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Pennsylvania Independent Regulatory Review Commission.

May 16, 2017

333 Market Street, 14th Floor

Harrisburg, PA 17101

RE: Pennsylvania State Civil Service Commission

Proposed Regulation #61-6

Implementation of Act 69 of 2016 and Act 167 of 2016

IRRC Identification Number 3167

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Dear Commissioners:

After reading the comments and assertions submitted by numerous state agencies and the House of Representatives regarding the Civil Service Commission's proposed regulation implementation to Section 502 of Act 167 of 2016, I felt compelled to offer my perspective as a concerned citizen of the Commonwealth and as a testing and examination development professional with approximately 30 years of experience in the testing profession.

The basic premise of developing a fair and equitable assessment tool is based on an accurate assessment of the required knowledges, skills and abilities (KSA's) needed to perform the job upon entry to the position. The job classification provides a description of the work to be performed, cites examples of that work, the underlying KSA's determined to be necessary to successfully perform that body of work and then states the minimum education/training and experience requirements that are expected to produce the necessary KSA's. The job classification document is developed jointly by classification professionals in the Office of Administration, the respective agency subject matter experts for that classification and staff in the Civil Service Commission. The best assessment method is then derived from the job analysis jointly preformed by Civil Service Commission and appointing authority staffs. Consequently, the appointing authorities have always had input into the ultimate assessment method used to provide them with either a group scored or ranked scored list of qualified eligible candidates. Under the proposed regulation implementation, this process would remain.

When a job classification is specific to one appointing authority, the ability of that appointing authority to determine the most appropriate assessment method based on the jointly conducted job analysis and the recommendations of a test development specialist is relatively straight forward. However when a job classification exists in multiple appointing authorities a consensus among the appointing authorities is necessary. When the job classification has one set of KSA's and minimum education/training and or experience requirements, a different assessment method used to create a list of eligible candidates is not supportable since the best method of assessment has been determined through the job analysis and subject matter experts' opinions. The list of eligibles should not be established based on different assessment methods since the measurable criteria must be the same to ensure fair and equitable

appointment opportunities. That does not presuppose that at a future point in time, the best method of assessment could change, but it would need to be again based on a consensus decision among appointing authorities. Any specific appointing authority concerns for a specific KSA could be addressed as it always has been through the selective certification process.

Optional assessment methods consist of not only written, multiple choice type examinations, which can contain video based scenarios reflecting an applicant's ability to reason appropriately and apply judgements and decision making responses that will not exacerbate or accelerate a situation (these are often very desirable characteristics and personality traits for an appointing authority especially in the correctional and law enforcement job classifications) but also of oral response examinations, timed skill and proficiency examinations , and evaluations of experience and training(E &T).

Based on the job analysis, the most effective measurement of applicant requirements may not be an experience and training type assessment tool. At times, the subject matter experts of an appointing authority request a change from an E&T assessment because applicants either exaggerated or fabricated the extent of their experience and proficiency levels. Subsequently, the appointing authority was not satisfied with the quality of the applicants in the hiring pool. Several studies support this phenomenon occurring in the Federal Government and private sector hiring experiences.

Additionally, an E&T type assessment is not necessarily appropriate for trainee level positions. The minimum education and training requirements do not usually state a particular type of experience therefore, there is no experience that can be assessed or specified. For those job classifications either at a trainee or above level where a specialized area of education/training is desirable and supported, a selective survey tool can be completed at the time of candidate application and utilized by appointing authorities when requesting an eligible list based on the requested criteria.

No one method of testing or assessment method is appropriate for all job classifications. It must always be based on the job analysis and how to best measure the necessary entry level requirements. There is no one size fits all assessment tool.

Based on the above, I do not believe that the Civil Service Commission's proposed regulations to implement the language in Section 502 of Act 167 of 2016 circumvents the intent of that section, but is in fact based on sound professional examination practices and principles that provide for fair assessment of the relative capacity and fitness of applicants to perform the duties and meet the job requirements for the positions for which they have applied. I also believe that the best interests of the appointing authorities are served by receiving a list of qualified individuals who can best perform the job.

Beth Harfmann

A handwritten signature in black ink that reads "Beth Harfmann". The signature is fluid and cursive, with the first name "Beth" written in a larger, more prominent script than the last name "Harfmann".

Retired Director, Bureau of Personnel Assessment

PA State Civil Service Commission

Cc: Denise Wood, Esq., Assistant Counsel, State Civil Service Commission