



# **COMPLIANCE REVIEW REPORT**

**SECRETARY OF STATE**

Compliance Review Unit  
State Personnel Board  
April 26, 2017

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## **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 departments 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 five areas: examinations, appointments, equal employment opportunity (EEO), personal services contracts (PSC's), and mandated training 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 Secretary of State (SOS) personnel practices in the areas of examinations, appointments, EEO, and PSC's from February 1, 2016, through November 30, 2016, and mandated training from November 1, 2014, through November 30, 2016. The following table summarizes the compliance review findings.

Area	Finding	Severity
Examinations	Examinations Complied with Civil Service Laws and Board Rules	In Compliance
Appointments	Probationary Evaluations Were Not Provided for All Appointments Reviewed	Serious
Personal Services Contracts	Personal Services Contracts Complied with Procedural Requirements	In Compliance

Area	Finding	Severity
Equal Employment Opportunity	Equal Employment Opportunity Program Complied with Civil Service Laws and Board Rules	In Compliance
Mandated Training	Mandated Training Complied with Statutory 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

### **BACKGROUND**

The SOS's office is dedicated to making government more transparent and accessible in the areas of elections, business, political campaigning, legislative advocacy, and historical treasures. The SOS's responsibilities include:

- Serving as the state's Chief Elections Officer
- Implementing electronic filing and Internet disclosure of campaign and lobbyist financial information
- Maintaining business filings
- Commissioning notaries public
- Operating the Safe at Home confidential address program
- Maintaining the Domestic Partners and Advance Health Care Directive Registries
- Safeguarding the State Archives
- Serving as a trustee of the California Museum

The SOS's office is headquartered in Sacramento with a regional office in Los Angeles. As of December 2016, the SOS employed approximately 484 staff members; 49 Exempt/management staff (this includes Career Executive Assignments, Exempts, and managers), 37 supervisory staff, and 398 rank and file staff.

## **SCOPE AND METHODOLOGY**

The scope of the compliance review was limited to reviewing SOS's examinations, appointments, EEO program, and PSC's from February 1, 2016, through November 30, 2016, and mandated training from November 1, 2014, through November 30, 2016. The primary objective of the review was to determine if SOS's personnel practices, policies, and procedures complied with state civil service laws and board regulations, and to recommend corrective action for those deficiencies identified.

A cross-section of the SOS's examinations and appointments were selected to ensure that various samples of examinations and appointment types, classifications, and levels were reviewed. The CRU examined the documentation that the SOS provided, which included examination plans, examination bulletins, job analyses, 511b's, scoring results, notice of personnel action (NOPA) 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 SOS's 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 SOS's PSC's were also reviewed.<sup>1</sup> It was beyond the scope of the compliance review to make conclusions as to whether the SOS justifications for the contracts were legally sufficient. The review was limited to whether the SOS practices, policies, and procedures relative to PSC's complied with procedural requirements.

In addition, the SOS's mandated training was reviewed to ensure all employees required to file statements of economic interest were provided ethics training and that all supervisors were provided basic supervisory and sexual harassment prevention training within statutory timelines.

The SOS declined to have an exit conference. On April 21, 2017, the CRU received and carefully reviewed the response, which is attached to this final compliance report.

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<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.

## FINDINGS AND RECOMMENDATIONS

### Examinations

Examinations to establish an eligible list must be competitive and of such character as to fairly 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 of employees for each class of position and for applicants for examinations. (Gov. Code, § 18931.) Within a reasonable time before the scheduled date of 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 department or a designated appointing power as directed in 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 SOS conducted seven examinations. The CRU reviewed four of those examinations, which are listed below:

Classification	Examination Type	Exam Components	Final File Date	No. of Applications
Archivist II	Open	Qualification Appraisal Panel <sup>2</sup>	7/1/2016	4
Career Executive Assignment A	CEA	Statement Of Qualifications (SOQ) <sup>3</sup>	3/18/2016	6

<sup>2</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.

<sup>3</sup> In a statement of qualifications (SOQ's) examination, applicants submit a written summary of their qualifications and experience related to a published list of desired qualifications. Raters, typically subject matter experts, evaluate the responses according to a predetermined rating scale designed to assess their ability to perform in a job classification, assign scores and rank the competitors in a list.

