

# **COMPLIANCE REVIEW REPORT**

# CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Compliance Review Unit State Personnel Board September 28, 2015

### TABLE OF CONTENTS

Introduction	1
Executive Summary	1
Background	2
Scope and Methodology	2
Findings and Recommendations	3
Examinations	3
Appointments	5
Equal Employment Opportunity (EEO)	10
Personal Services Contracts	11
Departmental Response	13
SPB Reply	13

#### **INTRODUCTION**

Established by the California Constitution, the State Personnel Board (the SPB or Board) is charged with enforcing and administering the civil service statutes, prescribing probationary periods and classifications, adopting regulations, and reviewing disciplinary actions and merit-related appeals. The SPB oversees the merit-based recruitment and selection process for the hiring of over 200,000 state employees. These employees provide critical services to the people of California, including but not limited to, protecting life and property, managing emergency operations, providing education, promoting the public health, and preserving the environment. The SPB provides direction to DTSCs through the Board's decisions, rules, policies, and consultation.

Pursuant to Government Code section 18661, the SPB's Compliance Review Unit (CRU) conducts compliance reviews of appointing authority's personnel practices in four areas: examinations, appointments, equal employment opportunity (EEO), and personal services contracts (PSC's) to ensure compliance with civil service laws and board regulations. The purpose of these reviews is to ensure state agencies are in compliance with merit related laws, rules, and policies and to identify and share best practices identified during the reviews. The SPB conducts these reviews on a three-year cycle.

The CRU may also conduct special investigations in response to a specific request or when the SPB obtains information suggesting a potential merit-related violation.

#### EXECUTIVE SUMMARY

The CRU conducted a routine compliance review of California Department of Toxic Substances Control (DTSC) personnel practices in the areas of examinations, appointments, EEO, and PSC's from May 1, 2014, through January 31, 2015. The following table summarizes the compliance review findings.

Area	Finding	Severity	
Examinations	Examinations Complied with Civil Service Laws and Board Rules	In Compliance	
Appointments	Equal Employment Opportunity Questionnaires Were Not Separated from Applications	Very Serious	
Appointments	Applications Were Not Date Stamped	Non-serious or Technical	
Appointments	Certifications Were Not Documented Electronically	Observation	

Area	Finding	Severity
Equal	Equal Employment Opportunity Program	
Employment	Complied with Civil Service Laws and Board	In Compliance
Opportunity	Rules	
Personal Services	Personal Services Contracts Complied with	In Compliance
Contracts	Procedural Requirements	in compliance

A color-coded system is used to identify the severity of the violations as follows:

- Red = Very Serious
- Orange = Serious
- Yellow = Non-serious or Technical
- Green = In Compliance
- Gray = Observation

#### BACKGROUND

The DTSC was established to protect California against threats to public health and degradation to the environment and to restore properties degraded by past environmental contamination. The mission of the DTSC is to protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products. There are eight DTSC offices and two environmental chemistry laboratories throughout California. The DTSC employs 1,028 staff consisting of scientists, engineers, toxicologists, attorneys, criminal investigators, and administrative staff.

### SCOPE AND METHODOLOGY

The scope of the compliance review was limited to reviewing DTSC examinations, appointments, EEO program, and PSC's from May 1, 2014, through January 31, 2015. The primary objective of the review was to determine if DTSC personnel practices, policies, and procedures complied with state civil service laws and board regulations, and to recommend corrective action where deficiencies were identified.

A cross-section of DTSC examinations and appointments were selected for review to ensure that samples of various examinations and appointment types, classifications, and levels were reviewed. The CRU examined the documentation that the DTSC provided, which included examination plans, examination bulletins, job analyses, 511b's, scoring results, notice of personnel action forms, vacancy postings, application screening criteria, hiring interview rating criteria, certification lists, transfer movement worksheets, employment history records, correspondence, and probation reports.

The review of the DTSC EEO program included examining written EEO policies and procedures; the EEO officer's role, duties, and reporting relationship; the internal discrimination complaint process; the upward mobility program; the reasonable accommodation program; the discrimination complaint process; and the Disability Advisory Committee (DAC). The CRU also interviewed appropriate DTSC staff.

The DTSC's PSCs were also reviewed.<sup>1</sup> It was beyond the scope of the compliance review to make conclusions as to whether DTSC justifications for the contracts were legally sufficient. The review was limited to whether DTSC practices, policies, and procedures relative to PSC's complied with applicable statutory law and board regulations.

