



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3000 • Sacramento, CA 95811  
(916) 322-5660 • Fax (916) 322-0886

January 06, 2022

VIA ELECTRONIC MAIL AT [jared.goldman@chhs.ca.gov](mailto:jared.goldman@chhs.ca.gov)

Jared Goldman  
General Counsel, California Health and Human Services Agency  
1215 O Street, MS-8  
Sacramento, CA 95814

**Re: Request for Exemption from Conflict of Interest Code Requirement  
Our File No. E-21-009**

Dear Mr. Goldman:

This is in response to your October 11, 2021, request on behalf of the Health and Human Services Data Exchange Framework Stakeholder Advisory Group (“Stakeholder Advisory Group”), a statutorily created advisory body, and its members for an exemption from the requirement to file a Conflict of Interest Code pursuant to Government Code section 87300.

The exemption request is approved because the Stakeholder Advisory Group satisfies the criteria in the Commission’s governing regulation. (Cal. Code Regs., tit. 2, § 18751, subd. (d)(1).) The Stakeholder Advisory Group has established that it has no “designated employees,” as it is an advisory body with unsalaried members and no designated staff. In addition, it will not acquire real property in the foreseeable future, has no budget, and has no decision-making authority.

The Stakeholder Advisory Group’s sole purpose is to advise CHHS on the development and implementation of the California Health and Human Services Data Exchange Framework (“Framework”), a single data sharing agreement and common set of policies and procedures to govern the exchange of health information among health care entities and government agencies beginning in June 2024. Therefore, the Stakeholder 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 this approval be reconsidered by the Commission within 30 days after the exemption approval is posted to the Commission’s website. The Commission Chair will consider any request and, if in 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. If the agency wishes to continue the exemption, it must submit an extension request. (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 black ink, appearing to read 'T. Lewis', written over a horizontal line.

By: Toren Lewis  
Counsel, Legal Division

TAL: dv