NORTH LOS ANGELES CALIFORNIA REGIONAL CENTER
ADMINISTRATIVE POLICY

SUBJECT: CALIFORNIA PUBLIC RECORDS ACT POLICY
DATE: January 1, 2026

ARTICLE I. INTRODUCTION

Effective January 1, 2026, the North Los Angeles California Regional Center ("Center") is subject to the California Public Records Act ("CPRA")[1] pursuant to Welfare and Institutions Code section 4639.76, as enacted by Assembly Bill 1147 (Disability Equity, Transparency, and Accountability Act of 2024)[2]. This policy establishes the procedures for responding to public records requests in compliance with CPRA requirements, ensuring transparency, accountability, and timely access to public records. As a publicly funded entity, this agency recognizes the public's right to access records related to its operations, decision-making, and use of resources. This policy applies to public records maintained by the agency, including electronic, written, and stored communications that qualify as public records. All agency employees, contractors, and representatives must adhere to these procedures to ensure compliance with the law and to maintain public trust.

ARTICLE II. PURPOSE

The purpose of this policy is to provide direction on how to receive, process, and respond to requests to inspect or receive copies of Center records. All requests for Center records will be handled pursuant to the provisions of the CPRA.[3]

ARTICLE III. DEFINITIONS

Section 3.1 Definitions

A. **Center personnel** shall collectively refer to all Center employees, board members[4], appointed officials, and anyone who prepares, owns, uses, or retains public records on behalf of the Center.

B. **CPRA Specialist** or designee.

C. **CPRA Portal** is a web-based system where members of the public may submit CPRA requests to the Center and the Center may respond, including the production of records.

[1] Gov. Code, § 7920.000 *et seq.*
[2] Welf. & Inst. Code, § 4639.76
[3] Gov. Code, § 7920.000 *et seq.*
[4] Welf. & Inst. Code, § 4622

D. **CPRA Request** is a request by a Person[5] to inspect and/or to receive a copy of Center records. Commonly requested records include emails related to a particular subject matter and Center contracts.

E. **Person** a "Person" includes any natural person, corporation, partnership, limited liability company, firm, or association.[6]

F. **Public Record** is defined by the CPRA and includes any writing that contains information relating to the conduct of the public's business prepared, owned, used, or retained by the Center regardless of physical form or characteristics, and regardless of whether created or transmitted on or by a Center-owned device.[7]

G. **Writing** shall mean any typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combination thereof, and any record thereby created, regardless of the manner in which the record has been stored.[8]

Section 3.2 General Scope

This policy applies to all Center personnel and shall be interpreted to be consistent with other Center-wide policies.

ARTICLE IV. POLICY & PROCEDURES

Section 4.1 Policy and Procedures

Every Person[9] has a fundamental right to copy and inspect public records.[10] It is important for the Center to properly gather potentially responsive records, review the records for privileged or exempt information, and produce responsive, nonexempt documents in a timely manner. The CPRA Specialist is responsible for gathering responsive records, making the appropriate redactions, and responding to the requester. However, it is the responsibility of all Center personnel to assist in identifying responsive records and prioritizing CPRA requests as reasonably permitted by their job duties.

This policy shall be interpreted to be consistent with CPRA statutes, case law, and other governing authority.

[5] Gov. Code, § 7920.520
[6] Gov. Code, § 7920.520
[7] Gov. Code, § 7920.530
[8] Gov. Code, § 7920.545
[9] Gov. Code, § 7920.520
[10] Gov. Code, § 7921.000

Section 4.2 The CPRA Request

A. Any Person may make a records request. The Center cannot require that the requester provide their name or other identifying information or the purpose of the request.[11] Anonymous requests or fictitious names are permitted. If the requester refuses to give his/her contact information, Center personnel shall set a date within 10 calendar days for the requester to check on the status of the request.

B. Any request (verbal or written) to review a record qualifies as a CPRA request. The requester is not required to cite to the CPRA, file a request with a specific office, or use the Center's CPRA Portal (if applicable).

i. If Center personnel receive a request outside of the CPRA Portal, they may ask but not require the person to use the CPRA Portal. If the person refuses, Center personnel shall receive the request and then submit the request to the CPRA Portal and process consistent with the rest of these guidelines.

ii. Center personnel should consider whether the requester has a right to the records that are outside of the CPRA (e.g., employee's request to review their personnel file; a request for copies of certified payroll records; a union's Request for Information, etc.).

C. All CPRA requests shall be forwarded to the CPRA Portal. Any CPRA request involving members of the Board should be brought to the attention of the Center's General Counsel and Executive Director.

D. The CPRA Portal shall document the date of the CPRA request and assign a reference number.

E. If the request does not reasonably identify a Center record, the CPRA Specialist shall make every effort to assist the requester in making a focused and effective request.[12] The CPRA Specialist shall document their efforts to:

i. Assist the member of the public to identify records and information that are responsive to the request or to the purpose of the request, if stated.

ii. Describe the information technology and physical location in which the records exist.

iii. Provide suggestions for overcoming any practical basis for denying access to the records or information sought.

