



COMPLIANCE REVIEW REPORT

CALIFORNIA WORKFORCE DEVELOPMENT BOARD

Compliance Review Unit
State Personnel Board
April 30, 2024

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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 authorities' 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.

Pursuant to Government Code section 18502, subdivision (c), the SPB and the California Department of Human Resources (CalHR) may "delegate, share, or transfer between them responsibilities for programs within their respective jurisdictions pursuant to an agreement." SPB and CalHR, by mutual agreement, expanded the scope of program areas to be audited to include more operational practices that have been delegated to departments and for which CalHR provides policy direction. Many of these delegated practices are cost drivers to the state and were not being monitored on a statewide basis.

As such, SPB also conducts compliance reviews of appointing authorities' personnel practices to ensure that state departments are appropriately managing the following non-merit-related personnel functions: compensation and pay, leave, and policy and processes. These reviews will help to avoid and prevent potential costly litigation related to improper personnel practices, and deter waste, fraud, and abuse.

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.

It should be noted that this report only contains findings from this hiring authority's compliance review. Other issues found in SPB appeals and special investigations as well as audit and review findings by other agencies such as the CalHR and the California State Auditor are reported elsewhere.

EXECUTIVE SUMMARY

The CRU conducted a routine compliance review of the California Workforce Development Board (CWDB) personnel practices in the areas of examinations, appointments, EEO, PSC's, mandated training, compensation and pay, leave, and policy and processes. The following table summarizes the compliance review findings.

Area	Severity	Finding
Appointments	Serious	Probationary Evaluations Were Not Provided for All Appointments Reviewed and Some That Were Provided Were Untimely
Appointments	Technical	Appointment Documentation Was Not Kept for the Appropriate Amount of Time
Equal Employment Opportunity	In Compliance	Equal Employment Opportunity Program Complied with All Civil Service Laws and Board Rules
Mandated Training	Very Serious	Ethics Training Was Not Provided for All Filers ¹
Mandated Training	Very Serious	Sexual Harassment Prevention Training Was Not Provided for All Employees ²
Mandated Training	Very Serious	Supervisory Training Was Not Provided for All Supervisors, Managers, and CEAs
Compensation and Pay	In Compliance	Salary Determinations Complied with Civil Service Laws, Board Rules, and CalHR Policies and Guidelines
Compensation and Pay	In Compliance	Alternate Range Movements Complied with Civil Service Laws, Board Rules, and/or CalHR Policies and Guidelines
Compensation and Pay	In Compliance	Out of Class Pay Authorizations Complied with Civil Service Laws, Board Rules, and CalHR Policies and Guidelines

¹ Repeat finding. The CWDB's November 5, 2021, compliance review report identified that of the 12 new filers, 5 were not provided training.

² Repeat finding. The CWDB's November 5, 2021, compliance review report identified that 2 of 8 new supervisors were not provided sexual harassment prevention training within 6 months of their appointment.

Area	Severity	Finding
Leave	In Compliance	Administrative Time Off Authorizations Complied with Civil Service Laws, Board Rules, and/or CalHR Policies and Guidelines
Leave	Serious	Department Has Not Implemented a Monthly Internal Audit Process to Verify All Leave Input is Keyed Accurately and Timely
Leave	In Compliance	Service and Leave Transactions Complied with Civil Service Laws, Board Rules, and/or CalHR Policies and Guidelines
Policy	In Compliance	Nepotism Policy Complied with Civil Service Laws, Board Rules, and/or CalHR Policies and Guidelines
Policy	In Compliance	Workers' Compensation Process Complied with Civil Service Laws, Board Rules, and/or CalHR Policies and Guidelines
Policy	Serious	Performance Appraisals Were Not Provided to All Employees

BACKGROUND

The CWDB is responsible for the oversight and continuous improvement of the workforce system in California, which encompasses a wide array of work, including: policy development; workforce support and innovation; and performance assessment, measurement and reporting.

The CWDB assists the Governor in setting and guiding workforce development policy, developing innovative initiatives through statewide programs, and expanding the High Road vision through its field branch. The workforce development system is comprised of 49 Local Workforce Development Areas, each with its own business-led Local Workforce Development Board (Local Board). These Local Boards work together with the state and their local Chief Elected Officials to oversee the delivery of workforce services relevant to their residents and businesses.

The Employment Development Department (EDD) performs human resources operations for the CWDB.

SCOPE AND METHODOLOGY

The scope of the compliance review was limited to reviewing the CWDB's appointments, EEO program, mandated training, compensation and pay, leave, and policy and processes³. The primary objective of the review was to determine if the CWDB's personnel practices, policies, and procedures complied with state civil service laws and Board regulations, Bargaining Unit Agreements, CalHR policies and guidelines, CalHR Delegation Agreements, and to recommend corrective action where deficiencies were identified.

The CWDB did not conduct any examinations or permanent withhold actions during the compliance review period.

A cross-section of the CWDB's appointments was selected for review to ensure that samples of various appointment types, classifications, and levels were reviewed. The CRU examined the documentation that the CWDB provided, which included Notice of Personnel Action (NOPA) forms, Request for Personnel Actions, vacancy postings, certification lists, transfer movement worksheets, employment history records, correspondence, and probation reports. The CWDB did not conduct any unlawful appointment investigations during the compliance review period. Additionally, the CWDB did not make any additional appointments during the compliance review period.

The CWDB's appointments were also selected for review to ensure the CWDB applied salary regulations accurately and correctly processed employees' compensation and pay. The CRU examined the documentation that the CWDB provided, which included employees' employment and pay history and any other relevant documentation such as certifications, degrees, and/or the appointee's application. Additionally, the CRU reviewed specific documentation for the following personnel functions related to compensation and pay, e.g., alternate range movements, and out-of-class assignments.

