

COMMONWEALTH OF PENNSYLVANIA

Julie L. Heintzelman : State Civil Service Commission
 :
 v. :
 :
 State Correctional Institution at Dallas, :
 Department of Corrections : Appeal No. 31568

Julie L. Heintzelman Suzanne Edwards
Pro Se Attorney for Appointing Authority

ADJUDICATION

This is an appeal by Julie L. Heintzelman challenging her annual Employee Performance Review (hereinafter “EPR”) for rating period February 2024 to February 2025, related to her position as a Corrections Counselor 2, regular status, for the State Correctional Institution at Dallas, Department of Corrections. A hearing was held on July 22, 2025, via video, before Commissioner Gregory M. Lane.

The Commissioners have reviewed the Notes of Testimony and exhibits introduced at the hearing, as well as the written argument of the appellant.¹ The issue before the Commission is whether appellant established her annual EPR for rating period February 2024 to February 2025 was motivated by discrimination.

¹ By letter dated September 23, 2025, the appointing authority notified the Commission that it was electing not to submit a written argument or Brief.

FINDINGS OF FACT

1. On February 26, 2025, appellant received her annual Employee Performance Review (hereinafter “EPR”) for rating period February 2024 to February 2025. Appellant received ratings of “needs improvement” for two factors—work results and work habits. Appellant received an overall rating of “satisfactory.” Comm. Ex. A.
2. On March 4, 2025, appellant signed her EPR, indicating she disagreed with the rating and would like to discuss the rating with her Reviewing Officer. Comm. Ex. A.
3. The appeal was properly raised before this Commission and was heard under Section 3003(7)(ii) of Act 71 of 2018. Comm. Ex. C.
4. Appellant is employed by the appointing authority as a Corrections Counselor 2. N.T. pp. 27-28.
5. In her role as a Corrections Counselor 2, appellant is responsible for updating inmate programming records in the appointing authority’s Vantage system. N.T. p. 201.

6. On her annual EPR for rating period February 2024 to February 2025, appellant received a “needs improvement” rating for work results based on her alleged failure to timely update the Vantage system. Comm. Ex. A (p. 2).
7. The Vantage system is the newest of several systems that track inmate programming. N.T. pp. 198-199.
8. There are critical functionality gaps in the Vantage system, most notable the inability for users to make changes to entries. N.T. pp. 128-129, 140-141, 202.
9. A joint labor-management subcommittee was formed to collaboratively resolve issues stemming from the transition to the Vantage system. N.T. pp. 141-142, 145-146; Ap. Ex. 9.
10. The subcommittee has been convening monthly since June 2024. N.T. pp. 141-142; Ap. Ex. 9.
11. Appellant is a member of the subcommittee. N.T. pp. 142, 148.

12. As of the issuance date of appellant's EPR, there were no policies related to the Vantage system. N.T. p. 148.
13. Other inmate information systems, such as ICAR, are governed by specific policies and standards for information updates. N.T. pp. 202-203, 207.
14. At no point during the February 2024 to February 2025 rating period were issues related to appellant's Vantage system entries discussed with her. N.T. pp. 128, 207-208.
15. At no point during the February 2024 to February 2025 rating period was any direction given to appellant regarding concrete deadlines for entering information into the Vantage system.
16. Appellant entered information into the Vantage system as soon as practicable. N.T. p. 203.
17. Management Directive 540.7, as amended, requires appellant's immediate supervisor develop and provide her with written performance standards and expectations at the start of the rating period and as work assignments dictate. MD 540.7, pp. 3, 6, 10.

18. The performance standards must be conveyed in writing. MD 540.7, p. 10.
19. Performance standards include three components: 1) the work to be accomplished; 2) how it will be measured; and 3) the expected level for success. MD 540.7, p. 2.
20. No performance standards were provided to appellant during the February 2024 to February 2025 rating period. N.T. pp. 57, 62-63, 81, 95, 95, 98, 100, 101, 125-127, 181.
21. Appellant only received an updated position description during the February 2024 to February 2025 rating period. N.T. pp. 62, 81, 127.
22. The updated position description does not contain qualitative or quantitative measures for assessing appellant's work performance. AA Ex. 2.
23. Management Directive 540.7, as amended, requires at least one semi-annual progress review to be conducted during the evaluation period. MD 540.7, pp. 3, 6-7, 11.

