Adopt the following Motion.

**MOTION:**

The Board designates employee positions required to file a Statement of Economic Interests (Form 700) to receive mandatory biennial ethics training in compliance with SB 827.