



**CIVIL SERVICE COMMISSION
CITY AND COUNTY OF SAN FRANCISCO**

**LONDON N. BREED
MAYOR**

Sent via Electronic Mail

November 21, 2024

NOTICE OF CIVIL SERVICE COMMISSION MEETING

**SUBJECT: FOLLOW-UP REPORT ON THE STATUS OF DE-IDENTIFICATION FROM THE
DEPARTMENT OF HUMAN RESOURCES.**

The above matter will be considered by the Civil Service Commission at a hybrid meeting (in-person and virtual) in Room 400, City Hall, 1 Dr. Goodlett Place, San Francisco, California 94102 and through Cisco WebEx to be held on **December 2, 2024, at 2:00 p.m.**

This item will appear on the Human Resources Director's Report. Please refer to the attached notice for procedural and other information about Commission hearings.

Attendance by you or an authorized representative is recommended. Should you or your representative not attend, the Commission will rule on the information previously submitted and testimony provided at its meeting. All calendared items will be heard and resolved at this time unless good reasons are presented for a continuance.

CIVIL SERVICE COMMISSION

LAVENA HOLMES
Deputy Director

Attachment

Cc: Carol Isen, Department of Human Resources
Kate Howard, Department of Human Resources
Anna Biasbas, Department of Human Resources
Dave Johnson, Department of Human Resources
Shawn Sherburne, Department of Human Resources
Lisa Pigula, Department of Human Resources
John Kraus, Department of Human Resources
Julia Ma, Department of Human Resources
Bill Miles, Municipal Transportation Agency
Kimberly Ackerman, Municipal Transportation Agency
Commission File
Commissioners' Binder
Chron

NOTICE OF COMMISSION HEARING POLICIES AND PROCEDURES

A. Commission Office

The Civil Service Commission office is located at, 25 Van Ness Avenue, Suite 720, San Francisco, CA 94102. The telephone number is (628) 652-1100. The fax number is (628) 652-1109. The email address is civilservice@sfgov.org and the web address is www.sfgov.org/civilservice/. Office hours are from 8:00 a.m. to 5:00 p.m., Monday through Friday.

B. Policy Requiring Written Reports

It is the policy of the Civil Service Commission that except for appeals filed under Civil Service Commission Rule 111A Position-Based Testing, all items appearing on its agenda be supported by a written report prepared by Commission or departmental staff. All documents referred to in any Agenda Document are posted adjacent to the Agenda, or if more than one (1) page in length, available for public inspection and copying at the Civil Service Commission office. Reports from City and County personnel supporting agenda items are submitted in accordance with the procedures established by the Executive Officer. Reports not submitted according to procedures, in the format and quantity required, and by the deadline, will not be calendared.

C. Policy on Written Submissions by Appellants

All written material submitted by appellants to be considered by the Commission in support of an agenda item shall be submitted to the Commission office, no later than 5:00 p.m. on the fourth (4th) business day preceding the Commission meeting for which the item is calendared (ordinarily, on Tuesday). An original copy on 8 1/2-inch X 11 inch paper, three-hole punched on left margin, and page numbered in the bottom center margin, shall be provided. Written material submitted for the Commission's review becomes part of a public record and shall be open for public inspection.

D. Policy on Materials being Considered by the Commission

Copies of all staff reports and materials being considered by the Civil Service Commission are available for public view 72 hours prior to the Civil Service Commission meeting on the Civil Service Commission's website at <https://sf.gov/civilservice> and in its office located at 25 Van Ness Avenue, Suite 720, San Francisco, CA 94102. If any materials related to an item on this agenda have been distributed to the Civil Service Commission after distribution of the agenda packet, those materials will be available for public inspection at the Civil Service Commission's during normal office hours (8:00 a.m. to 5:00 p.m. Monday through Friday).

E. Policy and Procedure for Hearings to be Scheduled after 5:00 p.m. and Requests for Postponement

A request to hear an item after 5:00 p.m. should be directed to the Executive Officer as soon as possible following the receipt of notification of an upcoming hearing. Requests may be made by telephone at (628) 652-1100 and confirmed in writing or by fax at (628) 652-1109.

A request for a postponement (continuance) to delay an item to another meeting may be directed to the Commission Executive Officer by telephone or in writing. Before acting, the Executive Officer may refer certain requests to another City official for recommendation. Telephone requests must be confirmed in writing prior to the meeting. Immediately following the "Announcement of Changes" portion of the agenda at the beginning of the meeting, the Commission will consider a request for a postponement that has been previously denied. Appeals filed under Civil Service Commission Rule 111A Position-Based Testing shall be considered on the date it is calendared for hearing except under extraordinary circumstances and upon mutual agreement between the appellant and the Department of Human Resources.

F. Policy and Procedure on Hearing Items Out of Order

Requests to hear items out of order are to be directed to the Commission President at the beginning of the agenda. The President will rule on each request. Such requests may be granted with mutual agreement among the affected parties.

G. Procedure for Commission Hearings

All Commission hearings on disputed matters shall conform to the following procedures: The Commission reserves the right to question each party during its presentation and, in its discretion, to modify any time allocations and requirements.

If a matter is severed from the *Consent Agenda* or the *Ratification Agenda*, presentation by the opponent will be for a maximum time limit of five (5) minutes and response by the departmental representative for a maximum time limit of five (5) minutes. Requests by the public to sever items from the [*Consent Agenda* or] *Ratification Agenda* must be provided with justification for the record.

For items on the *Regular Agenda*, presentation by the departmental representative for a maximum time of five (5) minutes and response by the opponent for a maximum time limit of five (5) minutes.

For items on the *Separations Agenda*, presentation by the department followed by the employee or employee's representative shall be for a maximum time limit of ten (10) minutes for each party unless extended by the Commission.

Each presentation shall conform to the following:

1. Opening summary of case (brief overview);
2. Discussion of evidence;
3. Corroborating witnesses, if necessary; and
4. Closing remarks.

The Commission may allocate five (5) minutes for each side to rebut evidence presented by the other side.

H. Policy on Audio Recording of Commission Meetings

As provided in the San Francisco Sunshine Ordinance, all Commission meetings are audio recorded in digital form. These audio recordings of open sessions are available starting on the day after the Commission meeting on the Civil Service Commission website at www.sfgov.org/civilservice/.