During the compliance review period, the CWDB did not issue or authorize hiring above minimum requests, red circle rate requests, arduous pay, bilingual pay, or monthly pay differentials.

The review of the CWDB's EEO program included examining written EEO policies and procedures; the EEO Officer's role, duties, and reporting relationship; the internal

³ Timeframes of the compliance review varied depending on the area of review. Please refer to each section for specific compliance review timeframes.

discrimination complaint process; the reasonable accommodation program; the discrimination complaint process; and the Disability Advisory Committee.

The CWDB did not execute any PSC's during the compliance review period.

The CWDB's mandated training program was reviewed to ensure all employees required to file statements of economic interest were provided ethics training, that all supervisors, managers, and those serving in Career Executive Assignments (CEA) were provided leadership and development training, and that all employees were provided sexual harassment prevention training within statutory timelines.

The CRU reviewed the CWDB's monthly internal audit process to verify all leave input into any leave accounting system was keyed accurately and timely and ensure the department certified that all leave records have been reviewed and corrected if necessary. The CRU selected a small cross-section of the CWDB's units in order to ensure they maintained accurate and timely leave accounting records. Part of this review also examined a cross-section of the CWDB's employees' employment and pay history, state service records, and leave accrual histories to ensure employees with non-qualifying pay periods did not receive vacation/sick leave and/or annual leave accruals or state service credit.

Additionally, the CRU reviewed a selection of the CWDB employees who used Administrative Time Off (ATO) in order to ensure that ATO was appropriately administered. Additionally, the CWDB did not track any temporary intermittent employees by actual time worked during the compliance review period.

Moreover, the CRU reviewed the CWDB's policies and processes concerning nepotism, workers' compensation, and performance appraisals. The review was limited to whether the CWDB's policies and processes adhered to procedural requirements.

The CWDB declined to have an exit conference to explain and discuss the CRU's initial findings and recommendations. The CRU received and carefully reviewed the CWDB's written response on April 10, 2024, which is attached to this final compliance review report.

FINDINGS AND RECOMMENDATIONS

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.) The hiring process for eligible candidates chosen for job interviews shall be competitive and be designed and administered to hire candidates who will be successful. (Cal. Code Regs., tit. 2, § 250, subd. (b).) Interviews shall be conducted using job-related criteria. (*ibid.*) Persons selected for appointment shall satisfy the minimum qualifications of the classification to which he or she is appointed or have previously passed probation and achieved permanent status in that same classification. (Cal. Code Regs., tit. 2, § 250, subd. (d).) While persons selected for appointment may meet some or most of the preferred or desirable qualifications, they are not required to meet all the preferred or desirable qualifications. (*ibid.*) This section does not apply to intra-agency job reassignments. (Cal. Code Regs., tit. 2, § 250, subd. (e).)

During the period under review, February 1, 2022, through October 31, 2022, the CWDB made 30 appointments. The CRU reviewed 12 of those appointments, which are listed below:

Classification	Appointment Type	Tenure	Time Base	No. of Appts.
Associate Governmental Program Analyst	Certification List	Permanent	Full Time	5
Research Data Specialist II	Certification List	Permanent	Full Time	1
Staff Services Analyst (General)	Certification List	Permanent	Full Time	1
Staff Services Manager I	Certification List	Permanent	Full Time	3
Staff Services Manager II (Supervisory)	Certification List	Permanent	Full Time	1
Associate Governmental Program Analyst	Transfer	Permanent	Full Time	1

SEVERITY: SERIOUS	FINDING NO. 1 PROBATIONARY EVALUATIONS WERE NOT PROVIDED FOR ALL APPOINTMENTS REVIEWED AND SOME THAT WERE PROVIDED WERE UNTIMELY
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Summary: The CWDB did not provide 2 probationary reports of performance for 2 of the 12 appointments reviewed by the CRU. In addition, the CWDB did not provide two probationary reports of performance in a timely manner, as reflected in the table below.

Classification	Appointment Type	No. of Appointments	Total No. of Missing Probation Reports
Research Data Specialist II	Certification List	1	1
Staff Services Manager I	Certification List	1	1

Classification	Appointment Type	No. of Appointments	Total No. of Late Probation Reports
Staff Services Manager II (Supervisory)	Certification List	1	2

Criteria: The service of a probationary period is required when an employee enters or is promoted in the state civil service by permanent appointment from an employment list; upon reinstatement after a break in continuity of service resulting from a permanent separation; or after any other type of appointment situation not specifically excepted from the probationary period. (Gov. Code, § 19171.) During the probationary period, the appointing power shall evaluate the work and efficiency of a probationer in the manner and at such periods as the department rules may require. (Gov. Code, § 19172.) A report of the probationer's performance shall be made to the employee at sufficiently frequent intervals to keep the employee adequately informed of progress on the job. (Cal. Code Regs., tit. 2, § 599.795.) A written appraisal of performance shall be made to the Department within 10 days after the end of each one-third portion of the probationary period. (*Ibid.*) The Board's record retention rules require that appointing powers retain all probationary reports for five years from the date the record is created. (Cal. Code Regs., tit. 2, § 26, subd. (a)(3).)

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 CWDB states that the hiring of an unprecedented number of additional staff resulted in the managers' inability to ensure completion of probationary reports of performance.

Corrective Action: Within 90 days of the date of this report, the CWDB must submit to the SPB a written corrective action response which addresses the corrections the department will implement to demonstrate conformity with the probationary requirements of Government Code section 19172 and California Code of Regulations, title 2, section 599.795. Copies of relevant documentation demonstrating that the corrective action has been implemented must be included with the corrective action response.

