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COVID-19 Advisory



Impact of COVID-19 on Form 700s - Filing Deadline Extended

March 30, 2020

The deadline for district officials and employees to file Form 700s has been extended from April 1 to June 1, 2020. While the Fair Political Practices Commission (FPPC) encourages filers to complete the form as soon as possible, given the impacts of COVID-19, it has extended the deadline by 60 days. If they have not already filed, filers should make sure they understand the financial interests to be reported on the schedules of Form 700, including gifts they may have received from persons, organizations, consultants, and businesses during 2019.

Remember that Schedule D of the Form 700 must list gifts valued at \$50 or more in the aggregate from a single disclosable source during the calendar year, and the total amount of gifts received from a single source during the calendar year may not exceed \$500. A source is “disclosable” if it is within the disclosure categories listed for your position in your district’s conflict of interest code. Gifts from sources which do not fall within your position’s disclosure categories do not need to be reported on your Form 700.

The definition of “gift” is broad and can include anything of value provided to an official, for which consideration of equal or greater value is not provided. Gifts may include meals, attendance at holiday parties or conference receptions (excluding “drop-ins”), presents and similar items—even rebates and discounts on services or events that are not available to the general public.

If an official receives a gift, it is always best to check whether there are any exemptions that might apply; otherwise, the gift must be reported by the official. Even where a gift has been received, the official may have other options, such as returning the gift to the giver or donating it to charity, either of which eliminates the need to report the gift. The Fair Political Practices Commission issues publications to assist officials in understanding gifts and Form 700 reporting obligations. These publications are available on the FPPC website.

Remember: Form 700 requires the disclosure of a wide variety of financial interests beyond gifts. Those include investments, real property income, income (including that of a spouse), and travel payments. Each category is subject to specific rules and exemptions but not all categories apply to all reporting individuals at the school district. Please check your district’s Conflict Code for specifics.

DWK will continue to provide guidance as information becomes available. For more information regarding the impact of COVID-19 on your district’s operations, please visit our COVID-19 Resources page at <https://www.dwkesq.com/covid-19-resources-page/>.

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