LCW 2025

LEGISLATIVE ROUNDUP

This Legislative Roundup is a compilation of bills that will or may affect the operations of public agency clients located in California that the legislature adopted and the Governor signed into law in 2025. Unless otherwise noted, the new laws described in the Roundup take effect January 1, 2026. The Roundup presents the laws by subject, as described in the Table of Contents below.

If you have any questions about your agency's obligations under the new or amended laws described herein, please contact one of Liebert Cassidy Whitmore's offices and an attorney will be happy to assist you with your question.

INDEX

LABOR RELATIONS

AB 339 — Requires Agencies to Give 45 Days' Notice to Employee Organizations Before Contracting.

The Meyers-Milias-Brown Act (MMBA) authorizes local public employees to form, join, and participate in the activities of employee organizations of their own choosing for representation on matters of labor relations. The MMBA also requires the governing body or management of a public agency to meet and confer in good faith regarding wages, hours, and other terms and conditions of employment with representatives of recognized employee organizations and to fully consider presentations that are made by the employee organization on behalf of its members before arriving at a determination of policy or course of action. Pursuant to existing legal obligations under the MMBA and Public Employment Relations Board (PERB) case law, an agency has an affirmative obligation to provide notice to a recognized employee organization and to meet and confer with the organization upon request regarding a proposal to contract out work in a bargaining unit.

Government Code section 19130 permits public agencies to contract for services, subject to certain conditions. Public agencies enter into these contracts through various, sometimes competitive methods, such as requesting proposals or quotes from external, private firms.

Starting January 1, 2026, AB 339 requires public agencies to give a recognized employee organization at least 45 days' written notice before issuing a request for proposal, a request for quotes, or renewing or extending an existing contract to perform services that fall within the scope of work of job classifications represented by that organization.

The notice to the employee organization must include details, including the following:

1. The anticipated contract duration;
2. The scope of work to be performed under the proposed contract;
3. Anticipated costs associated with the proposed contract;
4. A draft of the contract solicitation (or if not yet drafted, any information that would normally be included); and
5. The agency's justifications for contracting the work at issue.

AB 339 exempts certain contract services from the new law's notice requirements, including services for public works, software or data services that directly support public works, and services that involve planning, designing, administering, overseeing, or delivering public works projects, buildings, and infrastructure.

Additionally, AB 339 provides that, in emergencies or exigent circumstances that prevent a public agency from providing the requisite 45 days' notice, an agency must provide notice as soon as practicable under the circumstances.

To the extent that a public agency has negotiated terms related to contracting that are more restrictive or prescriptive than those set forth under AB 339, those contractual obligations continue to apply.

(AB 339 adds section 3504.1 to the Government Code.)

AB 156 — Modification to IHSS Worker Impasse Procedures.

The Welfare and Institutions Code establishes procedures for collective bargaining between a county or a public authority established by a county, and the employee organization representing In-Home Supportive Services (IHSS) providers in the county. When negotiations between a county or public authority employer and an employee organization reach an impasse, the Code establishes a three-step process consisting of mediation, factfinding, and post-factfinding mediation, followed by public disclosure of the factfinding panel's recommendations and potential financial penalties for the employer that fails to reach a timely agreement. If both parties agree, the parties may bypass the mediation process and move directly to fact-finding. Either party may request post-factfinding mediation; the findings of fact and recommended settlement terms from post-factfinding mediation may not be made public until the mediation has concluded.

AB 156 revises and shortens this impasse resolution process. AB 156 permits either the county or public authority employer or the employee organization to bypass mediation and proceed directly to factfinding, rather than through mutual agreement. After factfinding, AB 156 allows the parties, by mutual agreement, to request post-factfinding mediation. If either party declines to pursue post-factfinding mediation, the factfinding panel's findings and recommended settlement terms must be made public immediately.

The Code requires a county board of supervisors in the jurisdiction where the impasse exists to hold a public hearing within 30 days after the factfinding report is released. If the parties do not reach a collective bargaining agreement within 30 days of the report's release, the state may withhold 1991 Realignment funds from the county until the parties reach an agreement. The Welfare and Institutions Code previously set this timeframe for 90 days.

AB 156 took effect immediately on September 17, 2025, as a budget trailer bill.

(AB 156 amends Sections 53270 and 7926.300, and adds Sections 20508.4 and 20825.19 to the Government Code, and amends Sections 12300.4 and 12301.61, and adds Section 12316.9 to the Welfare and Institutions Code.)

EMPLOYMENT

SB 521 — Disqualification of Public Employment.

The Government Code disqualifies a public employee from any public employment for five years if the employee is convicted of a felony related to bribery, embezzlement of public money, extortion, theft of public money, perjury, or conspiracy to commit those crimes, when the crime arises directly from the employee's official duties.

SB 521 expands the list of disqualifying offenses to include a conviction for a felony involving a conflict of interest. SB 521's provisions apply to all cities, including charter cities.

SB 521 also adds a permanent disqualification for a city manager or city attorney, including individuals who provide such services under contract, if the individual is convicted of any felony listed in Government Code Section 1021.5, including a conviction that relates to a conflict of interest. A city manager or city attorney convicted of any disqualifying felony will be permanently barred from holding public employment in an equivalent role.

SB 521 defines "city manager" as a person employed pursuant to Government Code Section 34851 on or after January 1, 2026, and "city attorney" as a person employed pursuant to Section 41801 on or after January 1, 2026.

(SB 521 amends Section 1021.5 and adds Section 1021.6 to the Government Code.)

SB 303 — Bias Mitigation Training.

The Civil Rights Department (CRD) enforces the California Fair Employment and Housing Act (FEHA), which prohibits employment and housing discrimination based on protected characteristics. CRD investigates complaints, pursues enforcement actions, and seeks to eliminate unlawful practices.

Public and private employers provide bias mitigation or elimination training in order to educate employees on understanding, recognizing, and acknowledging bias, including employees' own personal biases, and their impact in the workplace. SB 303 provides that an employee's assessment, testing, admission, or acknowledgment of their own personal biases that is made in good faith and solicited or required as part of a bias mitigation training does not, by itself, constitute unlawful discrimination.

(SB 303 adds Section 12940.2 to the Government Code.)

SB 513 — Personnel Records Related to Education and Training.

The Labor Code grants current and former employees, or their representative, the right to inspect and receive a copy of personnel records maintained by an employer relating to the employee's performance and to records regarding any grievance concerning the employee. Existing law requires the employer to make the contents of those personnel records available for inspection, as specified, and makes it a crime for an employer to violate these requirements.

SB 513 adds any records maintained by the employer that relate to employee education and training to the type of personnel records subject to inspection. SB 513 requires that an employer that maintains such education and training records ensure those records include: (1) the name of the employee; (2) the name of the training provider; (3) the duration and date of the training; (4) the core competencies of the training, including skills in equipment or software; and (5) the resulting certification or qualification.

(SB 513 amends Section 1198.5 of the Labor Code.)

SB 642 — Pay Scale and Wage Ranges.

The Labor Code requires employers to provide applicants, upon request, a pay scale of range of wages the employer reasonably expects to pay for a position and to include that information in job postings if the employer employs more than 15 employees. The Labor Code also prohibits employers from paying employees at rates less than those paid to employees of the opposite sex or of another race or ethnicity for substantially similar work, except under specific circumstances.

Effective January 1, 2026, SB 642 updates the definition of "pay scale" to mean "a good-faith estimate of the expected salary or hourly wage range that an employer reasonably expects to pay for a position upon hire." Employers must continue to include the pay scale in job postings.

SB 642 also replaces the phrase "opposite sex" with "another sex," clarifying that the law applies across all gender comparisons.

SB 642 extends the statute of limitations for filing a civil action for alleged violations from two to three years after the last date the cause of action occurs, allowing employees to seek relief for the entire period of a violation, up to six years. SB 642 specifies that a cause of action occurs under the following circumstances: (1) when an alleged unlawful compensation decision or practice is adopted; (2) when an individual becomes subject to the decision or practice; or (3) when an individual is affected by the application of the decision or practice.

(SB 642 amends Sections 432.3 and 1197.5 of the Labor Code.)

SB 294 — The Workplace Know Your Rights Act.

The Division of Labor Standards Enforcement (DLSE), within the Department of Industrial Relations (DIR), enforces state labor laws.

SB 294 creates the Workplace Know Your Rights Act under the Labor Code, which requires employers to provide a stand-alone written notice to each current employee about specified workers' rights. Employers must provide such notice on or before February 1, 2026, and annually thereafter.

Employers must provide notice to all current employees, new hires, and any authorized representatives describing the following rights:

1. Rights to workers' compensation benefits and contact information for the Division of Workers' Compensation.
2. The right to notice of immigration agency inspections.
3. Protection from unfair immigration-related practices.
4. The right to organize or join a union and engage in concerted activities.
5. Constitutional rights when interacting with law enforcement at the workplace, including protections against unreasonable searches and self-incrimination.

Employers may provide the notice by personal service, regular mail, email, text, or another method that can be reasonably anticipated to be received within one business day.

SB 294 requires employers to issue the notice in the language normally used to communicate with employees, and to maintain compliance records for three years. The Labor Commissioner must create and post a template notice by January 1, 2026, that will include other legal developments that the Labor Commissioner deems relevant, update the template annually, and make it available in multiple languages.