24. Management Directive 540.7, as amended, defines “progress review” as “[a]n assessment of the employee’s work performance that occurs at the mid-point for both annual and probationary evaluation periods.” MD 540.7, p. 3
25. Progress reviews may be in writing or oral. MD 540.7, p. 3.
26. If the progress review is completed orally, appropriate documentation of the discussion must be maintained by the supervisor. MD 540.7, p. 3.
27. No progress review was conducted with appellant during the February 2024 to February 2025 rating period. N.T. pp. 125-127.

DISCUSSION

The present appeal challenges appellant’s annual Employee Performance Review (hereinafter “EPR”) for rating period February 2024 to February 2025. This challenge could only be brought before this Commission through Section 3003(7)(ii) of Act 71 of 2018² (hereinafter “Act 71”) based upon an

² Act of June 28, 2018, P.L. 460, No. 71, § 1.

allegation of discrimination in violation of Section 2704 of Act 71. 71 Pa.C.S. §§ 2704, 3003(7)(ii). Specifically, appellant alleges procedural discrimination, as well as discrimination based on her labor union affiliation. Comm. Ex. B; Ap. Bf.

In an appeal alleging discrimination, the burden of presenting evidence in support of all allegations of discrimination lies with the appellant. *Nosko v. Somerset State Hospital*, 139 Pa. Commw. 367, 370-371, 590 A.2d. 844, 846 (1991). Accordingly, the sole question for determination by this Commission is whether appellant has presented sufficient evidence to establish her claims of discrimination. Section 2704 of Act 71 of 2018 provides:

An officer or employee of the Commonwealth may not discriminate against an individual in recruitment, examination, appointment, training, promotion, retention or any other personnel action with respect to the classified service because of race, gender, religion, disability or political, partisan or labor union affiliation or other nonmerit factors.

71 Pa.C.S. § 2704.

The provisions of Section 2704 are substantially the same as the provisions in Section 905.1 of Act 286 (71 P.S. § 741.905a), and both sections of the respective acts use virtually the same language.³ In applying this language, the courts have held these provisions address both “traditional” and “procedural”

³ Section 905.1 provides:

905.1 Prohibition of Discrimination—No officer or employe[e] of the Commonwealth shall discriminate against any person in recruitment, examination, appointment, training, promotion, retention or any other personnel action with respect to the classified service because of political or religious opinions or affiliations because of labor union affiliations or because of race, national origin or other non-merit factors.

71 P.S. § 741.905a.

discrimination. *Pronko v. Department of Revenue*, 114 Pa. Commw. 428, 439, 539 A.2d 456, 462 (Pa. Commw. Ct. 1988). “Traditional discrimination” encompasses claims of discrimination based on race, sex, age, or other non-merit factors. *Price v. Luzerne/Wyoming Counties Area Agency on Aging*, 672 A.2d 409, 411 n. 4 (Pa. Commw. Ct. 1996), citing *Pronko v. Department of Revenue*, 114 Pa. Commw. 428, 539 A.2d 462 (1988). “Procedural discrimination” involves a violation of procedures required pursuant to the Act or related Rules. *Id.* It also includes violations of Management Directives. *Bellew v. Com., State Civil Service Commission*, 543 A.2d 1266, 1268 (Pa. Commw. Ct. 1988).

Here, appellant has alleged both procedural and traditional discrimination. Comm. Ex. B; Ap. Bf. Appellant alleges several procedural violations related to Management Directive 540.7, as amended. Comm. Ex. B; Ap. Bf. Appellant also raises a traditional discrimination claim based on her labor union affiliation and use of leave under the Family Medical Leave Act (hereinafter “FMLA”). Comm. Ex. B; Ap. Bf.

In support of her claims, appellant testified on her own behalf and presented the testimony of two union business agents, Kimberly Yost⁴ and Steve Jarrell.⁵ The appointing authority presented the testimony of Corrections

⁴ Yost is a business agent with SEIU Local 668. N.T. pp. 235-236. Yost has held that position for approximately thirty-two years. N.T. p. 236. One of the shops assigned to Yost is the appointing authority. N.T. pp. 236-237.

⁵ Jarrell is a contract enforcement business agent with SEIU Local 668. N.T. p. 248. Jarrell is assigned to the statewide corrections committee. N.T. pp. 248-249. Jarrell is responsible for ensuring the employer does not commit any unfair labor practices, violate the contract, or engage in any anti-union behavior. N.T. p. 249.