I. Speaking before the Civil Service Commission

Speaker cards are not required. The Commission will take in-person public comment on all items appearing on the agenda at the time the item is heard. The Commission will take public comment on matters not on the Agenda, but within the jurisdiction of the Commission during the "Requests to Speak" portion of the regular meeting. Maximum time will be three (3) minutes. A subsequent comment after the three (3) minute period is limited to one (1) minute. The timer shall be in operation during public comment. Upon any specific request by a Commissioner, time may be extended. People who have received an accommodation due to a disability (as described below) may provide their public comments remotely. The Commission will also allow public comment from members of the public who choose to participate remotely. It is possible that the Commission may experience technical challenges that interfere with the ability of members of the public to participate in the meeting remotely. If that happens, the Commission will attempt to correct the problem, but may continue the hearing so long as people attending in-person are able to observe and offer public comment.

J. Public Comment and Due Process

During general public comment, members of the public sometimes wish to address the Civil Service Commission regarding matters that may come before the Commission in its capacity as an adjudicative body. The Commission does not restrict this use of general public comment. To protect the due process rights of parties to its adjudicative proceedings, however, the Commission will not consider, in connection with any adjudicative proceeding, statements made during general public comment. If members of the public have information that they believe to be relevant to a matter that will come before the Commission in its adjudicative capacity, they may wish to address the Commission during the public comment portion of that adjudicative proceeding. The Commission will not consider public comment in connection with an adjudicative proceeding without providing the parties an opportunity to respond.

K. Policy on use of Cell Phones, Pagers and Similar Sound-Producing Electronic Devices at and During Public Meetings

The ringing and use of cell phones, pagers and similar sound-producing electronic devices are prohibited at this meeting. Please be advised that the Chair may order the removal from the meeting room of any person(s) responsible for the ringing or use of a cell phone, pager, or other similar sound-producing electronic devices.

Information on Disability Access

*** Temporary Wheelchair-accessible entrances are located on Van Ness Avenue and Grove Street. Please note the wheelchair lift at the Goodlett Place/Polk Street is temporarily not available. After multiple repairs that were followed by additional breakdowns, the wheelchair lift at the Goodlett/Polk entrance is being replaced for improved operation and reliability.**

The Civil Service Commission normally meets in Room 400 (Fourth Floor) City Hall, 1 Dr. Carlton B. Goodlett Place. However, meetings not held in this room are conducted in the Civic Center area. City Hall is wheelchair accessible. The closest accessible BART station is the Civic Center, located 2 ½ blocks from City Hall. Accessible MUNI lines serving City Hall are 47 Van Ness Avenue, 9 San Bruno and 71 Haight/Noriega, as well as the METRO stations at Van Ness and Market and at Civic Center. For more information about MUNI accessible services, call (415) 923-6142. Accessible curbside parking has been designated at points in the vicinity of City Hall adjacent to Grove Street and Van Ness Avenue.

The following services are available on request 48 hours prior to the meeting; except for Monday meetings, for which the deadline shall be 4:00 p.m. of the last business day of the preceding week. For American Sign Language interpreters or the use of a reader during a meeting, a sound enhancement system, and/or alternative formats of the agenda and minutes, please contact the Commission office to make arrangements for the accommodation. Late requests will be honored, if possible.

Individuals with severe allergies, environmental illness, multiple chemical sensitivity or related disabilities should call our ADA coordinator at (628) 652-1100 or email civilservice@sfgov.org to discuss meeting accessibility. In order to assist the City's efforts to accommodate such people, attendees at public meetings are reminded that other attendees may be sensitive to various chemical-based products. Please help the City to accommodate these individuals.

Know your Rights under the Sunshine Ordinance (Chapter 67 of the San Francisco Administrative Code)

Government's duty is to serve the public, reaching its decisions in full view of the public. Commissions, boards, councils, and other agencies of the City and County exist to conduct the people's business. This ordinance assures that deliberations are conducted before the people and that City operations are open to the people's review. For more information on your rights under the Sunshine Ordinance or to report a violation of the ordinance, or to obtain a free copy of the Sunshine Ordinance, contact Victor Young, Administrator of the Sunshine Ordinance Task Force, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA 94102-4689 at (415) 554-7724, by fax: (415) 554-7854, by e-mail: sotf@sfgov.org, or on the City's website at www.sfgov.org/bdsupvrs/sunshine.

San Francisco Lobbyist Ordinance

Individuals and entities that influence or attempt to influence local legislative or administrative action may be required by the San Francisco Lobbyist Ordinance (San Francisco Campaign and Governmental Conduct Code Section 2.100) to register and report lobbying activity. For more information about the Lobbyist Ordinance, please contact the San Francisco Ethics Commission at 25 Van Ness Ave., Suite 220, San Francisco, CA 94102, telephone (415) 252-3100, fax (415) 252-3112 and web site <https://sfethics.org/>.

Notifications

Carol Isen, Human Resources Director
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103
Carol.Isen@sfgov.org

Kate Howard
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103
Kate.Howard@sfgov.org

Anna Biasbas
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103
Anna.Biasbas@sfgov.org

Dave Johnson
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103
Dave.Johnson@sfgov.org

Shawn Sherburne
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103
Shawn.Sherburne@sfgov.org

Lisa Pigula
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103
Lisa.Pigula@sfgov.org

John Kraus
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103
John.C.Kraus@sfgov.org

Julia Ma
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103
Julia.F.Ma@sfgov.org

Bill Miles
Municipal Transportation Agency
1 S Van Ness Ave.
San Francisco, CA 94103
William.MilesII@sfmta.org

Kimberly Ackerman
Municipal Transportation Agency
1 S Van Ness Ave.
San Francisco, CA 94103
Kimberly.Ackerman@sfmta.org



DATE: November 21, 2024

TO: Honorable Civil Service Commission

THROUGH: Carol Isen, Human Resources Director
Anna Biasbas, Employment Services Director

FROM: Dave Johnson, Assistant Director of Employment Services, Retired
Shawn Sherburne, Assistant Director of Employment Services
Lisa Pigula, Assistant Director of Employment Services