On September 10, 2015, an exit conference was held with the DTSC to explain and discuss the CRU's initial findings and recommendations. The DTSC was given until September 24, 2015, to submit a written response to the CRU's draft report. On September 24, 2015, the CRU received and carefully reviewed the response, which is attached to this final compliance report.

### FINDINGS AND RECOMMENDATIONS

### Examinations

Examinations to establish an eligible list must be competitive and of such character as fairly to test and determine the qualifications, fitness, and ability of competitors to perform the duties of the class of position for which he or she seeks appointment. (Gov. Code, § 18930.) Examinations may be assembled or unassembled, written or oral, or in the form of a demonstration of skills, or any combination of those tests. (*Ibid.*) The Board establishes minimum qualifications for determining the fitness and qualifications

<sup>&</sup>lt;sup>1</sup> If an employee organization requests the SPB to review any personal services contract during the SPB compliance review period or prior to the completion of the final compliance review report, the SPB will not audit the contract. Instead, the SPB will review the contract pursuant to its statutory and regulatory process. In this instance, none of the reviewed PSC's were challenged.

of employees for each class of position and for applicants for examinations. (Gov. Code, § 18931.) Within a reasonable time before the scheduled date for the examination, the designated appointing power shall announce or advertise the examination for the establishment of eligible lists. (Gov. Code, § 18933, subd. (a).) the advertisement shall contain such information as the date and place of the examination and the nature of the minimum qualifications. (*Ibid.*) Every applicant for examination shall file an application in the office of the DTSC or a designated appointing power as directed by the examination announcement. (Gov. Code, § 18934.) Generally, the final earned rating of each person competing in any examination is to be determined by the weighted average of the earned ratings on all phases of the examination. (Gov. Code, § 18936.) Each competitor shall be notified in writing of the results of the examination when the employment list resulting from the examination is established. (Gov. Code, § 18938.5.)

During the period under review, the DTSC conducted seven examinations. The CRU reviewed all seven of the examination(s), which are listed below:

Classification	Exam Type	Exam Components	Final File Date	No. of Applications
Supervising Criminal Investigator I	Open	Supplemental Application (SA) <sup>2</sup>	1/7/2015	5
Senior Industrial Hygienist	Open	Training and Experience (T&E) <sup>3</sup>	6/30/2014	3
Senior Personnel Specialist	Promotional	T&E	4/14/2014	3
Office Services Supervisor II	Open	Written <sup>4</sup> and T&E	Cancelled	0
Office Services Supervisor II	Open	Written and T&E	10/19/2014	18
Office Services Supervisor II	Open	Written and T&E	1/1/2015	12

<sup>&</sup>lt;sup>2</sup> In a supplemental application (SA) examination, applicants are not required to present themselves in person at a predetermined time and place. Supplemental applications are in addition to the regular application and must be completed in order to remain in the examination. Supplemental applications are also known as "rated" applications.

<sup>&</sup>lt;sup>3</sup> The training and experience (T&E) examination is administered either online or in writing, and asks the applicant to answer multiple-choice questions about his or her level of training and/or experience performing certain tasks typically performed by those in this classification. Responses yield point values, which are totaled by the online system or a DTSC exam analyst, and then assigned a percentage score.

<sup>&</sup>lt;sup>4</sup> A written examination is a testing procedure in which candidates' job-related knowledge and skills are assessed through the use of a variety of item formats. Written examinations are either objectively scored or subjectively scored.

Classification	Exam Type	Exam Components	Final File Date	No. of Applications
Career Executive Assignment (CEA), Division Chief	Open	SA and Qualification Appraisal Panel (QAP) <sup>5</sup>	10/30/2014	23

## FINDING NO. 1 – Examinations Complied with Civil Service Laws and Board Rules

The DTSC administered five open examinations and one promotional examination to create eligible lists from which to make appointments. For all of the examinations, the DTSC published and distributed examination bulletins containing the required information. Applications received by the DTSC were accepted prior to the final filing date and were thereafter properly assessed to determine whether applicants met the minimum qualifications (MQ's) for admittance to the examination, and those applicants who met the MQ's were also notified about the next phase of the examination process. After all phases of the examination process were completed, the score of each competitor was computed, and a list of eligible candidates was established. The examination results listed the names of all successful competitors arranged in order of the score received by rank. Competitors were then notified of their final scores.

