



COMPLIANCE REVIEW REPORT

CALIFORNIA CONSERVATION CORPS

Compliance Review Unit
State Personnel Board
May 26, 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 Conservation Corps (CCC) personnel practices in the areas of examinations, appointments, EEO, and PSC's from June 1, 2011, to November 30, 2012, and from January 1, 2013, through December 31, 2013. The following table summarizes the compliance review findings.

Area	Finding	Severity
Examinations	Job Analyses Were Not Developed or Used for All the Civil Service Examinations Reviewed	Very Serious
Appointments	Appointments Complied With Civil Services Laws and Board Rules	In Compliance
Equal Employment Opportunity	Equal Employment Opportunity Program Properly Complied With Civil Service Laws and Board Rules	In Compliance
Personal Services Contracts	Personal Services Contracts Complied with Procedural Requirements	In Compliance

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

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

BACKGROUND

The CCC provides young women and men the opportunity to work hard responding to fires, floods, and other disasters, restoring California's natural resources, and installing clean energy and energy conservation measures. Through their service, the members of the CCC gain life, work, and academic skills to become strong workers and citizens. The CCC program combines public service, continuing education, leadership, personal, and career development. The CCC was established by Governor Jerry Brown in 1976 and enrolls over 2,000 young adults annually from different locations.

The CCC operates 25 facilities statewide, including 7 residential facilities and 18 non-residential satellite centers in urban and rural areas. These facilities help the CCC achieve its mission of providing employment, training, and educational opportunities to young men and women, and assisting federal, state, and local agencies, and nonprofit entities with the conservation of California's natural resources.

The CCC's mission statement reads: The young women and men of the Corps work hard protecting and restoring California's environment and responding to disasters, becoming stronger workers, citizens, and individuals through their service.

SCOPE AND METHODOLOGY

The scope of the compliance review was limited to reviewing CCC examinations, appointments, EEO program, and PSC's from June 1, 2011, to November 30, 2012, and from January 1, 2013, through December 31, 2013. The CCC 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 CCC 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 CCC examinations and appointments were selected for review to ensure that samples of various examinations and appointment types, classifications,

and levels were reviewed. The CRU examined the documentation that the CCC provided, which included examination plans, examination bulletins, job analyses (JA's), 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 CCC 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 CCC staff.

The CCC's PSC's were also reviewed. The CCC contracted for construction services, counseling services, and transportation supply services.¹ It was beyond the scope of the compliance review to make conclusions as to whether CCC justifications for the contracts were legally sufficient. The review was limited to whether CCC practices, policies, and procedures relative to PSC's complied with applicable procedural requirements.

On April 7, 2015, an exit conference was held with the CCC to explain and discuss the CRU's initial findings and recommendations. A revised draft report was sent to the CCC on May 8, 2015. The CCC provided a written response on May 22, 2015. The CRU received and carefully reviewed the response, which is included in 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

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

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 power as directed in the examination announcement. (Gov. Code, § 18934.) Generally, the final earned rating of each person competing in any examination is to be determined by the weighted average of the earned ratings on all phases of the examination. (Gov. Code, § 18936.) Each competitor shall be notified in writing of the results of the examination when the employment list resulting from the examination is established. (Gov. Code, § 18938.5.)

During the period under review, the CCC conducted 18 examinations. The CRU reviewed 14 of the examinations, which are listed below:

Classification	Exam Type	Exam Components	Final File Date	No. of Applicants
Accountant I (Specialist)	Promo/Spot	Education and Experience ² (E&E)	2/10/2012	2
Accounting Officer (Specialist)	Promo/Spot	E&E	9/26/2012	10
Business Services Officer I (Supervisor)	Open/Spot (Fortuna)	E&E	7/31/2013	21
Chief Executive Assignment (CEA) I - Regional Deputy, Region II	Open	Statement of Qualifications (SOQ), Hiring Interview	4/27/2012	6
CEA II - Chief, Administrative Services Division	Open	SOQ, Hiring Interview	4/19/2011	16

²In an Education and Experience (E&E) examination, one or more raters reviews the applicants' Standard 678 application forms, and scores and ranks them according to a predetermined rating scale that may include years of relevant higher education, professional licenses or certifications, and/or years of relevant work experience.