Classification	Examination Type	Exam Components	Final File Date	No. of Applications
Career Executive Assignment B	CEA	SOQ	2/23/2016	26
Document Preservation Technician	Open	Performance <sup>4</sup> and QAP	4/25/16	8

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

The SOS administered two open examinations and two CEA examinations to create eligible lists from which to make appointments. The SOS published and distributed examination bulletins containing the required information for all examinations. Applications received by the SOS were accepted prior to the final filing date and were thereafter properly assessed to determine whether applicants met the minimum qualifications for admittance to the examination. The SOS notified applicants as to whether they qualified to take the examination, and those applicants who met the minimum qualifications 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 SOS conducted during the compliance review period. Accordingly, the SOS 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.) 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 qualifications for a

<sup>4</sup> A performance examination is a category of motor work sample tests where there is some physical activity or the physical implementation of things.

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 SOS made 133 appointments. The CRU reviewed 44 of those appointments, which are listed below:

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Accounting Analyst	Certification List	Permanent	Full Time	1
Archivist II	Certification List	Permanent	Full Time	3
Associate Governmental Program Analyst	Certification List	Permanent	Full Time	1
Associate Information Systems Analyst (Specialist)	Certification List	Permanent	Full Time	1
Associate Personnel Analyst	Certification List	Permanent	Full Time	1
Data Processing Manager IV	Certification List	Permanent	Full Time	1
Document Preservation Technician	Certification List	Permanent	Full Time	1
Office Assistant (Typing)	Certification List	Permanent	Full Time	3
Office Assistant (Typing)	Certification List	Limited Term	Full Time	2
Political Reform Program Specialist	Certification List	Permanent	Full Time	1
Program Technician	Certification List	Limited Term	Full Time	1
Program Technician II	Certification List	Limited Term	Full Time	3
Program Technician III	Certification List	Permanent	Full Time	1
Staff Services Manager II (Supervisory)	Certification List	Permanent	Full Time	3
Staff Services Manager III	Certification List	Permanent	Full Time	5

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Office Assistant (Typing)	Mandatory Reinstatement	Permanent	Full Time	2
Supervising Program Technician III	Mandatory Reinstatement	Permanent	Full Time	1
Associate Accounting Analyst	Transfer	Permanent	Full Time	1
Data Processing Manager III	Transfer	Permanent	Full Time	1
Digital Composition Specialist I	Transfer	Permanent	Full Time	1
Program Technician	Transfer	Limited Term	Full Time	3
Program Technician II	Transfer	Limited Term	Full Time	2
Program Technician II	Transfer	Permanent	Full Time	2
Research Program Specialist I	Transfer	Permanent	Full Time	1
Staff Services Manager I (Supervisor)	Transfer	Permanent	Full Time	1
Supervising Program Technician I	Transfer	Limited Term	Full Time	1

For each of the 28 list appointments, the SOS properly advertised the job vacancies, sent out contact letters, screened applications, interviewed candidates, and cleared the certification lists for SROA and reemployment, and conducted background and reference checks as appropriate.

The SOS made three appointments via mandatory reinstatement. A state agency is required to reinstate an employee to his or her former position if the employee is (1) terminated from a temporary or limited-term appointment by either the employee or the appointing power; (2) rejected during probation; or (3) demoted from a managerial position. (Gov. Code, § 19140.5.) The following conditions, however, must apply: the employee accepted the appointment without a break in continuity of service and the reinstatement is requested within ten working days after the effective date of the termination. (*Ibid.*) The SOS complied with the rules and laws governing mandatory reinstatements.

The CRU reviewed 13 SOS appointments made via transfer. A transfer of an employee from a position under one appointing power to a position under another appointing power may be made if the transfer is to a position in the same class or in another class with substantially the same salary range and designated as appropriate by the executive officer. (Cal. Code Reg., tit. 2, § 425.) The SOS verified the eligibility of the candidate to their appointed class.

However, the SOS did not provide probation reports for all appointments as described in finding two.

**FINDING NO. 2 – Probationary Evaluations Were Not Provided for All Appointments Reviewed**

**Summary:** The SOS did not prepare, complete, and/or retain two required probationary reports of performance.

Classification	Appointment Type	No. of Appointments	No. of Uncompleted Prob. Reports
Staff Services Manager III	List Appointment	2	2
<b>Total</b>		<b>2</b>	<b>2</b>

**Criteria:** A new probationary period is not required when an employee is appointed by reinstatement with a right of return. (Cal. Code Regs., tit. 2, § 322, subd. (d)(2).) However, the service of a probationary period is required when an employee enters state civil service by permanent appointment from an employment list. (Cal. Code Regs., tit. 2, § 322, subd. (a).) In addition, unless waived by the appointing power, a new probationary period is required when an employee is appointed to a position under the following circumstances: (1) without a break in service in the same class in which the employee has completed the probationary period, but under a different appointing power; and (2) without a break in service to a class with substantially the same or lower level of duties and responsibilities and salary range as a class in which the employee has completed the probationary period. (Cal. Code Regs., tit. 2, § 322, subd. (c)(1) & (2).)

