CALIFORNIA STATE PERSONNEL BOARD

COMPLIANCE REVIEW REPORT

& SPECIAL INVESTIGATION

CALIFORNIA MILITARY DEPARTMENT

Compliance Review Unit
State Personnel Board
August 28, 2015

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

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

EXECUTIVE SUMMARY

The CRU conducted a routine compliance review of California Military Department (Military) personnel practices in the areas of examinations and PSC's from May 11, 2011, to October 31, 2012, and in the areas of appointments and EEO from January 1, 2013, through December 31, 2013. Additionally the CRU conducted a special investigation into the Armory Custodian examination administered in 2014. The following table summarizes the compliance review findings.

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Area	Finding	Severity
Examinations	Equal Employment Opportunity Questionnaires Were Not Separated from Applications	Very Serious
Examinations	Job Analyses Were Not Developed or Used for the Examination Process	Very Serious

Area	Finding	Severity
Examinations	Special Investigation - Armory Custodian Examination Was Compromised	Very Serious
Appointments	Probationary Evaluations Were Not Provided for All Appointments Reviewed	Serious
Equal Employment Opportunity	Equal Employment Officer Does Not Monitor the Composition of Oral Panels in Departmental Exams	Very Serious

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 California Military Department is a diverse, community-based organization comprised of four pillars: the California Army National Guard, the California Air National Guard, the California State Military Reserve, and the California Youth and Community Programs. At their core, more than 23,000 soldiers, airmen and airwomen, and state military reservists, stand ready to respond to emergencies in California and across the United States. In times of conflict or distress, service members also deploy overseas in support of combat and humanitarian operations. Across the organization, the Military is committed to improving, preparing, and protecting our communities, state, and nation.

SCOPE AND METHODOLOGY

The scope of the compliance review was limited to reviewing Military examinations and PSC's from May 11, 2011, to October 31, 2012, and appointments and EEO program from January 1, 2013, to December 31, 2013. The Military compliance review began as a baseline review, and was later expanded to allow for a full compliance review. The primary objective of the review was to determine if Military personnel practices, policies, and procedures complied with state civil service laws and board regulations, and to recommend corrective action where deficiencies were identified.

A cross-section of the Military's examinations and appointments was selected for review to ensure that samples of various examinations and appointment types, classifications,

and levels were reviewed. The CRU examined the documentation that the Military provided, which included examination plans, examination bulletins, job analyses, 511b's, scoring results, notice of personnel action forms, vacancy postings, application screening criteria, hiring interview rating criteria, certification lists, transfer movement worksheets, employment history records, correspondence, and probation reports.

The review of the Military'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 CRU also interviewed appropriate Military staff.

The Military had no PSC's in effect during the compliance review period of May 11, 2011, to October 31, 2012.

On July 30, 2015, an exit conference was held with the Military to explain and discuss the CRU's initial findings and recommendations. The CRU received and carefully reviewed the Military's written response on August 19, 2015, which is attached to this final compliance review report.

FINDINGS AND RECOMMENDATIONS

Examinations

Examinations to establish an eligible list must be competitive and of such character as fairly to test and determine the qualifications, fitness, and ability of competitors to perform the duties of the class of position for which he or she seeks appointment. (Gov. Code, § 18930.) Examinations may be assembled or unassembled, written or oral, or in the form of a demonstration of skills, or any combination of those tests. (*Ibid*.) The Board establishes minimum qualifications (MQ's) 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 for the examination, the designated appointing power shall announce or advertise the examination for the establishment of eligible lists. (Gov. Code, § 18933, subd. (a).) The advertisement shall contain such information as the date and place of the examination and the nature of the MQ's. (*Ibid*.) Every applicant for examination shall file an application with the department or a designated appointing authority 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 Military conducted 11 examinations. The CRU reviewed 6 of those examinations, which are listed below:

Classification	Exam Type	Exam Components	Final File Date	No. of Applications
Account Clerk II	Open	Qualification Appraisal Panel (QAP)[1]	6/9/2011	113
Chief of Plant Operations II	Open	QAP	8/16/2011	3
Environmental Scientist	Promotional	E &E	7/14/2011	2
Staff Services Analyst	Transfer	Written[2]	continuous	2
Staff Services Manager I	Open/ Promotional	QAP	12/28/2011	28
Supervising Account Clerk II	Promotional	QAP	3/14/2011	3

FINDING NO. 1 – Equal Employment Opportunity Questionnaires Were Not Separated from All Applications

Summary: Out of 151 examination applications reviewed, the Military did not separate 134 EEO questionnaires from the STD 678 employment application. Specifically, the Staff Services Manager I (25), Supervisor Account Clerk II (8), Environmental Scientist (2), Chief of Plant Operation II (3), and Account Clerk II (96) examinations included EEO questionnaires that were not separated from the STD 678 employment application.