CEA II, Chief Counsel	Open	SOQ, Supplemental Questionnaire, and Qualification Appraisal Panel ³	4/21/2011	3
Conservation Administrator II	Open	QAP	10/4/2013	44
Conservation Supervisor	Open/Non - Promotional	QAP	5/3/0213	54
Conservationist I, CCC	Open/Non-Promotional	QAP	Continuous	185
Conservationist II	Open	QAP	5/3/2013	51
Cook, CCC	Open/Spot (Camarillo)	Written ⁴	4/27/2012	5
Cook, CCC	Open/Spot (Ukiah)	Written	5/4/2012	19
Cook, CCC	Open/Spot (San Luis Obispo)	Written	6/1/2012	14
Personnel Supervisor II	Promo/Spot	E&E	4/27/2012	1

FINDING NO. 1 – Job Analyses Were Not Developed or Used for All the Civil Service Examinations Reviewed

Summary: The CCC provided JA's for the following classes: Accounting Officer (Specialist), Conservationist I, Conversationalist II, Conservation Administrator II, and Conservation Supervisor. However, the CCC did not provide JA's for the Cook and Personnel Supervisor II civil service examinations. Partial JA's which did not exhibit the required elements as listed in the Merit Selection Manual (MSM), were provided for Accountant I (Specialist) and Business Services Officer I (Supervisor) examinations.

³ 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.

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

Classification	List Active Date	List Expiration Date	No. of Eligibles
Accountant I (Specialist)	4/13/12	4/13/16	1
Business Services Officer I (Supervisor)	8/22/13	8/22/17	4
Cook, CCC	8/28/12	8/28/16	7
Personnel Supervisor II	4/27/12	4/27/16	1

The examination lists have not expired for the following classifications:

- (1) Accountant I (Specialist)
- (2) Business Services Officer I (Supervisor)
- (3) Cook, CCC
- (4) Personnel Supervisor II

Criteria:

The MSM, which is incorporated in California Code of Regulations, title 2, section 50, mandates the development and use of a JA for the examination process. A "[j]ob 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 JA's adhere to the legal and professional standards outlined in the JA section of the MSM, and that certain elements must be included in the JA studies. (*Ibid.*) Those requirements include the following: (1) that the JA 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 must 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 noted may not have been job-related or legally defensible.

Cause: The CCC states that they had a staff shortage due to a hiring freeze.

Action: To correct this deficiency, the CCC must abolish the examination lists that have not expired. In addition, prior to administering any future examinations the CCC must create and develop each examination based upon a JA that meets the requirements of the MSM. The CCC must submit to the CRU a written corrective action plan within 60 days that describes the steps that will be taken to ensure JA's are developed for any new examinations conducted. Furthermore, the CRU finds that the appointments made from the examinations that were administered without a JA were made in good faith, were not the fault of the appointed employees, 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 CCC made 371 appointments. The CRU reviewed 165 of those appointments, which are listed below:

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Accountant I (Specialist)	Certification List	Permanent	Full	2
Accountant Trainee	Certification List	Limited Term	Full	1

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Accountant Trainee	Certification List	Permanent	Full	1
Accounting Officer (Specialist)	Certification List	Permanent	Full	1
Associate Governmental Program Analyst	Certification List	Limited Term	Full	2
Associate Governmental Program Analyst	Certification List	Permanent	Full	3
Business Services Officer (Supervisor)	Certification List	Permanent	Full	1
Conservation Administrator II, CCC	Certification List	Permanent	Full	3
Conservation Supervisor	Certification List	Limited Term	Full	3
Conservationist I (Energy)	Certification List	Permanent	Full	1
Conservationist I, CCC	Certification List	Limited Term	Full	11
Conservationist I, CCC	Certification List	Permanent	Full	19
Conservationist II, CCC	Certification List	Limited Term	Full	4
Conservationist II, CCC	Certification List	Permanent	Full	3
Cook, CCC	Certification List	Permanent	Full	1
Office Technician (Typing)	Certification List	Permanent	Full	4
Personnel Specialist	Certification List	Permanent	Full	2
Staff Service Analyst	Certification List	Limited Term	Full	1
Staff Services Analyst (General)	Certification List	Permanent	Full	1
Staff Services Manager I	Certification List	Limited Term	Full	1
Staff Services Manager I	Certification List	Permanent	Full	4
Supervising Cook I	Certification List	Permanent	Full	2

