CALIFORNIA STATE PERSONNEL BOARD

COMPLIANCE REVIEW REPORT

CALIFORNIA CONSERVATION CORPS

Compliance Review Division
State Personnel Board
November 4, 2026

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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 Division (CRD) 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 CRD 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 CRD conducted a routine compliance review of the California Conservation Corps (CCC) 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	Compliance	Finding
Examinations	In Compliance	Examinations Complied with Civil Service Laws and Board Rules
Examinations	In Compliance	Permanent Withhold Actions Complied with Civil Service Laws and Board Rules
Appointments	Out of Compliance	Probationary Evaluations Were Not Provided for All Appointments Reviewed and Some That Were Provided Were Untimely
Equal Employment Opportunity	In Compliance	Equal Employment Opportunity Program Complied with All Civil Service Laws and Board Rules
Personal Services Contracts	Out of Compliance	Unions Were Not Notified of Personal Services Contracts
Mandated Training	Substantial[1] Compliance	Ethics Training Was Provided for All Filers With Three Exceptions
Mandated Training	Out of Compliance	Tribal Consultations Training Was Not Provided for All Officials
Compensation and Pay	In Compliance	Salary Determinations Complied with Civil Service Laws, Board Rules, and CalHR Policies and Guidelines

[1] The department has achieved 90% or more compliance in this area and has provided a response sufficient to address full compliance in the future; therefore, no corrective action is required.

Area	Compliance	Finding
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	Pay Differential Authorizations Complied with Civil Service Laws, Board Rules, and CalHR Policies and Guidelines
Compensation and Pay	Out of Compliance	Incorrect Authorization of Out-of-Class Pay
Leave	In Compliance	Positive Paid Employees' Tracked Hours Complied with Civil Service Laws, Board Rules, and/or CalHR Policies and Guidelines
Leave	In Compliance	Administrative Time Off Authorizations Complied with Civil Service Laws, Board Rules, and/or CalHR Policies and Guidelines
Leave	In Compliance	Leave Auditing and Timekeeping 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	Out of Compliance	Performance Appraisals Were Not Provided to All Employees

BACKGROUND

The CCC is a department within the California Natural Resources Agency, and the oldest and largest conservation corps in the nation. The program offers young adults ages 18 to 26 a year of paid service with the State of California, providing hands-on experience that supports both environmental stewardship and community resilience. Throughout their service year, Corpsmembers work on critical natural resource projects, including habitat restoration, trail construction, forest health, energy conservation, and more. They also

mobilize to support communities during natural and human-caused disasters, assisting with wildfire response, flood mitigation, storm recovery, and other emergency operations.

The CCC has engaged more than 150,000 young adults over its 50-year history. Through service, Corpsmembers develop practical work skills, earn academic and career-building certifications, and gain the personal and professional tools needed to succeed in future employment opportunities. The success of the CCC is made possible by over 700 dedicated staff who serve as mentors, trainers, leaders, and role models for nearly 1,600 Corpsmembers.

SCOPE AND METHODOLOGY

The scope of the compliance review was limited to reviewing the CCC's examinations, appointments, EEO program, PSC's, mandated training, compensation and pay, leave, policy and processes[2]. The primary objective of the review was to determine if the CCC'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 actions where deficiencies were identified.

A cross-section of the CCC's examinations was selected for review to ensure that samples of various examination types, classifications, and levels were reviewed. The CRD examined the documentation that the CCC provided, which included examination plans, examination bulletins, job analyses, and scoring results. The CRD also reviewed the CCC's permanent withhold actions documentation, including Withhold Determination Worksheets, State applications (STD 678), class specifications, and withhold letters.

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

The CCC's appointments were also selected for review to ensure the CCC applied salary regulations accurately and correctly processed employees' compensation and pay. The

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

CRD examined the documentation that the CCC 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 CRD reviewed specific documentation for the following personnel functions related to compensation and pay monthly pay differentials, alternate range movements, and out-of-class assignments.

During the compliance review period, the CCC did not issue or authorize red circle rate requests, arduous pay, and bilingual pay.

The review of the CCC'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 reasonable accommodation program; the discrimination complaint process; and the Disability Advisory Committee.

The CCC's PSC's were also reviewed.[3] It was beyond the scope of the compliance review to make conclusions as to whether the CCC's justifications for the contracts were legally sufficient. The review was limited to whether the CCC's practices, policies, and procedures relative to PSC's complied with procedural requirements.

The CCC'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, that all employees were provided sexual harassment prevention training, and that all officials with authority to represent the state in a tribal government-to-government consultation were provided tribal consultations training within statutory timelines.

The CRD reviewed the CCC'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 CRD selected a small cross-section of the CCC'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 CCC's employees' employment and pay history. Additionally, the CRD reviewed a selection of the CCC employees who used Administrative Time Off (ATO) in order to ensure that ATO was appropriately administered. Further, the CRD reviewed a

[3]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.

selection of CCC positive paid employees whose hours are tracked during the compliance review period in order to ensure that they adhered to procedural requirements.

During the compliance review period, the CCC did not have any employees with non-qualifying pay period transactions.