SB 294 also requires that, by March 30, 2026, employers provide employees the opportunity to name an emergency contact and to indicate whether they would like the employer to notify the contact if the employee is arrested or detained

on their worksite, or during work hours or during the performance of the employee's job duties, but not on the worksite, if the employer has actual knowledge of the arrest or detention of the employee. SB 294 requires that employers provide employees the opportunity to update their emergency contact at any time.

SB 294 prohibits retaliation or discrimination against employees who exercise or attempt to exercise their rights under the Workplace Know Your Rights Act. The Labor Commissioner and public prosecutors may enforce the law, and employers who violate it may face penalties of up to $500 per employee per violation per day, up to $10,000 per employee for violations of the emergency contact provisions of the Workplace Know Your Rights Act. The law permits waiver through a collective bargaining agreement only if clearly stated, and allows local ordinances to provide greater employee protections.

(AB 294 adds Part 5.6 (commencing with Section 1550) to Division 2 of the Labor Code.)

SB 477 — California Civil Rights Department Enforcement Procedures.

The Civil Rights Department (CRD) enforces the California Fair Employment and Housing Act (FEHA), which prohibits employment and housing discrimination based on protected characteristics. CRD investigates complaints, pursues enforcement actions, and seeks to eliminate unlawful practices.

Effective January 1, 2026, SB 477 clarifies FEHA's enforcement procedures regarding complaint processing, deadlines, and right-to-sue provisions. SB 477 provides a statutory definition for the term "group or class complaint," which means a complaint that alleges a pattern or practice of discrimination. SB 477 notes that the definition is declaratory and reflects existing law.

SB 477 clarifies that the CRD's deadline to issue a right-to-sue notice shall be no later than one year for an individual complaint and two years for a group or class complaint.

SB 477 directs CRD to issue a right-to-sue notice to a complainant whose complaint relates to a complaint filed in the name of the director or a group or class complaint upon request by the person claiming to be aggrieved or, if the person claiming to be aggrieved does not request such notice, after the complaint has been fully and finally disposed of and all related proceedings, actions and appeals conclude.

SB 477 tolls (pauses) the time to file a civil action when a complainant timely appeals the closure of a complaint by CRD, signs a written agreement with CRD, or CRD extends the complaint investigation period due to a petition to compel cooperation.

(SB 477 amends Sections 12926, 12960, 12965, and 12981 of the Government Code.)

SB 261 — Enforcement of DLSE Judgments Against an Employer.

The Labor Code authorizes the Division of Labor Standards Enforcement (DLSE) under the Labor Commissioner (Commissioner) to enforce California's labor laws, investigate wage claims, and issue orders, decisions, and awards for unpaid wages. When a judgment becomes final, the Commissioner or a judgment creditor may collect the amount owed and recover attorney's fees and costs spent for enforcing the judgment. If a final judgment against an employer remains unsatisfied after specified periods of time, such as for 30 days, the Commissioner may take enforcement actions, including barring the employer from conducting business in the state.

SB 261 extends who may recover court costs and attorney's fees for enforcing a judgment to include a public prosecutor.

Additionally, SB 261 requires a court to impose a civil penalty of up to three times the unpaid judgment amount, including post-judgment interest, when an employer fails to pay a final judgment for unpaid wages 180 days after the appeal period ends and no appeal is pending.

SB 261 directs courts to impose the full penalty unless the employer demonstrates by clear and convincing evidence good cause to reduce the penalty. Courts must distribute penalties 50 percent (50 %) to the affected employees and 50 percent (50 %) to the DLSE for enforcement and education purposes.

(SB 261 amends Section 98.2 and adds Sections 238.05 and 238.10 to the Labor Code.)

SB 590 — Leave for Designated Persons Under Paid Family Leave.

The Unemployment Insurance Code established the Paid Family Leave Program that provides for wage replacement benefits for up to eight weeks for workers who take time off work for prescribed purposes, including to care for a seriously ill family member.

Effective July 1, 2028, SB 590 expands eligibility for benefits under the Paid Family Leave Program to include individuals who take time off work to care for a "designated person" who is seriously ill. SB 590 defines designated person to mean any care recipient related by blood or whose association with the individual is the equivalent of a family relationship, and makes conforming changes to the definitions of the terms "family care leave" and "family member."

SB 590 requires an individual who requests benefits pursuant to the Paid Family Leave Program to care for a designated person for the first time to identify the designated person and, under penalty of perjury, attest to how the individual is related by blood to the designated person, or how the individual's association with the designated person is the equivalent of a family relationship.

(SB 590 amends Sections 3301, 3302, and 3303 of the Unemployment Insurance Code.)

SB 809 — Employment Status and Reimbursement Rules for Vehicle Use.

Courts apply the three-part "ABC" Test to determine whether a worker qualifies as an employee or an independent contractor in matters concerning wages and benefits. Under this test, a court evaluates whether the worker: (1) operates independently of the hiring entity's control; (2) performs work outside the usual course of the hiring entity's business; and (3) engages in an independently established trade, occupation, or business.

Additionally, the Labor Code requires employers to reimburse employees, but not independent contractors, for necessary expenditures incurred in the course of employment.

SB 809 clarifies that existing law does not consider ownership of a vehicle used to perform labor or services for compensation, whether personal or commercial, as determinative of a worker's status as an independent contractor.

SB 809 further clarifies that the Labor Code provision requiring employers to reimburse employees for necessary work-related expenditures includes costs associated with the use of personal and commercial vehicles. In the context of construction trucking, SB 809 requires employers to reimburse employees who are commercial drivers and who own their trucks, tractors, or trailers for expenses related to use, maintenance, and depreciation.

Employers and employees who drive personal and commercial vehicles, or the labor union that represents such employees, must negotiate reimbursement rates. Such reimbursement rate may be established as either a flat rate or per-mile rate, but not less than either the actual expenses incurred by the employee or the standard mileage rate set by the Internal Revenue Service.

(SB 809 adds Sections 2750.9, 2775.5, and 2802.2 to the Labor Code.)

AB 406 — Prohibition on Discrimination Against Victims of Violence Reinstated to Labor Code.

The California Fair Employment and Housing Act (FEHA) prohibits employers from discriminating or retaliating against employees who take time off work due to jury service, court appearances, or circumstances related to qualifying acts of violence or crime. The FEHA currently authorizes the Civil Rights Department (CRD) to enforce these protections effective January 1, 2025, and provides rights related to leave, confidentiality, and reasonable accommodation for affected employees.

Until January 1, 2025, the Labor Code set forth the statutory prohibitions on discrimination or retaliation against an employee who took time off from work for the above purposes. During that time, the Division of Labor Standards Enforcement

(DLSE) had authority to enforce these provisions. However, as of January 1, 2025, these Labor Code provisions were repealed and replaced by the provisions in the Government Code (under FEHA, as noted above) prohibiting discrimination or retaliation against an employee who is a victim or whose family member is a victim of qualifying acts of violence.

AB 406 reinstates the prior Labor Code provisions that governed employee rights to take leave or request accommodations as victims of crime, applying those provisions on a limited basis to alleged violations that occurred on or before December 31, 2024. AB 406 adds a sunset clause to the reinstated Labor Code provisions such that they are repealed January 1, 2035.

AB 406 also transfers enforcement responsibilities for the reinstated Labor Code provisions from the DLSE to the CRD to maintain consistency in enforcement.

AB 406 also updates the paid sick leave law in Labor Code Section 246.5 to reflect the transition from Labor Code to Government Code provisions, clarifying that victims of violence may use paid sick leave for qualifying absences.

AB 406 removes the requirement that an employee give reasonable notice before taking time off to serve on a jury, and prevents an employer from retaliating against an employee for doing so without giving reasonable notice.

AB 406 took effect immediately on October 1, 2025, as urgency legislation.

(AB 406 amends Section 12945.8 of the Government Code, amends Section 246.5, amends and repeals Sections 230.2 and 230.5, and adds Sections 230 and 230.1 of the Labor Code.)

AB 692 — Prohibition on Employee Repayment Contract Provisions.

Existing law declares that contracts restraining a person from engaging in a lawful profession, trade, or business are void as against public policy, except as expressly authorized.

Effective January 1, 2026, AB 692 prohibits employment contracts or work-related agreements that do the following: (1) require a worker to repay an employer, training provider, or debt collector if the worker's employment or work relationship ends; or (2) impose any penalty, fee, or cost as a result of termination. AB 692 exempts certain repayment obligations under contract, including the following: (1) a governmental loan repayment or forgiveness program; (2) a tuition repayment for transferable educational credentials that satisfies certain conditions; (3) an approved apprenticeship program; (4) the receipt of discretionary or unearned monetary payment at the outset of employment (i.e., a signing bonus); and (5) the lease, financing, or purchase of residential property.

AB 692 authorizes an employee or their representative to bring a civil action to recover actual damages or $5,000 per affected employee, whichever is greater, as well as injunctive relief, attorney's fees, and costs. AB 692 specifies that these rights and remedies do not restrict other enforcement options under state law.

(AB 692 adds Section 16608 to the Business and Professions Code and Section 926 to the Labor Code.)

AB 858 — Retention and Rehiring Provisions for Employees Separated Related to COVID-19.

