

MARLENE CANTER, PRESIDENT  
 MÓNICA GARCÍA  
 JULIE KORENSTEIN  
 MARGUERITE POINDEXTER LAMOTTE  
 MIKE LANSING  
 JON LAURITZEN  
 DAVID TOKOFSKY



Administrative Office  
 333 South Broadway Avenue, 24<sup>th</sup> Floor  
 Los Angeles, California 90017  
 Telephone: (213) 241-7000  
 Fax: (213) 241-8442

DAVID L. BREWER III  
 SUPERINTENDENT OF SCHOOLS

Dear LAUSD Business Partner:

Like so many public and private institutions across the country, the Los Angeles Unified School District (LAUSD) values the highest standards of business ethics and integrity in our relationships with our contractors and consultants. We count on your excellence to help us in achieving our mission of educating the students of the Los Angeles area.

Core to our business practices are the three guiding principles which our *Contractor Code of Conduct* (UPDATED NOVEMBER 2006) is premised upon:

- Ethical and responsible use of scarce public tax dollars is a critical underpinning of effective government
- Contracting integrity and quality of service are the shared responsibilities of LAUSD and our Contractors
- Proactive and transparent management of potential ethics concerns improves public confidence

These principles are also embedded in our contractor selection process and are the keys to a successful business relationship with LAUSD. **Please ensure that anyone who conducts business with LAUSD on your behalf is well aware of our policies and our expectations for ethical business conduct.**

For your convenience, the Ethics Office website you are on includes a number of resources such as the full text of our *Contractor Code of Conduct* and other training tools. You can also register with LAUSD's Lobbying Disclosure Program on our site. Please note that LAUSD is systematically tracking for compliance with our Lobbying Code.

Given that federal laws have recently established the need for *all* organizations, large and small, to promote an organizational culture that "encourages ethical conduct," you no doubt have your own efforts underway to strengthen ethical practice in your organization. We look forward to complementing your efforts with additional tools and resources that will be made available on this website.

We greatly appreciate your valued contributions to-date in helping LAUSD enhance our public's trust. If you have any questions regarding our efforts to promote responsible and ethical business practices, or if you wish to share with us details of your successes in strengthening ethical conduct, please contact us at: [ContractorEthics@lausd.net](mailto:ContractorEthics@lausd.net).

Thank you for your commitment to supporting the students of Los Angeles with your very best!

Yea-Lan Chiang  
 Ethics Officer

Mark Hovatter  
 Director of Facilities Contracts

Duane P. Johnson  
 Chief Procurement Officer

## Overview of LAUSD's Contractor Code

For your reference, below is a quick, high-level introduction to our Contractor Code of Conduct:

- ① *Demonstrate Honesty and Integrity*  
Ensure that communications with us are always provided truthfully, accurately and completely.
- ② *Be a Responsible Bidder*  
Steer clear of being a proposer or sub-proposer on any work you or your organization helped to scope.
- ③ *Maintain Our Contracting Cone of Silence*  
Refrain from lobbying activities during the designated times required. Limit any contract inquiries to approved contract officials *only*.
- ④ *Manage Potential Conflicts*  
Disclose potential or actual conflicts to LAUSD via a written "Meaningful Conflict Disclosure" statement.
- ⑤ *Use LAUSD Resources Responsibly*  
Ensure that LAUSD assets of time, property, info, supplies, equipment ... are used for LAUSD work.
- ⑥ *Protect Our Confidentiality*  
Seek permission before sharing any information obtained in the course of your work for LAUSD.
- ⑦ *Guard the LAUSD Affiliation*  
Avoid any use of LAUSD names, logos or marks without appropriate and prior written approval.
- ⑧ *Respect Our Gift Limits*  
Abide by our zero tolerance gift limit for LAUSD procurement employees and the \$100 per calendar year limit for all other employees.
- ⑨ *Observe LAUSD Cooling Periods*  
Safeguard your hiring of any current or former LAUSD officials with ethical walls to avoid conflict.
- ⑩ *Satisfy Your Disclosure Obligations*  
Be proactive in fulfilling state-mandated personal financial disclosure requirements and LAUSD's Lobbying Disclosure rules as you meet the triggers.