SEVERITY: TECHNICAL	FINDING NO. 2 APPOINTMENT DOCUMENTATION WAS NOT KEPT FOR THE APPROPRIATE AMOUNT OF TIME
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Summary: Of the 12 appointments reviewed, the CWDB did not retain 3 NOPAs.

Criteria: As specified in section 26 of the Board's Regulations, appointing powers are required to retain records related to affirmative action, equal employment opportunity, examinations, merit, selection, and appointments for a minimum period of five years from the date the record is created. These records are required to be readily accessible and retained in an orderly and systematic manner. (Cal. Code Regs., tit. 2, § 26.)

Severity: Technical. Without documentation, the CRU could not verify if the appointments were properly conducted.

Cause: The CWDB states that the Human Resources Services Division, at the time of the audit, had not implemented additional measures for the tracking and retention of NOPAs.

Corrective Action: Within 90 days of the date of this report, the CWDB must submit to the SPB a written corrective action response which addresses the corrections the department will implement to ensure conformity with the record retention requirements of California Code of Regulations, title 2, section 26. Copies of relevant documentation demonstrating that the corrective action has been implemented must be included with the corrective action response.

Equal Employment Opportunity

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 EEO; issue procedures for filing, processing, and resolving discrimination complaints; and cooperate with the CalHR, in accordance with Civil Code section 1798.24, subdivisions (o) and (p), by providing access to all required files, documents and data necessary to carry out these mandates. (*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, subd. (a).)

Pursuant to Government Code section 19795, subdivision (a), in a state agency with less than 500 employees, like CWDB, the EEO Officer may be the Personnel Officer.

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).)

IN COMPLIANCE	FINDING NO. 3 EQUAL EMPLOYMENT OPPORTUNITY PROGRAM COMPLIED WITH ALL CIVIL SERVICE LAWS AND BOARD RULES
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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 CWDB’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 CWDB. The CWDB also provided evidence of its efforts to promote EEO in its hiring and employment practices and to increase its hiring of persons with a disability.

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 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) and (b), & 19995.4, subd. (b).) Additionally, 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).)

Within 12 months of the initial appointment of an employee to a management or 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.*)

New employees must be provided sexual harassment prevention training within six months of appointment. Thereafter, each department must provide its supervisors two hours of sexual harassment prevention training and non-supervisors one hour of sexual harassment prevention training every two years. (Gov. Code, § 12950.1, subds. (a) and (b); Gov. Code, § 19995.4.)

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 CWDB's mandated training program that was in effect during the compliance review period, January 1, 2021, through December 31, 2022. The CWDB's ethics training, sexual harassment prevention training, and supervisory training were found to be out of compliance.

SEVERITY: VERY SERIOUS	FINDING NO. 4 ETHICS TRAINING WAS NOT PROVIDED FOR ALL FILERS
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Summary: The CWDB provided ethics training to its 28 existing filers within 6 months of their appointment. However, the CWDB did not provide ethics training to 2 of 37 new filers within 6 months of their appointment. This is the second consecutive time this has been a finding for the CWDB.

Criteria: New filers must be provided ethics training within six months of appointment. Existing filers must be trained at least once during each consecutive period of two calendar years commencing on the first odd-numbered year thereafter. (Gov. Code, § 11146.3, subd. (b).)

Severity: Very Serious. The department does not ensure that its filers are aware of prohibitions related to their official position and influence.

Cause: The CWDB states that the hiring of an unprecedented number of additional staff resulted in managers' inability to ensure training was completed for their staff or for themselves.

Corrective Action: Within 90 days of this report, the CWDB must submit to the SPB a written correction action response which addresses the corrections the department will implement to demonstrate conformity with Government Code section 11146.3. Copies of relevant documentation demonstrating that the corrective action has been implemented must be included with the corrective action response.

SEVERITY: VERY SERIOUS	FINDING NO. 5 SEXUAL HARASSMENT PREVENTION TRAINING WAS NOT PROVIDED FOR ALL EMPLOYEES
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Summary: The CWDB did not provide sexual harassment prevention training to 2 of 8 new supervisors within 6 months of their appointment. In addition, the CWDB did not provide sexual harassment prevention training to 1 of 14 existing supervisors every 2 years. This is the second consecutive time this has been a finding for the CWDB.

The CWDB provided sexual harassment prevention training to its 37 existing non-supervisors every 2 years.

Criteria: Each department must provide its supervisors two hours of sexual harassment prevention training every two years and non-supervisory employees one hour of sexual harassment prevention training every two years. New employees must be provided sexual harassment prevention training within six months of appointment. (Gov. Code, § 12950.1, subds. (a) and (b); Gov. Code § 19995.4.)

Severity: Very Serious. The department does not ensure that all new and existing supervisors are properly trained to respond to sexual harassment or unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature. This limits the department's ability to retain a quality workforce, impacts employee morale and productivity, and subjects the department to litigation.

Cause: The CWDB states that the hiring of an unprecedented number of additional staff resulted in managers' inability to ensure training was completed for their staff or for themselves.

Corrective Action: Within 90 days of the date of this report, the CWDB must submit to the SPB a written corrective action response which addresses the corrections the department will implement to ensure that all employees are provided sexual harassment prevention training in accordance with Government Code section 12950.1. Copies of relevant documentation demonstrating that the corrective action has been implemented must be included with the corrective action response.

SEVERITY: VERY SERIOUS	FINDING NO. 6 SUPERVISORY TRAINING WAS NOT PROVIDED FOR ALL SUPERVISORS, MANAGERS, AND CEAS
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Summary: The CWDB did not provide manager training to its 1 new manager within 12 months of appointment; and did not provide CEA training to its 1 new CEA within 12 months of appointment.

Criteria: Each department must provide its new supervisors a minimum of 80 hours of supervisory training within the probationary period.(Gov. Code, § 19995.4, subd. (b).)