Existing law requires certain employers in the hospitality, building services, airport, and event industries to offer available job positions to qualified laid-off employees who were separated from employment on or after March 4, 2020, for reasons related to the COVID-19 pandemic. Employers must offer positions based on a preference system that prioritizes employees with the greatest length of service and must maintain records of layoff and recall communications for at least three years. The law also prohibits retaliation against laid-off employees who seek to enforce these rights and authorizes enforcement by the Division of Labor Standards Enforcement (DLSE) through civil penalties and reinstatement remedies.

AB 858 extends the operation of the worker recall and retention requirements from December 31, 2025, to January 1, 2027, and preserves existing enforcement mechanisms, including employee rights to reinstatement, backpay, and benefits, as well as civil penalties of $100 per affected employee and $500 per day in liquidated damages for

ongoing violations. It continues to grant the DLSE exclusive authority to enforce these provisions and authorizes courts to issue injunctive relief.

(AB 858 amends Section 2810.8 of the Labor Code.)

AB 247 — Minimum Wages for Incarcerated and Youth Fire Crew Members.

An incarcerated individual in state or county correctional facilities who is assigned as an inmate firefighter may earn additional sentence credits of two days of credit for each day of service after completing training or while assigned to a conservation camp or firefighting unit. Youth wards at the Pine Grove Youth Conservation Camp may also receive training in wildland firefighting skills through programs operated by the Department of Corrections and Rehabilitation in partnership with California counties.

AB 247 entitles both incarcerated adult hand crew members and youth hand crew members assigned to active fire incidents to receive an hourly wage of $7.25, in addition to any sentence credits earned. These wage provisions under AB 247 only apply to incarcerated individuals working in state or county conservation camps, correctional facilities, or institutions, and to wards or youth assigned to the Pine Grove Youth Conservation Camp. AB 247 requires that the Department of Corrections and Rehabilitation review the wage rate annually and establish regulations that create an administrative adjudication and remedy process for resolving disputes over wages owed.

AB 247 took effect immediately on October 13, 2025, as urgency legislation.

(AB 247 amends Section 4019.2, and adds Section 2714 to the Penal Code, and Section 1760.46 to the Welfare and Institutions Code.)

THE RALPH M. BROWN ACT

SB 707 — Overhaul of Meeting and Teleconferencing Requirements Under the Brown Act.

The Ralph M. Brown Act (Brown Act) requires local legislative bodies to hold open and public meetings, with limited exceptions, and to permit all persons be permitted to attend and participate in these meetings. Current law sets standards for teleconferencing, public notice, agenda posting, and public participation.

SB 707 significantly overhauls and standardizes key provisions of the Brown Act.

SB 707 also imposes additional requirements on "eligible legislative bodies" that do not otherwise apply to all legislative bodies subject to the Brown Act. SB 707 defines "eligible legislative body" as "a city council of a city with a population of 30,000 or more," a "county board of supervisors of a county, or city and county, with a population of 30,000 or more," or a "city council of a city located in a county with a population of 600,000 or more." The definition of "eligible legislative body" also includes "the board of directors of a special district that has an internet website" for special districts that (1) include the entirety of a county with a population of 600,000 or more and the special district has over 200 full-time employees; (2) have over 1,000 full-time employees; or (3) have over 200 full-time employees and has annual revenues, based on the most recent Financial Transaction Report data published by the California State Controller, that exceed four hundred million dollars ($400,000,000), adjusted annually for inflation commencing January 1, 2027, as measured by the percentage change in the California Consumer Price Index from January 1 of the prior year to January 1 of the current year." The current definition of "special district" under Government Code section 53835 remains unchanged by SB 707.

Effective July 1, 2026, and continuing until January 1, 2030, SB 707 expands public access and participation in local government meetings. SB 707 requires eligible legislative bodies to provide two-way telephonic or audiovisual access for all open meetings and to take specific actions that encourage residents to participate. Additionally, each eligible legislative body will be required to adopt, in open session before July 1, 2026, a policy that addresses disruptions to telephonic or internet service during meetings. When a disruption occurs, the eligible legislative body must recess the meeting for at least one hour and make a good-faith effort to restore service before resuming.

SB 707 will make permanent the existing rule that allows members of legislative bodies to engage in separate social media communications, provided they do not collectively deliberate or act on items within the legislative body's jurisdiction.

SB 707 requires each legislative body to make oral reports in open session before taking final action on specific forms of compensation for local agency executives, department heads, and similar officers.

Starting July 1, 2026, and continuing until July 1, 2030, each eligible legislative body must translate required meeting agendas into every applicable language when it posts the agenda with the required 72-hour notice. The bill defines "applicable languages" as those spoken by at least 20 percent (20%) of the local population that speaks English less than "very well," according to the most recent American Community Survey.

SB 707 also expands public comment rights. The Brown Act requires agendas for regular meetings to let the public directly address the legislative body on any topic of public interest. It exempts items already reviewed by a committee unless the legislative body determines the item has substantially changed. SB 707 adds new exceptions to that exemption, excluding committees focused on elections, budgets, police oversight, privacy, limiting access to public library materials, or taxes and related spending, except as otherwise specified. SB 707 directs every local agency to provide a copy of the Brown Act to all elected and appointed members of legislative bodies.

Key amongst SB 707's provisions are the standardization of audio and visual teleconferencing rules. Each legislative body that uses teleconferencing will need to provide two-way audiovisual or telephonic access and a live webcast that lets the public both see and hear the meeting. The legislative body must record in its minutes the names of members who participate remotely and the specific law that authorizes each member's remote participation. Each local agency must identify and make available meeting locations for use by legislative bodies. Members with disabilities will still be able to participate remotely as a reasonable accommodation as is the case under existing law.

SB 707 redefines "teleconference" to exclude situations where members only watch or listen through non-interactive media. SB 707 requires all legislative bodies to post special meeting notices on their websites and establishes uniform emergency meeting procedures across all local agencies. The bill applies these provisions to neighborhood councils, student body associations, student-run community college organizations, and certain subsidiary or multijurisdictional bodies. These bodies must maintain at least one (1) physical location where the public can attend, observe, and participate. Presiding officers will have the authority to remove disruptive individuals from both in-person and teleconferenced meetings.

(SB 707 amends Sections 54952.7, 54953, 54953.5, 54953.7, 54954.2, 54954.3, 54956, 54956.5, 54957.6, 54957.9, and 54957.95, amends and repeals Section 54952.2, adds Sections 54953.8, 54953.8.1, 54953.8.2, and 54957.96, and adds and repeals Sections 54953.4, 54953.8.3, 54953.8.4, 54953.8.5, 54953.8.6, and 54953.8.7of the Government Code.)

CALIFORNIA PUBLIC RECORDS ACT (CPRA)

AB 343 — Information Regarding Elected or Appointed Officials.

The California Public Records Act (CPRA) grants the public a broad right to obtain disclosable records in the possession of a local or state agency. At the same time, the CPRA limits access to certain information about elected and appointed officials and makes it a crime to disclose specified details about such officials, including private information and information necessary for an elected or appointed official's safety.

Current law exempts disclosure of private information regarding judges, court commissioners, federal defenders, and judges of federally recognized Indian tribes from disclosure.

AB 343 expands this exemption to include retired judges and court commissioners, active and retired judges of the State Bar Court, retired federal judges and federal defenders, retired judges of federally recognized Indian tribes, and court appointees who serve as children's counsel in family or dependency proceedings.

(AB 343 amends Section 7920.500 of the Government Code.)

AB 370 — Extension to Respond During a Cyber Attack.

The California Public Records Act (CPRA) requires agencies to determine whether a public records request seeks copies of disclosable records in the agency's possession. The CPRA requires that, within 10 days of receiving the request, the agency notify the requester of its determination and the reasons for it and state the estimated date and time when the records will be made available, if the request seeks copies of disclosable records in the agency's possession. If unusual circumstances exist, the CPRA allows an agency to extend the deadline to respond to the request by no more than 14 days by providing written notice to the requester, setting forth the reasons for the extension and the date on which a determination is expected to be dispatched. The CPRA enumerates certain "unusual circumstances" for which an extension may be necessary.

Effective January 1, 2026, SB 370 expands the list of qualifying "unusual circumstances" to include a situation where, due to a cyberattack, the agency is unable to access its electronic servers or systems to search for and obtain a responsive electronic record. Under AB 370, the agency may delay the provision of a response to the requester only until the agency regains access to its electronic servers or systems and can search for and obtain the electronic record responsive to the request.

(AB 370 amends Section 7922.535 of the Government Code.)

AB 1004 — Exemption for Confidential Tribal Financial Information.

The California Public Records Act (CPRA) grants the public a broad right to obtain disclosable records in the possession of a local or state agency.

AB 1004 makes any record containing financial information provided by an Indian tribe to an agency confidential, if such information was provided as a condition of or requirement for receiving financial assistance, and not a public record subject to inspection or disclosure under the CPRA. Agreements or contracts between agencies and tribes related to financial assistance must contain a provision stating that the financial information disclosed shall remain confidential, shall not be a public record, and shall not be open to public inspection.

AB 1004 adds Tribal financial information to the list of records exempted under the CPRA.

(AB 1004 amends Section 7922.535 of the Government Code.)