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

The CRD received and carefully reviewed the CCC's written response on October 20, 2026, 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 for determining the fitness and qualifications of employees for each class of position and for applicants for examinations. (Gov. Code, § 18931, subd. (a).) Within a reasonable time before the scheduled date for the examination, the designated appointing power shall announce or advertise the examination for the establishment of eligible lists. (Gov. Code, § 18933, subd. (a).) The advertisement shall contain such information as the date and place of the examination and the nature of the minimum qualifications. (*Ibid*.) Every applicant for examination shall file an application with the department or a designated appointing power as directed by the examination announcement. (Gov. Code, § 18934, subd. (a)(1).) 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, October 1, 2025, through March 31, 2026, the CCC conducted 25 examinations. The CRD reviewed 10 of these examinations, which are listed below:

Classification	Exam Type	Exam Components	Final File Date	No. of Apps
CEA A, Region Deputy	CEA	Statement of Qualifications (SOQ)[4]	12/19/25	43
CEA B, Communications Director	CEA	SOQ	2/12/26	20
Administrative Officer I, Resources Agency	Departmental Open	Training and Experience (T&E)[5]	10/17/25	58
Conservationist I	Departmental Open	T&E	3/27/26	9
Conservationist I	Departmental Open	T&E	10/27/25	4
Conservationist I	Departmental Open	T&E	11/10/25	7
Conservationist I	Departmental Open	T&E	12/4/25	8
Conservationist I	Departmental Open	T&E	2/23/26	5
Conservationist II	Departmental Open	T&E	2/20/26	36
Conservationist Supervisor	Departmental Open	T&E	3/6/26	41

FINDING NO. 1	**EXAMINATIONS COMPLIED WITH CIVIL SERVICE LAWS AND BOARD RULES**

The CRD reviewed two CEA and eight open examinations which the CCC administered in order to create eligible lists from which to make appointments. The CCC published and distributed examination bulletins containing the required information for all examinations. Applications received by the CCC were accepted prior to the final filing date. Applicants

[4] In a Statement of Qualifications examination, applicants submit a written summary of their qualifications and experience related to a published list of desired qualifications. Raters, typically subject matter experts, evaluate the responses according to a predetermined rating scale designed to assess their ability to perform in a job classification, assign scores and rank the competitors in a list.

[5] The Training and Experience examination is administered either online or in writing, and asks the applicant to answer multiple-choice questions about his or her level of training and/or experience performing certain tasks typically performed by those in this classification. Responses yield point values.

were notified about the next phase of the examination process. After all phases of the examination process were completed, the score of each competitor was computed, and a list of eligible candidates was established. The examination results listed the names of all successful competitors arranged in order of the score received by rank. The CRD found no deficiencies in the examinations that the CCC conducted during the compliance review period.

Permanent Withhold Actions

Departments are granted statutory authority to permit withhold of eligibles from lists based on specified criteria. (Gov. Code, § 18935.) Permanent appointments and promotions within the state civil service system shall be merit-based, ascertained by a competitive examination process. (Cal. Const., art. VII, § 1, subd. (b).) If a candidate for appointment is found not to satisfy the minimum qualifications, the appointing power shall provide written notice to the candidate, specifying which qualification(s) are not satisfied and the reason(s) why. The candidate shall have an opportunity to establish that s/he meets the qualifications. (Cal. Code Regs., tit. 2, § 249.4, subd. (b).) If the candidate fails to respond or fails to establish that s/he meets the minimum qualification(s), the candidate's name shall be removed from the eligibility list. (Cal. Code Regs., tit. 2, § 249.4, subd. (b)(1), (2),), (HR Manual, section 1105.) The appointing authority shall promptly notify the candidate in writing and shall notify the candidate of his or her appeal rights. *(Ibid.)* A permanent withhold does not necessarily permanently restrict a candidate from retaking the examination for the same classification in the future; however, the appointing authority may place a withhold on the candidate's subsequent eligibility record if the candidate still does not meet the minimum qualifications or continues to be unsuitable. (HR Manual, Section 1105). State agency human resources offices are required to maintain specific withhold documentation for a period of five years. *(Ibid.)*

During the period under review, October 1, 2025, through March 31, 2026, the CCC conducted one permanent withhold action. The CRD reviewed the permanent withhold action, which is listed below:

Exam Title	Reason Candidate Placed on Withhold	No. of Withholds
Senior Accounting Officer (Specialist)	Failed to Meet Minimum Qualifications	1

FINDING NO. 2	PERMANENT WITHHOLD ACTIONS COMPLIED WITH CIVIL SERVICE LAWS AND BOARD RULES

The CRD found no deficiencies in the permanent withhold action undertaken by the department during the compliance review period.

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).)

For the purposes of temporary appointments, an employment list is considered not to exist where there is an open eligible list that has three or fewer names of persons willing to accept appointment and no other employment list for the classification is available. (Cal. Code Regs., tit. 2, § 265.) In such a situation, an appointing power may make a temporary appointment in accordance with section 265.1 *(Ibid.)* A Temporary Authorization Utilization (TAU) appointment shall not exceed nine months in a 12-month period. (Cal. Const., art. VII.) 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.)