SUBJECT: **Report on the Status of De-Identification**

Executive Summary

This report discusses the Department of Human Resources' (DHR) decision to rescind its 2019 policy on the implementation of de-identification (de-ID); and provides rationale for the Civil Service Commission (CSC) to retain authorization for posting score reports as specified in the rules in Volumes I and IV. The report concludes that:

- a comparison of the demographics (race/ethnicity and sex) of the City workforce to the demographics of the 11 Bay Area counties provided a clear assessment, classification by classification, of where the City workforce is under- and over-represented relative to the Bay Area labor market;
- the evidence demonstrates that the City workforce closely reflects the diversity found in its applicant pools;
- only a small subset of recruitments provide data to enable a comparison of pre- and post-de-ID efforts since the 2018 implementation of the de-ID program, and that data did not show any significant effect of de-ID on increasing diversity;
- in alignment with the CSC record retention policy, data is no longer available to enable a comparison of pre-de-ID recruitments against post-de-ID recruitments.

As discussed in this report the implementation of de-ID has:

- not produced any significant increase in diversity in hiring;
- resulted in extra manual work for Human Resources staff citywide;
- precipitated delays in the hiring process.

Rescission of the DHR policy on the implementation of de-ID will result in eliminating:

- The requirement to include a minimum qualification supplemental questionnaire (MQSQ);
- The notice to eligibles regarding the MQSQ;
- Redaction of information from application materials including those for hiring manager review.

Finally, this report notes that several major metropolitan public sector jurisdictions cited in a previous report continue to not publicly post the names of eligibles. The practice aligns with restrictions in the public education system governing publicly posting students grades and wishes of candidates to remain anonymous.

Background

The Board of Supervisors issued Resolution No. 145-16 in April 2016 requesting that DHR analyze strategies and create a plan to reduce the effect of implicit bias in the hiring process for City employment. DHR and City departments agreed that the Post-Referral Selection Process (PRSP) was the optimal point in the hiring process for targeted intervention, as a review of relevant research conducted at the time indicated that implicit bias comes into play most often when hiring managers are deciding whom to interview.

On September 17, 2018, the CSC adopted amendments to Volume I – Miscellaneous Classifications of its rules to provide for de-ID in the hiring process.

The City implemented the de-ID process on October 15, 2018, to remove demographic information and indicators from candidate profiles, including no longer publicly posting eligible lists with names. Instead, examination score reports are posted with aggregated counts of candidates at each score and rank. Information such as names, addresses, names of schools attended, and other identifying information is redacted from the view of hiring managers when screening down to determine whom to interview or to advance to the selection phase. These identifiers can suggest information about an applicant's race, ethnicity, gender, age, nationality, and other demographics, which are not necessarily job-related and can trigger unconscious bias in the selection and hiring processes. The intended outcome was to eliminate information that can result in conscious or unconscious bias, and instead ensure hiring managers base interview selections on job-relevant criteria, such as experience, training, and educational achievement.

This report is the sixth since the 2018 implementation of de-ID. Previous reports provided information regarding the effect of de-ID on Classification-Based Testing (CBT) recruitments. As discussed in those reports, very few recruitments met the criteria initially established for the first analysis of data in 2019 (50 or more eligibles on the list and at least five hires made from the list), and data from those recruitments showed no significant changes to the demographics of the City workforce in the five years since the implementation of de-ID. Recent reports concluded that de-ID was not accomplishing the intended goal of increasing diversity in the workforce but was presenting a barrier to expeditious hiring.

The focus of DHR's reporting has been the comparison of demographic outcomes across recruitments within the same classification which occurred pre- and post-de-ID. To assess the intended outcomes of de-ID, DHR tracked post-de-ID CBT recruitments with 50 or more eligibles on the list and at least five hires made from the list. These criteria were applied because assessment of larger candidate pools with more hires provides more meaningful information on any changes in the diversity as candidates move through the selection process.

DHR identified in the report to the CSC on February 3, 2020, seven CBT eligible lists posted after the launch of de-ID and projected to expire by December 31, 2019. City departments were asked to indicate the method used to select candidates to interview for these seven recruitments along with the “comparison” recruitments that were conducted prior to the launch of de-ID.

DHR focused on the initial referrals for these recruitments because there are more positions citywide tied to an initial referral. This results in more reachable eligibles and could prompt a “screen down” as it may not be feasible to interview a high number of reachable eligibles. Analysis of data pre- and post-de-ID showed an increase in diversity in the pool of candidates invited to interview in only two of the seven CBT recruitments.

DHR identified in its report to the CSC on November 15, 2021, 12 CBT eligible lists posted after the launch of de-ID. DHR again applied a threshold of including only the post-de-ID CBT recruitments with 50 or more eligibles on the list and five or more hires made from the list. City departments were instructed to provide DHR with data on these 12 recruitments along with comparison recruitments that were conducted prior to the launch of de-ID. Although this 2021 report concluded that since the implementation of de-ID, the City has seen an increase in diverse representation in the interview process, and that overall de-ID has contributed in a positive way in regards to diversity, the small sample of recruitments available for comparison render that conclusion insignificant and raised the question as to whether the additional staff time to implement de-ID is of value to the City.

DHR identified in the report to the CSC on December 5, 2022, 37 eligible lists posted after the launch of de-ID and which were expired. DHR again applied a threshold of including only the post-de-ID CBT recruitments with 50 or more eligibles on the list and five or more hires made from the list. City departments were asked to provide DHR with data on these 37 recruitments along with comparison recruitments that were conducted prior to the launch of de-ID. DHR determined based on responses from City departments that a de-ID process was used in only three of the 37 recruitments. This 2022 report concluded that while there were incremental positive changes in representation of classes across the three recruitments, the impact on each class was insignificant. Analysis of the gender and race/ethnicity composition of the three classes across the five fiscal years suggested that the implementation of de-ID has had minimal to no effect on diversifying the composition of the City workforce. Analysis of the “city-wide” demographic data across a five-year period similarly provided only minimal support for a positive effect due to de-ID.