Classification Program Manager (hereinafter “CCPM”) Wayne Inniss⁶ and Field Human Resource Officer (hereinafter “FHRO”) Jason Jordan.⁷ The Commission has reviewed the entirety of the evidence presented by the parties. The evidence relevant to this adjudication is summarized below, along with the Commission’s findings.

Appellant began her career with the appointing authority as a Drug and Alcohol Treatment Specialist. N.T. p. 30. On February 15, 2015, she was reclassified to her current position, Corrections Counselor 2. N.T. pp. 27-28, 30, 192. As a Corrections Counselor 2, appellant continues to serve as a treatment specialist. N.T. pp. 30-31.

In addition to her job duties, appellant holds leadership positions with the union, SEIU Local 668. N.T. pp. 32-33. Since 2018, appellant has served as the chief shop steward at the appointing authority. N.T. p. 32. In 2024, she was named chair of the union’s statewide corrections committee, a role which requires quarterly travel for statewide management meetings. N.T. p. 33. Appellant also currently serves on a joint labor-management subcommittee tasked with resolving issues stemming from the transition to Vantage, which is a new software system that tracks inmate programming. N.T. pp. 141-142, 145-146, 198-199; Ap. Ex. 9.

⁶ Inniss is employed by the appointing authority as a CCPM. N.T. p. 276. Inniss has held this position since June 2021 and worked for the Commonwealth since 2008. N.T. pp. 278-279. As a CCPM, Inniss oversees all areas that deal with inmate programming and their reentry into society, except for sex offender programming. N.T. p. 279. Inniss supervises forty employees, including appellant. N.T. p. 280. Inniss began supervising appellant in 2021. N.T. p. 280.

⁷ Jordan is employed by the Office of Administration as an FHRO. N.T. pp. 406, 409. Jordan has held this position for the past seven years and has worked for the Commonwealth for twenty-three years. N.T. p. 408. As an FHRO, Jordan provides HR services to the appointing authority. N.T. p. 410.

On February 26, 2025, appellant met with her supervisor, CCPM Wayne Inniss, to discuss her annual EPR for the February 2024 to February 2025 rating period. N.T. p. 99. This was the first time she met with her supervisor during the rating period to discuss her job performance. N.T. pp. 99, 367.

The EPR rated appellant on six job factors: 1) job knowledge/skills; 2) work results; 3) communications; 4) initiative/problem solving; 5) interpersonal relations/equal opportunity; 6) work habits. Comm. Ex. A. The five possible ratings for each factor were “outstanding,” “commendable,” “satisfactory,” “needs improvement,” and “unsatisfactory.” Comm. Ex. A. Appellant received ratings of “needs improvement” for two factors—work results and work habits. Comm. Ex. A (pp. 2-3); N.T. pp. 81, 195. For the remaining factors, appellant was rated “commendable” or “satisfactory.”⁸ Comm. Ex. A.

The work results factor measures the employee’s results in meeting established objectives, expectations, standards of quality, quantity, customer service, and timeliness, both individually and in a team. Comm. Ex. A (p. 2). A “needs improvement” rating for this factor reflects the employee “often has difficulty meeting expected quality, quantity, customer service, and/or timeliness standards.” Comm. Ex. A. (p. 2); N.T. p. 81. On the annual EPR at issue, appellant received a “needs improvement” rating for work results because she allegedly failed to update the Vantage system, in a timely manner, to reflect the treatment group status of inmates. Comm. Ex. A (p. 2); N.T. pp. 198-199.

⁸ The Commission will not review the factors for which the appellant was rated “commendable” or “satisfactory,” as there is no discernible harm associated with these ratings. Instead, our review will focus specifically on the “needs improvement” ratings in work habits and work results, as these two factors could negatively impact appellant’s career progression.

The Vantage system is in its second year of use and still has critical functionality gaps, most notable the inability for users to make changes to entries. N.T. pp. 128-129, 140-141, 202. Concerns regarding safety, program fidelity, and waiting lists related to the Vantage system have been a recurring topic in local and statewide union-management meetings. N.T. p. 140-141. In response, a joint labor-management subcommittee was formed to collaboratively resolve these issues. N.T. pp. 141-142, 145-146; Ap. Ex. 9. The subcommittee, of which appellant is a member, has been convening monthly since June 2024. N.T. pp. 141-142, 148; Ap. Ex. 9.

