

December 29, 2021

Jared Blumenfeld, Secretary
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

Dear Secretary Jared Blumenfeld,

In accordance with the State Leadership Accountability Act (Leadership Accountability), the Department of Pesticide Regulation submits this report on the review of our internal control and monitoring systems for the biennial period ending December 31, 2021.

Should you have any questions please contact Christina Bugai, Assistant Director, at (916) 650-6957, Christina.Bugai@cdpr.ca.gov.

GOVERNANCE

Mission and Strategic Plan

The mission of DPR is to protect human health and the environment by regulating pesticide sales and use and by fostering reduced-risk pest management. As part of its mission, the Department is working to accelerate a system wide transition to safer, more sustainable pest management practices.

Pest management is essential to protecting public health, the food supply and enabling effective resource management. The people of California and our environment are best served by a continuous effort to minimize risks associated with pest management.

DPR pursues its mission through the following goals and objectives:

1. Goal #1: Protect people and the environment – Assure the people of California and their environment are not adversely affected by pesticides.
 - a. Objective #1: Assure that pesticide products available for use in California are evaluated and registered, as required by statute, and do not pose an unacceptable risk.
 - b. Objective #2: Continuously evaluate and respond to the human health and environmental risks from pesticide use.
 - c. Objective #3: Respond to identified risks to human health and the environment through collaboration with other governmental agencies, stakeholders and the public.
 - d. Objective #4: Exercise DPR's statutory and regulatory authorities, as well as other opportunities, to work with affected persons to meet existing and emerging challenges involving pesticide risks.
 - e. Objective #5: Use state-of-the-art scientific practices and technologies to advance the evaluation and management of pest management.
2. Goal #2: Advance reduced-risk pest management systems – Advance the research,

development and adoption of effective pest management systems that reduce risks to people and the environment.

- a. Objective #1: Encourage and support research and development of reduced-risk pest management practices and technologies.
 - b. Objective #2: Promote adoption of reduced-risk pest management systems and practices.
 - c. Objective #3: Advance reduced-risk pest management systems for California by providing policy, scientific, and technical leadership and collaboration at local, state, national, and international forums.
3. Goal #3: Enforce and achieve compliance – Maintain and continuously improve strong and equitable compliance and enforcement programs to ensure people and the environment are not exposed to unacceptable pesticide risks.
- a. Objective #1: Obtain compliance through clear, equitable rules; education; licensing; and strong, effective enforcement.
 - b. Objective #2: Provide training, guidance, and support to county agricultural commissioners.
 - c. Objective #3: Ensure effective and consistent enforcement.
 - d. Objective #4: Through continuous review of data and information, improve our compliance and enforcement programs.
4. Goal #4: Ensure Environmental Justice – Protect all people in California, regardless of race, culture, income, or geographical location, from adverse environmental and health effects of pesticides.
- a. Objective #1: Ensure DPR's programs, regulations, policies and activities address risks associated with pesticide use in environmental justice communities.
 - b. Objective #2: Ensure that needed multilingual outreach materials are made available to environmental justice communities.
 - c. Objective #3: Ensure that DPR provides outreach to and engages with environmental justice communities. Provide accessible and meaningful opportunities to learn about DPR and the county agricultural commissioner responsibilities and programs and to provide input.
 - d. Objective #4: Maintain transparency and effectiveness in public participation through the use of advisory committees, workshops, community advocacy networks and other forums.
 - e. Objective #5: Work with the county agricultural commissioners and environmental justice communities to address pesticide issues in those communities.
5. Goal #5: Continuously improve performance, accountability, and organizational effectiveness – Efficiently deliver our programs by attracting and retaining a strong workforce, effective business processes, and use of current technology.
- a. Objective #1: Use current and emerging technology to implement and maintain stable, compliant, resilient and effective information systems to support DPR's business and program needs.

