

January 30, 2025

D-2025-Community Services Division-002

TO: REGIONAL CENTER EXECUTIVE DIRECTORS

SUBJECT: REQUIRED CHANGES TO CONFLICT-OF-INTEREST POLICIES

This letter requires all regional centers to update their conflict-of-interest policies. Welfare and Institutions Code (WIC) Section 4626.5 was amended by [Chapter 902](#), Statutes of 2024, effective on January 1, 2025, as noted in bold font below:

WIC 4626.5. Each regional center shall submit a conflict-of-interest policy to the department by July 1, 2011, and shall post the policy on its internet website by August 1, 2011. The policy shall do, or comply with, all of the following:

- (a) Contain the elements of this section and be consistent with applicable law.
- (b) Define conflicts of interest.
- (c) Identify positions within the regional center required to complete and file a conflict-of-interest statement.
- (d) Facilitate disclosure of information to identify conflicts of interest.
- (e) Require candidates for nomination, election, or appointment to a regional center board, and applicants for regional center director to disclose any potential or present conflicts of interest prior to being appointed, elected, or confirmed for hire by the regional center or the regional center governing board.
- (f) Require the regional center and its governing board to regularly and consistently monitor and enforce compliance with its conflict-of-interest policy.
- (g) Prohibit a regional center employee from accepting a gift or gifts from a service provider, consumer, or consumer's family member valued over fifteen dollars (\$15) per year.**
- (h) Establish a policy prohibiting regional center senior staff from hiring relatives at the center or any ancillary foundation and organization. The policy shall be included in the regional center contract and shall be included in training of the governing board.**

For purposes of subdivisions (g) and (h) above, "family member" and "relatives" both are defined based upon the following definition in subdivision (f) of Section 54505 of Title 17 regulations: "Family Member" includes the individual's spouse, domestic partner, parents, stepparents, grandparents, siblings, step-siblings, children, stepchildren, grandchildren, parents-in-law, brothers-in-law, sisters-in-law, sons-in-law, and daughters-in-law." This definition should be considered to include such associations by blood, marriage, and adoption.

For purposes of subdivision (h) above, “regional center senior staff” are identified as people in key positions that drive the strategic decision-making at each regional center. These key positions include:

- Executive Director
- Associate Executive Director or comparable position, if applicable
- Members of the regional center’s executive team
- The highest-ranking staff position in each of the following disciplines:
  - Case Management
  - Clinical Services
  - Community Services
  - Finance
  - Human Resources

Regional centers must update and publicly post their conflict-of-interest policies within 90 days of receipt of this letter and inform their primary liaison within the Department’s Office of Community Operations when their policies are compliant with this new law.

If you have questions, please contact your regional center’s primary liaison within the Office of Community Operations.

Sincerely,

*Original Signed by:*

ERNIE CRUZ  
Deputy Director  
Community Services Division

cc: Regional Center Administrators  
Regional Center Chief Counselors  
Regional Center Community Services Directors  
Association of Regional Center Agencies  
Pete Cervinka, Department of Developmental Services  
Michi Gates, Department of Developmental Services  
Carla Castañeda, Department of Developmental Services