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Conservationist I, CCC	Emergency Hire	Temporary	Intermittent	8
Cook, CCC	Emergency Hire	Temporary	Intermittent	3
Cook, CCC	Emergency Hire	Temporary	Full	1
Office Assistant (Typing)	Emergency Hire	Temporary	Full	1
Office Technician (Typing)	Emergency Hire	Temporary	Full	1
Staff Services Analyst	Emergency Hire	Temporary	Full	4
Director, Energy Program Development, CEA	Information List	Permanent	Full	1
Conservation Admin II, CCC	Limited Term Extension	Limited Term	Full	1
Conservation Supervisor, CCC	Limited Term Extension	Limited Term	Full	2
Conservationist I	Limited Term Extension	Limited Term	Full	1
Conservationist II, CCC	Limited Term Extension	Limited Term	Full	3
Staff Services Analyst	Limited Term Extension	Limited Term	Full	1
Staff Services Manager I	Limited Term Extension	Limited Term	Full	1
Associate Budget Analyst	Mandatory Reinstatement	Permanent	Full	1
Backcountry Trails Camp Supervisor	Mandatory Reinstatement	Permanent	Full	1
Conservationist I, CCC	Mandatory Reinstatement	Permanent	Full	16
Conservationist II, CCC	Mandatory Reinstatement	Permanent	Full	2
Construction Supervisor	Mandatory Reinstatement	Permanent	Full	1
Cook, CCC	Mandatory Reinstatement	Permanent	Full	1
Senior Accounting Officer (Specialist)	Mandatory Reinstatement	Permanent	Full	1

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Accountant I (Specialist)	Permissive Reinstatement	Permanent	Full	1
Business Service Assistant (Specialist)	Permissive Reinstatement	Limited Term	Full	1
Conservationist I (Energy)	Permissive Reinstatement	Permanent	Full	1
Conservationist I, CCC	Permissive Reinstatement	Limited Term	Full	3
Cook, CCC	Permissive Reinstatement	Permanent	Full	2
Office Technician (T)	Permissive Reinstatement	Permanent	Full	1
Conservationist II, CCC	Retired Annuitant	Temporary	Intermittent	1
Conservationist I, CCC	Temporary Authorized (TAU)	Temporary	Full	1
Backcountry Trails Supervisor	TAU	Temporary	Full	5
Conservationist I (Energy), CCC	TAU	Temporary	Full	1
Supervising Cook I	TAU	Temporary	Full	1
Business Services Assistant (Specialist)	TAU	Temporary	Full	1
Accountant I (Specialist)	Transfer	Permanent	Full	2
Associate Governmental Program Analyst	Transfer	Permanent	Full	1
Associate Personnel Analyst	Transfer	Permanent	Full	1
Business Services Assistant (Specialist)	Transfer	Limited Term	Full	1
Business Services Officer I, Supervisor	Transfer	Permanent	Full	1
Conservationist I, CCC	Transfer	Limited Term	Full	2
Conservationist I, CCC	Transfer	Permanent	Full	3
Conservationist II, CCC	Transfer	Limited Term	Full	1
Conservationist II, CCC	Transfer	Permanent	Full	2
Cook, CCC	Transfer	Permanent	Full	1
Office Technician (Typing)	Transfer	Permanent	Full	3

Classification	Appointment Type	Tenure	Time Base	No. of Appointments
Staff Services Analyst (General)	Transfer	Permanent	Full	4
Staff Services Manager I	Transfer	Permanent	Full	1
Supervising Cook I	Transfer	Permanent	Full	1

FINDING NO. 2 – Appointments Properly Complied With Civil Service Laws and Board Rules

The CCC measured each applicant’s ability to perform the duties of the job by conducting hiring interviews and selecting the best-suited candidates. For each of the 71 list appointments reviewed, the CCC ordered a certification list of candidates ranked competitively. After properly clearing the certification lists including SROA, the selected candidates were appointed based on eligibility attained by being reachable within the first three ranks of the certification lists.

The CRU reviewed 24 CCC appointments made to positions via transfer. A transfer of an employee from a position under one appointing power to a position under another appointing power may be made, if the transfer is to a position in the same class or in another class with substantially the same salary range and designated as appropriate by the executive officer. (Cal. Code Reg., tit. 2, § 425.) The CCC verified the eligibility of each candidate to their appointed class.

The CRU reviewed 18 CCC appointments made to positions via emergency appointment. When emergency appointments are made under Government Code Section 19888.1, the appointing power shall establish and retain records consisting of the name of the appointee, the duties of the position, the reason for the appointment and such further data as may be required by the executive officer for the purpose of ensuring compliance with the provisions of this article. (Cal. Code Reg., tit. 2, § 301.) No person may serve under an emergency appointment for more than 60 working days in any 12 consecutive calendar months. Service under section 302.1 may be exempted from this limit by the California Department of Human Resources (CalHR). (Cal. Code Reg., tit. 2, § 303.) The CCC followed applicable law and rule in making the emergency appointments.