- b. Objective #2: Use cost effective and secure technologies to collect and deliver information electronically.
 - c. Objective #3: Use a comprehensive risk-based approach to protect and support business systems and assets in compliance with State and industry information security best practices.
 - d. Objective #4: Use technology to foster collaboration and transparency with other government agencies and the public.
 - e. Objective #5: Ensure that existing and new policies, procedures, and programs contribute to: the development and retention of a diverse and motivated workforce, and a productive work environment that meets our organization's needs.
 - f. Objective #6: Maintain a leadership and workforce development program focused on effective mentoring, employee development, and the retention of experienced talent for the future.
 - g. Objective #7: Support our skilled scientific and professional staff in maintaining and advancing their expertise by providing opportunities for growth and development.
 - h. Objective #8: Preserve the financial integrity of DPR's programs and activities through accurate forecasting of revenue trends, expenditures, and external influences that could impact DPR funding.
 - i. Objective #9: Annually plan, track, and account for program costs and performance, and assess our ability to meet future program needs.
6. Goal #6: Communication and outreach – Promote an understanding and awareness of DPR programs, priorities, initiatives and accomplishments through effective external communications, multilingual translations, outreach and public education.
- a. Objective #1: Participate in active conversations with our stakeholders about all DPR programs and initiatives.
 - b. Objective #2: Optimize social media, print and electronic media to convey DPR's mission and accomplishments to the public.
 - c. Objective #3: Engage in outreach to educate households, service establishments, institutional users and government agencies about the safe, appropriate and effective pest management.

Control Environment

The California Department of Pesticide Regulation (DPR) works actively to establish and maintain an effective control environment. DPR's Management (which includes all supervisors, managers, branch chiefs, and the executive team) accomplishes this goal by setting and modeling standards of ethics and integrity, setting and communicating priorities, exercising executive-level oversight, and working within an organizational structure with assigned responsibilities and authority and staff accountability, and maintaining documentation of the control system.

DPR Management focuses recruitment efforts on the Department's operational needs, priorities and values, including developing a workforce that reflects the diversity of the state. Management has designated specific employees from each branch to engage in DPR's Recruitment Workgroup led by the Department's Recruitment Specialist. The workgroup members attend various recruitment events, discuss recruitment strategies, and relay information to Management regarding new, innovative ways to

strengthen and focus recruitment efforts within each branch.

Management identifies, and lists as screening criteria, the required and desirable knowledge and skills for each vacancy during the hiring process. This process has been standardized departmentally and gives Management tools to interview and select the most qualified candidates. Upon hire, all employees review and sign duty statements that outline their roles and responsibilities and the requirement that they exercise those roles and responsibilities ethically and with integrity. Management review of duty statements with new employees promotes a strong, competent workforce by documenting and demonstrating expected roles and responsibilities.

Management is committed to growing and developing the talent base within DPR through internal training, such as Implicit Bias training, Strategies for Diverse and Inclusive Hiring training, and personal mentoring. In 2020, DPR launched a new program, the HRB Consultation Program, which gives managers the chance to ask questions and bring up HR specific topics to discuss. The meetings allow HRB and management to create relationships and support one another. Since the establishment of this program in 2020, 54 managers and supervisors have participated. DPR also utilizes coaching and mentoring trainers where individual plans are created for specific employees to build upon individual strengths and overcome challenges.

Management evaluates staff performance by reviewing their work with an annual performance appraisal which management is required to submit to the Human Resources Branch as well as holding regular check-in meetings. The manager/supervisor training held by the Human Resources Branch instructs Management to consistently engage with their employees and develop the most effective, individual strategies to ensure their staff feel supported and are able to be productive. When holding staff accountable for their duties and deadlines, Management is instructed to assist staff in prioritizing their workloads and be flexible when there is a need to re-evaluate and/or re-prioritize due to unreasonable and/or excessive pressures.

The Department's top executives – Director Julie Henderson, and Acting Chief Deputy Director Karen Morrison – set priorities for and provide direction to department leadership, and exercise oversight of department operations. This executive leadership is coupled with a management level organizational structure to ensure appropriate levels of responsibility and authority are being exercised and that staff are held accountable.

DPR maintains and documents an effective control system and complies with the State Leadership Accountability Act (SLAA). The department provides reports and updates to the SLAA Report bi-annually, performs ongoing monitoring throughout the year, and tracks important meetings and dates throughout the SLAA process in Excel.

Information and Communication

DPR uses multiple channels of communication to ensure meaningful, accurate information is communicated internally and externally. DPR convenes weekly executive team meetings, monthly management team meetings, quarterly manager and supervisor meetings, annual all staff meetings, and individual branch meetings as needed, to convey information throughout the department. Quarterly manager and supervisor meetings include an "open issues" segment to address any questions or concerns that managers or supervisors may have. This type of platform allows for new or ongoing concerns to be raised, addressed and/or discussed and ensures that relevant information is being

communicated across all levels of management. DPR also uses weekly CalEPA Senior Management Team meetings, weekly CalEPA Administrative Chiefs meetings, weekly CalEPA Chief Information Officers meetings, and biweekly CalEPA HR Chiefs meetings to raise issues and focus on objectives relevant to the Agency as a whole. These channels of communication ensure that relevant and necessary information is transmitted internally in an effective and timely manner throughout the year. Additionally, DPR utilizes internal email notifications to provide any relevant information to staff as it relates to information technology, human resources, and fiscal matters. DPR also subscribes to numerous lists and attends multiple interagency forums to stay up to date and aware of any changes that would affect the Department. These include updates from control agencies (e.g., Department of Technology, CalHR, and Department of General Services) and partner agencies (e.g., Natural Resources Agency and California Department of Food and Agriculture).