Criteria: Government Code section 19704 makes it unlawful for a hiring department to require or permit any notation or entry to be made on

[1] 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.

[2] A written examination is a testing procedure in which candidates' job-related knowledge and skills are assessed through the use of a variety of item formats. Written examinations are either objectively scored or subjectively scored.

any application indicating or in any way suggesting or pertaining to any protected category listed in Government Code section 12940, subdivision (a) (e.g., a person's race, religious creed, color, national origin, age, or sexual orientation). Applicants for employment in state civil service are asked to voluntarily provide ethnic data about themselves where such data is determined by the California Department of Human Resources (CalHR) to be necessary to an assessment of the ethnic and sex fairness of the selection process and to the planning and monitoring of affirmative action efforts. (Gov. Code, § 19705.) The EEO questionnaire of the state application form (STD 678) states, "This questionnaire will be separated from the application prior to the examination and will not be used in any employment decisions."

Severity: Very Serious. The applicants' protected classes were visible, subjecting the agency to potential liability.

Cause: The Military states that there was a lack of training and/or awareness of the laws and rules governing the examination process

Action: The Military has submitted a corrective action plan for ensuring EEO questionnaires are separated from the STD 678 employment applications as part of its department response, therefore no further action is required at this time.

FINDING NO. 2 – Job Analyses Were Not Developed or Used for the Examination Process

Summary: The Military was unable to provide job analyses for the four examinations listed in the table below. Without copies of the job analyses to review, the CRU is unable to determine if the civil service examinations were administered utilizing job-related examination procedures as required by the Merit Selection Manual (MSM).

Classification	List Active Date	List Expiration Date	No. of Eligibles
Account Clerk II	9/30/2011	9/30/2012	3

Classification	List Active Date	List Expiration Date	No. of Eligibles
Chief of Plant Operation II	1/19/2012	1/19/2016	2
Environmental Scientist	8/22/2011	8/22/2013	1
Supervising Account Clerk II	4/28/2011	4/28/2015	2

Criteria: The MSM, which is incorporated in California Code of Regulations (CCR), title 2, section 50, mandates the development and use of a job analysis for the examination process. A "job analysis shall serve as the primary basis for demonstrating and documenting the job-relatedness of examination processes conducted for the establishment of eligible lists within the State's civil service." (MSM (Oct. 2003), § 2200, p. 2.) The MSM requires that job analyses adhere to the legal and professional standards outlined in the job analysis section of the MSM and that certain elements must be included in the job analysis studies. (Ibid.) Those requirements include the following: (1) that the job analysis be performed for the job for which the subsequent selection procedure is developed and used; (2) the methodology utilized be described and documented; (3) the job analytic data be collected from a variety of current sources; (4) job tasks be specified in terms of importance or criticality, and their frequency of performance; (5) and job tasks be sufficiently detailed to derive the requisite knowledge, skills, abilities (KSAs), and personal characteristics that are required to perform the essential tasks and functions of the job classification. (MSM, § 2200, pp. 2-3.)

Severity: Very Serious. The examinations may not have been job-related or legally defensible.

Cause: The Military states that there was a lack of training and/or awareness of the laws and rules governing the examination process.

Action: To correct this deficiency the Military must abolish the Chief of Plant Operation II examination list, which has not expired, within 60 days of the Executive Officer's approval of this compliance review report. Prior to administering any future examinations the Military must create and develop each examination based upon a job

analysis that meets the requirements of the MSM. The Military has submitted a corrective action plan for ensuring job analyses are developed as part of its department response. The CRU finds that the appointments made from the examinations that were administered without a JA were made in good faith, and do not merit being voided.