During the period under review, March 1, 2025, through August 31, 2025, the CCC made 94 appointments. The CRD reviewed 29 of these appointments, which are listed below:

Classification	Appointment Type	Tenure	Time Base	No. of Appts.
CEA B, Director of Legislative and External Affairs	CEA	CEA	Full Time	1
CEA B, Statewide Programs Deputy Director	CEA	CEA	Full Time	1
Accountant Trainee	Certification List	Permanent	Full Time	1
Accounting Officer (Specialist)	Certification List	Permanent	Full Time	1
Administrative Officer I, Resources Agency	Certification List	Permanent	Full Time	1
Administrative Officer II, Resources Agency	Certification List	Permanent	Full Time	1
Associate Governmental Program Analyst	Certification List	Permanent	Full Time	1
Conservationist I	Certification List	Permanent	Full Time	1
Conservationist II	Certification List	Permanent	Full Time	1
Conservationist Supervisor	Certification List	Permanent	Full Time	1
Cook Specialist I	Certification List	Permanent	Full Time	1
Fish Habitat Assistant	Certification List	Permanent	Full Time	1
Information Technology Specialist I	Certification List	Permanent	Full Time	1
Office Technician (Typing)	Certification List	Permanent	Full Time	1
Senior Accounting Officer (Specialist)	Certification List	Permanent	Full Time	1
Staff Services Analyst	Certification List	Permanent	Full Time	2
Staff Services Manager I	Certification List	Permanent	Full Time	1
Staff Services Manger II (Managerial)	Certification List	Permanent	Full Time	1
Supervising Cook I	Certification List	Permanent	Full Time	1
Cook Specialist II	Emergency	Emergency	Intermittent	1
Associate Governmental Program Analyst	Reinstatement	Permanent	Full Time	1
Conservationist I	Reinstatement	Permanent	Full Time	1
Senior Personnel Specialist	Reinstatement	Permanent	Full Time	1
Backcountry Trails Camp Supervisor, CCC	Temporary	Temporary	Full Time	2
Office Technician (Typing)	Training & Development	Limited Term	Full Time	1
Conservationist II	Transfer	Limited Term	Full Time	1
Information Technology Manager II	Transfer	Permanent	Full Time	1

FINDING NO. 3	PROBATIONARY EVALUATIONS WERE NOT PROVIDED FOR ALL APPOINTMENTS REVIEWED AND SOME THAT WERE PROVIDED WERE UNTIMELY

Summary: The CCC did not provide 3 of the 87 probationary reports of performance requested for review by the CRD. In addition, the CCC did not provide six probationary reports of performance in a timely manner.

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).)

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).)

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).)

FINDING NO. 4	EQUAL EMPLOYMENT OPPORTUNITY PROGRAM COMPLIED WITH ALL CIVIL SERVICE LAWS AND BOARD RULES

After reviewing the policies, procedures, and programs necessary for compliance with the EEO program's role and responsibilities according to statutory and regulatory guidelines, the CRD determined that the CCC'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 CCC. The CCC 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.

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 Regs., 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, but are not limited to, 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 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 period under review, October 1, 2025, through March 31, 2026, the CCC had 13 PSC's that were in effect. The CRD reviewed 10 of these, which are listed below:

Vendor	Services	Contract Amount	Justification Identified?	Union Notification?
Biometrics4ALL LLC	Live Scan Services	$149,994	Yes	Yes
Crisis Prevention Institute Inc.	Verbal Intervention Training	$49,999	Yes	Yes
CTC313-Consulting-Teaching-Coaching	Basic Construction Training Course	$30,000	Yes	No
Epoch Education, Inc.	Compassionate Dialogue Training	$49,764	Yes	No
Hazardous Materials Institute LLC	First Responder Training	$14,200	Yes	Yes
Lance A Ferris LCSW	On-Site Counseling Services	$13,300	Yes	No
Public Health Institute	Planning & Preparedness Training	$28,000	Yes	No
Sierra Rescue Co. LLC	Wilderness First Aid Training	$23,700	Yes	No
Travis D. Tramel RDHAP Inc	Dental Services	$98,000	Yes	No
Washoe Tribe of Nevada and California	Washoe Tribe Cultural Training	$2,250	Yes	Yes

FINDING NO. 5	**UNIONS WERE NOT NOTIFIED OF PERSONAL SERVICES CONTRACTS[6]**

Summary: The CCC did not notify unions prior to entering into 6 of the 10 PSCs reviewed.

[6] Repeat finding; see report dated March 4, 2024.

Criteria: Before a state agency executes a contract or amendment to a contract for personal services conditions specified within Government Code section 19130, subdivision (b), the agency shall notify all organizations that represent state employees who perform or could perform the type of work that is called for within the contract, unless exempted under Government Code section 19132, subdivision (b)(1). (Cal. Code Regs., tit. 2, § 547.60.2.)

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 Legislature encourages the state and its agencies to consult on a government-to-government basis with federally recognized tribes and with nonfederally recognized tribes and tribal organizations in order to allow tribal officials the opportunity to provide meaningful and timely input in the development of policies, programs, and projects that have tribal implications. (Gov. Code, § 11019.81, sub. (c).) Each official specified in Government Code section 11019.81 subdivision (f)[7] shall complete tribal consultations training by January 1, 2025, or, for officials appointed after that date, within six months of their appointment or confirmation of appointment, whichever is later. (Gov. Code, § 11019.81, sub. (h).) Each official shall retake the training annually. (*Ibid*.)