The CRU found no deficiencies in the examinations that the DTSC conducted during the compliance review period. Accordingly, the DTSC fulfilled its responsibilities to administer those examinations in compliance with civil service laws and board rules.

#### Appointments

In all cases not excepted or exempted by Article VII of the California Constitution, the appointing power must fill positions by appointment, including cases of transfers, reinstatements, promotions, and demotions in strict accordance with the Civil Service Act and Board rules. (Gov. Code, § 19050.) Except as provided by law, appointments to vacant positions shall be made from employment lists. (*Ibid.*) Appointments made from eligible lists, by way of transfer, or by way of reinstatement, must be made on the basis of merit and fitness, which requires consideration of each individual's job-related

<sup>&</sup>lt;sup>5</sup> The qualification appraisal panel (QAP) interview is the oral component of an examination whereby competitors appear before a panel of two or more evaluators. Candidates are rated and ranked against one another based on an assessment of their ability to perform in a job classification.

qualifications for a position, including his or her knowledge, skills, abilities, experience, and physical and mental fitness. (Cal. Code Regs., tit. 2, § 250, subd. (a).)

During the compliance review period, the DTSC made 78 appointments. The CRU reviewed 49 of those appointments, which are listed below:

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Associate Environmental Planner	Certification List	Limited Term	Full Time	1
Associate Environmental Planner	Certification List	Permanent	Full Time	1
Associate Governmental Program Analyst	Certification List	Limited Term	Full Time	3
Associate Governmental Program Analyst	Certification List	Permanent	Full Time	6
Associate Information Systems Analyst (Specialist)	Certification List	Permanent	Full Time	2
Attorney	Certification List	Limited Term	Full Time	2
Attorney	Certification List	Permanent	Full Time	1
Engineering Geologist	Certification List	Permanent	Full Time	1
Environmental Scientist	Certification List	Permanent	Full Time	3
Hazardous Substances Engineer	Certification List	Limited Term	Full Time	1
Hazardous Substances Engineer	Certification List	Permanent	Full Time	2
Program Technician II	Certification List	Limited Term	Full Time	3
Public Participation Specialist, Department of Health Services	Certification List	Permanent	Full Time	1
Research Scientist II (Chemical Sciences)	Certification List	Permanent	Full Time	2
Senior Toxicologist	Certification List	Permanent	Full Time	2
Staff Information Systems Analyst (Specialist)	Certification List	Permanent	Full Time	1
Research Scientist III (Chemical Sciences)	Temporary Authorization Utilization (TAU)	Temporary	Intermittent	1
Student Assistant	TAU	Temporary	Intermittent	5

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Associate Governmental Program Analyst	Training & Development	Permanent	Full Time	2
Attorney	Transfer	Limited Term	Full Time	1
Environmental Scientist	Transfer	Permanent	Full Time	1
Hazardous Substances Engineer	Transfer	Permanent	Full Time	1
Office Technician (Typing)	Transfer	Permanent	Full Time	2
Research Scientist II (Chemical Sciences)	Transfer	Permanent	Full Time	1
Senior Environmental Scientist (Specialist)	Transfer	Permanent	Full Time	1
Staff Services Analyst	Transfer	Limited Term	Full Time	2

FINDING NO. 2 – Equal Employment Opportunity Questionnaires Were Not Separated from Applications

- Summary: The DTSC did not separate 324 EEO questionnaires from 1,708 STD. 678 employment applications.
- Criteria: Government Code section 19704 makes it unlawful for a hiring department to require or permit any notation or entry to be made on any application indicating or in any way suggesting or pertaining to any protected category listed in Government Code section 12940, subdivision (a) (e.g., a person's race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, or military and veteran status). Applicants for employment in state civil service are asked to provide voluntarily ethnic data about themselves where such data is determined by the California Department of Human Resources (CalHR) to be necessary to an assessment of the ethnic and sex fairness of the selection process and to the planning and monitoring of affirmative action efforts. (Gov. Code, § 19705.) The EEO questionnaire of the state application form (STD. 678) states, "This questionnaire will be separated from the application prior to the examination and will not be used in any employment decisions."