FINDING NO. 3 – Special Investigation - Armory Custodian Examination Was Compromised

Summary: In response to a complaint, the CRU conducted a special investigation into the Armory Custodian examination administered in 2014. The CRU found that the examination analyst who administered the Armory Custodian examination allowed her son, who received the highest score, to participate in the examination. The examination analyst, who was also involved in creating the exam, did not sign a security agreement, did not disqualify herself from the examination administration, and did not let management know that her son would be competing. Additionally, a qualified applicant who met the MQ's was not scored or allowed to participate in the examination. Furthermore, the Armory Custodian examination was not developed using a job analysis.

Classification	List Active Date	List Expiration Date	No. of Eligibles
Armory Custodian I	9/24/2014	9/24/2015	8

Criteria: Cal. Code Regs., tit. 2, § 197.5, subd. (b) mandates that when anyone directly involved in the development or administration of any phase of an examination and a competitor are related by blood, "(1) The rater shall disqualify him/herself from rating the applicant, or (2) shall not participate in any phase of the administration of that particular examination."

Severity: Very Serious. The compromised examination provided one candidate with an unfair advantage over other candidates. The equitable administration of the civil service merit system has been jeopardized. Additionally, since no job analysis was used, the examinations may not have been job-related or legally defensible.

Cause: The Military states that there was a lack of training and/or awareness of the laws and rules governing the examination process.

Action: It is recommended that within 30 days of the Executive Officer's approval of these findings and recommendations that the Military must abolish the Armory Custodian I list. The Military has submitted a corrective action plan to ensure that future examinations are not compromised as part of its department response. The CRU found that the examination analyst's son was not appointed to the Armory Custodian I classification. Additionally, the CRU finds that the appointments made from the Armory Custodian I examination were made in good faith, and do not merit being voided.

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 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 Military made 44 appointments. The CRU reviewed 42 of those appointments, which are listed below:

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Accounting Technician	Certification List	Permanent	Full Time	1
Armory Custodian I	Certification List	Permanent	Full Time	1
Assistant Estimator of Building Construction	Certification List	Permanent	Full Time	1
Associate Environmental Planner	Certification List	Permanent	Full Time	1
Associate Governmental Program Analyst	Certification List	Permanent	Full Time	3

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Building Maintenance Worker	Certification List	Permanent	Full Time	2
Chief Engineer II	Certification List	Permanent	Full Time	2
Custodian	Certification List	Permanent	Full Time	1
Electrician II	Certification List	Permanent	Full Time	1
Environmental Planner	Certification List	Permanent	Full Time	2
Environmental Scientist	Certification List	Permanent	Full Time	1
Executive Secretary I	Certification List	Permanent	Full Time	1
Heavy Equipment Operator	Certification List	Permanent	Full Time	1
Information Officer II	Certification List	Permanent	Full Time	1
Maintenance Mechanic	Certification List	Permanent	Full Time	1
Materials and Stores Specialist	Certification List	Permanent	Full Time	1
Military Instructor	Certification List	Permanent	Full Time	
Painter I	Certification List	Permanent	Full Time	1
Plumber II	Certification List	Permanent	Full Time	1
Senior Environmental Planner	Certification List	Permanent	Full Time	1
Skilled Laborer	Certification List	Permanent	Full Time	1
Staff Services Analyst	Certification List	Permanent	Full Time	1
Staff Services Manager II	Certification List	Permanent	Full Time	1
Stationary Engineer	Certification List	Permanent	Full Time	1
Supervising Management Auditor	Certification List	Permanent	Full Time	1
Utility Shop Supervisor	Certification List	Permanent	Full Time	1
Account Clerk II	Reinstatement	Permanent	Full Time	1
Armory Custodian I	Reinstatement	Permanent	Full Time	1
Executive Secretary	Reinstatement	Permanent	Full Time	1
Management Services Technician	Reinstatement	Permanent	Full Time	1
Special Consultant	Temporary Authorization Utilization	Permanent	Full Time	1
Account Clerk II	Transfer	Permanent	Full Time	2
Executive Secretary	Transfer	Permanent	Full Time	1
Maintenance Mechanic	Transfer	Permanent	Full Time	1
Office Technician (Typing)	Transfer	Permanent	Full Time	1
Personnel Specialist	Transfer	Permanent	Full Time	1

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Skilled Laborer	Transfer	Permanent	Full Time	1

FINDING NO. 4 – Probationary Evaluations Were Not Provided for All Appointments Reviewed

Summary: The Military did not prepare, complete, and/or retain required probationary reports of performance for 12 of the 42 appointments reviewed by CRU.