DHR identified in its November 20, 2023 report to the CSC, ten CBT eligible lists across five classifications. These lists met the criteria of 50 or more eligibles and five or more hires made from the list. City departments were instructed to provide DHR with data on these ten recruitments along with comparison recruitments that were conducted prior to the launch of de-ID. This time there was no de-IDed screen down used for any of the “qualified” recruitments and consequently no comparative data for measuring the effect of de-ID on diversity.

Analysis across the six-year span of these reports provides no evidence of de-ID having any significant effect on diversity. In accordance with the CSC’s Record Retention Policy specifying that requisite data is retained for five years, there is no comparative data of pre-de-ID recruitments to analyze in this report.

Instead, DHR explored the demographic composition of the City’s workforce (38,262 employees) versus the demographics of the available labor force in the 11 Bay Area counties (hereinafter referred to as “County Data”), and in San Francisco. The source of the County data is the Census Bureau labor pool data from the 2022 American Community Survey estimates. The study is founded on available data and caution must be taken as any conclusions are only as good as the responses received to the survey. Relying on data aggregated across the 11 counties somewhat addresses this issue. At the direction of Human Resources Director Isen, DHR also looked at the demographics of the City’s workforce versus the applicant pool.

Analysis

The comparison of the City workforce demographic data versus the 11 Bay Area counties was a multistep process. It was necessary to first align each of the 939 classifications involved in the study¹ with one or more of the 525 job categories cited in the County data. Some City classifications aligned with multiple County data categories because the County data categories are more specific. For example, the 182X Administrative Analyst series was aligned with categories under both the “Business” and “Finance” categories. And the wide variety of work scopes in the City’s 09XX management classification series aligned with 15 categories under “Manager”. In these instances, the County data was aggregated for comparison to specific City classifications. There was no corollary County data for 29 of the 939 City classifications.

The study compared the relative percentages of demographic categories in the City classifications against the County data to ascertain whether the City workforce was under- or over-represented in relation to that County data. While underrepresentation is the primary target of de-ID, overrepresentation is also important to fully understand the comparative demographics of the workforce. Table 1 below shows the number of classifications in which a category is under- versus over-represented, the relative percentage of under- and over-representation, the number of classifications in which the under-representation is less than 5% (minimally significant), and the number of classifications in which adding one incumbent would flip the under representation to parity or over-representation (“Insignificant”):

¹ The 939 classifications resulted from a query of Class, race, and sex in PeopleSoft.

Table 1

Category	Representation vs Greater Bay Area Labor Force					
	Under	% Under	Over	% Over	Less than 5%	Insignificant
Native American/Alaskan Native	4	4.08%	94	95.92%	4	4
Asian	126	18.86%	542	81.14%	53	53
Black	83	15.43%	455	84.57%	43	29
Filipino	97	20.95%	366	79.05%	52	35
Hispanic	376	62.05%	230	37.95%	88	80
Multiracial	115	42.28%	157	57.72%	83	29
Pacific Islander/Native Hawaiian	9	20.45%	35	79.55%	9	6
White	414	55.13%	337	44.87%	62	99
Female	155	47.84%	169	52.16%	48	12

It is evident based on the analysis, that Hispanics and Whites are the most under-represented in City classifications relative to the County data. All other groups are more often over-represented than under-represented.

DHR recognizes the limited utility of comparing the demographics of the available labor force in the 11 Bay Area counties. Although the comparison is informative, the fact is that the job markets and the populations attracted by those job markets vary widely across the 11 counties, and the expectation that San Francisco could attract and hire a labor force that reflects those demographics is perhaps not realistic.

As mentioned previously, the study endeavored to examine the demographics of the City workforce against the available labor force in San Francisco. This effort was abandoned upon noticing significant issues with the data again likely based on who responded to the survey. For example, data for “firefighters” showed 260 white males, 79 Hispanic females, and 61 multiracial males. All other race groups were zero. Data for “human resources assistants” showed 102 White females with all other race groups again at zero. Anomalies such as these negated comparison to the SF labor force and limit the significance of any conclusions reached, but the aggregation of the data across the 11 counties does tend to minimize the effect of the sampling discrepancies.

Finally, the study compared the demographics of the City workforce against the demographics of over 1.25 million “City” job applicants who self-identified with regard to race and/or gender. The representation in the pool of applicants for specific classifications was compared to the workforce representation in the classification. Table 2 below reflects the results of this comparison.

Table 2

Category	Correlation
American Indian / Alaskan Native	0.112
Asian	0.822
Black	0.772
Filipino	0.773
Hispanic	0.572
Multiracial	0.166
Pacific Islander / Native Hawaiian	0.106
White	0.833
Race/Ethnicity Aggregated	0.885
Female	0.909
Male	0.912
Sex Aggregated	0.907

An examination of 2,702 instances of representation of a race category in both pools yielded a correlation of 0.885. A similar examination of 676 instances of representation of females and males in both pools (applicants and workforce) yielded a correlation of 0.907. Although there is no evidence to indicate that de-ID has had any effect on increasing diversity, both of the above statistics are strong evidence (correlation statistics range from -1.0 to +1.0) that the City hires in a way that closely reflects the demographic composition of its pool of applicants without use of de-ID tools. The correlation statistics for American Indian/Alaskan Native, Multiracial, and

Pacific Islander/Native Hawaiian are positive but minimal as expected given the extremely low numbers across the board (the percentage representation is often less than 0.1). Also, American Indian/Alaskan Natives have representation in both pools in only 25% of the classifications in the study. That statistic for Multiracial is 65%, and for Pacific Islander/Native Hawaiian is 38%. Those three categories are most often represented in the applicant pool (a count of one or two), but not in the workforce. The probability of being hired at that representation is extremely low.

Discussion

As stated above, only a few recruitments provided comparative data for measuring the effect of de-ID on diversity since program implementation in 2018. Analysis across the span of these reports provides no evidence of de-ID having any significant effect on diversity. In accordance with the CSC Record Retention Policy, there is now no available comparative data for recruitments conducted prior to the implementation de-ID.

Additionally, while the applicant tracking system can remove identifying information from the standard application, City Departments and the DHR Employment Services team report that supplemental information provided by candidates in the post referral selection process must be manually redacted. For lists with large pools of eligibles, this is labor intensive and provides a barrier to expeditious hiring further contributing to the challenges the City faces in staffing its workforce.

