



October 9, 2019

Via Electronic Mail

The Honorable Members of the California Public Employment Relations Board
c/o Kristina Gonzalez, Assistant to the Board
1031 18th Street
Sacramento, California 95811

In Regards to Comments On Proposed Regulations (October 10, 2019, Board Meeting)

Dear Board Members:

The California Public Employers Labor Relations Association (CALPELRA) is a professional California nonprofit association comprised of public sector professional management representatives responsible for carrying out the labor relations/human resource programs for their jurisdictions. CALPELRA's members work in city, county, or state government, school districts, community colleges, state university systems, trial courts, the judicial council, and special districts. Our members represent management in employee relations, bargaining, and other activities involving public employee unions and associations. We also serve lawyers and private consultants exclusively serving management in all facets of employer-employee relations.

As we noted in our previous comments submitted on the proposed regulations considered at the June 13, 2019, Board meeting, our members come from a variety of different public agencies and have a broad array of perspectives. One of CALPELRA's primary concerns is ensuring that regulations are clear and unambiguous so that all involved in the process understand the applicable rules and procedures. To avoid potential ambiguities, we offer the following comments/suggestions on the proposed revisions to section 32700:

1. Revise the language of subsection 32700(a)(3) to make it clear that the proof of support regulations do not supersede valid and reasonable local rules adopted pursuant to MMBA Government Code Section 3507.
2. Revise the language of subsection 32700(d)(4) to avoid any suggestion that subsection (d)(4)(C) allows proof of support without an employee signature. The introductory language of subsection (d)(4) clearly requires the list of employees to be a list of those "who have signed or electronically signed proofs of support, or provided a pdf, screenshot, or image demonstrating their signatures on such proofs of support" Despite this clear statement, the

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language of subsection (d)(4)(C) may create confusion, because it makes no explicit reference to a signature. One way to address this would be to revise the subsection (d)(4)(C) as follows: "Records showing that the signed proof of support contains the employee's name and a cellular phone number, email address, or home address, that the employer"

CALPELRA appreciates the Board and Staff's continuing efforts to clarify these regulations, and we thank you for the opportunity to provide input at this stage of the process.

Sincerely,



Janet Cory Sommer

CALPELRA Chief Executive Officer

cc: Ian Appleyard, CALPELRA Board President
Debra Boutté, CALPELRA Board President
Jennifer Curtis, Board Vice President
Thom Harpole, Board Secretary
Debra Gill, Board Treasurer
Aram Chaparyan, Board Member
Marguerite Malloy, Board Member
Brad Rankin, Board Member
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