Upon initial appointment of an employee to a managerial position, each employee must receive 40 hours of leadership training within 12 months of appointment. (Gov. Code, § 19995.4, subd. (d).)

Upon initial appointment of an employee to a Career Executive Assignment position, each employee must receive 20 hours of leadership training within 12 months of appointment. (Gov. Code, § 19995.4, subd. (e).)

Severity: Very Serious. The department does not ensure its leaders are properly trained. Without proper training, leaders may not properly carry out their leadership roles, including managing employees.

Cause: The CWDB states that the hiring of an unprecedented number of additional staff resulted in managers' inability to ensure training was completed for their staff or for themselves.

Corrective Action: Within 90 days of the date of this report, the CWDB must submit to the SPB a written corrective action response which addresses the corrections the department will implement to ensure that new supervisors, managers, and CEAs are provided leadership and development training within twelve months of appointment, and that thereafter, they receive a minimum of 20 hours of leadership training biennially, as required by Government Code section 19995.4. Copies of relevant documentation demonstrating that the corrective action has been implemented must be included with the corrective action response.

Compensation and Pay

Salary Determination

The pay plan for state civil service consists of salary ranges and steps established by CalHR. (Cal. Code Regs., tit. 2, § 599.666.) Several salary rules dictate how departments calculate and determine an employee’s salary rate⁴ upon appointment depending on the appointment type, the employee’s state employment and pay history, and tenure.

Typically, agencies appoint employees to the minimum rate of the salary range for the class. Special provisions for appointments above the minimum exist to meet special recruitment needs and to accommodate employees who transfer into a class from another civil service class and are already receiving salaries above the minimum.

During the period under review, February 1, 2022, through October 31, 2022, the CWDB made 30 appointments. The CRU reviewed 5 of those appointments to determine if the CWDB applied salary regulations accurately and correctly processed employees’ compensation, which are listed below:

Classification	Appointment Type	Tenure	Time Base	Salary (Monthly Rate)
Associate Governmental Program Analyst	Certification List	Permanent	Full Time	\$5383
Associate Governmental	Certification List	Permanent	Full Time	\$5518

⁴ “Rate” is any one of the salary rates in the resolution by CalHR which establishes the salary ranges and steps of the Pay Plan (Cal. Code Regs., tit. 2, section 599.666).

Classification	Appointment Type	Tenure	Time Base	Salary (Monthly Rate)
Program Analyst				
Associate Governmental Program Analyst	Certification List	Permanent	Full Time	\$5884
Research Data Specialist II	Certification List	Permanent	Full Time	\$6844
Staff Services Manager I	Certification List	Permanent	Full Time	\$6563

IN COMPLIANCE	FINDING NO. 7 SALARY DETERMINATIONS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND CALHR POLICIES AND GUIDELINES
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The CRU found no deficiencies in the salary determinations that were reviewed. The CWDB appropriately calculated and keyed the salaries for each appointment and correctly determined employees' anniversary dates ensuring that subsequent merit salary adjustments will satisfy civil service laws, Board rules and CalHR policies and guidelines.

Alternate Range Movement Salary Determination (within same classification)

If an employee qualifies under established criteria and moves from one alternate range to another alternate range of a class, the employee shall receive an increase or a decrease equivalent to the total of the range differential between the maximum salary rates of the alternate ranges. (Cal. Code Regs., tit. 2, § 599.681.) However, in many instances, the CalHR provides salary rules departments must use when employees move between alternate ranges. These rules are described in the alternate range criteria. (CalHR Pay Scales). When no salary rule or method is cited in the alternate range criteria, departments must default to Rule 599.681.

During the period under review, February 1, 2022, through October 31, 2022, the CWDB employees made one alternate range movement within a classification. The CRU reviewed one alternate range movement to determine if the CWDB applied salary regulations accurately and correctly processed each employee's compensation, which is listed below:

Classification	Prior Range	Current Range	Time Base	Salary (Monthly Rate)
Staff Services Analyst (General)	B	C	Full Time	\$4775.00

IN COMPLIANCE	FINDING NO. 8 ALTERNATIVE RANGE MOVEMENTS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND CALHR POLICIES AND GUIDELINES
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The CRU determined that the alternate range movement the CWDB made during the compliance review period, satisfied civil service laws, Board rules and CalHR policies and guidelines.

Out-of-Class Assignments and Pay

For excluded⁵ and most rank-and-file employees, out-of-class (OOC) work is defined as performing, more than 50 percent of the time, the full range of duties and responsibilities allocated to an existing class and not allocated to the class in which the person has a current, legal appointment. (Cal. Code Regs., tit. 2, § 599.810, subd. (a)(2).) A higher classification is one with a salary range maximum that is any amount higher than the salary range maximum of the classification to which the employee is appointed. (Cal. Code Regs., tit. 2, § 599.810, subd. (a)(3).)

According to the Classification and Pay Guide, OOC assignments should only be used as a last resort to accommodate temporary staffing needs. All civil service alternatives should be explored first before using OOC assignments. However, certain MOU provisions and the California Code of Regulations, title 2, section 599.810 allow for short-term OOC assignments to meet temporary staffing needs. Should OOC work become necessary, the assignment would be made pursuant to the applicable MOU provisions or salary regulations. Before assigning the OOC work, the department should have a plan to correct the situation before the time period outlined in applicable law, policy or MOU expires. (Classification and Pay Guide Section 375.)

During the period under review, February 1, 2022, through October 31, 2022, the CWDB issued OOC pay to two employees. The CRU reviewed these OOC assignments to ensure compliance with applicable MOU provisions, salary regulations, and CalHR policies and guidelines. These are listed below:

Classification	CBID	Out-of-Class Classification	Time Frame
Associate Governmental Program Analyst	S01	Staff Services Manager I	04/11/2022 – 06/30/2022

⁵ “Excluded employee” means an employee as defined in Government Code section 3527, subdivision (b) (Ralph C. Dills Act) except those excluded employees who are designated managerial pursuant to Government Code section 18801.1.