- **Severity:** <u>Very Serious</u>. The applicants' protected classes were visible, subjecting the agency to potential liability.
- **Cause:** The DTSC states that although Personnel Liaisons and supervisors have been previously instructed to remove the EEO Questionnaires from the applications if attached, the DTSC has concluded that staff have not consistently complied with DTSC directives or Government Code section 19704.
- Action: It is recommended that within 60 days of the Executive Officer's approval of these findings and recommendations, the DTSC submit to the CRU a written corrective action plan that the department will implement to ensure conformity with in the future that EEO questionnaires are separated from all applications. Copies of any relevant documentation should be included with the plan.

#### FINDING NO. 3 – Applications Were Not Date Stamped

- **Summary:** The DTSC accepted and processed 142 out of 1,708 applications that were not date stamped.
- **Criteria:** California Code Regulations, title 2, section 174 (Rule 174) requires timely filing of applications: All applications must be filed at the place, within the time, in the manner, and on the form specified in the examination announcement.

Filing an application 'within the time' shall mean postmarked by the postal service or date stamped at one of the department's offices (or appropriate office of the agency administering the examination) by the date specified.

An application that is not postmarked or date stamped by the specified date shall be accepted, if one of the following conditions as detailed in Rule 174 apply: (1) the application was delayed due to verified error; (2) the application was submitted in error to the wrong state agency and is either postmarked or date stamped on or before the specified date; (3) the employing agency verifies examination announcement distribution problems that prevented

timely notification to an employee of a promotional examination; or (4) the employing agency verifies that the applicant failed to receive timely notice of promotional examination. (Cal. Code Reg., tit. 2, § 174, suds. (a), (b), (c), & (d).) The same final filing date procedures are applied to the selection process used to fill a job vacancy.

- Severity: <u>Non-Serious or Technical</u>. Final filing dates are established to ensure all applicants are given the same amount of time in which to apply for a job vacancy and to set a deadline for the recruitment. Therefore, although the acceptance of applications after the final filing date may give some applicants more time to prepare their application than other applicants who meet the final filing date, the acceptance of late applications will not impact the results of the job vacancy selection.
- **Cause:** The DTSC states that the Personnel Liaisons or designated support staff are responsible for either stamping the applications received or maintaining the postmarked envelope associated with the applications. The DTSC acknowledges that this practice has not been applied consistently.
- Action: It is recommended that within 60 days of the Executive Officer's approval of these findings and recommendations, the DTSC submit to the CRU a written corrective action plan that the department will implement to ensure conformity with Rule 174. Copies of any relevant documentation should be included with the plan.

### **OBSERVATION NO. 1– Certifications Were Not Documented Electronically**

For three certification list appointments, the DTSC used Certification List Working Reports (CLWR) to code appointments in place of the actual certification lists within ECOS. Since the implementation of ECOS in January 2014, a certification is ordered electronically to certify eligibility of a candidate, and the hire is documented on the electronic certification. (2 CCR § 251). The CLWR is a report within ECOS that acts as a snapshot of a point in time of the status of the certification; however, it is not the official certification. The header on every page of the CLWR states: "CAUTION – DO NOT MAKE APPOINTMENTS OR COMMITMENTS FROM THIS REPORT." This is to

prevent agencies from coding the hires on the paper reports, and to instruct agencies to process hires on the electronic certifications.

By failing to document the certification electronically, the DTSC is unable to retain the historical data of their appointments. This can lead to a violation of California Code of Regulations, title 2, section 254 mandating vacancies under Government Code §19057.1, 19057.2 and 19057.3 which shall be filled by the three highest ranks certified. In addition, if SROA or Reemployment were present, bypassing electronic coding can lead to violation of California Code of Reg. 2, section 599.854.4. For all three of the appointments, SROA and Reemployment eligible lists were not in effect.

### Equal Employment Opportunity (EEO)

Each state agency is responsible for an effective EEO program. (Gov. Code, § 19790.) The appointing power for each state agency has the major responsibility for monitoring the effectiveness of its EEO program. (Gov. Code, § 19794.) To that end, the appointing power must issue a policy statement committed to equal employment opportunity; issue procedures for filing, processing, and resolving discrimination complaints; issue procedures for providing equal upward mobility and promotional opportunities; and cooperate with the California Department of Human Resources (CalHR) by providing access to all required files, documents and data. (*Ibid*.) In addition, the appointing power must appoint, at the managerial level, an EEO officer, who shall report directly to, and be under the supervision of, the director of the department to develop, implement, coordinate, and monitor the department's EEO program. (Gov. Code, § 19795.)