During the probationary period, the appointing power is required to evaluate the work and efficiency of a probationer at sufficiently frequent intervals to keep the employee adequately informed of progress on the job. (Gov. Code, § 19172; Cal. Code Regs., tit. 2, § 599.795.) The appointing power must prepare a written appraisal of performance each one-third of the probationary period. (Cal. Code Regs., tit. 2, § 599.795.)

**Severity:** Serious. The probationary period is the final step in the selection process to ensure that the individual selected can successfully perform the full scope of their job duties. Failing to use the probationary period to assist an employee in improving his or her performance or terminating the appointment upon determination that the appointment is not a good job/person match is unfair to the employee and serves to erode the quality of state government.

**Cause:** The SOS's Human Resources Office makes a good faith effort to inform supervisors and managers regarding the requirements of completing probationary evaluations. Supervisors and managers are provided the forms and due dates of probationary evaluations of their employees. The SOS also uses a tracking database that has improved collection of probationary reports since the last compliance review.

**Action:** It is recommended that within 60 days of the Executive Officer's approval of these findings and recommendations, the SOS submit to the CRU a written corrective action plan that addresses the corrections the department will implement to ensure conformity with the probationary requirements of Government Code section 19172.

#### 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 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.) In a state agency with less than 500 employees, like the SOS, the EEO officer may be the personnel officer. (*Ibid.*)

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 SOS's EEO policies, procedures, and programs in effect during the compliance review period.

**FINDING NO. 3 – 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 SOS'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 Executive Director of the SOS. In addition, the SOS has an established DAC that reports to the director on issues affecting persons with a disability. The SOS 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 staff. Accordingly, the SOS's EEO program complied with civil service laws and board rules.

Personal Services Contracts

A 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 PSC’s achieve cost savings for the state. PSC’s 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 PSC’s a state agency is required to notify the 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 SOS had 21 PSC’s that were in effect and subject to Department of General Services (DGS) approval, and thus our procedural review. The CRU reviewed seven contracts, which are listed below:

Vendor	Services	Contract Dates	Contract Amount	Justification Identified
Cooperative Personnel Services dba CPS HR Consulting	Notary Testing	7/1/16 – 6/30/17	\$1,498,725.00	Yes
CTS LanguageLink	Written Language Translation	8/1/16 – 12/31/16	\$954,465.00	Yes
Inter-Con Security	Security	3/1/16 – 1/31/18	\$1,957,250.00	Yes
Inter-Con Security Systems, Inc.	Security	3/1/16 – 1/31/18	\$95,200.00	Yes
Sjoberg Evashenk Consulting, Inc.	Performance Audit	1/6/16-11/1/16	\$158,190.00	Yes

Vendor	Services	Contract Dates	Contract Amount	Justification Identified
Technology Management Solutions, Inc.	IT Consulting – CARS Project	8/22/16 – 4/21/17	\$542,720.00	Yes
Transcend Translations	Written and Verbal Language Translation	8/1/16 – 6/30/17	\$217,000.00	Yes

**FINDING NO. 4 – 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 amount of all the PSC’s reviewed was \$5,423,550.00. It was beyond the scope of the review to make conclusions as to whether the SOS justifications for the contract were legally sufficient. For all PSC’s subject to DGS approval, the SOS provided specific and detailed factual information in the written justifications as to how each of the two contracts met at least one condition set forth in Government Code section 19131, subdivision (b). Accordingly, the SOS PSC’s complied with procedural requirements.

Mandated Training

Each member, officer, or designated employee of a state agency who is required to file a statement of economic interest (referred to as “filers”) because of the position he or she holds with the agency is required to take an orientation course on the relevant ethics statutes and regulations that govern the official conduct of state officials. (Gov. Code, §§ 11146 & 11146.1.) State agencies are required to offer filers the orientation course on a semi-annual basis. (Gov. Code, § 11146.1.) New filers must be trained within six months of appointment and at least once during each consecutive period of two calendar years, commencing on the first odd-numbered year thereafter. (Gov. Code, § 11146.3.)

Upon the initial appointment of any employee designated in a supervisory position, the employee shall be provided a minimum of 80 hours of training, as prescribed by the

California Department of Human Resources (CalHR). (Gov. Code, § 19995.4, subd. (b).) The training addresses such topics as the role of the supervisor, techniques of supervision, performance standards, and sexual harassment and abusive conduct prevention. (Gov. Code, §§ 12950.1, subds. (a), (b), & (c), & 19995.4, subd. (b).) The training must be successfully completed within the term of the employee's probationary period or within six months of the initial appointment, unless it is demonstrated that to do so creates additional costs or that the training cannot be completed during this time period due to limited availability of supervisory training courses. (Gov. Code, § 19995.4, subd. (c).) As to the sexual harassment and abusive-conduct prevention component, the training must thereafter be provided to supervisors once every two years. (Gov. Code, § 12950.1.)

