

March 5, 2026

D-2026-Case Management-001

TO: REGIONAL CENTER EXECUTIVE DIRECTORS

SUBJECT: REGIONAL CENTER PURCHASE OF SERVICE REQUIREMENTS AND CONSIDERATIONS

This letter identifies laws in Welfare and Institutions Code (WIC) regional centers must follow when determining the purchase of services or supports for individuals and families they serve, and the steps regional centers and planning teams should follow when considering services or supports. This letter is not intended to encompass all laws regional centers must follow when purchasing services or supports.

Definition and General Requirements

WIC Section [4512\(b\)](#) defines “Services and supports for persons with developmental disabilities” as:

“...specialized services and supports or special adaptations of generic services and supports directed toward the alleviation of a developmental disability or toward the social, personal, physical, or economic habilitation or rehabilitation of an individual with a developmental disability, or toward the achievement and maintenance of an independent, productive, and normal life. The determination of which services and supports are necessary for each consumer shall be made through the individual program plan process. The determination shall be made on the basis of the needs and preferences of the consumer or, when appropriate, the consumer’s family, and shall include consideration of a range of service options proposed by individual program plan participants, the effectiveness of each option in meeting the goals stated in the individual program plan, and the cost-effectiveness of each option....”

This excerpt of the law defines services and supports, with emphasis added to note important considerations and cost-effectiveness which are addressed below.

WIC Section [4646\(a\)](#) expands on the individual program plan (IPP) and services and supports, stating the intent of the Legislature that:

- the IPP and provision of services and supports is centered on the individual and the family of the individual and takes into account the needs and preferences of the individual and the family, if appropriate.
- the IPP be developed using a person-centered approach that reflects the needs and preferences of the individual, and, as appropriate, their family.
- the services and supports should assist each individual in achieving their personal outcomes and life goals and promote inclusion in their community.

- the provision of services to individuals and their families be effective in meeting the goals stated in the IPP, reflect the preferences and choices of the individual, and reflect the cost-effective use of public resources.

In accordance with WIC Section [4646.4](#), regional centers shall ensure, at the time of development, scheduled review, or modification of an individual's IPP or individualized family service plan (IFSP), the establishment of an internal process. This internal process shall ensure adherence with federal and state law and regulation, and if purchasing services and supports, shall ensure all of the following:

1. Conformance with the regional center's purchase of service policies, as approved by the Department of Developmental Services (Department) pursuant to WIC Section [4434](#).
2. Utilization of generic services and supports if appropriate, as specified in WIC Section [4646.4](#).
3. Utilization of other services and sources of funding as contained in WIC Section [4659](#).
4. Consideration of the family's responsibility for providing similar services and supports for a minor child without disabilities in identifying the individual's service and support needs as provided in the least restrictive and most appropriate setting.
5. Consideration of information obtained from the individual and, if appropriate, the parents, legal guardian, conservator, or authorized representative about the individual's need for the services, barriers to service access, and other information.

Specific Requirements and Considerations

Cost-Effectiveness

Please note: The 2025 Developmental Services Budget Trailer Bill, [Assembly Bill 143](#), added WIC Section [4648\(a\)\(6\)\(D\)\(ii\)](#) which requires the Department, with community input, to issue a written directive defining the term "cost effective" for all programs no later than August 1, 2026. That directive is forthcoming, and potentially could change the information below about cost-effectiveness.

As stated above, the individual program planning team must consider the cost-effectiveness of services or supports. WIC Section [4648\(a\)\(6\)\(D\)\(i\)](#) further specifies that regional centers shall consider all of the following when determining cost-effectiveness:

1. The regional center is required to select the service or support that is:
 - The least costly available provider of comparable service;
 - Able to accomplish (all or part) of the individual program plan; and
 - Consistent with the particular needs of the individual and family as identified in the IPP.

2. When considering whether the service or support is the least costly available, the regional center shall:
 - Include the cost of transportation; and
 - Determine the availability of federal funding to cover some or all of the costs associated with the service or support.
3. If the least costly available service will result in the individual having to move from an existing provider of services or supports to a more restrictive or less integrated services or supports, then the regional center shall not require the individual to use the least costly available provider.

Additional sections of WIC emphasize regional center responsibility to consider cost effectiveness, including Sections [4640.7\(b\)](#), [4646\(a\)](#), [4651\(a\)](#), [4659](#) and [4697\(b\)\(2\)](#).[4659](#) and [4697\(b\)\(2\)](#).

Generic Services and Resources

Please note: The 2023 Developmental Services Budget Trailer Bill, Senate Bill 138, added WIC Section 4435.2 which requires the Department, with community input, to define generic services. That directive is forthcoming, and potentially could change the information below about generic services and resources.

Regional centers must identify and pursue all possible sources of funding prior to purchasing needed services or supports. WIC Section [4648\(a\)\(8\)](#) states that regional center funds shall not be used to supplant the budget of an agency that has a legal responsibility to serve all members of the general public and is receiving public funds for providing those services. WIC Section [4659](#) specifies that sources of funding shall include, but not be limited to, both of the following:

“(1) Governmental or other entities or programs required to provide or pay the cost of providing services, including Medi-Cal, Medicare, the Civilian Health and Medical Program for Uniform Services, school districts, and federal supplemental security income and the state supplementary program.

“(2) Private entities, to the maximum extent they are liable for the cost of services, aid, insurance, or medical assistance to the consumer.”