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

The CRD reviewed the CCC's mandated training program that was in effect during the compliance review period, April 1, 2024, through March 31, 2026. The CCC's supervisory training and sexual harassment prevention training were found to be in compliance, while the CCC's ethics and tribal consultations training were found to be out of compliance.

FINDING NO. 6	**ETHICS TRAINING WAS PROVIDED FOR ALL FILERS WITH THREE EXCEPTIONS**

Summary: The CCC did not provide ethics training to 2 of 84 existing filers. In addition, the CCC did not provide ethics training to 1 of 10 new filers within 6 months of their appointment.

[7] Within the executive branch, the following officials have authority to represent the state in a tribal government-to-government consultation: the governor, the attorney general, each constitutional officer and statewide elected official, the director of each state agency and department, the chair and executive officer of each state commission and task force, and the chief counsel of any state agency. (Gov. Code, § 11019.81, sub. (f) (1).) Each authorized official may formally designate another agency official to conduct preliminary tribal consultations, and each designated official may have the authority to act on behalf of the state during a government-to-government consultation. (Gov. Code, § 11019.81, sub. (f) (2).)

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).)

FINDING NO. 7	TRIBAL CONSULTATIONS TRAINING WAS NOT PROVIDED FOR ALL OFFICIALS

Summary: The CCC did not provide tribal consultations training to one of four existing officials annually.

Criteria: Each department must provide annual tribal consultations training to its officials with authority to represent the state in a tribal government-to-government consultation. New officials must be provided tribal consultations training within six months of their appointment or confirmation, whichever is later. (Gov. Code, § 11019.81, sub. (h).)

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 rate[8] 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, March 1, 2025, through August 31, 2026, the CCC made 94 appointments. The CRD reviewed 13 of these appointments to determine if the CCC applied salary regulations accurately and correctly processed employees' compensation.

[8] "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).

FINDING NO. 8	SALARY DETERMINATIONS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND CALHR POLICIES AND GUIDELINES

The CRD found no deficiencies in the salary determinations that were reviewed. The CCC 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, March 1, 2025, through August 31, 2026, the CCC employees made nine alternate range movements within a classification. The CRD reviewed eight of these alternate range movements to determine if the CCC applied salary regulations accurately and correctly processed each employee's compensation, which are listed below:

Classification	Prior Range	Current Range	Salary (Monthly Rate)
Conservationist I	A	B	$4,420
Conservationist I	A	B	$4,333
Information Technology Associate	B	C	$5,805
Information Technology Specialist I	B	C	$9,785
Personnel Specialist	B	C	$5,767
Personnel Specialist	A	B	$4,497
Staff Services Analyst	A	B	$4,059
Staff Services Analyst	B	C	$4,868

FINDING NO. 9	ALTERNATE RANGE MOVEMENTS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND CALHR POLICIES AND GUIDELINES

The CRD determined that the alternate range movements the CCC made during the compliance review period, satisfied civil service laws, Board rules and CalHR policies and guidelines.

Pay Differentials

A pay differential is special additional pay recognizing unusual competencies, circumstances, or working conditions applying to some or all incumbents in select classes. A pay differential may be appropriate in those instances when a subgroup of positions within the overall job class might have unusual circumstances, competencies, or working conditions that distinguish these positions from other positions in the same class. Typically, pay differentials are based on qualifying pay criteria such as: work locations or shift assignments; professional or educational certification; temporary responsibilities; special licenses, skills or training; performance-based pay; incentive-based pay; or recruitment and retention. (Classification and Pay Manual Section 230.)

California State Civil Service Pay Scales Section 14 describes the qualifying pay criteria for the majority of pay differentials. However, some of the alternate range criteria in the pay scales function as pay differentials. Generally, departments issuing pay differentials should, in order to justify the additional pay, document the following: the effective date of the pay differential, the collective bargaining unit identifier, the classification applicable to the salary rate and conditions along with the specific criteria, and any relevant documentation to verify the employee meets the criteria.

During the period under review, March 1, 2025, through August 31, 2026, the CCC authorized 45 pay differentials[9]. The CRD reviewed 27 of these pay differentials to ensure compliance with applicable CalHR policies and guidelines, which are listed below:

Classification	Pay Differential	Monthly Amount
Administrative Officer I, Resources Agency	441	$250
Associate Governmental Program Analyst	441	$250
Backcountry Trails Camp Supervisor, CCC	245	2%
Conservationist I	245	2%

[9] For the purposes of CRD's review, only monthly pay differentials were selected for review at this time.