Classification	Appointment Type	No. of Appointments	No. of Uncompleted Prob. Reports
Accounting Technician	Certification List	1	1
Associate Governmental Program Analyst	Certification List	3	1
Electrician II	Certification List	1	1
Environmental Planner	Certification List	2	2
Executive Secretary	Certification List	1	1
Heavy Equipment Operator	Certification List	1	3
Information Officer II	Certification List	1	2
Armory Custodian I	Reinstatement	1	2
Personnel Specialist	Transfer	1	1
Total		12	14

Criteria: 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 god job/person match is unfair to the employee and serves to erode the quality of state government.

Cause: The Military states that there was a lack of training of the Specialists to follow-up with supervisors to ensure preparation, retention, and completion of the probationary reports.

Action: The Military has submitted a corrective action plan for ensuring probationary evaluations are completed in a timely fashion as part of its department response, therefore no further action is required at this time.

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 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 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.)

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

FINDING NO. 5 – Equal Employment Officer Does Not Monitor the Composition of Oral Panels in Departmental Exams

Summary: The Military's EEO Officer does not monitor the composition of oral panels for departmental examinations.

Criteria: The EEO Officer at each department must monitor the composition of oral panels during departmental examinations. (Gov. Code, § 19795, subd. (a))

Severity: Very Serious. Requiring the EEO Officer to monitor oral panels is intended to ensure protection against discrimination in the hiring process.

Cause: The Military states that there was a lack of training and/or awareness of the laws and rules governing the EEO process regarding the monitoring the composition of oral panels for departmental exams.

Action: It is recommended that within 60 days of the Executive Officer's approval of these findings and recommendations, the Military submit to the CRU a written corrective action plan that addresses the corrections the department will implement to ensure conformity with the requirements of Government Code section 19795. Copies of any relevant documentation should be included in the plan.

DEPARTMENTAL RESPONSE

The Military's departmental response is attached as Attachment 1.

SPB REPLY

Based upon the Military's written response, the Military will comply with the CRU recommendations and findings. The Military submitted corrective action plans for four out of five departmental findings.

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

Attachment 1

STATE OF CALIFORNIA

Edmund G. Brown Jr., Governor

MILITARY DEPARTMENT
OFFICE OF THE ADJUTANT GENERAL
9800 Goethe Road - P.O. Box 269101
Sacramento, California 95826-9101

August 19, 2015

Alton Ford, Staff Services Manager I
State Personnel Board
801 Capitol Mall
Sacramento, CA 95814

Dear Mr. Ford:

This letter is in response to the State Personnel Board's (SPB) Compliance Review and Special Investigation Report of the California Military Department's Examinations, Appointments, and Equal Employment Opportunity (EEO) programs. SPB conducted a baseline compliance review that later expanded to a full compliance review. The first review commenced with our examination processes conducted on May 11, 2011 through October 31, 2012 proceeded with the review of our appointments and EEO programs on January 1, 2013 through December 31, 2013. This review was done to ensure compliance with civil service laws and rules and the merit principles of the State Civil Service System.

The State Personnel Board (SPB) representative presented five findings. We concur with your findings and therefore want to take corrective action for each of the findings, that we (1) did not remove EEO questionnaires from our applications, (2) lacked job analyses for many of our department specific classifications, (3) compromised an examination, (4), did not provide probationary evaluations for some of our classifications, and (5) did not ensure that our EEO Officer monitored the composition of our qualification appraisal panels and that it is my understanding this is a universal concern throughout the state government.

Listed below are the findings from the SPB report and the corresponding corrective action to be adopted:

FINDING NO. 1: EQUAL EMPLOYMENT OPPORTUNITY QUESTIONNAIRES WERE NOT SEPARATED FROM ALL APPLICATIONS

CAUSE: Lack of training and/or awareness of the laws and rules governing the examination processes.

Response: In response to this finding, the Department drafted Examination Procedures providing instructions to remove the EEO questionnaire (app flaps) from all applications and to place it in a confidential destruct container. Additionally, all commands were directed that this page is only to be included if the applicant is applying to take an examination, but will be kept separate from the applications and provided to the EEO officer for the purpose of bottom-line hiring data reporting. A copy of the procedures are enclosed.