Classification	CBID	Out-of-Class Classification	Time Frame
Staff Services Manager I	M01	Staff Services Manager II	04/11/2022 – 06/30/2022

IN COMPLIANCE	FINDING NO. 9	OUT OF CLASS PAY AUTHORIZATIONS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND CALHR POLICIES AND GUIDELINES
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The CRU found no deficiencies in the OOC pay assignments that the CWDB authorized during the compliance review period. OOC pay was issued appropriately to employees performing, more than 50 percent of the time, the full range of duties and responsibilities allocated to an existing class and not allocated to the class in which the person has a current, legal appointment.

Leave

Administrative Time Off

ATO is a form of paid administrative leave status initiated by appointing authorities for a variety of reasons. (Human Resources Manual Section 2121.) Most often, ATO is used when an employee cannot come to work because of a pending investigation, fitness for duty evaluation, or when work facilities are unavailable. (*Ibid.*) ATO can also be granted when employees need time off for reasons such as blood or organ donation, extreme weather preventing safe travel to work, states of emergency, voting, and when employees need time off to attend special events. (*Ibid.*)

During the period under review, October 1, 2021, through September 30, 2022, the CWDB authorized 22 ATO transactions. The CRU reviewed 18 of these ATO transactions to ensure compliance with applicable laws, regulations, and CalHR policy and guidelines, which are listed below:

Classification	Time Frame	Amount of Time on ATO
Associate Budget Analyst	03/11/2022 – 03/12/2022; 03/15/2022 – 03/18/2022	6 days
Associate Governmental Program Analyst	02/16/2022; 07/13/2022 – 07/15/2022	3 days and 1 hour
Associate Governmental Program Analyst	05/24/2022 – 05/26/2022	3 days
Associate Governmental Program Analyst	06/22/2022 – 06/23/2022	2 days

Classification	Time Frame	Amount of Time on ATO
Associate Governmental Program Analyst	06/24/2022; 06/27/2022 – 06/28/2022	3 days
Associate Governmental Program Analyst	08/30/2022 – 09/02/2022	4 days
Associate Governmental Program Analyst	09/14/2022 – 09/16/2022; 09/19/2022	4 days
Information Technology Specialist I	2/18/2022	1 day
Information Technology Specialist II	01/18/2022 – 01/19/2022	2 days
Research Data Analyst II	06/22/2022 – 06/24/2022	3 days
Staff Services Analyst (General)	06/27/2022 – 06/28/2022	2 days
Staff Services Manager I	05/12/2022 – 05/13/2022; 05/16/2022	3 days
Staff Services Manager I	06/06/2022	1 day
Staff Services Manager I	06/13/2022 – 06/15/2022	3 days
Staff Services Manager I	06/15/2022 – 06/17/2022	3 days
Staff Services Manager I	07/08/2022; 07/11/2022 – 07/12/2022	3 days
Staff Services Manager I	8/16/2022	1 day
Staff Services Manager II (Supervisory)	06/09/2022 – 06/10/2022	2 days

IN COMPLIANCE	FINDING NO. 10 ADMINISTRATIVE TIME OFF AUTHORIZATIONS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND/OR CALHR POLICIES AND GUIDELINES
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The CRU found no deficiencies in the ATO transactions reviewed during the compliance review period. The CWDB provided the proper documentation justifying the use of ATO and adhered to applicable laws, regulations and CalHR policy and guidelines.

Leave Auditing and Timekeeping

Departments must keep complete and accurate time and attendance records for each employee and officer employed within the agency over which it has jurisdiction. (Cal. Code Regs., tit. 2, § 599.665.)

Departments are directed to create a monthly internal audit process to verify all leave input into any leave accounting system is keyed accurately and timely. (Human Resources Manual Section 2101.) Departments shall create an audit process to review and correct leave input errors on a monthly basis. The review of leave accounting records shall be completed by the pay period following the pay period in which the leave was keyed into the leave accounting system. (*Ibid.*) If an employee's attendance record is determined to have errors or it is determined that the employee has insufficient balances

for a leave type used, the attendance record must be amended. (*Ibid.*) Attendance records shall be corrected by the pay period following the pay period in which the error occurred. (*Ibid.*) Accurate and timely attendance reporting is required of all departments and is subject to audit. (*Ibid.*)

During the period under review, July 1, 2022, through September 30, 2022, the CWDB reported 3 units comprised of 78 active employees. The pay periods and timesheets reviewed by the CRU are summarized below:

Timesheet Leave Period	Unit Reviewed	No. of Employees	No. of Timesheets Reviewed	No. of Missing Timesheets
July 2022	401	74	74	0
August 2022	401	78	78	0
September 2022	401	75	75	0

SEVERITY: SERIOUS	FINDING NO. 11 DEPARTMENT HAS NOT IMPLEMENTED A MONTHLY INTERNAL AUDIT PROCESS TO VERIFY ALL LEAVE INPUT IS KEYED ACCURATELY AND TIMELY
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Summary: The CWDB failed to implement a monthly internal audit process to verify all timesheets were keyed accurately and timely and to certify that all leave records have been reviewed and corrected if necessary.