WIC Sections [4659\(c\)](#) and [\(d\)\(1\)](#) additionally specify that regional centers shall not:

“(c) ...purchase any service that would otherwise be available from Medi-Cal, Medicare, the Civilian Health and Medical Program for Uniform Services, In-Home Support Services, California Children’s Services, private insurance, or a health care service plan when a consumer or a family meets the criteria of this coverage but chooses not to pursue that coverage...”

“(d)(1) ...purchase medical or dental services for a consumer three years of age or older unless the regional center is provided with documentation of a Medi-Cal, private insurance, or a health care service plan denial and the regional center determines that an appeal by the consumer or family of the denial does not have merit....”

WIC Section [4648.55](#) addresses generic resources for certain services for individuals ages 18 to 22 years:

“(a) Except as provided in subdivision (d), a regional center shall not purchase day program, vocational education, work services, independent living program, or mobility training and related transportation services for a consumer who is 18 to 22 years of age, inclusive, if that consumer is eligible for special education and related education services and has not received a diploma or certificate of completion, unless the individual program plan (IPP) planning team determines that the consumer’s needs cannot be met in the educational system or grants an exemption pursuant to subdivision (d). If the planning team determines that generic services can meet the consumer’s day, vocational education, work services, independent living, or mobility training and related transportation needs, the regional center shall assist the consumer in accessing those services.”

Exceptions to some of these laws are provided below in the [Specific Exceptions](#) section of this letter and are intended to allow regional centers to proceed with authorization and should not be conditioned on repeated denials or prolonged appeals when timely access to services otherwise would be delayed.

Family Responsibility

WIC Section [4646.4\(a\)\(4\)](#) requires consideration of family responsibility, specifically:

“Consideration of the family’s responsibility for providing similar services and supports for a minor child without disabilities in identifying the consumer’s service and support needs as provided in the least restrictive and most appropriate setting. In this determination, regional centers shall take into account the consumer’s need for extraordinary care, services, supports and supervision, and the need for timely access to this care.”

Out-of-State Services

WIC Section [4519](#) specifies that regional centers shall not purchase out-of-state services, including for residential placement, outside of the State, using Department-allocated funds unless it receives approval from the Department prior to the expenditure of funds. Information on purchase of out-of-state services and instructions for requesting authorization can be found in the Department’s [November 18, 2025 letter](#) to regional centers.

Experimental Services

WIC Section [4648\(a\)\(17\)](#) states that "...regional centers shall not purchase experimental treatments, therapeutic services, or devices that have not been clinically determined or scientifically proven to be effective or safe or for which risks and complications are unknown. Experimental treatments or therapeutic services include experimental medical or nutritional therapy when the use of the product for that purpose is not a general physician practice."

Specific Exceptions

WIC provides exceptions that allow regional centers to purchase some unauthorized services under specified conditions, including the following:

- Social Recreation Services, Camping Services, and Nonmedical Therapies
WIC Section [4688.22\(b\)\(4\)\(A\)](#) states that regional center purchase of service policies and procedures related to these services shall not "*Restrict funding of the services described in this section to only those that are specialized or directed toward the alleviation of a developmental disability within the meaning of subdivision (b) of Section 4512.*"
- Medical and Dental Services
WIC Section [4646.4\(a\)\(2\)\(A\) through \(C\)](#) state that regional center funding may be authorized for a medical service, considered a generic service, when the planning team determines the service identified in the IFSP or IPP is not available within 60 calendar days through the family's private health insurance policy or health care service plan or under the Medi-Cal program, as specified; and during any plan delays, including the appeals process.

WIC Section [4659\(d\)\(1\)](#), referenced in [Generic Services and Resources](#) above, provides that regional centers may pay for medical or dental services for individuals ages three years or older, as specified, during the following periods:

"...(A) While coverage is being pursued, but before a denial is made.

(B) Pending a final administrative decision on the administrative appeal if the family has provided to the regional center a verification that an administrative appeal is being pursued.

(C) Until the commencement of services by Medi-Cal, private insurance, or a health care service plan."

- Services for Individuals Ages 18 to 22 Years
WIC Section [4648.55\(d\)](#), referenced in [Generic Services and Resources](#) above, provides exceptions for the purchase of day program, vocational education, work services, independent living program, or mobility training and related transportation services for an individual who is 18 to 22 years of age, as specified, in either of the following circumstances:

“(1) For participation in a paid internship or competitive integrated employment that is an outcome of a paid internship described in subdivision (a) of Section 4870 if the IPP planning team determines that the consumer could benefit from participation in a paid internship or competitive integrated employment. Participation in a paid internship or competitive integrated employment that is an outcome of a paid internship does not preclude a consumer from continuing to receive public education services to the extent those services are determined to continue to meet the consumer’s needs.

“(2) On an individual basis in extraordinary circumstances to permit purchase of a service identified in subdivision (a). An exemption shall be granted through the IPP process and shall be based on a determination that the generic service is not appropriate to meet the consumer’s need. The consumer shall be informed of the exemption and the process for obtaining an exemption.”

- Out-of-State Services
WIC Section [4519\(d\)](#), referenced in [Out-of-State Services](#) above, authorizes the Department or regional centers to expend funds “...for the purchase of services for residents of this state and administrative costs incurred in providing services in the border areas of a state adjacent to California when the purchase is approved by the regional center director.” Clarifying information is provided in the Department’s [July 14, 2025 letter](#) to regional centers.

Questions from individuals and families should be directed to their regional center service coordinator. Questions from regional centers should be directed to the Department’s Community Operations Branch at cob@dds.ca.gov.

Sincerely,

Original signed by:

ERNIE CRUZ
Deputy Director
Community Services Division

cc: Regional Center Administrators
Regional Center Directors of Consumer Services
Regional Center Community Services Directors
Association of Regional Center Agencies