Another barrier to expeditious hiring is the minimum qualification supplemental questionnaire (MQSQ). This questionnaire was introduced to provide a means for responding to a candidate challenging standing on a list even though candidates on the list were not publicly identified. Upon request, a candidate could review answers to the MQSQ wherein candidates self-certified how they met the minimum qualifications. Since the inception of the de-ID program, DHR is aware of exceedingly few instances of such requests. The MQSQ requires staff time and creates an unnecessary barrier for candidates to advance in the selection process as candidates that do not

respond to the questionnaire are not placed on eligible lists. For these reasons, the MQSQ runs counter to City efforts to expedite hiring and to be an employer of choice.

DHR is also aware that departments will sometimes simply interview all reachable eligibles to avoid de-ID even though this extends the hiring process.

There is utility in continuing to post score reports that do not contain names of eligibles. In particular, some candidates request to remain anonymous so that current employers do not become aware they are pursuing other job opportunities and so that others cannot see their exam score. DHR has received inquiries from candidates that found their names publicly posted and expressed concern that their employer could also see their candidacy, which could result in tension in the workplace. Even though they already lost their anonymity, these candidates requested to be completely removed from the respective eligible list(s) and to forfeit future job referral opportunities. Posting score reports without names mitigates this issue.

Another example where posting score reports mitigates issues relates to the practice of aligning the lowest score in the pool with 700 points and the highest score with 1,000 points (1,060 with promotive points). The perception is that there is a significant difference between the candidates at the bottom and at the top. The reality can be much different as very close raw scores are adjusted to the new scale. Although the practice is psychometrically sound, the public perception is a huge difference in ability which can be devastating to candidates at the bottom of the list. Also, current City employees in the position as exempt who test for the permanent position may be embarrassed or worry about the impact on their working relationships if their colleagues see they scored “low”. In summary, the posting of names on eligible lists can have a chilling effect on application rates which is counter to the City’s efforts to increase hiring.

DHR, in its March 19, 2018 CSC report, cited five major metropolitan agencies (Los Angeles County, Orange County, Alameda County, Sacramento County, and the City of San Jose) that do not publicly post eligible lists. An online review of these agencies did not show that any of those agencies have changed that practice. Also, in that 2018 report, DHR discussed the similarity of educational institutions not publicly posting student grades. Under the Family Educational Rights and Privacy Act (FERPA), educational institutions are prohibited from publicly posting grades by the student's name, student identification number, or social security number without first obtaining each student's written permission. The comparative agency review and the similar nature of FERPA further support continuing to post score reports rather than eligible lists.

Conclusion

To summarize:

- a comparison of the demographics (race/ethnicity and sex) of the SF workforce to the demographics of the 11 Bay Area counties provided a clear picture classification by classification of where SF is under- and over-represented relative to that wider demographic
- there is strong evidence that the City workforce closely reflects the diversity found in its applicant pools
- only a few recruitments provided data to enable a comparison of pre- and post-de-ID efforts since the 2018 implementation of the de-ID program

- the available data did not show any significant effect of de-ID on increasing diversity
- in alignment with the CSC record retention policy there is no longer data available to enable a comparison of pre-de-ID recruitments against post-de-ID recruitments
- the implementation of de-ID has necessitated extra manual work for Human Resources staff citywide
- the implementation of de-ID process has resulted in delays in hiring

Based on these findings, DHR is rescinding the de-ID policies specified in its July 24, 2019 CSC staff report (Attachment A). Specifically, DHR will rescind the:

- requirement to include a minimum qualification supplemental questionnaire (MQSQ)
- notice to eligibles regarding the MQSQ
- redaction of information from application materials

Research supports that major metropolitan public sector jurisdictions in California do not publicly post the names of eligibles, and this protection of confidentiality aligns with educational statutes regulating public posting of student grades. DHR recommends that the CSC retain the rules in volumes I and IV that authorize posting score reports without the names of eligibles.

In the interest of maintaining transparency to both City employees and the general public, DHR will continue to publicly post the names and ranks of individuals who are hired to permanent positions. This posting is found at: [Permanent Civil Service Appointments | Department of Human Resources](#).

The expectation continues to be that the City and County of San Francisco attract (through its applicant pools) and hire (through an unbiased, merit-based process) a workforce reflective of the community's demographics. DHR is still fully committed to diversifying the City workforce and is continuing to reach out to diverse candidates through the Career Center at City Hall. This includes offering free one-on-one career counseling services and workshops to help jobseekers understand the City's Civil Service hiring process and learn how to apply for City jobs. DHR's Diversity Recruitment Team keeps diverse job seekers informed about the City's in-demand job opportunities through collaboration with community organizations and through active participation in career fairs at local colleges and in diverse San Francisco communities.

DHR's Workforce Development Team operates career pipeline programs including the San Francisco Fellows program and numerous apprenticeship programs. These programs provide diverse and underrepresented populations the opportunity to gain paid, on-the-job training and work experience that qualifies them for entry-level classifications in the City's skilled crafts and trades, IT, and administrative analyst jobs. DHR will also continue to require annual training in recognizing and mitigating implicit bias in the hiring process.

Recommendation

DHR respectfully recommends that the Commission adopt this report on de-ID and remove it from the list of annual reports submitted by DHR.