Classification	Pay Differential	Monthly Amount
Conservationist I	245	4%
Conservationist I (2 positions)	245	3%
Conservationist II (4 positions)	245	3%
Conservationist II	245	4%
Conservationist Supervisor (5 positions)	245	3%
Cook Specialist I	441	$250
Departmental Construction and Maintenance Supervisor	245	3%
Fish Habitat Specialist	441	$250
Management Services Technician (2 positions)		
Office Technician (Typing)		
Staff Services Analyst		
Staff Services Manager II (Managerial)		
Supervising Cook I (2 positions)		

FINDING NO. 10	**PAY DIFFERENTIAL AUTHORIZATIONS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND CALHR POLICIES AND GUIDELINES**

The CRD found no deficiencies in the pay differentials that the CCC authorized during the compliance review period. Pay differentials were issued correctly in recognition of unusual competencies, circumstances, or working conditions in accordance with applicable rules and guidelines.

Out-of-Class Assignments and Pay

For excluded[10] 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).)

[10] "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.

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, March 1, 2025, through August 31, 2026, the CCC issued OOC pay to 14 employees. The CRD reviewed 11 of these OOC assignments to ensure compliance with applicable MOU provisions, salary regulations, and CalHR policies and guidelines, which are listed below:

Classification	Bargaining Unit	Out-of-Class Classification	Time Frame
Administrative Officer I, Resources Agency	S01	Staff Services Manager II	7/18/25-12/31/25
Administrative Officer II, Resources Agency	S01	Staff Services Manager II	5/1/25-9/30/25
Associate Governmental Program Analyst	R01	Staff Services Manager II	6/1/25-6/30/25
Associate Governmental Program Analyst	R01	Staff Services Manager II	5/13/25-7/18/25
CEA A, Region I Deputy	M01	CEA B, Capital Outlay Deputy	4/1/25-10/30/25
Conservationist Supervisor	S07	Staff Services Manager I	3/17/25-05/18/25
Conservationist Supervisor	S07	Staff Services Manager II	5/1/25-7/30/25
Cook Specialist II	R15	Supervising Cook	11/18/24-3/17/25
Management Services Technician	R01	Administrative Officer I, Resources Agency	2/13/25-6/12/25
Staff Services Manager II	M01	CEA, Region 1 Deputy	4/22/25-10/18/25

Classification	Bargaining Unit	Out-of-Class Classification	Time Frame
Office Technician (Typing)	R04	Administrative Officer I, Resources Agency	5/1/25-10/31/25

FINDING NO. 11	INCORRECT AUTHORIZATION OF OUT-OF-CLASS PAY

Summary: The CRD found 8 errors in the 11 OOC pay assignments reviewed:

Classification	Out-of-Class Classification	Description of Findings	Criteria
Administrative Officer I, Resources Agency	Staff Services Manager II	Incorrect OOC rate calculated due to omission of the 3% PLP reduction, resulting in employee being overcompensated.	Pay Differential 101 and CalHR Manual section 2113
Administrative Officer II, Resources Agency	Staff Services Manager II	Incorrect OOC rate calculated due to omission of the 3% PLP reduction, resulting in employee being overcompensated.	Pay Differential 101 and CalHR Manual section 2113
Associate Governmental Program Analyst	Staff Services Manager II	Incorrect OOC rate calculated due to omission of the 3% PLP reduction, resulting in employee being overcompensated.	Pay Differential 91 and CalHR Manual section 2113
CEA A, Region I Deputy	CEA B, Capital Outlay Deputy	Incorrect OOC rate calculated due to omission of the 3% PLP reduction, resulting in employee being overcompensated.	Pay Differential 101 and CalHR Manual section 2113
Conservationist Supervisor	Staff Services Manager I	Incorrect OOC rate calculated, resulting in the employee being overcompensated.	Pay Differential 101
Conservationist Supervisor	Staff Services Manager II	Incorrect OOC rate calculated due to omission of the 2% PLP reduction, resulting in employee being overcompensated.	Pay Differential 101 and CalHR Manual section 2113

Classification	Out-of-Class Classification	Description of Findings	Criteria
Staff Services Manager II	CEA A, Region 1 Deputy	Incorrect OOC rate calculated due to omission of the 3% PLP reduction, resulting in employee being overcompensated.	Pay Differential 101 and CalHR Manual section 2113
Office Technician (Typing)	Administrative Officer I, Resources Agency	Incorrect OOC rate calculated due to omission of the 3% PLP reduction, resulting in employee being overcompensated.	Pay Differential 91 and CalHR Manual section 2113

Criteria: An employee may be temporarily required to perform out-of-class work by his/her department for up to one hundred twenty (120) calendar days in any twelve (12) consecutive calendar months when it determines that such an assignment is of unusual urgency, nature, volume, location, duration, or other special characteristics; and, cannot feasibly be met through use of other civil service or administrative alternatives. Departments may not use out-of-class assignments to avoid giving civil service examinations or to avoid using existing eligibility lists created as the result of a civil service examination.

Employees may be compensated for performing duties of a higher classification provided that: the assignment is made in advance in writing and the employee is given a copy of the assignment; and the duties performed by the employee are not described in a training and development assignment or by the specification for the class to which the excluded employee is appointed and, are fully consistent with the types of jobs described in the specification for the higher classification; and the employee does not perform such duties for more than 120 days in a fiscal year. (Cal. Code Regs., tit. 2, § 599.810, subd. (b)(1)(3)(4).)