As of the issuance date of appellant's EPR, there were no specific policies governing the Vantage system. N.T. p. 148. Nor was appellant given any other direction as to the standards for updating information in the Vantage system. N.T. pp. 128, 207-208. Appellant testified she entered information into the Vantage system as soon as practicable and believed she was doing so correctly. N.T. pp. 203, 206.

Regarding appellant's work habits, this factor "measures [the] employee's performance relative to efficient methods of operation, customer service, proper conduct, speech, ethical behavior, and Commonwealth/agency/work unit policies and procedures, such as attendance, punctuality, safety, security, proper care and maintenance of assigned equipment, and economical use of office supplies." Comm. Ex. A (p. 3). A "needs improvement" rating for work habits reflects the employee: 1) frequently lacks organization and planning of work and does not adequately use available resources; and/or 2) often does not meet standards in complying with work policies/safety rules and/or care of equipment. Comm. Ex. A. (p. 3).

Here, appellant's work was not an issue. Comm. Ex. A (p. 3). The area noted as needing improvement was her attendance and punctuality. Comm. Ex. A. The comment under the work habits section of the EPR explained:

Ms. Heintzelman's work continues to be operationally effective. Attendance and punctuality were areas noted as needing improvement in the 2024-25 rating year. Ms. Heintzelman often struggled with arriving on time during the 2024-25 rating period. Attendance and punctuality will continue to be monitored during the 2025-26 rating period.

Comm. Ex. A. (p. 3); N.T. pp. 83-84, 131. No specific dates were provided to appellant in the EPR or during her subsequent meeting with the Reviewing Officer. N.T. pp. 133-134.

Appellant denied being tardy and asserted she had approved FMLA leave for intermittent absences. N.T. pp. 84, 162; Ap. Ex. 10. Appellant further testified her supervisor did not speak with her about her leave during the rating period. N.T. p. 210. Nor did she receive a progress review, indicating she was not meeting timeliness standards related to her leave entries. N.T. p. 84. With that said, appellant acknowledged she was disciplined for tardiness in May 2025, three months outside of the rating period at issue. N.T. p. 209; AA Ex. 7.

At the conclusion of appellant's case in chief, the appointing authority moved to dismiss the appeal for failure to establish a *prima facie* case. N.T. p. 272. Ruling on the Motion was deferred pending review by the full Commission. N.T. p. 273. Following a thorough review of the record, the Commission finds appellant has met her burden of establishing a *prima facie* case of procedural discrimination. The Commission further finds appellant has presented credible evidence supportive

of procedural discrimination and resolves all conflicts of evidence in favor of appellant.⁹ Accordingly, the appointing authority's Motion to Dismiss for failure to establish a *prima facie* case is hereby denied for the reasons set forth below.

To establish a claim of "procedural discrimination," the employee must show she was harmed because of the procedural noncompliance with the Act, or that, because of the peculiar nature of the procedural impropriety, she could have been harmed, but there is no way to prove that for certain. *Price, supra*. No showing of intent is required. *Price, supra*.

Appellant argues the appointing authority failed to adhere to certain standards which are mandatory for evaluating the performance of employees. Ap. Bf., pp. 2-8. Specifically, appellant asserts the appointing authority failed to provide her with written performance standards and did not conduct a progress review during the rating period as required under the Management Directives.¹⁰ Ap. Bf, pp. 2-8.

Management Directive 540.7, as amended, establishes the policies, responsibilities, and procedures for the Commonwealth's Performance Management Program, which includes all requirements related to performance standards and progress reviews. Performance standards and progress reviews are essential tools for setting expectations, monitoring progress, measuring results, appraising, and

⁹ It is within the purview of the Commission to determine the credibility of the witnesses. *State Correctional Institution at Graterford, Department of Corrections v. Jordan*, 505 A.2d 339, 341 (Pa. Commw. Ct. 1986).