Because the EEO Officer investigates and ensures proper handling of discrimination, sexual harassment and other employee complaints, the position requires separation from the regular chain of command, as well as regular and unencumbered access to the head of the organization.

Each state agency must establish a separate committee of employees who are individuals with a disability, or who have an interest in disability issues, to advise the head of the agency on issues of concern to employees with disabilities. (Gov. Code, § 19795, subd. (b)(1).) The department must invite all employees to serve on the committee and take appropriate steps to ensure that the final committee is comprised of members who have disabilities or who have an interest in disability issues. (Gov. Code, § 19795, subd. (b)(2).)

The CRU reviewed the DTSC's EEO program that was in effect during the compliance review period. In addition, the CRU interviewed appropriate DTSC staff.

#### FINDING NO. 4 – Equal Employment Opportunity Program Complied with Civil Service Laws and Board Rules

After reviewing the policies, procedures, and programs necessary for compliance with the EEO program's role and responsibilities according to statutory and regulatory guidelines, the CRU determined that the DTSC's EEO program provided employees with information and guidance on the EEO process including instructions on how to file discrimination claims. Furthermore, the EEO program outlines the roles and responsibilities of the EEO Officer, as well as supervisors and managers. The EEO Officer, who is at a managerial level, reports directly to the director of the DTSC. In addition, the DTSC has an established DAC that reports to the director on issues affecting persons with a disability. The DTSC also provided evidence of its efforts to promote EEO in its hiring and employment practices, to increase its hiring of persons with a disability, and to offer upward mobility opportunities for its entry-level

#### Personal Services Contracts

A personal services contract (PSC) includes any contract, requisition, or purchase order under which labor or personal services is a significant, separately identifiable element, and the business or person performing the services is an independent contractor that does not have status as an employee of the State. (Cal. Code Reg., tit. 2, § 547.59.) The California Constitution has an implied civil service mandate limiting the state's authority to contract with private entities to perform services the state has historically or customarily performed. Government Code section 19130, subdivision (a), however, codifies exceptions to the civil service mandate where PSCs achieve cost savings for the state. PSCs that are of a type enumerated in subdivision (b) of Government Code section 19130 are also permissible. Subdivision (b) contracts include private contracts for a new state function, services that are not available within state service, services that are incidental to a contract for the purchase or lease of real or personal property, and services that are of an urgent, temporary, or occasional nature.

For cost-savings PSCs, a state agency is required to notify SPB of its intent to execute such a contract. (Gov. Code, § 19131.) For subdivision (b) contracts, the SPB reviews the adequacy of the proposed or executed contract at the request of an employee organization representing state employees. (Gov. Code, § 19132.)

During the compliance review period, the DTSC had 14 PSC's that were in effect and subject to DGS approval. The CRU reviewed 3 of these, which are listed below:

Vendor	Services	Contract Dates	Contract Amount	Justification Identified
Environmental Science Associates (ESA)	CEQA Related Services	11/1/2013 - 12/31/2016	\$388,932.00	Yes
Advanced Technology Laboratories	Chemical Laboratory Services	5/1/2014 - 6/30/2016	\$200,000.00	Yes
PerkinElmer Health Sciences, Inc.	Relocation of Equipment	10/24/2014 - 6/30/2015	\$170,302.00	Yes

# FINDING NO. 5 – Personal Services Contracts Complied with Procedural Requirements

When a state agency requests approval from the DGS for a subdivision (b) contract, the agency must include with its contract transmittal a written justification that includes specific and detailed factual information that demonstrates how the contract meets one or more conditions specified in Government Code section 19131, subdivision (b). (Cal. Code Reg., tit. 2, § 547.60.)

The total dollar amount of all the PSC's reviewed was \$759,234. It was beyond the scope of the review to make conclusions as to whether DTSC justifications for the contract were legally sufficient. For all PSC's reviewed, the DTSC provided specific and detailed factual information in the written justifications as to how each of the three contracts met at least one condition set forth in Government Code section 19131, subdivision (b). Accordingly, the DTSC PSC's complied with civil service laws and board rules.

#### **DEPARTMENTAL RESPONSE**

The DTSC's response is attached as Attachment 1.