For excluded employees, there shall be no compensation for assignments that last for 15 consecutive working days or less. (Cal. Code Regs., tit. 2, § 599.810, subd. (c).) An excluded employee performing in a higher class for more than 15 consecutive working days shall receive the rate of pay the excluded employee would

receive if appointed to the higher class for the entire duration of the assignment, not to exceed one year. (Cal. Code Regs., tit. 2, § 599.810, subd. (d).) An excluded employee may be assigned out-of-class work for more than 120 calendar days during any 12-month period only if the appointing power files a written statement with the Department certifying that the additional out-of-class work is required to meet a need that cannot be met through other administrative or civil service alternatives. (Cal. Code Regs., tit. 2, § 599.810, subd. (e).)

Leave

Positive Paid Employees

Actual Time Worked (ATW) is a method that can be used to keep track of a Temporary Authorization Utilization (TAU) employee's time to ensure that the Constitutional limit of 9 months in any 12 consecutive months is not exceeded. The ATW method of counting time is used to continue the employment status for an employee until the completion of an examination, for seasonal type work, while attending school, or for consulting services.

An employee is appointed TAU-ATW when he/she is not expected to work all the working days of a month. When counting 189 days, every day worked, including partial days[11] worked and paid absences[12], are counted. (Cal. Code Regs., tit. 2, § 265.1, subd. (b).) The hours worked in one day are not limited by this rule. *(Ibid.)* The 12-consecutive month timeframe begins by counting the first pay period worked as the first month of the 12-consecutive month timeframe. *(Ibid.)* The employee shall serve no longer than 189 days in a 12 consecutive month period. *(Ibid.)* A new 189-days working limit in a 12-consecutive month timeframe may begin in the month immediately following the month that marks the end of the previous 12-consecutive month timeframe. *(Ibid.)*

It is an ATW appointment because the employee does not work each workday of the month, and it might become desirable or necessary for the employee to work beyond nine calendar months. The appointing power shall monitor and control the days worked to ensure the limitations set forth are not exceeded. (Cal. Code Regs., tit. 2, § 265.1, subd. (f).)

[11] For example, two hours or ten hours count as one day.
[12] For example, vacation, sick leave, compensating time off, etc.

For student assistants, graduate student assistants, youth aids, and seasonal classifications a maximum work-time limit of 1,500 hours within 12 consecutive months may be used rather than the 189-day calculation. (Cal. Code Regs., tit. 2, § 265.1, subd. (d).)

Additionally, according to Government Code section 21224, retired annuitant appointments shall not exceed a maximum of 960 hours in any fiscal year (July-June), regardless of the number of state employers, without reinstatement, loss or interruption of benefits.

At the time of the review, the CCC had 15 positive paid employees whose hours were tracked. The CRD reviewed 12 of these positive paid appointments to ensure compliance with applicable laws, regulations, policies and guidelines, which are listed below:

Classification	Tenure	Time Frame	Time Worked (Hours)
Associate Governmental Program Analyst	Retired Annuitant	7/1/24-6/30/25	958
Associate Governmental Program Analyst	Retired Annuitant	7/1/24-6/30/25	960
Associate Governmental Program Analyst	Retired Annuitant	7/1/24-6/30/25	690.25
Associate Governmental Program Analyst	Retired Annuitant	7/1/24-6/30/25	960
Conservationist I	Temporary	1/12/26-4/26/26	791.5
Conservationist I	Temporary	1/05/26-4/30/26	460.5
Conservationist I	Temporary	12/14/25-4/5/26	686.5
Cook Specialist I	Temporary	3/16/26-4/30/26	339
Office Technician	Retired Annuitant	7/1/24-6/30/25	1,867.75[13]
Senior Personnel Specialist	Retired Annuitant	7/1/24-6/30/25	1,851.25
Staff Services Analyst	Retired Annuitant	7/1/24-6/30/25	959.5
Staff Services Analyst	Retired Annuitant	7/1/24-6/30/25	960

[13] Executive Order N-1-23, signed by Governor Newsom on January 16, 2023, suspended work hour limitations on retired annuitants' hours due to the severe winter storms emergency related to an Atmospheric River. In this case, the CCC provided documentation to support that Retired Annuitants whose hours exceeded limitations were in fact due to the severe winter storms-related work.

FINDING NO. 12	POSITIVE PAID EMPLOYEES' TRACKED HOURS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND/OR CALHR POLICIES AND GUIDELINES

The CRD found no deficiencies in the positive paid employees reviewed during the compliance review period. The CCC provided sufficient justification and adhered to applicable laws, regulations and CalHR policy and guidelines for positive paid employees.

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, January 1, 2025, through December 31, 2026, the CCC authorized nine ATO transactions. The CRD reviewed eight of these ATO transactions to ensure compliance with applicable laws, regulations, and CalHR policy and guidelines.

FINDING NO. 13	ADMINISTRATIVE TIME OFF AUTHORIZATIONS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND/OR CALHR POLICIES AND GUIDELINES

The CRD found no deficiencies in the ATO transactions reviewed during the compliance review period. The CCC provided the proper documentation justifying the use of ATO and adhered to applicable laws, regulations and CalHR policy and guidelines.