Criteria: Each appointing power shall keep complete and accurate time and attendance records for each employee and officer employed within the agency over which it has jurisdiction. (Cal. Code Regs., tit. 2, § 599.665.) Departments are directed to create an audit process to verify all leave input is keyed accurately and timely. (Human Resources Manual Section 2101.) Departments shall identify and record all errors found and shall certify that all leave records for the unit/pay period identified have been reviewed and all leave errors identified have been corrected. (*Ibid.*) Attendance records shall be corrected by the pay period following the pay period in which the error occurred. (*Ibid.*)

Severity: Serious. Departments must document that they reviewed all leave inputted into their leave accounting system to ensure accuracy and timeliness. Failure to audit leave could put the department at risk

of incurring additional costs from the initiation of collection efforts from overpayments, and the risk of liability related to recovering inappropriately credited leave hours and funds.

Cause: The CWDB states that the EDD is the personnel transaction processing entity for the CWDB. The EDD recognizes the importance of ensuring the accuracy of all leave input keyed. As the CWDB awaits the full implementation of an enterprise-wide system that would meet this requirement, the EDD has implemented a process to validate the items keyed monthly.

Corrective Action: Within 90 days of the date of this report, the CWDB must submit to the SPB a written corrective action response which addresses the corrections the department will implement to ensure that their monthly internal audit process was documented and that all leave input is keyed accurately and timely. Copies of relevant documentation demonstrating that the corrective action has been implemented must be included with the corrective action response.

State Service

The state recognizes two different types of absences while an employee is on pay status, paid or unpaid. The unpaid absences can affect whether a pay period is a qualifying or non-qualifying pay period for state service and leave accruals.

Generally, an employee who has 11 or more working days of service in a monthly pay period shall be considered to have a complete month, a month of service, or continuous service.⁶ (Cal. Code Regs., tit. 2, § 599.608.) Full time and fractional employees who work less than 11 working days in a pay period will have a non-qualifying month and will not receive state service or leave accruals for that month.

Hourly or daily rate employees working at a department in which the full-time workweek is 40 hours who earn the equivalent of 160 hours of service in a monthly pay period or accumulated pay periods shall be considered to have a complete month, a month of service, or continuous service. (Cal. Code Regs., tit. 2, § 599.609.)

⁶ Government Code sections 19143, 19849.9, 19856.1, 19858.1, 19859, 19861, 19863.1, and 19997.4 and California Code of Regulations, title 2, sections 599.609, 599.682, 599.683, 599.685, 599.687, 599.737, 599.738, 599.739, 599.740, 599.746, 599.747, 599.776.1, 599.787, 599.791, 599.840 and 599.843 provide further clarification for calculating state time.

For each qualifying monthly pay period, the employee shall be allowed credit for vacation with pay on the first day of the following monthly pay period. (Cal. Code Regs., tit. 2, § 599.608.) When computing months of total state service to determine a change in the monthly credit for vacation with pay, only qualifying monthly pay periods of service before and after breaks in service shall be counted. (Cal. Code Regs., tit.2, § 599.739.) Portions of non-qualifying monthly pay periods of service shall not be counted nor accumulated. (*Ibid.*) On the first day following a qualifying monthly pay period, excluded employees⁷ shall be allowed credit for annual leave with pay. (Cal. Code Regs., tit. 2, § 599.752.)

Permanent intermittent employees also earn leave credits on the pay period following the accumulated accrual of 160 hours worked. Hours worked in excess of 160 hours in a monthly pay period, are not counted or accumulated towards leave credits.

During the period under review, February 1, 2022, through October 31, 2022, the CWDB had one employee with one non-qualifying pay period transaction. The CRU reviewed this transaction to ensure compliance with applicable laws, regulations and CalHR policy and guidelines, which is listed below:

Type of Transaction	Time base	No. Reviewed
Non-Qualifying Pay Period	Full Time	1

IN COMPLIANCE	FINDING NO. 12	SERVICE AND LEAVE TRANSACTIONS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND/OR CALHR POLICIES AND GUIDELINES
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The CRU determined that the CWDB ensured employees with non-qualifying pay periods did not receive vacation/sick leave, annual leave, and/or state service accruals. The CRU found no deficiencies in this area.

Policy and Processes

Nepotism

It is the policy of the State of California to hire, transfer, and promote all employees on the basis of merit and fitness in accordance with civil service statutes, rules, and

⁷ As identified in Government Code sections 19858.3, subdivisions (a), (b), or (c), or as it applies to employees excluded from the definition of state employee under Government Code section 3513, subdivision (c), or California Code of Regulations, title 2, section 599.752, subdivision (a), and appointees of the Governor as designated by the Department and not subject to section 599.752.1.

regulations. Nepotism is expressly prohibited in the state workplace because it is antithetical to California’s merit based civil service. (Cal. Code Regs., tit. 2, § 87.) (*Ibid.*) All appointing powers shall adopt an anti-nepotism policy that includes the following components: (1) a statement that the appointing power is committed to merit-based hiring and that nepotism is antithetical to a merit-based civil service system; (2) a definition of “nepotism” as an employee’s use of influence or power to hire, transfer, or promote an applicant or employee because of a personal relationship; (3) a definition of “personal relationship” as persons related by blood, adoption, current or former marriage, domestic partnership or cohabitation; (4) a statement that prohibits participation in the selection of an applicant for employment by anyone who has a personal relationship with the applicant, as defined in section 83.6; (5) a statement that prohibits the direct or first-line supervision of an employee with whom the supervisor has a personal relationship, as defined in section 83.6; (6) a process for addressing issues of direct supervision when personal relationships between employees exist. (*Ibid.*)

IN COMPLIANCE	FINDING NO. 13 NEPOTISM POLICY COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND/OR CALHR POLICIES AND GUIDELINES
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The CRU verified that the policy was disseminated to all staff and emphasized the CWDB’s commitment to the state policy of hiring, transferring, and promoting employees on the basis of merit. Additionally, the CWDB’s nepotism policy was comprised of specific and sufficient components intended to prevent favoritism, or bias, based on a personal relationship from unduly influencing employment decisions.