Attachment A: July 24, 2019 CSC Staff Report on De-ID



CIVIL SERVICE COMMISSION

CITY AND COUNTY OF SAN FRANCISCO

CIVIL SERVICE COMMISSION REPORT TRANSMITTAL (FORM 22)

Refer to Civil Service Commission Procedure for Staff - Submission of Written Reports for Instructions on Completing and Processing this Form

1. Civil Service Commission Register Number: 0182 - 19 - 1
2. For Civil Service Commission Meeting of: August 5, 2019
3. Check One:
 - Ratification Agenda
 - Consent Agenda
 - Regular Agenda
 - Human Resources Director's Report X
4. Subject: Report on the Status of De-Identification in the Selection & Hiring Process
5. Recommendation: Adopt the Report.
6. Report prepared by: Anna Biasbas Telephone number: 415-557-4806
7. Notifications: **(Attach a list of the person(s) to be notified in the format described in IV. Commission Report Format -A).**
8. Reviewed and approved for Civil Service Commission Agenda:

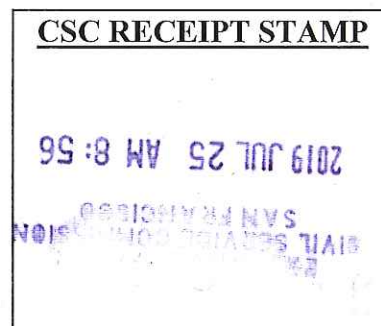
Human Resources Director: [Signature]

Date: 7/24/19
9. Submit the original time-stamped copy of this form and person(s) to be notified (see Item 7 above) along with the required copies of the report to:

Executive Officer
Civil Service Commission
25 Van Ness Avenue, Suite 720
San Francisco, CA 94102

10. Receipt-stamp this form in the ACSC RECEIPT STAMP box to the right using the time-stamp in the CSC Office.

Attachment



Notifications

Micki Callahan, Human Resources Director
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103

Kate Howard
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103

Susan Gard
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103

Anna Biasbas
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103

Stephanie Mayorga-Tipton
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103

Shawn Sherburne
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103

William Miles II
Department of Human Resources
1 S Van Ness Ave., 4th Floor
San Francisco, CA 94103



DATE: July 24, 2019

TO: Honorable Civil Service Commission

THROUGH: Micki Callahan *we*
Human Resources Director

FROM: Anna Biasbas
Employment Services Director

SUBJECT: Report on the Status of De-Identification in Selection and Hiring Processes

Executive Summary

This report provides a summary of DHR's implementation of de-identification rule changes adopted by the Commission effective October 15, 2018, as well as an update on the results of that implementation.

The report recommends adjusting timelines to start Quarter 3 of Fiscal Year 2019-20 and require semi-annual reporting thereafter.

Background

The City and County of San Francisco (City) is an equal opportunity employer, deeply committed to ensuring employees are hired based on merit, and without discrimination. The City shares a commitment to a diverse, inclusive and equitable community. To further this commitment and to move the City's diversity and inclusion efforts forward, the Board of Supervisors issued a Resolution in April of 2016 (Res. No. 145-16) requesting the Department of Human Resources (DHR) to analyze strategies and create a plan to reduce implicit bias in the hiring process for City employment. The Resolution specifically directed DHR to include modifying resume-review systems so that they do not reveal candidates' names, addresses, or graduation years, which can provide signals about race, ethnicity, gender, age, and nationality.

Following the passage of the Resolution, DHR began discussions with our applicant tracking system vendor to determine what would be required in order to have the system provide automated redaction of identifying information. DHR also met with departments to determine when de-identification would make the most sense from a processing perspective. Through these discussions, we determined Human Resources analysts still need to know the identities of candidates so they can review employment information and verify and apply promotional and veteran's preference points. Departments agreed that the Post-Referral Selection Process (PRSP) was the best place for de-identification, as research has shown that implicit bias comes into play most often when hiring managers decide whom to interview.

These efforts led to the City's focus on de-identifying applicant information such as names, addresses, names of schools attended, and other identifying information during list adoption and through PRSP. These identifiers can provide information about an applicant's race, ethnicity, gender, age, nationality and other demographics which can trigger unconscious biases in selection and hiring processes. By de-identifying this information, job-related

criteria such as experience, training and education are the main factors considered in determining the most qualified candidates to move forward in the hiring process.

As part of the City's overall hiring modernization project, beginning in July of 2017, DHR began reviewing Civil Service Commission (Commission) rules for Volume I Miscellaneous Classes with a focus on providing rule clarity, consistency and modernization. We identified rules that conflicted with the intended purpose of de-identifying application information in the PRSP. DHR's findings and recommendations were presented and discussed thoroughly at numerous Committee on Policy Procedures and Rules (COPAR) meetings and working group sessions and forums between December 2017 and February 2018. Also, all unions were invited to informational meetings regarding hiring modernization. For the unions that accepted, DHR held meetings on the following dates:

- ☐ October 11, 2017: SEIU Registered Nurses, SEIU 1021 Misc., Local 39, and MEA
- ☐ November 14, 2017: SEIU Registered Nurses, SEIU 1021 Misc., Local 21 and Local 39
- ☐ December 13, 2017: SEIU Registered Nurses, SEIU 1021 Misc., Local 6, Local 21, and MEA
- ☐ January 18, 2018: SEIU Registered Nurses, Local 6, Local 1414, Local 21, Local 22, Local 38, and MEA

On January 22, 2018, de-identification was introduced at the Commission meeting as a discussion item. DHR presented a proposal to de-identify application information when hiring managers filter the number of candidates to be interviewed. We also introduced the concept of confidential eligible lists whereby eligible lists would no longer be publicly posted. This would ensure hiring managers didn't see the names of candidates through a publicly posted eligible list.

DHR continued to hold meetings with departments and unions. For transparency in the hiring process, DHR also developed a webpage which would report the names of individuals hired from eligible lists for public information. Additionally, DHR held four focus group meetings in February 2018 with HR staff from a number of departments to better understand the business needs for a successful launch. DHR also met with Local 21 leadership on April 18, 2018 and presented at SEIU Town Halls on March 1, 2018 and April 19, 2018 to discuss the proposed de-identification process. These discussions resulted in a May 2018 staff report to the Commission on de-identification in the PRSP.

The Commission's Executive Officer and staff, along with DHR representatives, held six meet and discuss sessions regarding the proposed rule amendments between May 17 and June 26, 2018. The sessions allowed unions, individual employees, and other stakeholders the opportunity to engage in discussion about the proposed changes. With feedback from stakeholders, the Commission posted additional amendments to the Civil Service rules in August 2018. On September 17, 2018, the Commission adopted Civil Service rule amendments in support of de-identification in the hiring process, to be effective October 15, 2018.

With these rule changes, DHR began implementing the de-identification process including no longer publicly posting eligible lists with names. Instead, an examination score report is posted with an aggregate count of candidates at each score and rank. Additionally, DHR launched system de-identification functionality and an online Permanent Civil Service (PCS) hiring database on the DHR webpage. Lastly, DHR trained human resource staff throughout the City on the process and system changes necessary to implement de-identification for miscellaneous employees. The trainings focused on de-identification of application information in the examination process and PRSP. Over 230 citywide HR staff, from 39 different departments, attended the training sessions.