For appointments that are mandatory reinstatements, a state agency or department is required to reinstate an employee to his or her former position if the employee is (1) terminated from a temporary or limited-term appointment by either the employee or the

appointing power; (2) rejected during probation; or (3) demoted from a managerial position. (Gov. Code, § 19140.5.) However, the following conditions must apply: the employee accepted the appointment without a break in continuity of service and the reinstatement is requested within ten working days after the effective date of the termination. (*Ibid.*) The 24 employee appointments reviewed who were appointed as mandatory reinstatements accepted the appointments without a break in the continuity of their state service and requested reinstatement within ten working days after the effective date of the termination of their other position.

The CCC made nine appointments via permissive reinstatement. An appointing power may, in his or her discretion, reinstate any person having probationary or permanent status who was separated from his or her position by: (1) resignation; (2) service retirement; (3) termination from limited-term, temporary, career executive assignment, or exempt appointment; (4) absence without leave, as defined; or (5) without a break in continuity of state service to accept another civil service or exempt appointment. (Gov. Code, § 19140.) The CCC followed applicable law and rule in making the permissive reinstatement appointments.

The CCC made 10 appointments via TAU. Generally, when no employment list exists from which a position may be filled, an appointing power may fill the position by temporary appointment. (Gov. Code, § 19058.) If fewer than three names of persons willing to accept an appointment are on the open eligible list for the class to which a position belongs and no other employment list for such class is available, a temporary appointment may be allowed. (Cal. Code Regs., tit. 2, § 265) A TAU appointment shall not exceed nine months in a 12-month period. (Cal. Const., art. VII, § 5.) In addition, when a temporary appointment is made to a permanent position, an appropriate employment list shall be established for each class to which a temporary appointment is made before the expiration of the appointment. (Gov. Code, § 19058.) The CCC followed applicable law and rule in making the TAU appointments.

The CRU found no deficiencies in the appointments that the CCC conducted during the compliance review period. Accordingly, the CRU found that all the appointments the CCC made during the compliance review period satisfied civil service laws and board rules.

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 committing 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 CCC EEO policies, procedures, and programs in effect during the compliance review period. In addition, the CRU interviewed appropriate CCC staff.

FINDING NO. 3 – Equal Employment Opportunity Program Properly Complied With Civil Service Laws and Board Rules

After reviewing the policies, procedures, and programs that were in effect during the compliance review period the CRU determined that the CCC provided employees with guidance on the EEO process, including instructions on how to file discrimination claims. The EEO policy also outlines the roles and responsibilities of the EEO Officer, as well as supervisors and managers. The EEO Officer, who is at the managerial level, reports directly to the director of the CCC. The CCC provided evidence showing its efforts to promote EEO in its hiring and employment practices, to increase its hiring of persons with disabilities, and to offer upward mobility opportunities for its entry-level staff. In addition, the CCC has an established DAC. The CCC completed a workforce analysis, which was submitted to the CRU. Accordingly, the CCC EEO program complied with civil service laws and board rules.

Personal Services Contracts

A PSC includes any contract, requisition, or purchase order under which labor or personal services is a significant, separately identifiable element, and the business or

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

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

During the compliance review period, the CCC had six PSC’s that were in effect. One of the PSC’s was subject to Department of General Services (DGS) approval and thus CRU procedural review, and is listed below:

Vendor	Services	Contract Dates	Contract Amount	Sufficient Justification
NetBuilds	Construction Services	5/30/12-12/30/12	\$59,213	Yes

FINDING NO. 4 – Personal Services Contracts Complied with Procedural Requirements

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

It was beyond the scope of the review to make conclusions as to whether CCC justifications for the contract were legally sufficient. For the PSC subject to DGS approval, the CCC provided specific and detailed factual information in the written justifications as to how the contract met at least one condition set forth in Government

Code section 19131, subdivision (b). Accordingly, CCC's PSC's complied with procedural requirements.

DEPARTMENTAL RESPONSE

The CCC has reviewed the compliance review report and does not dispute the findings. The CCC takes compliance issues very seriously and had already implemented changes prior to the compliance review. The examination compliance findings were due to lack of knowledgeable staff resources due to a hiring freeze in place during 2011/2012. Once the freeze was lifted, experienced staff were hired to assist in revising the department's processes to ensure examinations administered by the department include complete JA's. The department also purchased necessary tools such as Survey Monkey to assist in providing necessary information for the JA's.

In accordance with the SPB recommendation, the CCC has abolished the referenced exams outlined in this report.

SPB REPLY

Based upon the CCC's written response, the CCC will comply with the CRU recommendations and findings. The CCC has already abolished the examination lists referenced in Finding No. 1.

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