ARTIFICIAL INTELLIGENCE

AB 316 — Defendant in a Civil Lawsuit Cannot Shift Liability to AI.

AB 316 provides that in a civil lawsuit, a defendant who developed, modified, or used artificial intelligence (AI) that is alleged to have caused harm to the plaintiff cannot assert as a defense that the AI autonomously caused the harm to the plaintiff. In other words, the bill establishes that it is the user of AI, not the technology itself, that may be liable under civil law for harm that results from AI. Employers may therefore be liable for discrimination or other harms that a plaintiff employee or applicant alleges were the result of an AI tool.

The bill defines AI as an engineered or machine-based system that varies in its level of autonomy and that can, for explicit or implicit objectives, infer from the input it receives how to generate outputs that can influence physical or virtual environments.

(AB 316 adds Section 1714.46 to the Civil Code.)

PUBLIC SAFETY

SB 8 — Expands Labor Code Section 4850 Benefits to Qualifying Peace Officers.

The Labor Code provides that certain enumerated persons who are employed on a regular, full-time basis and who become disabled by injury or illness arising out of and in the course of their duties are entitled to a one-year leave of absence without loss of salary.

SB 8 expands the list of enumerated persons to include "peace officers," as the term is defined in

Penal Code section 830.31, employed by a county containing a population of between 600,000 and 650,000.

(SB 8 amends Section 4850 of the Labor Code.)

SB 229 — Expands the Statutory Definition of "Peace Officer."

The Penal Code provides the statutory definition of "peace officer."

SB 229 expands the statutory definition of "peace officer" to include deputy sheriffs in Amador and Nevada Counties, whose duties are primarily custodial.

As a result, SB 229 provides that deputy sheriffs in Amador and Nevada Counties are now covered by and entitled to rights under the Public Safety Officers Procedural Bill of Rights Act.

(SB 229 amends Section 830.1 of the Penal Code.)

SB 447 — Extends Health Benefits for Minor Dependents of Local Public Safety Personnel.

The Labor Code provided that, if a local firefighter or peace officer, or Sheriff's Special Officer of the County of Orange, is killed in the line of duty or as a result of an accident or injury that occurred in the line of duty, the deceased employee's minor dependents continued receiving health benefits until the age of 21.

SB 447 raises the minimum age for which a deceased employee's minor dependents continue receiving health benefits to 26.

(SB 447 amends Section 4856 of the Labor Code.)

SB 459 — Extends Confidentiality Protection to Confidential Communications during Group Peer Support Services.

The Government Code provides for the Law Enforcement Peer Support and Crisis Referral Services Program, authorizing local and regional law enforcement agencies to create a peer support network. In addition, subject to certain enumerated exceptions, the Government Code permits law enforcement officers to keep communications with peer support team members confidential.

SB 459 expands these rights.

SB 459 amends the term "confidential communications" to include any information transmitted between law enforcement personnel and recipients of group peer support services while a peer support team member or mental health professional provides group peer support services. The term "group peer support services" is amended to mean peer support services comprised of at least one peer support team member or mental health professional and more than one recipient of group peer support services.

Subject to certain enumerated exceptions, which now include juvenile delinquency proceedings, a law enforcement officer has a right to refuse to disclose and to prevent another from disclosing confidential communication between law enforcement personnel and recipients of group peer support services made while a peer support team member or mental health professional provides group peer support services.

(SB 459 amends Sections 8669.3 and 8669.4 of the Government Code.)

SB 487 — Apportions Recovery to Peace Officers and Firefighters who Pursue Civil Claims against Third Parties.

The Labor Code authorizes an employer to make a claim or bring an action against a third-party who caused the injury or death of an employee that gave rise to the employer's obligations under California's Workers' Compensation system. The Labor Code also relieves the employer from an obligation to pay further compensation to or on behalf of the employee under certain circumstances, establishes certain requirements for a release or settlement agreement to be valid, authorizes certain credits to the employer, and authorizes the employer to enforce payment of a lien against a third-party or against the employee under certain circumstances.

Under SB 487, an employer of a peace officer or firefighter, as defined, may receive no more than one-third (1/3) of a third-party defendant's applicable liability insurance policy limits if the peace officer or firefighter establishes that their total

damages exceed the net recovery available after satisfaction of the employer's claim and the total liability insurance limits available are insufficient to fully compensate the employer and peace officer or firefighter's proven damages.

SB 487 also limits the employer's right to reimbursement, subrogation, or lien to the one-third (1/3) recovery threshold, and the employer may not assert any credit or offset against future workers' compensation benefits owed to the employee.

The one-third (1/3) recovery allocated to an employer may not affect or diminish the employer's existing obligation to provide any compensation under existing law. In addition, a release or settlement is not valid or binding unless it provides that the employer may not receive more than one-third (1/3) of the third-party insurance limits, and the employer has no right to assert any credit or offset against future workers' compensation benefits.

(SB 487 amends Sections 3852, 3858, 3859, 3860, 3861, and 3862 of the Labor Code.)

SB 524 — Creates Recordkeeping Requirements for AI-Assisted Police Reports.

Existing law requires local law enforcement agencies to conspicuously post on their websites all current standards, policies, practices, operating procedures, and education and training materials that would otherwise be available to the public under certain circumstances.

SB 524 addresses law enforcement agencies' use of artificial intelligence (AI) tools to create reports, such as AI software that analyzes camera footage or audio recordings to generate a report. SB 524 requires law enforcement agencies to adopt a policy governing the use of AI in preparing reports. The policy must include the following requirements.

If a law enforcement officer or agent uses AI, fully or in part, to draft a report, every page of the report must identify the specific AI program(s) used and prominently state:

> "This report was written either fully or in part using artificial intelligence."

The officer or agent who prepared the report must sign it to verify that they personally reviewed the report and the facts it states are true and correct.

SB 524 requires that all drafts of the report (including earlier AI-generated versions) must be retained for as long as the final report is retained. Further, SB 524 prohibits drafts generated using AI from constituting an officer's statement for legal purposes.

SB 524 requires that the AI software program used to draft a report must maintain an audit trail that, at a minimum, identifies who used AI to create the report, who made edits or changes, and, where applicable, any video footage used to generate content (e.g., body cameras). A contracted vendor providing AI services to a law enforcement agency may not share, sell, or use the agency's data, except in limited circumstances.

SB 524 requires that law enforcement agencies adopt the required policy by January 1, 2026.

(SB 524 adds Section 13663 to the Penal Code.)

SB 627 — Prohibits Law Enforcement Officers from Wearing Masks or Personal Disguises while Interacting with the Public in the Performance of Their Duties.

The Penal Code makes it a misdemeanor for any person to wear a mask, false whiskers, or any complete or partial disguise for the purpose of evading or escaping discovery, recognition, or identification in the commission of any public offense, or for concealment, flight, evasion, or escape from arrest or conviction for any public offense.

SB 627 makes it a misdemeanor for a local, state, or federal law enforcement officer to wear a "facial covering," as that term is defined, that conceals or obscures that officer's facial identity in the performance of their duties.

The prohibition does not apply to certain narrowly tailored exemptions or when an officer is assigned to a Special Weapons and Tactics (SWAT) unit while actively performing SWAT duties.

SB 627 provides that any officer found to have committed certain enumerated torts while wearing a facial covering in knowing and willful violation of this prohibition is not entitled to assert any privilege or immunity in a civil action and is liable for the greater of actual damages or statutory damages of no less than $10,000.

SB 627 also requires law enforcement agencies operating in California to maintain and publicly post a written policy regarding the use of facial coverings by July 1, 2026.

SB 627 enumerates the minimum requirements that must be included in the written policy, which shall be deemed consistent with Penal Code section 185.5, unless a verified written challenge to its legality is submitted by a member of the public. Upon receipt of the verified written challenge, the agency shall be afforded 90 days to correct any deficiencies, and if it fails to do so, the complaining party may challenge the written policy in a court of competent jurisdiction.

SB 627 requires that the written policy remain in effect until the court rules that it is not in compliance with Penal Code section 185.5 and all potential appeals to higher courts have been exhausted.

(SB 627 adds Section 185.5 to the Penal Code and Section 7289 to the Government Code.)

AB 354 — Provides for Fingerprint-Based Background Checks of Certain POST Employees or Staff.

Existing law requires any agency that employs peace officers to report certain information to the Peace Officer Standards and Training Commission (POST) and to complete investigations of any allegation of serious misconduct against an officer, regardless of that officer's employment status. Existing law also establishes the California Law Enforcement Telecommunications System (CLETS) to facilitate the exchange and dissemination of information between law enforcement agencies in California.

AB 354 requires POST employees or staff, including appointees, volunteers, contractors, and subcontractors, whose job duties require access to criminal offender record information, state summary criminal history information, or information obtained from CLETS, to undergo fingerprint-based state and national criminal history background checks.

In addition, AB 354 authorizes POST and POST employees or staff for whom fingerprint-based background checks have been completed and whose duties require such access to inspect or duplicate any information derived from CLETS.

AB 354 also authorizes POST to inspect and duplicate any criminal history, criminal offender record, or criminal justice information, or any other sensitive, confidential, or privileged information if it determines that the information is needed in the course of its duties.

(AB 354 adds Section 15169 to the Government Code, and Amends Sections 13500, 13503.1, 13510.8, and 13510.9 of the Government Code.)