¹⁰ The Commission takes administrative notice of the Management Directives relevant to the present matter, to include Management Directives 540.7, as amended (Performance Management) and 520.10 (Position Descriptions). *See Falasco, Commonwealth of Pennsylvania, Pennsylvania Board of Probation and Parole*, 104 Pa. Commw. 321, 326 n.6, 521 A.2d 991, 994 n.6 (1987) (holding an administrative agency may take official notice of facts which are obvious and notorious to an expert in the agency's field and those facts contained in reports and records in the agency's files, in addition to those facts which are obvious and notorious to the average person).

rewarding or correcting employee performance. As such, Management Directive 540.7 mandates the issuance of performance standards and the completion of mid-point progress reviews. The Commission finds the appointing authority failed to provide appellant performance standards and a mid-point progress review as required under Management Directive 540.7.

Pursuant to sections 6(c)(1) and 7(c)(1)(c)(2) of Management Directive 540.7, appellant's immediate supervisor¹¹ is responsible for developing and providing her with written performance standards and expectations at the start of the rating period and as work assignments dictate. MD 540.7, pp. 6, 10. The performance standards must be conveyed in writing. MD 540.7, p. 10. There is no exception. MD 540.7. The immediate supervisor is also required to maintain a record of the date the performance standards were conveyed. MD 540.7, p. 10. In conformance with these requirements, the EPR form¹² asks supervisors to note when the performance standards for the evaluation period were conveyed to the employee. Comm. Ex. A (p. 1). The performance standards should reflect the priorities emphasized on the EPR form and align with the appointing authority's plans and priorities. MD 540.7, p. 10.

Performance standards include three components: 1) the work to be accomplished; 2) how it will be measured; and 3) the expected level for success. MD 540.7, p. 2. Unlike performance standards, position descriptions generally do

¹¹ The Commission notes Section 6(c)(1) of Management Directive 540.7 uses the term "rater" when indicating who is responsible for developing and providing the written performance standards and expectations. MD 540.7, p. 6. Section 4(k) defines the term "rater" as the employee's immediate supervisor. MD 540.7, p. 3.

¹² The numerical designation of the EPR form, as referenced in the Management Directives, is Form 363L. See MD 540.7, pp. 10-12. The appointing authority used this form when completing the appellant's EPR for rating period February 2024 to February 2025. Comm. Ex. A.

not contain qualitative and quantitative measures for assessing the employee's performance.¹³ Indeed, Management Directive 540.7 addresses requirements related to each separately. MD 540.7, pp. 6, 10.

In addition to the guidance in the Management Directive, the Office of Administration offers additional resources to support supervisors in creating performance standards. One of these resources is the Performance Standards Planning Document, which consists of a blank form and instructions.¹⁴ The blank form provides a framework for supervisors to identify the key activities or responsibilities for each job factor, how the task will be measured, the approximate percentage of time the employee will spend on the task, and the priority.

The following example of performance standards is provided on the instructions page of the Performance Standards Planning Document:

| % | Priority | Key Activity or Responsibility | Performance Standard |
|-----|----------|---------------------------------------|----------------------------|
| 25% | 2 | A. Resolve customer service inquiries | within 48 hours of receipt |
| 5% | 5 | B. Prepare weekly progress report | with no more than 2 errors |

¹³ Management Directive 520.10 sets forth the policies, responsibilities, and procedures related to the development, maintenance, and utilization of position descriptions.

¹⁴ During her testimony, appellant misidentified the Performance Standards Planning Document as an attachment to Management Directive 540.7. N.T. pp. 108-109. The Performance Standards Planning Document, which includes a blank form and instructions, is a separate resource of which the Commission takes administrative notice. *See Falasco, supra*. Appellant included a copy of the form with her written rebuttal to the EPR. Ap. Ex. 8 (p. 8).

The Commission finds no such performance standards were provided to appellant during the February 2024 to February 2025 rating period. Appellant only received an updated position description, which does not contain any qualitative or quantitative measure for assessing her work performance. N.T. pp. 62, 81, 127; AA Ex. 2. Most notably, the position description does not set forth concrete deadlines related to the Vantage system. AA Ex. 2.

Furthermore, no other meaningful direction was provided to appellant during the rating period at issue by which she could address any perceived deficiencies. The lone email, dated January 16, 2025, sent by appellant's supervisor to all Corrections Counselor 2 employees, is insufficient. AA Ex. 5. This email was sent one month before the end of the rating period and merely reminded the employees of the importance of updating the Vantage system.¹⁵ N.T. p. 366; AA Ex. 5. There is no evidence appellant's supervisor provided corrective guidance specifically to appellant during the rating period or any concrete deadlines for updating the Vantage system. Indeed, he specifically acknowledged that he never provided such guidance. N.T. p. 367.