DPR shares important information to with its stakeholders through a variety of means. The most general source of information is the department's website, which provides news updates and reports data and other information. DPR also regularly hosts meetings with stakeholder groups, including the County Agricultural Commissioners and Sealers Association, non-governmental organizations, community-based organizations, and industry representatives, to provide opportunities for stakeholders to raise concerns and ask questions, and for the department to share updates on its activities and priorities. DPR also convenes several standing advisory committees that advise the department on a variety of issues, including licensing and certification, regulatory development, and grant programs.

The Department also provides mechanisms for employees to report impropriety within DPR and/or, inefficiencies and inappropriate actions to management and other decision makers. DPR is able to provide this through the Equal Employment Opportunity (EEO) Program led by DPR's EEO Officer. The EEO Officer is available to speak with employees to provide guidance and/or gather information to ensure that inappropriate actions are properly and thoroughly investigated. The EEO Officer also ensures that all DPR employees' behavior is consistent with the Department's EEO policies to ensure a safe and comfortable working environment. These policies include the EEO Administrative Directive, the No Harassment Administrative Directive and the Workplace Violence and Bullying Prevention Administrative Directive. The Department also utilizes the Health and Safety Suggestion Form, which gives employees the opportunity to make suggestions and recommendations concerning health and safety in the workplace. DPR also provides and requires mandatory Workplace Violence and Bullying Prevention Training (annually and upon hire) and Equal Employment Opportunity/Harassment Prevention Training (biennially and upon hire).

The multiple channels available for conveying information to both internal and external parties, as well as employees having the ability to report any improper behavior, provides a healthy flow of communication and information throughout DPR.

MONITORING

The information included here discusses the entity-wide, continuous process to ensure internal control systems are working as intended. The role of the executive monitoring sponsor includes facilitating and verifying that the Department of Pesticide Regulation monitoring practices are implemented and functioning. The responsibilities as the executive monitoring sponsor(s) have been given to: Julie Henderson, Director.

DPR engages in operational planning to ensure the effectiveness of its internal control systems and

evaluates the effectiveness of those systems using both routine and periodic reviews. The DPR operational planning process allows the Department to collect and communicate relevant and reliable information needed for operational, programmatic, and financial decision making. The Department's branch specific operational plans specify key performance goals selected from branch and executive office plans that will be conducted during a fiscal year. These goals that the Department identifies are classified into four types of work that are organized by their predictability and expected timeline of completion. The four primary types of work are routine, troubleshooting, special projects, and initiatives. DPR management uses these proposed goals and categories of work to establish tasks that need to be monitored on an ongoing basis.

The operational planning process begins in November with an executive management offsite meeting to identify potential near-term and longer-range planning issues. Meetings to discuss the Director's and department's priorities, expectations, and strategic plan objectives and goals for the upcoming fiscal year follow in February and March. From March through May, DPR develops draft operational plans which identify performance goals, as well as specific staff responsible for accomplishing those goals within a desired timeline. Operational plans are finalized in June. Upon completion, each operational plan provides guidance and is used as a reference for support in monitoring throughout the year.

In an effort to mitigate security risks, DPR's information security team manages an information security risk register. The team meets with information asset owners on a monthly basis to add new risks, review risk status, and plan mitigation. The Chief Information Officer (CIO) is provided with at least quarterly updates, or more frequently if risk level requires. DPR plans to initiate annual reviews of the information security risk register, so the CIO can keep the Executive Team informed of high risk items.

For medium or high information security risks, the information security team collaborates with Information Technology Branch partners and appropriate stakeholders to develop mitigation actions to reduce or eliminate risks. Examples of mitigation measures include: conducting security awareness training, phishing testing and training, and using hardware and software based security best practices or countermeasures.