On October 15, 2018, the City officially implemented the rule changes and launched de-identification.

Process Implementation

On October 15, 2018, the updated Civil Service rules took effect. As a result, all permanent examination announcements posted on or after October 15, represented under Volume I of the rules, included new language regarding the posting of examination score reports:

A confidential eligible list of applicant names that have passed the civil service examination process will be created, and used for certification purposes only. An examination score report will be established so applicants can view the ranks, final scores and number of eligible candidates. Applicant information, including names of applicants on the eligible list, shall not be made public unless required by law. However, an eligible list shall be made available for public inspection, upon request, once the eligible list is exhausted or expired and referrals resolved. The eligible list/score report resulting from this civil service examination process is subject to change after adoption (e.g., as a result of appeals), as directed by the Human Resources Director or the Civil Service Commission.

Examination score reports replaced publicly-available eligible lists. After each examination is complete, a score report is posted publicly during the Review of Ratings period. Score reports display only the final scores and ranks, and the number of individuals at each rank; no names are displayed. However, in accordance with the amended rules, as indicated in the language above, an eligible list will be made available for public inspection, upon request, after the list is exhausted or expired and all referrals resolved.

DHR's Examination Results webpage, found at <https://sfdhr.org/examination-results>, now splits into two sections: one for examination score reports and one for eligible list postings with names (for previously posted eligible lists in Volume I prior to October 15, 2018 and classes in Volumes II Uniformed Ranks of the Police Department and III Uniformed Ranks at the Fire Department of the Civil Service rules).

Note: Although not a part of this report, the website was also updated to reflect similar changes to Volume IV Municipal Transportation Agency Service-Critical of the Civil Service rules, which were adopted and effective February 4, 2019.

Examination Results



Score Reports

Score reports are posted for applicable examinations for miscellaneous classes in accordance with Civil Service Rules 111A, 112, 411A and 412. The scores and ranks achieved and number of individuals at each rank are listed in order of total scores. No names appear on examination score reports.

[View Past Score Reports >>](#)

POST DATE	LIST ID	CLASS & JOB TITLE
July 2, 2019	088223	0923 - Manager II 
July 2, 2019	094769	1244 - Senior Human Resources Analyst 
July 2, 2019	094303	1822 - Administrative Analyst 

Eligible Lists

Eligible Lists are posted in accordance with Civil Service Rules 212 and 312 for Uniformed Ranks of the Police and Fire Departments. The names of candidates passing all phases of an examination are placed on the eligible list in the order of total scores; candidates who have tied scores are listed in alphabetical order.

[View Past Eligible lists >>](#)

Some concerns that arose out of the meet and discuss sessions are that without an eligible list with names posted, one may not be able to challenge the qualifications of individuals on the list. If a person who was not qualified was mistakenly placed on an eligible list, that individual could potentially impact other candidates on the list who might not be considered due to being outside the reachable ranks. In order to address these concerns, all permanent examination announcements posted on or after October 15, 2018 now include a Minimum Qualification Supplemental Questionnaire (MQSQ).

MQSQs contain a series of questions related to the recruitment's qualification requirements and are utilized for candidates to self-certify the amount and level of training, experience and/or education that they possess. MQSQs do not collect any identifying information. HR analysts review both the MQSQs and the application submitted by candidates to determine who meets the posted minimum qualifications. At the conclusion of the examination process, during the Review of Ratings period, qualified candidates can now review the MQSQ responses of other candidates that made it onto the eligible list. The MQSQ review was added to maintain and enhance transparency in the examination process. Language has been added into the notices sent to candidates advising them of this opportunity:

If you wish, you may also review the minimum qualifications supplemental questionnaires of other candidates who passed the exam. The names and identities of other candidates are not included in these documents. This optional in-person appointment is intended only to give you the opportunity to confirm that all candidates meet the minimum qualifications.

For all certifications issued on or after October 15, 2018, de-identification processes are implemented up until the point that a hiring manager has decided which reachable candidates to interview. The hiring department's HR works closely with the hiring manager to determine if they wish to interview all reachable candidates, or narrow the pool of candidates by defining desirable job-related criteria. If the hiring manager chooses to interview all reachable candidates, there is no need for de-identification. However, if the hiring manager wishes to limit the number of candidates to interview, features in the applicant tracking system allow the hiring department's HR to share a redacted form of the application with the hiring manager. The hiring manager can then review the applications for those with the desired job-related criteria and inform the department's HR staff which applications should proceed to the next step using a system-generated number in lieu of a name.

The system also has a feature that allows HR staff to create a Referral Questionnaire (RQ) that can be sent to candidates to determine the amount or level of desirable job-related criteria or special conditions the candidates possess. No identifying information is asked and the responses to the RQ can be used to determine which candidates will proceed to the next step. Once a hiring manager has selected the pool of candidates for interview, there is no more need for de-identification and the department's HR staff can share the complete applications with the hiring manager.

Additionally, during the informational meetings with unions, concerns regarding transparency in hiring were raised. As a result, a new page was created and launched on DHR's website where any member of the public can view the name and rank of the individuals hired to Permanent Civil Service (PCS) positions on and after October 15, 2018. Since eligible lists are no longer posted publicly with names, this page was created to alleviate concerns that individuals will not be aware of who was hired. This page is updated with new hires every two weeks and allows for searching by department, class, job title, name, list ID or appointment date and is located at <https://sfdhr.org/permanent-civil-service-appointments>.

Permanent Civil Service Appointments

Department	Class	Job Title	Full Name
- Any -			
List	Appointment Date From	Appointment Date To	Search
	E.g., 2019-07-02	E.g., 2019-07-02	

Appointment Date: 29 June 2019	+
Appointment Date: 24 June 2019	+
Appointment Date: 19 June 2019	+

Within the City's current applicant tracking system, most major functionality was delivered to users on the launch date of October 15, 2018. This included the ability for HR staff to automatically redact items or sections of the application that could reveal identifiable information. Examination score reports were initially created by DHR. While the ability to create these reports wasn't originally accessible for departments to create themselves at launch, they are now available within the applicant tracking system for the departments to generate themselves.

