

ALAMEDA-CONTRA COSTA TRANSIT DISTRICT



STAFF REPORT

MEETING DATE: 7/22/2026

Staff Report No. 26-144

TO: AC Transit Board of Directors
FROM: Salvador Llamas, General Manager/Chief Executive Officer
SUBJECT: Board Policy 209 - Nepotism

ACTION ITEM

AGENDA PLANNING REQUEST: ☐

RECOMMENDED ACTION(S):

Consider approving amendments to Board Policy 209, Nepotism Policy.

Staff Contact:

Emily Cruz, Director of Human Resources

STRATEGIC IMPORTANCE:

Goal - High-Performing Workforce

Initiative - Employee Recruitment, Training and Retention

The Alameda-Contra Costa Transit District is committed to maintaining a fair, transparent and professional workplace that is free from real or perceived conflicts of interest. This policy defines expectations regarding the employment and supervision of individuals with family/familial relationships and/or interpersonal dating/intimate relationships, ensuring employment decisions are based on merit and operational needs. This policy also establishes safeguards to prevent favoritism, protect the integrity of management decisions, and maintain employee trust and confidence in District operations.

The proposed amendments add clarity to the policy while also creating guidelines for how conflicts of interest based on nepotism should be handled when they arise in the workplace.

BUDGETARY/FISCAL IMPACT:

There is no fiscal impact resulting from amendments to this policy.

BACKGROUND/RATIONALE:

Board Policy 209 - Nepotism was originally adopted in 2019 and was last reviewed for potential amendments in 2023. Staff has reviewed the policy and recommends the following amendments. Due to the number of changes, a red-lined version and a clean version of the policy have been attached.

Section I. Purpose - The Purpose section was edited for conciseness and clarity. The revisions modernize the

language while maintaining the policy's original intent.

Section III. Definitions - All definitions were revised to improve clarity and consistency throughout the policy. The definition of "Subordinate" was removed as it is not referenced elsewhere in the policy.

Section IV. A. - General - This section was modified for simplicity, clarity, and consistency.

Section IV. B - Restrictions - This new subsection consolidates the Policy's prohibited conduct into a single, dedicated list of restrictions. More specifically, the Restrictions Section was added to prohibit employees from exercising authority over, or providing input into, Personnel Decisions involving a Family/Familial Relationship or an individual with whom they have a Dating/Intimate Relationship. As a result of this clarification, certain previously listed prohibited situations were removed because they are now encompassed within the broader and more consistently applied Restrictions standard.

Former Sections IV.B. ("Personnel Actions") and IV.C. ("Confidential Records") were removed as standalone sections, and their content was incorporated into the retitled "Restrictions" section to improve organization and alignment with the policy's prohibitions.

Section IV.C. Procedure - Former Section IV.D. ("Obligation to Disclose") was renumbered as Section IV.C. and retitled "Procedure" following the consolidation and removal of prior Sections IV.B. and IV.C.

Section IV.C.1. Disclosure of Family/Familial Relationship or Dating/Intimate Relationship - This is a new subsection added to clarify disclosure requirements for both applicants and employees, including notice obligations when a Family/Familial Relationship or Dating/Intimate Relationship exists or is newly formed.

Additional subsections were added to clarify disclosure obligations and enforcement procedures. The amendments specify that employees must provide notice if a new Family/Familial Relationship or Dating/Intimate Relationship develops and clarify that the District may take appropriate steps to resolve violations of this policy.

Section V.A. - This section was modified for simplicity, clarity, and consistency.

ADVANTAGES/DISADVANTAGES:

The advantage of amending the Policy is that it creates greater clarity and also creates procedures for how issues of nepotism will be handled once they are identified. There are no disadvantages to amending the policy.

ALTERNATIVES ANALYSIS:

The alternative is to retain the current version of the Policy without amendments. This is not recommended as the current version of the Policy lacks clarity and does not include procedures for how conflicts of interest due to nepotism will be handled when they arise.

PRIOR RELEVANT BOARD ACTION/POLICIES:

Board Policy 209 - Nepotism

ATTACHMENTS:

1. Revised Board Policy 209 - Nepotism (Red-line)
2. Revised Board Policy 209 - Nepotism (Clean)
3. Existing Board Policy 209 - Nepotism

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Approved/Reviewed by:

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