### SPB REPLY

Based upon the DTSC's written response, the DTSC will comply with the CRU recommendations and findings and provide the CRU a corrective action plan.

It is further recommended that the DTSC comply with the afore-stated recommendations within 60 days of the Executive Officer's approval and submit to the CRU a written report of compliance.

Attachment 1





Department of Toxic Substances Control

Matthew Rodriquez Secretary for Environmental Protection Barbara A. Lee, Director 1001 "I" Street P.O. Box 806 Sacramento, California 95812-0806



Edmund G. Brown Jr. Governor

September 24, 2015

Suzanne Ambrose State Personnel Board 801 Capitol Mall Sacramento, CA 95814

Dear Ms. Ambrose,

In June 2015, the State Personnel Board (SPB) Compliance Audit Review Unit conducted a compliance review of the Department of Toxic Substances Control (DTSC) personnel practices to ensure that the DTSC is in compliance with merit related laws, rules, and principles. As a result, the SPB identified the following two findings and one observation that require DTSC corrective action: Equal Employment Opportunity (EEO) Questionnaires were not separated from applications; applications were not date stamped; and certification lists were not documented electronically.

The identified causes and responses to the findings and observation are listed below:

#### FINDING No. 2 - Equal Employment Opportunity Questionnaires Were Not Separated From Applications

**Cause:** As a standard practice, Personnel Liaisons (PL) and/or the hiring supervisor are listed as the contact on the California Department of Human Resources Vacant Positions Database (VPOS) advertisements. The contact receives all applications for the recruitment and is responsible for removing any attached EEO Questionnaires. Although the PLs and supervisors have been previously instructed to remove the EEO Questionnaires from the applications if attached, DTSC has concluded that staff have not consistently complied with DTSC directives or Government Code section 19704.

**Response:** In fiscal year 2013/2014, DTSC conducted mandatory Performance Management Training for all DTSC supervisors. During the training and included in the training materials, supervisors were instructed to remove and confidentially destroy any EEO Questionnaires attached to the applications received. DTSC will be conducting Performance Management Training in the Fall of 2015 and Spring of 2016 for newly hired supervisors. During the training, supervisors will be instructed to remove any EEO Questionnaires attached to the applications received.

In addition to the Performance Management Training, when DTSC Human Resources (HR) Classification and Pay (C&P) Analysts provide authorization for Program to post a VPOS advertisement, the C&P Analysts will reinforce to the hiring supervisor and designated PL that they are required to immediately remove and confidentially destroy any attached EEO Questionnaires to received applications.

#### FINDING No. 3 - Applications Were Not Date Stamped

**Cause:** The PL or designated support staff are responsible for either date stamping the applications received or maintaining the postmarked envelope associated with the applications. DTSC acknowledges that this practice has not been applied consistently.

**Response:** DTSC will be conducting Performance Management Training in the Fall of 2015 and Spring of 2016 for newly hired supervisors. During the training, supervisors will be instructed to remind their PL or designated support staff to ensure that all applications are date stamped when they are received.

In addition to the Performance Management Training, when DTSC Human Resources (HR) Classification and Pay (C&P) Analysts provide authorization for Program to post a VPOS ad, the C&P Analysts will reinforce to the hiring supervisor and designated PL that they are required to date stamp all applications when they are received.

#### **OBSERVATION No. 1 - Certifications Were Not Documented Electronically**

**Cause:** The C&P Analysts are responsible for coding all certification lists within the Examination and Certification Online System (ECOS). The DTSC has concluded that the C&P Analysts overlooked the electronic coding of the three certification lists that were identified in the compliance review.

**Response:** The C&P Manager held a meeting with all C&P Analysts to remind staff that they are required to electronically code the certification lists within ECOS prior to the expiration date of the certification list. Additionally, the C&P Manager reissued a copy of the C&P Checklist that is used to track the status of pending Request for Personnel Actions (RPA). The C&P Analysts are required to fill out the C&P checklist which contains the certification list information associated with the RPA including the certification list number, the certification list expiration date, and the date the candidate was coded in ECOS as hired.

#### CONCLUSION

DTSC strives to comply with all civil services laws, rules and merit principles. DTSC will continue to review departmental processes and make necessary enhancements to ensure compliance with the State Civil Service System.

If you have any questions, please contact me at (916) 322-0276.

Sincerely,

Joanne Haas

Joanne Haas Personnel Officer