Leave Accounting

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, October 1, 2025, through December 31, 2025, the CCC reported 53 units. The CRD reviewed 13 units within 3 pay periods to ensure compliance with applicable laws, regulations and CalHR policy and guidelines.

FINDING NO. 14	LEAVE ACCOUNTING COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND/OR CALHR POLICIES AND GUIDELINES

The CRD reviewed leave records from three different leave periods to ensure compliance with applicable laws, regulations and CalHR policy and guidelines. Based on our review, the CRD found no deficiencies. The CCC utilized a monthly internal audit process to verify all leave input into any leave accounting system was keyed accurately and timely.

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 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.)*

FINDING NO. 15	NEPOTISM POLICY COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND/OR CALHR POLICIES AND GUIDELINES

The CRD verified that the policy was disseminated to all staff and emphasized the CCC's commitment to the state policy of hiring, transferring, and promoting employees on the basis of merit. Additionally, the CCC'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 office to discuss the status of volunteers. *(Ibid.)* In this case, the CCC did not employ volunteers during the compliance review period.

FINDING NO. 16	WORKERS' COMPENSATION PROCESS COMPLIED WITH CIVIL SERVICE LAWS, BOARD RULES, AND/OR CALHR POLICIES AND GUIDELINES

The CRD verified that the CCC provides notice to their employees to inform them of their rights and responsibilities under California's Workers' Compensation Law. Furthermore, the CRD verified that when the CCC 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 CRD selected 56 permanent CCC employees to ensure that the department was conducting performance appraisals on an annual basis in accordance with applicable laws, regulations, policies and guidelines.

FINDING NO. 17	PERFORMANCE APPRAISALS WERE NOT PROVIDED TO ALL EMPLOYEES[14]

Summary: The CCC did not provide annual performance appraisals to 20 of 56 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.)

DEPARTMENTAL RESPONSE

The CCC's response is attached as Attachment 1.

CORRECTIVE ACTIONS

A written corrective action response addressing all areas identified as out of compliance, along with supporting documentation demonstrating the implantation of the specified corrective actions, must be submitted to the CRD within 90 days of the date of this report.

[14] Repeat finding; see reports dated March 4, 2024, and June 1, 2021.

October 1, 2026

Ms. Suzanne M. Ambrose, Executive Officer
State Personnel Board
801 Capitol Mall, Suite 1200
Sacramento, CA 95814

Dear Ms. Ambrose,

The California Conservation Corps (CCC) is in receipt of, and appreciates the interactive opportunity to discuss, the draft State Personnel Board (SPB) Compliance Review Report. The Department recognizes the importance of evaluations to ensure personnel practices are properly applied and adhered to in accordance with civil service laws, rules, and regulations.

In the September 2026 SPB Compliance Review Report, the CCC acknowledges the 17 findings, 6 of which were found to be out-of-compliance. Detailed below are the out-of-compliance findings along with the CCC's cause and corrective measures that have or will be applied.

1. **FINDING NO. 3 – PROBATIONARY EVALUATIONS WERE NOT PROVIDED FOR ALL APPOINTMENTS REVIEWED AND SOME THAT WERE PROVIDED WERE UNTIMELY.**
   Department Response: The CCC acknowledges the Compliance Review's findings that three (3) of 87 Probationary Evaluations were not provided to employees, and six (6) of 87 were not provided timely employees. Upon hire, CCC Human Resources sends an email to the Hiring Supervisor/Manager, which includes the Probationary Evaluation dates, along with the requirement to complete the evaluations timely (within 10 days of the conclusion of each of the three probationary reporting periods). The email encourages Managers/Supervisors to create calendar reminders to the Probationary Evaluation due dates with time built in for completion and a meeting with the employee(s). Additionally, CCC Human Resources maintains a Probationary Evaluations Tracker on Human Resources SharePoint that is accessible to Managers/Supervisors – this is a secondary resource that is color coded to display due dates for each probationary employee, upcoming/past due evaluations, and completed evaluations. HR sends a monthly reminder to

Managers/Supervisors with a link to the Probationary Evaluations Tracker on SharePoint.

Despite the efforts mentioned above, some supervisors still failed to provide/fail to provide timely Probationary Evaluations to employees.

Corrective Action: The HR Director shall propose to the Executive Team that timely completion of Performance Evaluations is added as a department Performance Expectation for 27/28 (PEs for 26/27 have already been set). The HR Director will also request to implement reminders through the department LMS (will make the same request for Performance Appraisals/IDPs).

2. **FINDING NO. 5 - UNIONS WERE NOT NOTIFIED TIMELY OF PERSONAL SERVICES CONTRACTS (PSC).**
   Department Response: As a result of the 2023 SPB Audit, the Human Resources (HR) Director and Business Services Manager met and developed an internal process whereby the step of notifying the Unions was added to the PSC checklist. The HR Director is cc'd on the email notifications, which are then saved to the contract files. The process was implemented by management on January 24, 2024. The CCC acknowledges the Compliance Review's findings that Unions were not notified prior to contract execution for six (6) of the ten (10) PSCs. This is a clear oversight on the timing of the implemented union notification process.

   Corrective Action: The HR Director and Business Services Manager have updated the PSC checklist to put the Union Notification step ahead of the contract execution step and highlighted the time sensitive nature of the notice.