F. Modified requests should be documented in response letters to the requester.

[11] Gov. Code, § 7921.300
[12] Gov. Code, § 7922.600

Section 4.3 Gathering Responsive Records

A. The CPRA Specialist shall immediately notify the Center personnel most likely to have responsive records.

i. It is the responsibility of all Center personnel to assist in identifying responsive records. After learning of a relevant CPRA request, Center personnel shall produce potentially responsive records to the CPRA Specialist as expeditiously as possible.

ii. When determining whether a record is potentially responsive, Center personnel shall consider if a reasonable person would interpret the request to include a particular document.

iii. Center personnel shall gather responsive records held on private devices or accounts in accordance with the Electronic Communication Policy.

B. Request for emails shall be handled in compliance with the Electronic Communications Policy. The CPRA Specialist shall work with the IT Department to identify responsive emails including developing a list of key words to include in the search and identifying relevant email addresses.

C. The CPRA Specialist shall gather all potentially responsive records, including confidential documents and documents potentially subject to privilege. Center personnel shall not create a record in response to a CPRA request that does not otherwise exist, without supervisor approval. The General Counsel shall be consulted in these instances.

Section 4.4 Response Timelines

A. The Center is required to respond to records requests promptly, but no later than 10 calendar days after receipt of the request.[13] If the tenth day falls on a weekend or a holiday, the due date is the next business day. For example, if the Center receives a request on February 1, then the tenth day is February 11. If February 11 is a Saturday, then the response is due on Monday, February 13.

B. The Center is not required to produce documents within 10 calendar days, but the CPRA Specialist must respond to the requester in writing with most applicable option below:

i. Inform the requester that the Center has no responsive records.

ii. Produce non-exempt, responsive records, citing the appropriate exemptions for any redacted or withheld records and identifying the name and title of person responsible for the claim of exemption.

[13] Gov. Code, § 7922.535

iii. Inform the requester that the Center has responsive records and set a reasonable date in the future for production. The documents may be produced at one time or on a rolling basis. Consult your supervisor about the timing of the production depending on the complexity of the response.

a. If the records need to be produced on a rolling basis, establish a production schedule and share the schedule with the requester.

b. Production should include non-exempt, responsive records, citing the appropriate exemptions for any redacted or withheld records and identifying the name and title of person responsible for the claim of exemption.

iv. Inform the requester that the Center is taking an extension of 14 calendar days to determine whether it has potentially responsive records. The Center does not need to request the extension but may take the extension as matter of right.

a. This extension must be made pursuant to Government Code section 7922.535, subdivision (c)(1)-(5), citing one or more of the following reasons:

(i) The need to search for and collect the requested records from field facilities or other establishments that are separate from the office processing the request.

(ii) The need to search for, collect, and appropriately examine a voluminous amount of separate and distinct records that are demanded in a single request.

(iii) The need for consultation, which shall be conducted with all practicable speed, with another agency having substantial interest in the determination of the request or among two or more components of the agency having substantial subject matter interest therein.

(iv) The need to compile data, to write programming language or a computer program, or to construct a computer report to extract data.

(v) The need to search for, collect, and appropriately examine records during a state of emergency proclaimed by the Governor in the jurisdiction where the agency is located when the state of emergency currently affects, due to the state of emergency, the agency's ability to timely respond to requests due to staffing shortages or closure of facilities where the requested records are located. This shall not apply

to a request for records created during and related to the state of emergency proclaimed by the Governor.

b. After the 14-day deadline, the Center must respond pursuant to Sections 4.4.B.i-iii above.

Section 4.5 Producing the Records

A. If amenable to the requester, the CPRA Specialist shall make responsive records available via the CPRA Portal. The requester shall not be charged for production pursuant to this subdivision.

B. The CPRA Specialist may also email responsive records to the requester, if preferred by the requester.

Section 4.6 Exemptions

A. Center personnel shall only redact the specific portion of the record that is exempt. Redactions should not only black out the information but also delete any embedded data, such as hyperlinks.

B. Information contained in a record that is non-responsive to the CPRA request shall not be redacted. Only information that is subject to an exemption may be redacted.

C. Potentially responsive records shall be reviewed to confirm that the records are public records and to assess whether an exemption applies. Non-public records are records that are primarily personal, containing no more than incidental mentions of agency business. Non-public records are not subject to the CPRA and are not required to be disclosed for a CPRA request.

D. Common exemptions:

i. The "catch-all" exemption. Information or documents may be withheld if the Center can demonstrate that on the facts of the particular case the public interest served by non-disclosure clearly outweighs the public interest served by disclosure.[14]

ii. Personnel, medical or similar files of center employees, the disclosure of which would constitute an unwarranted invasion of person privacy.[15]

iii. Center employee home addresses, home telephone numbers, personal cell phone numbers, and birth dates.[16]

[14] Gov. Code, § 7922.000
[15] Gov. Code, § 7927.700
[16] Gov. Code, § 7928.300

iv. Documents specifically prepared by, or at the direction of, the Center for use in existing or anticipated litigation.[17]

v. Attorney-Client Privileged Communications or Attorney Work Product.[18]

vi. Trade Secrets[19]

vii. Records deemed confidential pursuant to state or federal law (e.g., Welfare and Institutions Code, CMIA, HIPAA.[20]

Section 4.7 Violations

Violation of this policy may result in disciplinary action, up to and including termination.

[17] Gov. Code, § 7927.200
[18] Gov. Code, § 7927.700; Evid. Code, § 954 et seq.; Code Civ. Proc., § 2018.030
[19] Civ. Code, § 3426.1(d)
[20] Gov. Code, § 7927.705