AB 572 — Requires Identification Prior to Interviewing Immediate Family Members of a Person who Was Killed or Seriously Injured by a Peace Officer.

AB 572 requires that, by January 1, 2027, every law enforcement and prosecutorial agency must maintain a policy setting forth certain requirements for a peace officer or prosecuting attorney who initiates a formal interview to gather evidence related to a law enforcement incident resulting in a person's death or serious bodily injury by a peace officer.

Before the initial formal interview, the peace officer or prosecuting attorney must clearly identify themselves to the killed or seriously injured person's immediate family member, defined as a spouse, parent, grandparent, sibling, child, or grandchild, with their full name and the name of their employing agency. For in-person interviews, they must also display a form of official identification, such as a business card or official badge. The peace officer or prosecuting attorney must also inform the immediate family member of the status, if known, of the person who was killed or seriously injured.

AB 572 requires that police officers and prosecuting attorneys inform the immediate family member that they are conducting a formal interview for purposes of an investigation that may or may not involve an assessment of the conduct of the person who was killed or seriously injured, and that the family member may have a trusted support person with them. A support person need not possess any certification, training, or other special qualification, but may not be a percipient witness to or person of interest or suspect in the incident.

AB 572 prohibits police officers and prosecuting attorneys from using threats or deception to coerce or when conducting such an interview.

These requirements do not apply when a reasonable officer believes that delay would result in the loss or destruction of evidence or pose an imminent threat to public safety, or when the immediate family member has received advisements substantially equivalent to Miranda advisements.

(AB 572 adds Chapter 7.43, commencing with Section 7287, to Division 7 of Title 1 of the Government Code.)

AB 847, 1178, and 1388 — Expand and Clarify Access to Confidential Peace Officer Personnel Records.

The Government and Penal Codes provide for confidentiality protections that apply to peace officer personnel records, and enumerate the exceptions to those protections, including under the California Public Records Act (CPRA) and investigations of a peace officer and their employing agency conducted by a grand jury, a district attorney's office, the Attorney General's Office, or Peace Officer Standards and Training Commission (POST).

AB 847 expands access to confidential peace officer personnel records to a civilian oversight board or commission for a law enforcement agency. In addition, under AB 847, the inspector general and members of a sheriff oversight board are authorized to access confidential peace officer personnel records required for performance of their oversight duties, but must maintain the confidentiality of these records. A sheriff oversight board may also review these records in closed session, if such sessions comply with applicable confidentiality laws.

AB 1178 requires a court in an action to compel disclosure of confidential peace officer personnel records under a CPRA request to consider whether an officer is working undercover and their duties demand anonymity in determining whether there is a specific, articulable, and particularized reason to believe that disclosure would pose a significant danger to the physical safety of a person, to allow a law enforcement agency to redact that record.

AB 1388 prohibits an employing agency from agreeing with a peace officer that would require the agency to destroy, remove, or conceal a record of a misconduct investigation, to halt or make particular findings in a misconduct investigation, or to restrict the disclosure of information about an allegation or investigation of misconduct. AB 1388 also renders any provision of an agreement that is inconsistent with these requirements contrary to law and public policy, and void and unenforceable. In addition, any such prohibited agreement is subject to disclosure pursuant to a CPRA request.

(AB 847 amends Section 25303.7 of the Government Code and Section 832.7 of the Penal Code. AB 1178 amends Section 832.7 of the Penal Code. AB 1388 amends Sections 832.7 and 13510.9 of the Penal Code.)

AB 992 and SB 385 — Update Education Criteria for Peace Officers.

The Penal Code requires the Chancellor of the California Community Colleges, in consultation with specified entities, to develop a modern policing degree program and to prepare and submit a report to the Legislature outlining a plan to implement it. The Government Code enumerates the minimum standards that peace officers must meet, including minimum education standards.

AB 992 and SB 385 repeal the requirement that the Police Officer Standards and Training Commission (POST) approve and adopt the education criteria for peace officers based on the recommendations in the report. AB 992 and SB 385 thus impose higher education requirements directly, without POST approval and adoption.

AB 992 also authorizes specified credential evaluation services to evaluate the equivalency of

a foreign college or university degree for purposes of attaining the minimum education standards that peace officers must meet.

Under AB 992, starting on January 1, 2031, each peace officer must attain at least one enumerated degree or certificate. This includes a modern policing degree or a professional policing certificate as described in AB 992. The degree or certificate must be attained no later than 36 months after the peace officer receives their basic certificate from POST.

This requirement does not apply to any individual with at least eight years of experience as a sworn peace officer from another state and with a separation in good standing or with at least eight years of military service and with an honorable discharge if military service has concluded. An individual with less than eight years of the requisite experience as a sworn police officer from another state or the requisite military service must attain an enumerated degree or certificate no later than 48 months after receiving their basic certificate from POST.

AB 992 requires that a modern policing degree or professional policing certificate meet certain enumerated criteria. A modern policing degree must require at least 60 semester units or 90 quarter units, award credits for required POST-certified academy course instruction, and offer courses that include, without limitation, communications, psychology, writing, ethics, and criminal justice. A professional policing certificate must require at least 16 semester units or 24 quarter units, and include, without limitations, courses in the same list of subjects as a modern policing degree.

AB 992 does not apply to any person who, as of December 31, 2030, is currently enrolled in a basic academy or is employed as a peace officer by a public entity in California or the State Department of State Hospitals.

SB 385 took effect immediately on October 1, 2025, as urgency legislation.

(AB 992 amends Section 1031 of the Government Code, and adds Section 1031.5 to the Government Code. AB 992 and SB 385 amend Section 13511.1 of the Penal Code.)

AB 1181 — Strengthens Protections for Firefighters by Reducing their Exposure to Chemicals in their Personal Protective Equipment.

The California Occupational Safety and Health Act of 1973 grants the Occupational Safety and Health Standards Board (OSHSB) exclusive authority to adopt occupational safety and health standards within California. The Labor Code requires the OSHSB, in consultation with the Department of Industrial Relations (DIR), to complete a comprehensive review of all revisions to National Fire Protection Association standards pertaining to firefighter personal protective equipment (PPE) and to consider modifying existing safety orders and to render a decision regarding the adoption of necessary changes thereto, or other applicable standards and regulations, if it finds that the revisions to applicable National Fire Protection Association standards provide a greater degree of personal protection.

AB 1181 requires the OSHSB, in consultation with the DIR, to consider modifying its existing safety order regarding firefighter PPE by January 1, 2028. The modifications must address the National Fire Protection Association performance standards for personal protective equipment.

AB 1181 requires that the OSHSB use scientific research to create a standard for firefighter PPE used in California that includes performance standards relevant and applicable to how firefighters use their equipment while being the most protective of firefighters' health and safety. In addition, the modifications must mandate that PPE be free of hazardous substances that might pose long-term health risks, with manufacturers certifying compliance.

AB 1181 requires that the OSHSB provide for an implementation date that applies to auxiliary firefighting PPE, as defined to include self-contained breathing apparatuses and other respiratory protection products, hearing protection, protective communication devices, and fall-protection products. This date must be later than that which applies to firefighting personal protective garments, as defined to mean any garments designed, intended, or marketed to be worn by firefighters in the performance of their

duties, with the intent for use in fire and rescue activities, including jackets, pants, shoes, gloves, and helmets.

In addition, AB 1181 requires that the OSHSB specify an implementation timeline that includes phasing out firefighter PPE that is in use at the time of the modifications through normal attrition or within no later than 10 years.

By July 1, 2026, the Division of Occupational Safety and Health must provide a progress report to the Governor and the Legislature. However, the requirement for submission of such a report sunsets on July 1, 2030.

(AB 1181 amends Section 147.4 of the Labor Code.)

RETIREMENT

SB 853 — Amendments to California Public Retirement Systems.

California's public retirement systems, including the Public Employees' Retirement System (PERS), county systems governed by the County Employees Retirement Law of 1937 (CERL), and the State Teachers' Retirement System (STRS), administer defined benefit programs that determine eligibility, benefit formulas, and compensation standards for public employees. Each system operates under its own statutory framework but shares common principles governing service credit, final compensation, and coordinated benefits for members with employment in multiple jurisdictions. These statutes establish procedures for calculating retirement allowances, crediting service across concurrent or reciprocal systems, and applying benefit caps and contribution limits. They also regulate membership, employer reporting duties, and post-retirement employment restrictions.

SB 853 revises several provisions across PERS, CERL, and STRS to align practices with the Public Employees' Pension Reform Act of 2013 (PEPRA). SB 853 standardizes how retirement systems calculate "compensation earnable" and "pensionable compensation" for members who participate in multiple systems or retire concurrently under PERS, STRS, the University of California Retirement System, or judicial and legislative plans.

SB 853 clarifies that "state service" includes county employment that qualifies as compensation under PEPRA and directs county systems to calculate final compensation during absences based on the member's pay rate at the start of the absence.

SB 853 also limits retroactive conversions of general service to safety service for county prosecutors, public defenders, and investigators to service performed before January 1, 2013, while requiring post-2013 reclassifications to comply with PEPRA's limits on safety benefits.