Workers’ Compensation

Employers shall provide to every new employee, either at the time of hire or by the end of the first pay period, written notice concerning the rights, benefits, and obligations under workers’ compensation law. (Cal. Code Regs., tit. 8, § 9880, subd. (a).) This notice shall include the right to predesignate their personal physician or medical group; a form that the employee may use as an optional method for notifying the employer of the name of employee’s “personal physician,” as defined by Labor Code section 4600. (Cal. Code Regs., tit. 8, § 9880, subd. (c)(7) & (8).) Additionally, within one working day of receiving notice or knowledge that the employee has suffered a work-related injury or illness, employers shall provide a claim form and notice of potential eligibility for benefits to the injured employee. (Labor Code, § 5401, subd. (a).)

Public employers may choose to extend workers' compensation coverage to volunteers that perform services for the organization. (Human Resources Manual Section 1415.)

Workers' compensation coverage is not mandatory for volunteers as it is for employees. (*Ibid.*) This is specific to the legally uninsured state departments participating in the Master Agreement. (*Ibid.*) Departments with an insurance policy for workers' compensation coverage should contact their State Compensation Insurance Fund (State Fund) office to discuss the status of volunteers. (*Ibid.*)

In this case, the CWDB did not employ volunteers during the compliance review period.

IN COMPLIANCE	FINDING NO. 14	WORKERS' COMPENSATION PROCESS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND/OR CALHR POLICIES AND GUIDELINES
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The CRU verified that the CWDB provides notice to their employees to inform them of their rights and responsibilities under California's Workers' Compensation Law. Furthermore, the CRU verified that when the CWDB received workers' compensation claims, they properly provided claim forms within one working day of notice or knowledge of injury.

Performance Appraisals

According to Government Code section 19992.2, subdivision (a), appointing powers must "prepare performance reports." Furthermore, California Code of Regulations, title 2, section 599.798, directs supervisors to conduct written performance appraisals and discuss overall work performance with permanent employees at least once in each twelve calendar months after the completion of the employee's probationary period.

The CRU selected six permanent CWDB employees to ensure that the department was conducting performance appraisals on an annual basis in accordance with applicable laws, regulations, policies, and guidelines.

SEVERITY: SERIOUS	FINDING NO. 15	PERFORMANCE APPRAISALS WERE NOT PROVIDED TO ALL EMPLOYEES
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Summary: The CWDB did not provide annual performance appraisals to one of six employees reviewed after the completion of the employee's probationary period.

Criteria: Appointing powers shall prepare performance reports and keep them on file as prescribed by department rule. (Gov. Code, § 19992.2, subd. (a).) Each supervisor, as designated by the appointing power,

shall make an appraisal in writing, and shall discuss with the employee overall work performance at least once in each twelve calendar months following the end of the employee's probationary period. (Cal. Code Regs., tit. 2, § 599.798.)

Severity: Serious. The department does not ensure that all employees are appraised of work performance issues and/or goals in a systematic manner.

Cause: The CWDB states that the hiring of an unprecedented number of additional staff resulted in the managers' inability to complete performance reviews.

Corrective Action: Within 90 days of the date of this report, the CWDB must submit to the SPB a written corrective action response which addresses the corrections the department will implement to ensure conformity with Government Code section 19992.2 and California Code of Regulations, title 2, section 599.798. Copies of relevant documentation demonstrating that the corrective action has been implemented must be included with the corrective action response.

DEPARTMENTAL RESPONSE

The CWDB departmental response is attached as Attachment 1.

SPB REPLY

Based upon the CWDB written response, the CWDB will comply with the corrective actions specified in these report findings. Within 90 days of the date of this report, a written corrective action response including documentation demonstrating implementation of the corrective actions specified must be submitted to the CRU.

April 10, 2024

Attachment 1

State Personnel Board
Attention: Diana Campbell

Dear Diana Campbell:

The CWDB takes compliance issues very seriously and has taken steps to ensure both current and future compliance. The CWDB strives to ensure compliance with all civil services laws; maintain the integrity of the State's merit-based selection processes and mandated training requirements; and employ the best practices identified during the review. This letter serves as the initial responses submitted to the State Personnel Board (SPB) Compliance Review Report for the CWDB, dated March 20, 2024, and serves to address the findings issued.

The following plan will address the issues pointed out in the following findings:

- **Finding No. 1** – Probationary Evaluations Were Not Provided for All Appointments Reviewed and Some That Were Provided Untimely.
- **Finding No. 2** – Appointment Documentation Was Not Kept for The Appropriate Amount of Time
- **Finding No. 4** – Ethics Training Was Not Provided for All Filers.
- **Finding No. 5** – Sexual Harassment Prevention Training Was Not Provided for All Employees.
- **Finding No. 6** – Supervisory Training Was Not Provided for All Supervisors, Managers, And CEA's.
- **Finding No. 11** – Department Has Not Implemented A Monthly Internal Audit Process To Verify All Leave Input Is Keyed Accurately And Timely.
- **Finding No. 15** – Performance Appraisals Were Not Provided to All Employees.

Finding No. 1 – Probationary Evaluations Were Not Provided for All Appointments Reviewed

Summary: The CWDB did not provide 2 probationary reports of performance for 2 of the 12 appointments reviewed by the Compliance Review Unit (CRU). Additionally, the CWDB did not provide 2 probationary reports timely.

Cause: The CWDB saw a massive increase in the funding it received in years 2020-2023. This required the hiring of more staff to evaluate grant programs, execute contracts, and monitor grantee performance. This level of work was unprecedented in the history of the department which resulted in managers inability to complete performance reviews. In past years, the CWDB Human Resources team has sent email reminders to managers two or more weeks prior to probation reports and annual reviews being due. We have also followed up after reports are due and included the report writers' manager as well. However, the CWDB recognizes these

measures have not generated the desired results and will begin evaluating processes to ensure future compliance.

