



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811
(916) 322-5660 • Fax (916) 322-0886

December 28, 2023

VIA ELECTRONIC MAIL AT Maggie.Schuster@chhs.ca.gov Jared.Goldman@chhs.ca

Maggie Schuster
Deputy General Counsel
California Department of Health and Human Services

Jared Goldman
General Counsel
California Department of Health and Human Services

**Re: Order Granting Exemption from Conflict of Interest Code Requirement
Our File No. E-23-002**

Dear Ms. Schuster and Mr. Goldman:

This is in response to your November 30, 2023, request on behalf of the 988-Crisis Policy Advisory Group (“Advisory Group”), a statutorily created advisory committee housed with your agency, for an exemption from the requirement to file a conflict of interest code pursuant to Government Code section 87300.

The Advisory Group satisfies the Fair Political Practices Commission’s (“Commission”) governing regulation criteria, and the exemption request is approved. (Cal. Code Regs., tit. 2, § 18751, subd. (d)(1).) The Advisory Group has established that it has no “designated employees,” as it is an advisory body with unsalaried members. In addition, the Advisory Group will not acquire real property in the foreseeable future, has an annual operating budget of less than \$150,000 in that it has no budget of its own, and has no decisionmaking authority. The Advisory Group’s sole purpose is to make recommendations to support a five-year implementation plan for a comprehensive “988 system” and relating to topics such as strategies to support public communication and awareness regarding 988 and behavioral health crisis services, policy changes to meet population needs for behavioral health crisis services, and processes for establishing outcome measures, benchmarks, and targets.

The Advisory Group does not make any final governmental decisions; may not compel or prevent a governmental decision either by reason of a veto that may not be overridden; and does not make substantive recommendations that, over an extended period of time, have been regularly approved without significant amendment or modification by another public official

or governmental agency. Therefore, the Advisory Group need not develop a conflict of interest code, and its members are not required to file Statements of Economic Interest related to their positions.

Please note that interested parties may submit a request that the Commission reconsider this approval within 30 days after the exemption approval is posted to the Commission's website. The Commission Chair will consider the request, and if, at the Chair's discretion, good cause exists for reconsideration, the Chair will schedule the matter for a hearing before the Commission. (Cal. Code Regs., tit. 2, § 18751, subd. (f).)

Upon being issued, an exemption remains in effect until the basis for the grant of exemption no longer exists or the expiration of two years, whichever occurs earlier. The agency must submit an extension request if it wishes to continue the exemption. (Cal. Code Regs., tit. 2, § 18751, subd. (g).)

If you have questions on this matter, please contact me at (916) 322-5660.

Sincerely,

Galena West
Executive Director

A handwritten signature in blue ink, appearing to read "Katelyn L. Baeta-Orick".

By: Katelyn L. Baeta-Orick
Counsel, Legal Division

KBO:aja