



NOTICE OF INTENTION TO AMEND THE CONFLICT-OF-INTEREST CODE OF CENCAL HEALTH

NOTICE IS HEREBY GIVEN that the Santa Barbara San Luis Regional Health Authority dba CenCal Health pursuant to the authority vested in it by Section 87306 of the Government Code, proposes amendment to its conflict-of-interest code. A comment period has been established commencing on September 28, 2026 and closing after November 12, 2026. All inquiries should be directed to the contact listed below.

CenCal Health proposes to amend its conflict-of-interest code to include employee positions that involve the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest, as set forth in subdivision (a) of Section 87302 of the Government Code. The amendment carries out the purposes of the law and no other alternative would do so and be less burdensome to affected persons.

Changes to the conflict-of-interest code include: to update the officer and director level positions to reflect their current composition and titles, and category updates.

The proposed amendment and explanation of the reasons can be obtained from the agency's contact.

Any interested person may submit written comments relating to the proposed amendment by submitting them no later than November 12, 2026 or at the conclusion of the public hearing, if requested, whichever comes later. At this time, no public hearing is scheduled. A person may request a hearing no later than November 12, 2026.

CenCal Health has determined that the proposed amendments:

1. Impose no mandate on local agencies or school districts.
2. Impose no costs or savings on any state agency.
3. Impose no costs on any local agency or school district that are required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4 of Title 2 of the Government Code.
4. Will not result in any nondiscretionary costs or savings to local agencies.
5. Will not result in any costs or savings in federal funding to the state.
6. Will not have any potential cost impact on private persons, businesses or small businesses.

All inquiries concerning this proposed amendment and any communication required by this notice should be directed to: Rosalie Lopez, Sr. Legal Affairs Specialist, (805) 685-9525 x5338, rlopez@cencalhealth.org.

CONFLICT OF INTEREST CODE OF THE
Santa Barbara San Luis Obispo Regional Health Authority
dba CenCal Health

The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulations Section 18730) that contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations, Title 2, Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, shall constitute the ~~Conflict of Interest Code~~ conflict of interest code of the **Santa Barbara San Luis Obispo Regional Health Authority dba CenCal Health (hereinafter "CenCal Health")**.

~~Individuals holding designated positions listed in Appendix A shall file their statements of economic interests with CenCal Health, which will make the statements available for public inspection and reproduction. (Gov. Code § 81008.). All original statements will be retained by CenCal Health.~~ The Chief Financial Officer/Treasurer and Accounting Director must file their statements of economic interests electronically with the Fair Political Practices Commission. All other individuals holding designated positions must file their statements with the CenCal Health. All statements must be made available for public inspection and reproduction under Government Code Section 81008.

**Santa Barbara San Luis Obispo Regional Health Authority
dba CenCal Health**

CONFLICT OF INTEREST CODE
APPENDIX “A”

<u>Designated Positions</u>	<u>Disclosure Category</u>
Governing Board Members.....	1, 2, 4
Chief Executive Officer	1, 2, 4
Chief Operating ons Officer.....	1, 2, 4
Chief Financial Officer/Treasurer.....	1, 2, 4
Chief Medical Officer	2, 4
Chief Health Equity Officer.....	2, 4
Chief Compliance & Fraud Prevention Officer	2, 4
Chief Information Officer	2, 3, 4
Chief Performance Officer.....	2, 4
Chief Quality Officer.....	2
<u>Chief Strategic Engagement Officer.....</u>	<u>2</u>
Deputy Chief <u>Technology Information</u> Officer	2, 3, 4
<u>Legal Officer.....</u>	<u>2, 4</u>
Administrative Services Director.....	1, 2
Accounting Director.....	2
Claims Director	2
Audits, Monitoring & Oversight Director	2, 4
Financial Analysis Director	2
Senior Medical Director.....	2
Medical Director	2
Member Services Director	2
People Operations Director.....	2
Pharmacy Director	2
Provider Relations Director	2
Provider Services Director.....	2
Claims Associate Director	2
Member Services Associate Director.....	2
IT Operations Director.....	2, 3
<u>Security</u> Compliance Director & Privacy Officer.....	2, 4
<u>Enterprise Risk Management Director.....</u>	<u>2, 4</u>
<u>Regulatory Compliance Director.....</u>	<u>2, 4</u>
General Counsel.....	2, 4
Behavioral Health Director	2
Communications & Marketing Director	2
Data Analytics/Business Intelligence Director	2, 3
<u>Sr. Care Management and D-SNP Clinical Operations Director.....</u>	<u>2</u>
Dual Special Needs Clinical Programs <u>Associate</u> Director	2
Medicare Director	2
<u>Sr. Medical Management</u> <u>Advisor</u> Director	2
<u>Sr. Health Services Advisor.....</u>	<u>2</u>