Adding to the lack of direction is the fact that a mid-point progress review was not conducted in accordance with Management Directive 540.7, as amended. Periodic progress reviews enable "supervisors and employees to dialogue about accomplishments, shortcomings, and opportunities." MD 540.7, p. 3.

¹⁵ CCPM Inniss testified the January 16, 2025 email was in response to multiple reports from the parole department that the information in the Vantage system was not current. N.T. pp. 293-294. Inniss did not specify who was responsible for the reported deficiencies. N.T. pp. 293-294. The appointing authority presented evidence of only one instance where appellant failed to update information in the Vantage system in a timely manner. AA Ex. 4. The single incident occurred in May 2023, which was outside the rating period at issue. AA Ex. 4. Although Inniss testified he disagreed with appellant's May 2023 actions, there is no evidence he conveyed this to her or provided her with different performance standards. N.T. p. 309; AA Ex. 4.

Pursuant to sections 5(b), 6(c)(2), 6(c)(3)(a)(6) and 7(e) of Management Directive 540.7, at least one progress review must be conducted during the rating period. MD 540.7, pp. 3, 6-7,11. Section 4(j) defines “progress review” as “[a]n assessment of an employee’s work performance that occurs at the mid-point for both annual and probationary evaluation periods.” MD 540.7, p. 3. Progress reviews may be in writing or oral. MD 540.7, p. 1. However, written progress reviews are encouraged. MD 540.7, p. 3. If the progress review is completed orally, appropriate documentation of the discussion needs to be maintained by the supervisor. MD 540.7, pp. 3, 11.

Appellant’s supervisor, CCPM Innis, considered a discussion he had with appellant in March of 2024, one month after the rating period began, to be her mid-point progress review. N.T. p. 339. Innis recalled observing one of appellant’s groups that month, after which he spoke to her about directives from Central Office that could pose challenges, such as violence prevention, high inmates, and increased waiting lists. N.T. pp. 338-339. There is no evidence Innis discussed appellant’s performance during this meeting. The record lacks any indication that the appellant was ever apprised of the appointing authority’s performance expectations, or that she was failing to meet them.

Based on the above, the Commission finds the appointing authority did not follow the proper procedural requirements for conducting mid-point progress reviews. This failure resulted in harm to the appellant because she lacked a meaningful opportunity to improve her performance. This lack of guidance was further compounded by the fact that she did not receive written performance standards or any other clear qualitative or quantitative measures for assessing her

work performance. Accordingly, the Commission finds these procedural violations resulted in an adverse employment action—the needs improvement ratings for work results on her EPR for rating period February 2024 to February 2025.

Having found procedural discrimination as detailed above, the Commission need not reach appellant’s remaining procedural discrimination claims related to her time and attendance, EPR review, or EPR rebuttal. It is also unnecessary to address appellant’s traditional discrimination claims based on her union affiliation and use of FMLA leave. Accordingly, the Commission enters the following:

CONCLUSION OF LAW

Appellant presented evidence establishing discrimination violative of Section 2704 of Act 71 of 2018.

ORDER

AND NOW, the State Civil Service Commission, by agreement of its members, sustains the appeal of Julie L. Heintzelman challenging her annual Employee Performance Review (hereinafter “EPR”) for rating period February 2024 to February 2025, related to her position as a Corrections Counselor 2, regular status, for the State Correctional Institution at Dallas, Department of Corrections. Further, the State Civil Service Commission overrules the action of the State Correctional

Institution at Dallas, Department of Corrections in the issuance of the EPR for rating period February 2024 to February 2025. The State Civil Service Commission orders the following:

1. Within thirty (30) calendar days of the issued date of this opinion, the EPR for rating period February 2024 to February 2025 shall be expunged from Julie L. Heintzelman's record.
2. Within thirty (30) calendar days of the issued date of this opinion, Julie L. Heintzelman shall be provided with performance standards for her Corrections Counselor 2 position.
3. Within thirty (30) calendar days of the issued date of this opinion, the State Correctional Institution at Dallas, Department of Corrections shall submit written notice of compliance with this Order to the Executive Director of the State Civil Service Commission.

State Civil Service Commission

Maria P. Donatucci
Chairwoman

Gregory M. Lane
Commissioner

Pamela M. Iovino
Commissioner

Issued: December 23, 2025