Within 12 months of the initial appointment of an employee to a management or career executive assignment (CEA) position, the employee shall be provided leadership training and development, as prescribed by CalHR. (Gov. Code, §§ 19995.4, subds. (d) & (e).) For management employees the training must be a minimum of 40 hours and for CEAs the training must be a minimum of 20 hours. (*Ibid.*) Thereafter, for both categories of appointment, the employee must be provided a minimum of 20 hours of leadership training on a biannual basis. (*Ibid.*)

The Board may conduct reviews of any appointing power's personnel practices to ensure compliance with civil service laws and Board regulations. (Gov. Code, § 18661, subd. (a).) In particular, the Board may audit personnel practices related to such matters as selection and examination procedures, appointments, promotions, the management of probationary periods, and any other area related to the operation of the merit principle in state civil service. (*Ibid.*) Accordingly, the CRU reviews documents and records related to training that appointing powers are required by the afore-cited laws to provide its employees.

The CRU reviewed the SOS's mandated training program that was in effect during the compliance review period.

#### **FINDING NO. 5 – Mandated Training Complied with Statutory Requirements**

The SOS provided ethics training to its 44 new filers within six months of appointment and semiannual ethics training to its 68 existing filers during two-year calendar year period commencing in 2014. The SOS also provided supervisory training to its 27 new supervisors within 12 months of appointment. In addition, the SOS provided sexual harassment prevention training to its 28 new supervisors within six months of

appointment, and sexual harassment prevention training to its 49 existing supervisors every two years. Thus, the SOS complied with mandated training requirements within statutory timelines.

### **DEPARTMENTAL RESPONSE**

The SOS's response is attached as Attachment 1.

### **SPB REPLY**

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

It is further recommended that the SOS 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.



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DATE: April 21, 2017

TO: Suzanne Ambrose, Executive Officer  
State Personnel Board  
801 Capitol Mall  
Sacramento, CA 95814

FROM: Mike Green, Human Resources Manager

SUBJECT: Secretary of State Corrective Action Plan to SPB 2016 Compliance Review Report

Dear Ms. Ambrose:

In response to the finalized State Personnel Board (SPB) Compliance Report, the following is the Secretary of State's Corrective Action Plan for establishing preventive measures to address the identified findings which include the following:

**FINDING NO. 2 – Probationary Evaluations Were Not Provided for All Appointments Reviewed.**

The Secretary of State's Human Resources Office makes a good faith effort to inform supervisors and managers regarding the requirements of completing probationary evaluations. Supervisors and managers are provided the forms and due dates of probationary evaluations of their employees.

During the 2016 Compliance Review the State Personnel Board reviewed 44 appointments made by the Secretary of State; three (3) of those appointments were mandatory reinstatements that were not required to serve a new probationary period. Of the 41 remaining appointments the Secretary of State did not provide the first probationary report for two (2) employees during the Compliance Review period; this made for a deficiency of 4.8%.

During the prior Compliance Review in 2013 the State Personnel Board reviewed 95 appointments made by the Secretary of State. It was found that 30 of those appointed employees did not receive some and/or all of their probationary reports; this made for a deficiency of 31.5%. At that time the Secretary of State had recently instituted a tracking database in 2012, just prior to the Compliance Review, to better manage the filing of probationary reports.

The Secretary of State has seen an improvement in the collection of probationary reports since the last review, in large part due to the tracking database. The Secretary of State provides leadership training to its supervisors and managers which is geared towards a wide variety of supervisory roles and responsibilities. One such class covers the area of Progressive Discipline and focuses on the supervisor's role during the process, part of which highlights the importance of providing staff with timely probationary reports. The Secretary of State has given the Progressive Discipline course since June 2012.

### **Plan of Action**

The Secretary of State will continue to provide internal training to its supervisors and managers regarding their roles and responsibilities during the probationary period. The Secretary of State's Probation Report tracking spreadsheet includes regular reminders to those supervisors and managers who are not timely in providing probation reports to employees. In response to this latest compliance review the Secretary of State will also incorporate a yearly memo to send to all supervisors and managers reminding them of the importance of completing probation reports in a timely manner. Secretary of State submits this corrective action plan to ensure compliance with the probationary requirements of Government Code section 19172.

You are welcome to contact me if you have any questions at (916) 695-1515 or [Michael.Green@sos.ca.gov](mailto:Michael.Green@sos.ca.gov).