SB 853 strengthens reporting and compliance provisions within county retirement systems. It directs retirement boards to set their own reporting intervals for rehired retirees and authorizes a $200-per-month fee for employers that fail to report or enroll such employees on time. SB 853 allows retirement boards to recover administrative costs from employers or members who violate post-retirement employment limits.

SB 853 authorizes the Teachers' Retirement Board to determine an "employer" or "employing agency" under STRS and to determine membership in the Defined Benefit Program under STRS. SB 853 updates the reduced workload program for educators by requiring the program to end when a member earns less than one-half of their annualized pay rate, instead of working less than one-half the required hours or days.

Finally, SB 853 requires the state to reimburse local agencies and school districts for any costs the Commission on State Mandates identifies as state-mandated obligations.

(SB 853 amends Sections 22104.8, 22131, 22146.5, 22713, 22954, 22955, 22955.1, 24616.2, and 26122 of the Education Code, and amends Sections 7522.02, 20034, 20069, 20638, 20639, 31462.05, 31470.14, and 31680.9 of the Government Code.)

SB 301 — Exclusion from CERL.

The County Employees Retirement Law of 1937 (CERL) establishes county retirement systems and defines the rights and benefits of their members. Current law prohibits a county or district from providing retirement benefits for some, but not all, general members within the same group.

SB 301 clarifies and affirms this rule by prohibiting any county or district whose officers and employees are members of a CERL retirement system from excluding any employee, group, or classification from system membership, except for those legally defined as excludable officers and employees.

SB 301 defines "excludable officers and employees" as individuals whose tenures qualify as temporary, seasonal, intermittent, or part-time, as determined by the retirement board, or those excluded under Sections 31552 or 31553 of the Government Code.

SB 301 declares that this provision is declaratory of existing law.

(SB 301 adds Section 31566 to the Government Code.)

AB 1067 — Public Employee Misconduct and PEPRA.

The California Public Employees' Pension Reform Act of 2013 (PEPRA) defines how public retirement benefits are calculated, funded, and administered for state and local government employees who entered their respective retirement systems after January 1, 2013. It governs employee and employer contributions, benefit formulas, and other rules for participation in public retirement systems.

PEPRA requires any public employee convicted of a felony arising from the performance of their official duties, or from obtaining salary, disability retirement, service retirement, or other benefits, to forfeit all accrued rights and benefits in any public retirement system. The forfeiture applies from the date the felony conduct began to the date of conviction, and the employee may not accrue additional benefits in that system. An elected public officer who is convicted, during or after holding office, of a felony involving bribery, embezzlement, extortion, theft of public money, perjury, or related conspiracy must also forfeit all rights, benefits, and membership in any public retirement system effective on the date of final conviction.

AB 1067 requires that, if a public employer's investigation of an employee for misconduct arising from their official duties, or in connection with obtaining salary, disability retirement, service retirement, or other benefits, indicates the employee may have committed a crime, the public employer to continue investigating the employee, even if the employee retires while under investigation.

AB 1067 also requires that, if a public employer's investigation of an employee for misconduct arising from their official duties, or in connection with obtaining salary, disability retirement, service retirement, or other benefits, indicates the employee may have committed a crime, the public employer refer the matter to the appropriate law enforcement agency. Thereafter, the public employer may close the investigation.

If a court later convicts the employee of a felony for the conduct under investigation, AB1067 requires that the employee forfeit all accrued rights and benefits in any public retirement system, as provided under existing law under PEPRA.

(AB 1067 adds Section 7522.76 to the Government Code.)

UNEMPLOYMENT INSURANCE

SB 854 — Mail and Electronically Transmitted Documents.

The Unemployment Insurance Code governs the administration of unemployment and disability compensation programs and defines key terms used throughout the Code.

SB 854 standardizes the treatment of mailed and electronically transmitted documents throughout the Code by defining the terms "mail," "mailing," and "mailed" to include not only writings transmitted through the United States Postal Service or another mail carrier, but also those sent by electronic transmission. For electronically transmitted documents, the bill specifies that the "postmark date" means the date the writing was sent.

(SB 854 adds Section 22 to the Unemployment Insurance Code.)

WORKERS' COMPENSATION

AB 1293 — Qualified Medical Evaluations.

The Division of Workers' Compensation, through its Administrative Director, administers the Workers' Compensation system, which compensates employees for injuries that occur in the course of employment. The system provides procedures to resolve disputes about whether an injury is compensable and uses a qualified medical evaluator (QME) to conduct a comprehensive medical-legal evaluation addressing all contested medical issues in a claim. The law requires parties to send all communications with a panel QME before an evaluation in writing and to serve them on the opposing party 20 days in advance. The law also requires any later communication with the QME to be in writing and served on the opposing party when sent.

Effective January 1, 2027, AB 1293 will require the Administrative Director of the Division of Workers' Compensation to develop and make available a template QME report form that includes all required statutory and regulatory elements for a QME report. AB 1293 also requires the Administrative Director to develop and make available a medical evaluation request form for parties to use when communicating with a panel QME before an evaluation.

(AB 1293 adds Section 4062.4 to the Labor Code.)

PUBLIC AND ELECTED OFFICIALS

SB 482 — Roster of Public Officials.

The Government Code requires the California Secretary of State to compile, publish, and distribute a roster of state and local public officials, otherwise known as the "Cal Roster." However, the Secretary of State's office does not always receive the information it needs from state and local agencies to publish the Cal Roster in a timely manner.

SB 482 requires the governing body of each city, county, or delegated local entity, such as the office of the city clerk, to submit to the Secretary of State an updated list of local elected or appointed officials for publication in the Secretary of State's roster of public officials no more than 120 days after each general election.

(SB 482 adds Section 12242 to the Government Code.)

SB 827 — Ethics and Fiscal and Financial Training for Local Agency Officials.

The Government Code requires that specified local agency officials receive two hours of ethics training every two years, with the first training occurring within one year of the official commencing their service. The Government Code requires that local agencies maintain records of such training.

Effective January 1, 2026, SB 827 expands these requirements to include department heads or similar administrative officers of local agencies. Effective January 1, 2026, covered officials must complete an initial ethics training within six months of the official commencing their service.

SB 827 requires that local agencies maintain records of such trainings for at least five years and post to their websites clear instructions and contact information for members of the public to request copies of such training records.

SB 827 also creates a new requirement related to fiscal and financial training for the following officers, officials and executives: (1) elected officers; (2) members of a local agency's legislative body; (3) appointed officials who make decisions or recommendations regarding financial administration, budgeting, or the use of public resources; (4) local agency executives; and (5) employees designated by the local agency. Covered individuals must complete at least two hours of training on financial administration, budgeting, reporting, capital financing, debt management, pensions, cash management and investments, fiscal and financial planning, procurement and contracting, and related laws. Covered individuals must complete this training every two years.

SB 827 authorizes local agencies to contract with a qualified provider to offer the training or develop self-study materials with tests. SB 827 requires that providers develop the content in consultation with

recognized experts in local government finance and provide participants with proof of participation. Local agencies must distribute to covered individuals information on available trainings at least once annually.

(SB 827 adds amends Sections 53234, 53235.1, and 53235.2, and adds Article 2.4.6 (commencing with Section 53238) to Chapter 2 of Part 1 of Division 2 of Title 5 of the Government Code.)

AB 1286 — Prospective Employment of a Public Official.

The Political Reform Act of 1974 (PRA) requires individuals elected, appointed, or nominated to office to file statements disclosing their investments, interests, real property, and income received in the 12 months before assuming office within 30 days of assuming office, at regular intervals during their service, and when they leave office.

AB 1286 adds a new category to the disclosure: arrangements for prospective employment. Officials must now disclose any arrangement for prospective employment. AB 1286 defines an "arrangement for prospective employment" as an agreement in which a person has accepted a job offer from a future employer, whether verbally or in writing.

AB 1286 requires that, when an arrangement for prospective employment is required to be reported, the statement shall contain the following information: (1) the date that the filer accepted the prospective employer's offer of employment; (2) the business position; (3) a general description of the business activity of the prospective employer; and (4) the name and street address of the prospective employer.

(AB 1286 amends Sections 87202, 87203, and 87204, and adds Sections 82004.2 and 87207.5 of the Government Code.)

AB 1392 — Voter Registration Information of a Public Official or Candidate.

The Elections Code requires county elections officials to keep a registered voter's residence address, telephone number, and email address confidential. However, county elections officials must provide this information to candidates for office, committees supporting or opposing initiative or referendum measures, or anyone using it for election, scholarly, journalistic, political, or governmental purposes.

Effective January 1, 2026, AB 1392 requires county elections officials to keep the residential address, personal phone number, and personal email address of elected officials and candidates for federal, state, and local office confidential, exempting this information from the disclosure requirement, other than for journalistic or government purposes.

AB 1392 requires the California Secretary of State to provide counties with a list of federal and state officials and candidates for office. Counties must add local officials and candidates for office to the list and make such individuals' voter registration information confidential within five business days.

AB 1392 requires that County officials exclude these individuals' confidential information from voter lists, rosters, and indexes.

AB 1392 requires that county officials keep the elected official or candidate's information confidential until, for an elected official, the official no longer holds the office or, for a candidate, the winning candidate takes office.

AB 1392 permits elected officials or candidates for office to opt out of confidentiality provisions.