3. **FINDING NO. 6 – ETHICS TRAINING WAS PROVIDED FOR ALL FILERS WITH THREE (3) EXCEPTIONS.**
   Department Response: The CCC acknowledges the Compliance Review's findings in this situation. During the period reviewed, the CCC did offer Ethics Training to all filers. However, two (2) of ten (10) staff did not complete their training and one (1) of ten (10) new filers did not complete their training within 6 months of being hired. Nor did their supervisors ensure that their subordinates completed their assigned training timely. Ethics training is assigned through Learning Management Software (LMS), which tracks all mandated training. The LMS provides automated messages to remind staff when mandatory training is due along with a portal for staff to sign into their account and view their training records as well as upcoming mandated training and due dates. The CCC continues to see the value in utilizing the LMS as required training notifications are automatically generated along with follow-up emails to staff and supervisors. Since the implementation of the LMS we have realized an overall increase in completion of training. The CCC values the importance of filers being aware of prohibitions related to their official position and influence.

Corrective Action: The HR Director shall propose to the Executive Team that timely completion of all mandated training (Ethics, Leadership, Supervisory, SHP, etc.) be included as a department Performance Expectation for the 27/28 FY (the 26/27 FY PEs were already set). The CCC will continue to issue statements in the twice monthly Morning Roll Call (statewide employee newsletter) and other written communication tools to remind employees and supervisors of the importance of continued compliance.

4. **FINDING NO. 7 – TRIBAL CONSULTATIONS TRAINING WAS NOT PROVIDED FOR ALL OFFICIALS.**
   Department Response: The CCC acknowledges the Compliance Review's findings in this situation. During the period reviewed, there was one Official who did not complete their training timely.

   Like other mandatory training, Tribal Consultations training is assigned through Learning Management Software (LMS), which tracks all training. The LMS provides automated messages to remind staff when mandatory training is due along with a portal for staff to sign into their account and view their training records as well as upcoming mandated training and due dates. The CCC continues to see the value in utilizing the LMS as required training notifications are automatically generated along with follow-up emails to staff and supervisors. Since the implementation of the LMS we have realized an overall increase in timely completion of training. The CCC values the importance of Tribal Consultations training so that we may develop successful leaders.

   Corrective Action: The HR Director shall propose to the Executive Team that timely completion of all mandated training (Ethics, Leadership, Supervisory, SHP, etc.) be included as a department Performance Expectation for the 27/28 FY (the 26/27 FY PE's have already been established). The CCC will continue to issue statements in the twice monthly Morning Roll Call (statewide employee newsletter) and other written communication tools to remind employees and supervisors of the importance of continued compliance.

5. **FINDING NO. 11 – INCORRECT AUTHORIZATION OF OUT-OF-CLASS PAY**
   Department Response: The CCC acknowledges the Compliance Review's findings in this situation. The 3% PLP reduction affected the employee base salary. There was no clear guidance on the application of the 3% PLP reduction to other pay types, including differentials (Pay Differential 101, Pay Differential 91).

   Corrective Action: Due to the SPB evaluation finding, the CCC will ensure the 3% PLP reduction is applied to all OOC pay going forward.

6. **FINDING NO. 17 – PERFORMANCE APPRAISALS WERE NOT PROVIDED TO ALL EMPLOYEES**
   Department Response: The CCC acknowledges the Compliance Review's findings that 20 of 56 employees were not provided with Performance Appraisals and/or they

were not timely to all employees. The CCC conducts annual performance appraisals on a calendar year model (with employees being rated on their performance for the period of January 1 – December 31 of the previous calendar year). This is based on CCR 599.798 and our understanding that departments can choose the mechanism under which this annual appraisal occurs. In January of each year, Human Resources sends out a memo to notify all supervisors and managers of the requirement to complete and submit annual performance appraisals for their staff. The due date is typically set for the first business day in April. HR sends email reminders in February and March. Additionally, HR utilizes a communication tool referred to as the Morning Roll Call, a twice monthly statewide employee newsletter, to notify and remind staff of pending due dates like with the performance appraisals. Following the initial memo, HR sends several reports over the next month or two, to second-level managers to inform them of supervisors who have not submitted appraisals for their staff. In addition to continuing our current practice of the annual announcement, Morning Roll Call reminders, email reminders, and reports to managers, the CCC HR Office continues to include strong language in the annual announcement regarding the importance of performance appraisals and that it is reviewed during audits.

Despite the efforts mentioned above, several supervisors failed to provide timely performance appraisals to their subordinates.

The HR Director shall propose timely completion of Performance Appraisals and IDPs be added as a department Performance Expectation for the 27/28 FY (the 26/27 FY PEs were already established). The HR Director shall propose implementing reminders through the department LMS (also doing this for Probationary Reports as well).

Thank you again for the opportunity to discuss and respond to the Draft Compliance Review Report. If you have any questions, please contact Summer Kincaid, Human Resources Director at (916) 341-3222 or by email at Summer.Kincaid@ccc.ca.gov.

Sincerely,

Summer Kincaid

Human Resources Director

California Conservation Corps

cc Tabatha Chavez, Administrative Deputy Director