FINDING NO. 2: JOB ANALYSES WERE NOT DEVELOPED OR USED FOR THE EXAMINATION PROCESS FOR FOUR EXAMINATIONS

CAUSE: Lack of training and/or awareness of the laws and rules governing the examination processes.

Response: In response to this finding, the Department is currently in the process of developing job analyses for our department-specific classifications. We understand that a job analysis shall serve as the primary basis for demonstrating and documenting job-relatedness of examination processes conducted for the

establishment of eligible lists within the State Civil Service. We have recently completed job analyses for the Military Instructor, Water & Sewage Plant Operator I, and Firefighter. We shall provide a copy upon request. We are also in the process of completing a job analysis for the Armory Custodian. Moving forward, we estimate that all of the remaining job analyses (10) for our department-specific classifications will be completed within a couple of years. In addition, we have instituted an internal policy requiring that current job analyses be completed for all of our departmental examinations.

FINDING NO. 3: SPECIAL INVESTIGATION – ARMORY CUSTODIAN EXAMINATION WAS COMPROMISED

CAUSE: Lack of training and/or awareness of the laws and rules governing the examination processes.

Response: In response to this finding, the Department concurs that the examination was compromised due to a conflict of interest involving a former employee and her son. The employee at the time was not properly trained or aware of the laws and rules and the merit principles governing the examination processes. Given the reason provided and since the employee no longer works for State Personnel Programs, the Department does not plan to take action against the former employee. Moving forward, we will ensure that all analysts/staff involved in the examination process, signs a Security Agreement form indicating he/she will not participate in the development or administration of any phase of the exam if there is a Conflict of Interest and that the examination will be kept confidential and impartial.

FINDING NO. 4: PROBATIONARY EVALUATIONS WERE NOT PROVIDED FOR ALL APPOINTMENTS REVIEWED FOR 12 OUT OF 42 APPOINTMENTS.

CAUSE: Lack of training the specialist to follow-up with Supervisors to ensure preparation, retention, and completion of the probationary reports. Lack of the laws and rules governing the recruitment and retention processes.

Response: In response to this finding, the Department plans to implement a policy informing all supervisors to not only complete probationary evaluations, but complete them in a timely fashion for all of their perspective employees. In addition, the assigned Personnel Specialist will on a continuous basis follow-up with supervisors to ensure receipt of the probationary evaluations. This will be monitored and enforced at the management level.

FINDING NO. 5: EQUAL EMPLOYMENT OFFICER (EEO) DOES NOT MONITOR THE COMPOSITION OF ORAL PANELS IN DEPARTMENTAL EXAMS

CAUSE: Lack of Training and/or awareness of the laws and rules governing the EEO processes with regards to the monitoring the composition of Oral Panels for Departmental Exams.

Response: In response to this finding, the Department intends to ensure that the Military EEO Officer monitors the composition of oral panels for departmental examinations to ensure fairness and equal opportunity for all. The EEO officer will report to the director on EEO issues. The EEO program will provide employees with information and guidance on the EEO process, including instructions on how to file discrimination claims. In addition, the EEO program will outline the roles and responsibilities of the EEO officer, as well as supervisors and managers. The Military Department shall provide evidence of its efforts to promote equal employment opportunity in its hiring and employment practices. Furthermore, the Department has already initiated an active disability advisory committee that meets to discuss issues of concerns regarding employees with disabilities. The committee is comprised of individuals with a diverse background.

Upon acknowledgment of the State Personnel Boards' findings, and consistent with the Board's recommendations, we appreciated the opportunity to discuss the findings in the report with you on Thursday, July 30, 2015 to discuss/address the changes in our processes to bring our Human Resources deficiencies into compliance with requirements and best practices. As outlined above, some of the findings

in our report have already been addressed or is in the process of being addressed to be in compliance with personnel practices enforced by the SPB.

If you need additional information, please do not hesitate to contact Angie Miller, Personnel Manager, at (916) 854-3683 or Chief of State Personnel Programs, Charlotte Clarke, at (916) 854-3077. Again, thank you for the opportunity to respond to your report.

Sincerely,

Richard A. Rabe
Colonel, California Army National Guard
J1, Director, Manpower and Personnel

cc: Charlotte Clarke, Chief, State Personnel Programs
cc: Angie Miller, Manager, State Personnel Programs