Finding No. 2 – Appointment Documentation Was Not Kept for the Appropriate Amount of Time

Summary: Of the 12 appointments reviewed, the CWDB did not retain 3 Notice of Personnel Actions (NOPAs).

Cause: At the time of the audit, the HRSD, had not implemented additional measures for the tracking and retention of NOPAs.

Finding No. 4 – Ethics Training Was Not Provided for All Filers

Summary: Ethics training was not provided for 2 of 37 new filers within 6 months of their appointment.

Cause: The CWDB recognizes the importance of timely Ethics training for filers of Statements of Economic Interest. The CWDB saw a massive increase in the funding it received in years 2020-2023. This required the hiring of more staff to evaluate grant programs, execute contracts, and monitor grantee performance. This level of work was unprecedented in the history of the department which resulted in managers inability to ensure training was completed for either their staff or for themselves. In past years, the CWDB Human Resources team has taken over training coordinator duties and sent email reminders to staff and managers two or more weeks prior to trainings being due. We have also followed up after trainings are past due and included the staff member and their immediate supervisor. This had some effect, but the Human Resources department ultimately had little power to enforce the completion of the mandatory training or support negative consequences of non-compliance. The CWDB was on a block training schedule, which was designed to have all staff and management take the required training classes at the same time each year (or every other year). This worked initially but was ultimately too time-consuming for Human Resources team members to track. The CWDB will create a tracking system to sufficiently monitor the completion of Ethics training for filers of Statements of Economic Interest.

Finding No. 5 – Sexual Harassment Prevention Training Was Not Provided for All Employees

Summary: Sexual Harassment Prevention training was not provided to 2 of 8 new supervisors within 6 months of their appointment and 1 of 14 existing non-supervisory employees every 2 years.

Cause: The CWDB recognizes the importance of timely and regular Sexual Harassment Prevention training for all employees. The CWDB saw a massive increase in the funding it received in years 2020-2023. This required the hiring of more staff to evaluate grant programs, execute contracts, and monitor grantee performance. This level of work was unprecedented in

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the history of the department which resulted in managers inability to ensure training was completed for either their staff or for themselves. In past years, the CWDB Human Resources team has taken over training coordinator duties and has sent email reminders to staff and managers two or more weeks prior to trainings being due. We have also followed up after trainings are past due and included the staff member and their immediate supervisor. This had some effect, but the Human Resources department ultimately had little power to enforce the completion of the mandatory training or support negative consequences of non-compliance. The CWDB was on a block training schedule, which was designed to have all staff and management take the required training classes at the same time each year (or every other year). This worked initially but was ultimately too time-consuming for Human Resources team members to track. The CWDB will create a tracking system to sufficiently monitor the completion of Sexual Harassment Prevention training for all employees.

Finding No. 6 – Supervisory Training Was Not Provided for All Supervisors, Managers, and CEAs

Summary: The CWDB did not provide manager training to 1 new manager within 12 months of appointment and CEA training to 1 new CEA within 12 months of appointment.

Cause: The CWDB recognizes the importance of timely Supervisory and CEA training for all new supervisors and CEAs. The CWDB saw a massive increase in the funding it received in years 2020-2023. This required the hiring of more staff to evaluate grant programs, execute contracts, and monitor grantee performance. This level of work was unprecedented in the history of the department which resulted in managers inability to ensure training was completed for either their staff or for themselves. In past years, the CWDB Human Resources team has taken over training coordinator duties and has sent email reminders to staff and managers two or more weeks prior to trainings being due. We have also followed up after trainings are past due and included the staff member and their immediate supervisor. This had some effect, but the Human Resources department ultimately had little power to enforce the completion of the mandatory training or support negative consequences of non-compliance. The CWDB was on a block training schedule, which was designed to have all staff and management take the required training classes at the same time each year (or every other year). This worked initially but was ultimately too time-consuming for Human Resources team members to track. The CWDB will create a tracking system to sufficiently monitor the completion of Supervisory and CEA training for all new supervisors and CEAs.

Finding No. 11 – Department Has Not Implemented a Monthly Internal Audit Process to Verify All Leave Input is Keyed Accurately and Timely

Summary: The CWDB failed to implement a monthly internal audit process to verify all timesheets were keyed accurately and timely and to certify that all leave records have been reviewed and corrected if necessary.

Cause: As the personnel transaction processing entity for the CWDB, the EDD recognizes the importance of ensuring the accuracy of all leave input keyed. As we await the full

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implementation of an enterprise-wide system that would meet this requirement, the EDD has implemented the process to validate the items keyed on a monthly basis.

Finding No. 15 – Performance Appraisals Were Not Provided to All Employees

Summary: The CWDB did not provide annual performance appraisals to 1 of 6 employees reviewed after the completion of the employee’s probationary period.

Cause: The CWDB saw a massive increase in the funding it received in years 2020-2023. This required the hiring of more staff to evaluate grant programs, execute contracts, and monitor grantee performance. This level of work was unprecedented in the history of the department which resulted in managers inability to complete performance reviews. In past years, the CWDB Human Resources team has sent email reminders to managers two or more weeks prior to probation reports and annual reviews being due. We have also followed up after reports are due and included the report writers’ manager as well. However, the CWDB recognizes these measures have not generated the desired results and will begin evaluating processes to ensure future compliance.

If you have any questions or need additional information, please contact Haley Versoza at (916) 651-7095 or Haley.Versoza@edd.ca.gov.

Sincerely,



JEFFREY JACOBSTEIN, Section Manager
Human Resources and Communications