DPR is also able to rely on knowledgeable internal auditing staff as well as external control agency audits for periodic and detailed reviews. Additionally, DPR utilizes executive management, middle management, and frontline management to monitor the progress of their staff to identify vulnerabilities. When expectations are not met with internal controls, DPR management addresses vulnerabilities and adjusts the internal control system as needed. This process is achieved by performing, documenting, and measuring the control against an expected result. If that result is not attained, then it is determined that the internal control requires changes.

RISK ASSESSMENT PROCESS

The following personnel were involved in the Department of Pesticide Regulation risk assessment process: executive management, middle management, and front line management.

The following methods were used to identify risks: brainstorming meetings, employee engagement surveys, ongoing monitoring activities, other/prior risk assessments, and questionnaires.

The following criteria were used to rank risks: likelihood of occurrence, potential impact to mission/goals/objectives, and timing of potential event.

DPR relies on executive, middle, and front line management to identify and assess any risks that could impact the Department. Throughout the risk assessment process, there are a number of methods that DPR utilizes to ensure that the risks with the highest likelihood of occurrence and the largest potential impact are included in the SLAA report. In order to identify any potential risks to DPR, an employee engagement survey is sent out to all managers and supervisors. This survey gives middle and front line management the opportunity to provide input on risks that they believe impact the Department. The results of this survey are analyzed in a series of brainstorming meetings with executive management.

At these meetings, the proposed risks from the survey are ranked by executive management using criteria to identify the risks with the highest likelihood of occurrence, risks with the highest potential level of impact, and risks with the earliest potential occurrence. Executive management reviews the highest-rated risks from the survey and also reviews the risks that are outstanding from the previous SLAA report. After all risks have been reviewed, executive management identifies the highest priority risks to include in the next SLAA report. Identified risks continue to be monitored over time.

RISKS AND CONTROLS

Risk: Communication and Engagement

DPR has observed a lack of awareness or inaccurate/incomplete understanding by some stakeholders and the general public of how the department regulates pesticides to protect human health and the environment. Specifically, DPR has seen a lack of understanding of the scientific evaluation of pesticides that occurs both prior to registration and on a continuing basis after registration as DPR considers new science or information.

Through workshops and various community meetings, DPR has observed a lack of awareness from some stakeholders and the public about the role of the department, its mission to protect human health and the environment, and specific actions the department takes as part of its core functions to achieve that mission. This includes how the Department makes determinations about whether and how pesticides may be used in California as well as how compliance with pesticide laws and regulations is promoted and enforced. Specific concerns have been raised about the association between pesticide use and cancers, health risks, and ecological impacts, and about illegal pesticide use due to the lack of enforcement.

Expanding education, outreach and awareness of DPR's roles and responsibilities, as well as those of its partner county agricultural commissioners, within community settings across the state has been challenging due to the following:

1. Lack of expertise, capacity and resources to reach the right audiences (staffing, experienced outreach and other leadership and staff focused on community engagement, outreach materials and tools).
2. Increasing number of stakeholder events outpacing existing leadership and staff's ability to attend.
3. Lack of funding to run paid advertising that may reach the communities outside of traditional earned media and DPR social media channels.
4. Messaging challenges based on deep seated assumptions regarding DPR's association with industry and role to "allow" and "support" pesticide applications despite community concerns.

A lack of awareness regarding the functions and responsibilities of DPR has created confusion within public settings regarding whether and how to report a pesticide incident as well as overall mistrust in the Department and the County Agricultural Commissioners (CACs). This has led some to a harmful assumption that DPR is working behind a wall of secrecy that pesticide laws and regulations are not enforced effectively, and that communities and their health are not protected.

Control: Increasing Leadership, Staffing, and Funding to Support Outreach

DPR is in the process of hiring an Assistant Director of Environmental Justice and Equity to help lead the department's community outreach efforts.

The department also is adding four limited-term positions to the department to help address and support community outreach and education, including two information officers to expand community engagement within the Office of Communication and Outreach, and two environmental scientists in the Environmental Monitoring Branch to help increase and improve engagement and facilitate understanding of DPR regulatory and scientific approaches. These positions should start in early 2022 and will increase bandwidth for attending community meetings and creating new materials and outreach tools to address the communications gap. Funding to support related outreach needs has also been provided to DPR on a two-year, limited term basis (\$1.0 million/year).

Control: Stakeholder Engagement Meetings

DPR has initiated regular stakeholder meetings to strengthen engagement, discuss stakeholder and department issues and priorities, inform messaging and outreach material needs to address the education and awareness gap, and identify messengers among stakeholder groups to encourage distribution of DPR materials and messaging.