Operational Excellence Director	2
Program Development Director	2
Strategic Engagement Director	2
Configuration Director	2
Government Relations Director	2, 4
Sr. Quality Director of Quality & Population Health	2
Care Management Director	2
IT Development Director	2, 3
Utilization Management Associate Director	2
Vice President of Product Integration	2
Medical Management Associate Director CM	2
Communications & Marketing Associate Director	2
Health Services Regulatory Operations Associate Director	2
Consultants/New Positions	*

*Consultants/~~n~~New ~~p~~Positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the ~~c~~Code subject to the following limitation:

The Chief Executive Officer may determine in writing that a particular consultant or new position, although a “designated position,” is hired to perform a range of duties that is limited in scope and thus is not required to comply fully with the disclosure requirements described in this section. Such written determination shall include a description of the consultant’s or new position’s duties, and based upon that description, a statement of the extent of disclosure requirements. The Chief Executive Officer’s determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code (Gov. Code Sec. 81008).

Officials Who Manage Public Investments

The following positions are NOT covered by the conflict of interest code because they must file under Government Code Section 87200. Those who file under Government Code Section 87200 are required to file electronically with the Fair Political Practices Commission, therefore, these positions are listed for informational purposes only:

Chief Financial Officer/Treasurer
Accounting Director

An individual holding one of the above-listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe that their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

Santa Barbara San Luis Obispo Regional Health Authority

dba CenCal Health

CONFLICT OF INTEREST CODE

APPENDIX “B”

DISCLOSURE CATEGORIES

CATEGORY 1: ~~All interests in real property located within the jurisdiction of the CenCal Health. This includes all interests in real property within two miles of real property owned or used by CenCal Health.~~ Real property located within the jurisdiction as well as real property within two miles of the real property owned or used by the CenCal Health or the potential site.

CATEGORY 2: Investments, and business positions in business entities, and sources of income (including receipt of gifts, loans, and travel payments) from sources of the type to provide services (including training or consulting services), supplies, equipment, or other property utilized or to be utilized by CenCal Health. Such sources include, but are not limited to: health care providers, hospitals, pharmacies, laboratories, medical care treatment facilities, insurance companies, ambulance companies, trainers, consultants, and sources that are subject to CenCal Health’s regulatory, permit, or licensing authority.

CATEGORY 3: Investments, and business positions in business entities, and sources of income (including receipt of gifts, loans, and travel payments) ~~from sources of the type that provide information technology or telecommunications services (including training or consulting services); supplies, equipment or other property utilized or to be utilized by CenCal Health. Such sources include but are not limited to: manufacturers, distributors, suppliers, or installers of computer hardware (servers, hard drives, laptops, monitors, etc.) or software (programs, applications, databases, etc.).~~ if the business entity or source provides information technology or telecommunications goods, products or services including computer hardware or software companies, computer consultant services, IT training companies, data processing firms and media services.

CATEGORY 4: Investments, and business positions in business entities, and sources of income (including receipt of gifts, loans and travel payments) ~~from sources, that filed a legal claim or demand, or have a legal claim or demand pending, against CenCal Health made within two years prior to the date of disclosure.~~ if the business entity or source has, during the reporting period, filed a claim or has a claim pending before the CenCal Health.

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The Chief Financial Officer/Treasurer and Accounting Director must file their statements of economic interests electronically with **the Fair Political Practices Commission**. All other individuals holding designated positions must file their statements with the **CenCal Health**. All statements must be made available for public inspection and reproduction under Government Code Section 81008.

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Chief Technology Officer	2, 3, 4
Legal Officer	2, 4
Claims Director	2
Financial Analysis Director	2
Medical Director	2
Member Services Director	2
People Operations Director.....	2
Pharmacy Director	2
Provider Relations Director	2
Provider Services Director	2
Claims Associate Director	2
Member Services Associate Director.....	2
IT Operations Director	2, 3
Security Director & Privacy Officer	2, 4
Enterprise Risk Management Director.....	2, 4
Regulatory Compliance Director	2, 4
General Counsel.....	2, 4
Behavioral Health Director	2
Communications & Marketing Director	2
Sr. Care Management and D-SNP Clinical Operations Director.....	2
Dual Special Needs Clinical Programs Associate Director	2
Medicare Director	2
Sr. Medical Management Advisor	2
Sr. Health Services Advisor.....	2
Operational Excellence Director.....	2
Program Development Director	2
Strategic Engagement Director	2
Configuration Director.....	2
Government Relations Director	2, 4
Sr. Director of Quality & Population Health	2
Care Management Director.....	2

IT Development Director	2, 3
Utilization Management Director	2
Communications & Marketing Associate Director.....	2
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CATEGORY 4: Investments and business positions in business entities, and sources of income (including receipt of gifts, loans and travel payments) if the business entity or source has, during the reporting period, filed a claim or has a claim pending before the CenCal Health.