AB 1392 allows disclosure of the confidential information only for bona fide journalistic or governmental purposes.

(AB 1392 amends Sections 2194, 2227, 8040, 8600, and 10226.3, and adds Section 2166.9 to the Elections Code.)

AB 1029 — Statements of Financial Interest in a Digital Financial Asset.

The Political Reform Act of 1974 (PRA) requires public officials to regularly disclose their financial interests, including investments, property, and income, to help prevent conflicts of interest. Under current law, an investment includes items such as stocks or business ownership interests valued at $2,000 or more. Investments include a pro rata share of investments of any business entity, mutual fund, or trust in which the individual or immediate

family owns, directly, indirectly, or beneficially, a 10 percent interest or greater. Each government agency must also have a conflict of interest policy that requires certain employees to report their financial holdings.

Effective January 1, 2027, AB 1029 broadens the definition of an investment to include digital financial assets, such as cryptocurrencies or other digital forms of value.

AB 1029 requires that public officials and designated employees disclose their interests in these assets as part of their financial reporting.

(AB 1029 amends, repeals, and adds Sections 82034, 87206, 87302, and 87350 of the Government Code.)

MISCELLANEOUS

SB 580 — Model Immigration Enforcement Polices for State and Local Agencies.

Existing law requires the California Attorney General to develop model policies limiting assistance with immigration enforcement to the fullest extent possible, consistent with federal and state law, at public schools, public libraries, courthouses, specified health facilities, shelters, and other specified agencies.

SB 580 requires the Attorney General, by July 1, 2026, to publish model policies for state and local agencies that govern interactions with federal immigration authorities, consistent with federal and state law.

SB 580 requires that the Attorney General must also issue guidance, audit criteria, and training recommendations to ensure that databases operated by or for state and local agencies limit the use of personal information for immigration enforcement purposes.

SB 580 requires that state and local agencies adopt these models or equivalent policies by January 1, 2027.

SB 580 states that it addresses a matter of statewide concern and applies to all cities, including charter cities.

(SB 580 adds Section 12532.5 to the Government Code.)

SB 409 — Joint Powers Agreements.

The Public Contract Code exempts counties with a population of 2 million or more from public contracting requirements for the alteration of or repair work to county-owned buildings when the cost of such work is under $50,000.

SB 409 adds an additional exemption for a county with a population of 9 million or more from public contracting requirements for alteration or repair work on county-owned buildings when the cost of such work is under $125,000. Based on current census data, this exemption would apply exclusively to the County of Los Angeles.

(AB 409 amends Section 20123 to the Public Contract Code.)

AB 538 – Requires an Awarding Body to Obtain Payroll Records from a Contractor in Response to Public Request.

Existing law requires each contractor and subcontractor on a public works project to keep accurate certified payroll records, showing the name, address, social security number, work classification, straight time and overtime hours worked each day and week, and the actual per diem wages paid to each journeyman, apprentice, worker, or other employee employed by the contractor or subcontractor in connection with the public work. Upon request of the public through either the awarding body or the Division of Labor Standards Enforcement (DLSE), these payroll records must be made available as copies or for inspection.

AB 538 requires that, if such a request for certified payroll records is made through the awarding body and the body is not in possession of those records, the awarding body must obtain those certified payroll records from the relevant contractor or subcontractor and make them available.

AB 538 further provides that the contractor or subcontractor must provide the requested certified payroll records to the awarding body within ten days of receiving written notice from the awarding body. If the contractor or subcontractor fails to comply within that timeframe, the awarding body must notify the DLSE, which may take enforcement action pursuant to its authority under existing law.

(AB 538 amends Section 1776 of the Labor Code.)

AB 889 – Adjusts Process for Computing Employer Credits Toward Prevailing Wage.

Existing law requires workers employed on public works projects to be paid the prevailing wage determined by the Director of the Department of Industrial Relations (DIR Director), according to the type of work and location of the project. Existing law also permits employers to credit certain payments for fringe benefits against the obligation to pay the prevailing wage. Finally, existing law requires this credit to be computed on an annualized basis if the employer seeks credits for payments that are higher for public works projects than for private construction, except under certain circumstances, including if the DIR Director determines that annualization would not serve the purposes of the public works laws. AB 889 removes this exception for computing credits on an annualized basis. AB 889 further revokes any annualization exemptions that the DIR Director issued before January 1, 2026.

AB 889 also provides that an employer may take full credit for the hourly amounts contributed to defined contribution pension plans if the plans provide for both immediate participation and essentially immediate vesting, meaning that the benefits vest within the first 500 hours worked, even if the employer contributes at a lower rate or does not make contributions to private construction.

Finally, AB 889 provides that an employer has the burden of demonstrating it properly calculated credits on an annualized basis and must provide supporting records for the calculation to the Labor Commissioner upon request.

(AB 889 amends Section 1773.1 of the Labor Code.)

SB 598 – Authorizes Use of CM/GC Delivery for Local Water Infrastructure Projects

Existing law allows the Metropolitan Water District of Southern California to use the construction manager/general contractor (CM/GC) project delivery method for certain regional recycled water or other water infrastructure projects. Under that authority, the district may enter into a contract with a construction manager during the design phase to provide preconstruction services and, later, construction services for the project, subject to certain procedures and requirements. This authorization is currently set to become inoperative on January 1, 2028.

SB 598 extends and expands authority to use the CM/GC project delivery method by allowing, until January 1, 2031, any city, county, city and county, or special district that provides for the production, storage, supply, treatment, or distribution of water to use the CM/GC project delivery method for up to 15 capital outlay projects involving a regional recycled water project or other water infrastructure project undertaken to alleviate water supply shortages attributable to drought or climate change. SB 598 requires participating local agencies to award a contract using the CM/GC project delivery method on a best value basis or to the lowest responsible bidder.

(SB 568 adds Chapter 4.9 (commencing with Section 22199.5) to Part 3 of Division 2 of the Public Contract Code.)

COUNTIES AND MUNICIPALITIES

AB 17 — Election Precinct Maps.

The Elections Code requires county elections officials to divide their jurisdiction into precincts and to prepare detailed maps or exterior descriptions of the precincts. When precinct boundaries change, county election officials must create updated maps or descriptions.

Effective January 1, 2026, AB 17 adds a public access requirement for these maps. AB 17 requires the registrar of voters in each county to make available, upon request and free of charge, a digital map showing the effective boundaries of every precinct within the county.

(AB 17 adds Section 12263 to the Elections Code.)

AB 5 — Deadline to Count Election Votes.

The Elections Code requires county elections officials to commence the official canvass for an election no later than the Thursday following the election and to keep the canvass open to the public. The canvass must continue daily, except

on weekends and holidays, for at least six hours each day until the canvass is completed. Elections officials must prepare a certified statement of the results of the election within 30 days after the election and send a complete copy of all election results to the Secretary of State within 31 days of the election. The Secretary of State must then certify and file a statement of the vote no later than the 38th day after the election.

Effective January 1, 2026, AB 5 adds a new interim reporting requirement to this process. AB 5 requires county elections officials, by the 13th day following an election, to complete the counting of all ballots, except the following: (1) duplicate ballots; (2) votes by mail that is forwarded to count election officials; (3) votes by mail that the voter has an opportunity to verify; (4) provisional ballots; (5) ballots cast by conditional voter registration; (6) and ballots received after the fourth day following an election.

AB 5 further requires county elections officials to release the vote count for all ballots on or before the 13th day following an election, except for those ballots identified above.

AB 5 requires a county elections official who will not meet the 13-day deadline for counting ballots and releasing the vote for such ballots to file a notice of extension with the Secretary of State, stating the reason for the extension, and to post the extension filing on their website.

(AB 5 adds Section 15307 to the Elections Code.)

AB 91 — Middle Eastern and North African Inclusion Act.

Existing law requires state agencies, boards, and commissions that collect demographic data on the ancestry or ethnic origin of Californians to use separate data categories and tabulations for each major Asian and Pacific Islander group and to include that information in every demographic report published on or after July 1, 2012.

Effective January 1, 2028, AB 91, known as the Middle Eastern and North African Inclusion Act (MENA Inclusion Act), requires state and local agencies that collect demographic data to use separate collection categories and tabulations for major Middle Eastern and North African (MENA) groups. Middle Eastern groups include, but are not limited to, the following: (1) Afghan; (2) Bahraini; (3) Emirati; (4) Iranian; (5) Iraqi; (6) Israeli; (7) Jordanian: (8) Kuwaiti; (9) Lebanese; (10) Omani; (11) Palestinian; (12) Qatari; (13) Saudi Arabian; (14) Syrian; (15) Turkish; and (16) Yemeni. North African groups include, but are not limited to, the following: (1) Algerian; (2) Djiboutian; (3) Egyptian; (4) Libyan; (5) Mauritanian; (6) Moroccan; (7) Somali; (8) Sudanese; and (9) Tunisian. Transnational groups include, but are not limited to, the following: (1) Amazigh or Berber; (2) Armenian; (3) Assyrian; (4) Chaldean; (5) Circassian; and (6) Kurdish.

Effective January 1, 2028, agencies must include MENA data in all demographic reports on ancestry or ethnic origins that are published after January 1, 2029. AB 91 further requires that agencies make aggregated data publicly available, including, but not limited to, publishing the data online.