Control: Updating DPR Messaging and Developing Proactive Media Relations and Outreach

DPR has updated messaging to describe the role it plays in evaluating pesticides for health or environmental risks, working with CACs to advance compliance and enforcement efforts and engaging with communities to address concerns, including messaging regarding the department's work to accelerate a transition to safer, more sustainable pest management. DPR has also been shifting to a more proactive media relations and outreach approach to ensure more messaging and stories related to DPR's work and priorities are distributed across the state. In addition, the department is increasing the story telling, visuals and videos that are shared across social media and other DPR-owned channels.

Risk: Staff Recruitment and Retention

DPR has made it a priority to examine recruitment efforts and monitor staffing levels to determine departmental hiring needs. DPR remains dedicated to hiring a qualified and diverse workforce while ensuring the development of existing talent. However, due to a variety of factors, it has been challenging to find qualified candidates, fill vacancies, and retain current staff. It has been difficult to find and recruit candidates with the required education and experience needed for many of DPR's complex and specialized roles. Additionally, DPR has lost key staff due to retirements, promotional

opportunities outside of the Department, and increasing workload demands. The loss of key staff risks the loss of needed capacity and valuable expertise, knowledge, institutional history, and in-depth understanding of tasks and programs. If DPR does not retain staff or fill vacancies in a timely manner, the department also risks failing to complete priority projects, missing important deadlines, and burning out existing staff. These risks will negatively affect operational flow. DPR will continue to prioritize recruitment and retention and seek new ways to mitigate these risks.

Control: Collaboration for Succession Planning

The Recruitment Specialist developed a survey to help elicit ideas for succession planning and transferring knowledge throughout the Department. The survey was sent to all DPR managers and supervisors and was used to start collecting information on current succession planning and knowledge transfer efforts and needs. The Recruitment Specialist analyzed the survey results to understand DPR's current succession planning practices as a department and the differences in approach within each branch. This information was used to facilitate a discussion between executive management, in which branch chiefs were encouraged to examine their existing efforts, share their experiences, and learn different strategies from each other. This discussion helped executive management better understand succession planning options and encouraged them to think of possible changes that they could incorporate, which is key to retaining employees and program knowledge.

Control: Internal and External Recruitment Outreach

The Recruitment Specialist developed a survey and set of interview questions to gather recruitment-related information from current DPR employees. The survey responses and interviews have helped the Recruitment Specialist identify schools, programs, and organizations for DPR to work with for recruitment purposes, and the Recruitment Specialist has contacted many of these entities to discuss upcoming events and potential ways to partner in recruiting efforts. The Recruitment Specialist has also held meetings with representatives from other Boards, Departments, and Offices (BDOs) within CalEPA to discuss recruitment and to identify other groups and organizations for DPR to connect with. Additionally, the Recruitment Specialist independently researches other schools, groups, and organizations to partner with on an ongoing basis to continually increase recruitment efforts. DPR has also aimed to increase efforts to reach more diverse groups. All of these efforts have helped DPR reach more potential qualified, diverse candidates and find more efficient and effective ways to recruit.

Control: Upward Mobility and Career Development

The Department's existing Upward Mobility (UM) guide is being reviewed with the intent to modernize and support a more robust UM Program to support the career development of employees in all pay classifications. In support of a revamped UM Program, release of the updated UM guide will be announced to all staff, and additional resources curated by the Human Resources Branch will be disseminated to staff on a more consistent basis to increase the knowledge and awareness of the career development support offered by the Department. With this increase of visibility, staff will be able to better utilize resources and opportunities to increase their skills and aid in their overall advancement. The Department's committed, prioritized efforts towards upward mobility and career development will provide more support to employees and increase their

satisfaction in working with the Department, which can aid in staff retention. The Department highlights its commitment to supporting employees and their career development as a recruitment strategy.

Risk: Expanded Scope of Programs with Static Funding

Since 2014, DPR has experienced a significant expansion in its workload as a result of new laws, regulations, and court orders. While DPR has obtained additional resources to support some of this work, many of these new mandates compete for resources that have been previously dedicated to the department's core work. This significant amount of unfunded work has increased demands on staff trying to manage already full workloads.

The additional work areas include, but are not limited to, federally mandated licensing Certification and Training requirements, increased Environmental Justice (EJ) initiatives and activities, and expanding DPR's outreach and education to be responsive to community groups.