## Pitfalls You'll Want to Avoid

Be sure to avoid any violation(s) of LAUSD's Contractor Code of Conduct since there may be adverse consequences for you and your organization, including but not limited to the following sanctions:

- ➡ Voidance or termination of a contract
- ➡ Repayment to LAUSD or payment of fines
- ➡ Public listing on the LAUSD "Out of Compliance" registry
- ➡ Debarment from any further LAUSD bidding or contracting activities
- ➡ Prosecution by the appropriate authorities

## Where To Go for Help

Remember, if you are ever unsure of how to proceed in an ethical manner in your work with or on behalf of LAUSD, please be sure to seek advice from your designated contract analyst in the Procurement Services Group or Facilities Contracts Branch.

You may also review the resources on our Ethics Office website at: [www.lausd.net/ethics](http://www.lausd.net/ethics), or contact the Ethics Office, if you have further questions about LAUSD's Contractor Code of Conduct.

***Make Every Dollar Count!***



## Ethics Office

*Building Trust*

*Inside and Out*

**Doing Business  
Ethically  
↑ with LAUSD**

### ***What Every Contractor Needs to Know***

- How Ethics Helps You Succeed
- Overview of LAUSD's Contractor Code
- Pitfalls You'll Want to Avoid

#### **LAUSD Ethics Office**

333 S. Beaudry Avenue, 20<sup>th</sup> Floor  
Los Angeles • CA 90017

Tel: (213) 241-3330 • Fax: (213) 241-3319

[www.lausd.net/ethics](http://www.lausd.net/ethics)

[ContractorEthics@lausd.net](mailto:ContractorEthics@lausd.net)

## How Ethics Helps You Succeed

To enjoy a successful business relationship with the Los Angeles Unified School District (LAUSD), you need to ensure that anyone who conducts business with our district on your behalf is well aware of our policies and expectations for ethical business conduct.

You and your representatives should note that as with other leading public and private organizations around the country, LAUSD values the highest standards of business ethics and integrity in our relationships with our contractors and consultants. For an agency like ours, ethical conduct is more than just good business practice. Ethics is a cornerstone for maintaining the public confidence and trust we need to fulfill our mission of enabling student achievement.

Given that the business practices and actions of contractors and consultants can impact and reflect upon LAUSD, we seek business partners who demonstrate a consistent commitment to delivering excellence and to making every dollar count for the students we serve.

## Leveraging Our Guiding Principles

Strengthen your relationship with LAUSD by demonstrating your understanding of the three guiding principles behind our Contractor Code of Conduct (updated November 2006):

- Ethical and responsible use of scarce public tax dollars is critical to effective government
- Contracting integrity and quality of service are the shared responsibilities of LAUSD and our contractors
- Proactive and transparent management of potential ethics concerns improves public confidence

By observing these principles and the standards set by our Code, you ensure our mutual success.



## Lobbying Disclosure Program — Registration Triggers

If you or other individuals in your organization perform any of the following, you may need to register under LAUSD's Lobbying Disclosure Program:

- Attend or arrange meetings with LAUSD officials;
- Draft recommendations for LAUSD consideration;
- Give gifts, meals, event tickets or other benefits to LAUSD officials;
- Introduce or market products or services to LAUSD;
- Provide advice or recommend

- strategy to a client on LAUSD;
- Seek support or opposition from a third party (including the public) on LAUSD matters;
- Send letters or write e-mails to LAUSD officials in order to influence their decision-making; or
- Take any other action to influence purchasing, contracting, policy or other decisions under consideration by LAUSD officials (*outside of the service requirements of a contract or outside of a specific LAUSD-issued bid process*)

Registration is required if you or your organization conduct these activities and are either:

**A** Planning to spend over \$10,000 this calendar year to perform these activities on your own behalf

**OR**

**B** Paid by a client in any amount to conduct the above activities on a client's behalf

In either of these cases, go to: <http://ethics.lausd.net/elfs> to access our training and to register.