AB 91 requires that agencies protect individuals' personal identifying information. Agencies may aggregate data by geographic area to prevent the identification of individuals. Agencies must avoid publishing data that would be statistically unreliable.

(AB 91 adds Section 8310.4 to the Government Code.)

SB 515 — Demographic Information for African American Groups.

Existing law requires the State Controller's Office and the Department of Human Resources to include additional data categories for specified Black or African American groups when collecting demographic information on state employees.

Effective January 1, 2027, SB 515 requires general law and charter cities and counties to include the same additional collection categories and tabulations for Black or African American groups when collecting demographic data on persons hired for local government employment. These additional collection categories and tabulations for Black or African American groups include, but are not limited to: (1) African Americans who are descendants of persons who were enslaved in the United States; (2) Blacks who are not descendants of persons who were enslaved in the United States,

including, but not limited to, African Blacks, Caribbean Blacks, and other Blacks, and; (3) Unknown or choose not to identify.

SB 515 directs local agencies to handle and store all collected data securely and to protect individual privacy in compliance with applicable state and federal laws.

SB 515 states that its purpose is to improve the accuracy, consistency, and comprehensiveness of demographic data for employees who are descendants of persons enslaved and emancipated in the United States, also referred to as American Freedmen, and to support effective policy planning and resource allocation. SB 515 also directs local agencies to ensure the privacy and secure handling of collected data in compliance with relevant laws.

(SB 515 adds Section 53060.8 to the Government Code.)

SB 255 — County Recorder Notification Program.

The Government Code authorizes a county recorder to notify property owners by mail within 30 days of recording a deed, quitclaim deed, or deed of trust, if the county board of supervisors has adopted an authorizing resolution.

SB 255 requires every county to establish a recorder notification program by January 1, 2027, and requires each county board of supervisors to adopt an authorizing resolution.

SB 255 requires that, under each county's program, county recorders, or their designees, must mail a notice within 30 days of recordation of any deed, quitclaim deed, mortgage, or deed of trust to the parties executing the document at the address used for mailing property tax bills. A county recorder may require that a deed, quitclaim deed, mortgage, or deed of trust indicate the assessor's identification number(s).

SB 255 also authorizes a county recorder to establish an electronic notification program to notify parties upon recording of a deed, quitclaim deed, mortgage, or deed of trust. County recorders will be immune from liability for failure to provide such notice.

SB 255 requires that, if a county seeks to contract for the performance of such services, the county must conduct a competitive bid for such services.

(SB 255 repeals and adds Section 27297.7 to the Government Code.)

PUBLIC HEALTH CARE PROVIDERS

AB 82 — Protections for Providers and Patients Engaged in Legally Protected Health Care Activities.

Existing law authorizes reproductive health care providers, employees, volunteers, and patients to be approved by the California Secretary of State for the purposes of enabling state and local agencies to respond to requests for public records without disclosing a program participant's residence address contained in any public record. Under existing law, the Secretary of State administers an address confidentiality program that shields the residential addresses of reproductive health care participants from public records and allows them to use substitute mailing addresses.

Existing law prohibits knowingly publicly posting the personal information or image of any reproductive health care provider, patient, assistant, or other individuals residing at the same home address, with the intent to incite a third person to cause imminent great bodily harm to the person identified or to commit a crime involving violence or a threat of violence against the person identified. Existing law additionally prohibits soliciting, selling, or trading on the internet or social media, the personal information or image of such individuals.

Effective January 1, 2026, AB 82 expands these protections to include gender-affirming health care providers, employees, volunteers, and patients who face threats like those above because of their affiliation with a gender-affirming health care services facility.

AB 82 prohibits pharmacies, clinics, and prescribers from reporting or retaining prescription information for testosterone or mifepristone in the Controlled Substance Utilization Review and

Evaluation System (CURES) and requires the State Department of Justice to delete existing records of these prescriptions by January 1, 2027. AB 82 prohibits California agencies and officials from sharing with out-of-state entities CURES data that would reveal the identity of the customers using those services, unless the legal process or law enforcement agency includes an affidavit or declaration stating that the information requested is not in connection with an out-of-state proceeding relating to any legally protected health care activity or other requirements are satisfied.

AB 82 further updates criminal and judicial procedures to extend existing reproductive health services safeguards to all "legally protected health care activities" in the State, including gender-affirming care.

AB 82 prohibits courts and law enforcement agencies from cooperating with out-of-state investigations targeting such activities, and bail schedules must set $0 bail for individuals arrested in connection with another state's proceedings against providers or patients engaged in legally protected care in California. AB 82 also authorizes the Attorney General to impose a $15,000 civil penalty for false affidavits related to out-of-state legal or law enforcement requests.

(AB 82 amends Sections 6215, 6215.1, 6215.2, 6218, 6218.01, and 6219.05 of the Government Code, Sections 11165 and 11190 of the Health and Safety Code, and Sections 629.51, 1269b, 13778.2, and 13778.3 of the Penal Code.)

SB 497 — Medical Information About Legally Protected Healthcare Activity.

Existing law restricts the disclosure of medical information and regulates the issuance of subpoenas related to gender-affirming health care and other sensitive services. It also establishes the Controlled Substance Utilization Review and Evaluation System (CURES) to monitor controlled substance prescriptions.

Similar to AB 87, SB 497 prohibits a health care provider, health care service plan, contractor, or employer from releasing or disclosing medical information about an individual seeking or obtaining gender-affirming health care or gender-affirming mental health care in response to a foreign or out-of-state subpoena or request based on another state's law that conflicts with California law. SB 497 prohibits those entities from cooperating with or providing medical information to an out-of-state or federal agency if the requested information would identify an individual in connection with gender-affirming health care that is lawful in California. SB 497 applies similar restrictions to subpoenas or requests for information related to sensitive services, as defined in the Insurance Code.

SB 497 amends procedures for issuing subpoenas in California to prohibit attorneys and courts from recognizing or enforcing foreign subpoenas that are based on another state's law penalizing a person for providing, seeking, or obtaining gender-affirming health care.

SB 497 also prohibits state or local agencies and their employees or contractors from providing CURES data or using public resources to assist any out-of-state investigation or proceeding that seeks to impose civil, criminal, or disciplinary liability under another state's law for legally protected health care activity. The Department of Justice may share CURES data with out-of-state law enforcement only when presented with a valid warrant, subpoena, or court order. Unauthorized access to or disclosure of CURES data constitutes a misdemeanor.

SB 497 coordinates with AB 82 concerning amendments to the Health and Safety Code made by both bills.

SB 497 took effect immediately on October 13, 2025, as urgency legislation.

(SB 497 amends Sections 56.109 of the Civil Code, Sections 2029.300 and 2029.350 of the Code of Civil Procedure, Section 11165 of the Health and Safety Code, and Section 1326 of the Penal Code.)

SB 596 — Nurse-to-Patient Staffing Ratio Penalties for Acute General Hospitals.

The Health and Safety Code requires the California Department of Public Health (Department) to establish and enforce regulations on minimum nurse-to-patient staffing ratios in health facilities across the state. The Department possesses the authority to assess administrative fines against any facility that fails to staff nurses at levels sufficient

to satisfy applicable ratios, with increasing penalties for subsequent violations. Under the Health and Safety Code, the health facilities subject to these rules include "acute general hospitals," which the Health and Safety Code generally defines as hospitals with an organized medical staff that provides 24-hour inpatient care and offers basic services, such as medical, nursing, surgical, anesthesia, laboratory, radiology, pharmacy, and dietary care.

The Health and Safety Code exempts an acute general hospital from administrative penalties for violating nurse-to-patient staffing ratio regulations if the hospital can show that fluctuations in staffing levels were unpredictable and uncontrollable, that it made prompt efforts to maintain the requisite nurse-to-patient staffing ratio, and that it immediately used and exhausted its list of on-call nurses and the charge nurse. Currently, multiple violations found during the same inspection survey count as a single violation when determining whether it is a first, second, or subsequent offense.

SB 596 defines "on-call list" for these staffing requirements as a list of nurses scheduled to be on-call for the specific shift and unit where a violation occurred, or nurses assigned to a regularly scheduled float pool shift to cover shortages in one or more designated units. SB 596 clarifies that, if a hospital contacts or attempts to contact licensed nurses who are not scheduled to be on-call or assigned to a float pool for that unit and shift, the Department will not consider the hospital to have used and exhausted its on-call list.

While SB 596 does not change the rule that multiple violations found during the same inspection survey count as a single violation, SB 596 clarifies that violations discovered on different days count as separate violations.

(SB 596 amends Section 1280.3 of the Health and Safety Code.)

AB 533 – Expands Design-Build Authority for Health Care Districts.

Existing law authorizes only certain specified health care districts to use the design-build procedure described in Chapter 4 (commencing with Section 22160) of Part 3 of Division 2 of the Public Contract Code for the construction of a building or improvements directly related to a hospital or health facility building.

AB 533 expands this authority by allowing any health care district, upon approval by its board of directors, to use the design-build procedure in those circumstances. AB 533 also requires any hospital building project using the design-build procedure to be reviewed and inspected in accordance with the Alfred E. Alquist Hospital Facilities Seismic Safety Act of 1983.

(AB 533 adds Section 32132.6 to the Health and Safety Code.)