The additional unfunded demands and mandates have challenged DPR's ability to effectively carry out its core mission and statutory mandate to protect human health and the environment through the regulation of pesticides and promotion of reduced risk pest management. The often unfunded expansion in scope of DPR's work has required existing programs and their staff to absorb and address new demands and directives while conducting their core work, stressing staff and their ability to timely complete that work.

Control: Streamlining and Improving on Processes Throughout the Department

DPR is continuing to explore streamlining and work process improvements throughout the department in order to free resources to work on new programs. DPR will be implementing this through additional staff training, temporary cross-program assistance, improved online databases, and staff retention. If these approaches do not adequately address workload capacity needs, the department will consider requesting additional resources to support unfunded programs.

Control: Evaluating DPR's Funding Structure

DPR collects a mill assessment on the sale of all registered pesticide products in California. The current mill assessment level has remained the same since 2004, notwithstanding the significant programmatic expansions noted above. As a part of the 2021-2022 state budget, DPR received \$1 million to fund a study to evaluate current and future funding needs for DPR and the local County Agricultural Commissioners, the existing structure and rate of the mill assessment, current and future revenues produced by that structure and rate, detailed options that incentivize the use of safer sustainable pest management practices across the state of California, and long-term sustainable funding that allows DPR to continue to fulfill its mission. DPR is in the process of awarding a contract for this work.

Risk: Evolving Security Threats and Privacy Protection

The Cal-Secure Plan released in this fiscal year by California Department of Technology (CDT), introduces an information security maturity roadmap for all state entities, resulting in increased security and technology requirements. There are a number of cybersecurity processes and capabilities outlined

in Cal-Secure that DPR has not currently implemented that require resources for implementation and maintenance. Beyond the costs of the new technologies, staff will be required to administer and monitor the technologies to appropriately respond to security alerts and incidents. Due to insufficient staffing, DPR already finds it difficult to meet the requirements of Cal-Secure and other existing information security mandates. The DPR security team currently has 4 positions (1 Information Security Officer and 3 Security Analysts). The team has been established for 2 years and is currently operating at full capacity.

The most recent CDT Information Security Program Audit (ISPA) conducted in Q1 2020 identified two DPR privacy-related audit findings, both rated as medium risk findings:

1. Privacy Impact Assessments (PIAs) have never been performed
2. DPR's Notice of Collection does not comply with the Statewide Information Management Manual SIMM 5310-A

DPR does not have sufficient resources to address the privacy findings. DPR established an information security team in 2019/20 fiscal year to address the findings in the independent security assessment (ISA) and on-going security operations needed at that time. The team is currently fully engaged with core security functions. The increasing demands and security requirements in the Cal-Secure Plan released in this fiscal year by CDT creates additional workload to the team. The team already finds it difficult to meet the existing and new requirements.

Overall, DPR IT resources are operating at full capacity, putting Cal-Secure and privacy workload out of reach. These workloads cannot be redirected to other IT staff without negatively impacting daily operations, support, and critical project work. If this department need is not addressed, DPR will continue to have increased privacy risks year after year. The average cost of a data breach for public sector entities is \$1.08M as highlighted in IBM's Cost of a Data Breach Report 2020. By having these ongoing risks not adequately addressed, DPR is put into a more vulnerable position for a breach in privacy.

Control: Task Prioritization and Funding for Privacy Officer

To address the privacy concerns, DPR prioritizes specific privacy related tasks to support the most important projects, but still falls short of meeting all requirements and remediating audit findings. DPR will explore submitting a BCP requesting funding for a full-time dedicated Privacy Officer after evaluating currently authorized positions and department-level funding. The Privacy Officer would lead and perform the Privacy Impact Assessment, update our Notice of Collection, and address any privacy concerns identified from the assessments and audits. The Privacy Officer would develop and maintain an effective Privacy Program as outlined in SAM 5310 which requires the establishment of a privacy program and SIMM 5310 which requires privacy assessments.

CONCLUSION

The Department of Pesticide Regulation strives to reduce the risks inherent in our work and accepts the responsibility to continuously improve by addressing newly recognized risks and revising risk mitigation strategies as appropriate. I certify our internal control and monitoring systems are adequate to identify and address current and potential risks facing the organization.

Julie Henderson, Director

CC: California Legislature [Senate (2), Assembly (1)]
California State Auditor
California State Library
California State Controller
Director of California Department of Finance
Secretary of California Government Operations Agency