Training

Between September and October of 2018, DHR provided five training sessions on "Exams and De-Identification." This training was targeted for City HR staff responsible for administering exams and covered the de-identification process prior to list adoption. More than 170 City HR staff were trained on how to create a minimum qualification supplemental questionnaire, as well as creating and posting an examination score report, sending result notices to candidates and viewing/printing redacted applications.

Additionally, DHR provided eight training sessions on "PRSP and De-Identification." This training was targeted for Human Resources staff responsible for administering PRSP. This training outlined the impact of de-identification on PRSP highlighting rules, policies, requirements, and best practices. Over 230 City HR staff were trained on how to properly use de-identification during the Post-Referral Selection Process.

Department Feedback

At the beginning of December 2018, DHR met with departmental HR staff citywide to obtain feedback on how the process has been working so far.

Overall, the feedback received from departments was primarily positive. Staff reported the following successes:

- ☐ Smooth transition;
- ☐ Process supports fairness, equity and diversity;
- ☐ MQSQs were easy to create, screen and re-use for other recruitments;
- ☐ MQSQs sped up application review;
- ☐ Hiring managers are open and receptive to the new process, understanding the intention to support fairness, equity and diversity;
- ☐ Process helps hiring managers keep an open mind;

- ☐ Process provides clear boundaries and expectations that they can communicate easily to hiring managers;
- ☐ Hiring managers are more open to interviewing a larger number of candidates;
- ☐ Communication improvement: To reduce the number of candidates invited to interview, the department's HR staff work closely with hiring managers to base decisions on job-related criteria;
- ☐ Redaction tools to de-identify application work well/easy; and
- ☐ Candidates appreciated their individual results no longer being posted publicly.

Regarding challenges experienced, staff reported the following:

- ☐ Takes too long to redact resumes;
- ☐ Internal candidates could be easily identified based on descriptions on cover letters and resumes;
- ☐ Language for certain features in the applicant tracking system varies (some features are labeled differently depending on where a user is in the system);
- ☐ When creating a custom report, the system-created number for candidates is not an option. Takes too much time for staff to determine whom the hiring manager has selected to interview;
- ☐ Additional help needed on RQ creation (Question crafting – what to ask);
- ☐ Unsure how to use MQSQ filter for easy review of candidate responses; and
- ☐ Some departments have not yet utilized a confidential list for making hiring decisions.

One common challenge indicated was in reference to redacting cover letters or resumes. These are all formatted differently and there is not a function in the current applicant tracking system to automatically remove names, addresses, schools and other identifiable information from resumes. Since the application specifically states that an applicant must put all relevant information on it, resumes are not required to be provided to hiring managers. At this time, DHR recommends that departments do not provide hiring managers with cover letters or resumes unless they are willing to take on the extra work of manual redaction, until a system is built that is smart enough to detect and redact this information. However, DHR will continue to review this matter with departments to determine if there are technological solutions available to make redaction of resumes and cover letters easier.

DHR plans to address the other challenges indicated above by providing additional training on de-identification. The new specialized training will focus on the applicant tracking system and all the tools related to de-identification, including developing MQSQs and RQs, procedures for the review of ratings period, redaction tools, system codes related to PRSP, and how to maneuver the newly created PCS appointment website.

Follow-up meetings with departmental HR staff citywide were also held in March and June 2019. No additional successes or challenges have been reported because most departments have not experienced the full cycle of de-identification since eligible lists for classification-based examinations are typically a two-year duration. DHR plans to continue to obtain feedback at future meetings, on a quarterly basis.

Analysis

In Fiscal Year 2017-2018, the median time from posting to adoption was 56 days and 74 days for Position-Based (PBT) and Class-Based (CBT) recruitments respectively. Eligible lists have a minimum duration of six months and many active lists were adopted prior to de-identification for a period of two years, meaning those lists are publicly posted with names until the next examination is conducted. Although there have been 374 examination announcements (235 PBT, 138 CBT, 1 CCT) opened between October 15, 2018 and June 30, 2019, there has not yet been sufficient data of interviewees from post de-identification to compare with those prior to launch to report to the Commission.

DHR reviewed all eligible lists adopted after October 15, 2018 that expired by July 1, 2019. There were only 99 hires made from a total of 61 eligible lists. The majority of the eligible lists during this timeframe were generated from position-based examinations which typically result in the hire of a single employee unless the list is shared to make additional hires. At this point, there is not significant data available to determine if de-identification has resulted in demographics that demonstrate a more inclusive and diverse hiring process.

DHR plans to evaluate citywide class-based examination demographic data from the launch of de-identification in order to get a more meaningful assessment of its progress. Class-based examinations typically have high volume applicant pools and multiple hires are made from these eligible lists. The eligible list duration ranges from one to two years, which means data may not be available to evaluate until after January 2020.

Also, the current applicant tracking system is limited in its capabilities to easily and efficiently extract applicant demographic hiring data. With the complexity of the City's certification process having a different set of reachable eligibles per certification based on the number of positions available and/or special conditions, the process of obtaining this data is quite cumbersome and time consuming. The system does not have a straightforward report that allows us to have an at-a-glance view of the path of each candidate as they evolve from eligible list to interview to hire or not selected. As a result, the reporting of hiring demographics is a manual process at this time.

The City is currently in the process of acquiring a new applicant tracking system and/or upgrading the current one, which we hope results in efficiencies in reporting this type of data in the future. The procurement and implementation processes are projected to be completed by summer of 2020.

Based on this information and given the above time frames, there will not be significant demographic data to report on the effectiveness of de-identification until a period of at least 18 months from implementation has passed. As a result, DHR recommends that the next report be due in the third quarter of Fiscal Year 2019/2020 (January – April 2020) when we expect more hiring data to be available and provide more meaningful results. Due to the time it currently takes to pull and analyze this data, we also request the report to be required semi-annually (rather than on a quarterly basis).

Recommendation

Adopt the report and amend reporting requirements to begin during the third quarter of Fiscal Year 2019-2020 on a semi-annual basis.

c: Kate Howard, Managing Deputy Director, DHR