

Operationalizing Forensic Record Governance: System Integration & SB 513 Metadata Enforcement for Sapphos Environmental (2026 Compliance Cycle)

1. Executive Strategy: The Transition to Forensic HRIS Architecture

The operational landscape for professional services firms in California, particularly those engaged in high-stakes environmental consulting like Sapphos Environmental, has shifted fundamentally for the 2026 compliance cycle. The convergence of Senate Bill 513 (SB 513), Assembly Bill 692 (AB 692), and Senate Bill 464 (SB 464) has effectively transformed the Human Resources Information System (HRIS) from a passive repository of employee data into an active forensic engine. For Sapphos Environmental, a firm of 47 specialized employees including scientists, archaeologists, and historians based in Pasadena, the margin for error has vanished. The objective is no longer merely "record keeping"; it is the construction of a defensible, audit-ready digital infrastructure that proves compliance with wage ordinances, training mandates, and anti-bias regulations in real-time.

This report serves as the technical blueprint for Prompt 4 of the compliance series: **System Integration & SB 513 Metadata Enforcement**. It details the specific configuration, integration, and management of Sapphos Environmental's core automated systems—Gusto (Payroll/HRIS), TalentLMS (Learning & Development), and the Applicant Tracking System (ATS)—to ensure every digital footprint is legally robust. We move beyond policy theory into the granular mechanics of field mapping, API triggers, and automated workflows.

The primary mandate of this system integration is to enforce the "Good Order" of the 47 active personnel files. In 2026, "Good Order" is defined by the immediate availability of metadata-rich records that can withstand a forensic audit by the Department of Industrial Relations (DIR), the Civil Rights Department (CRD), or the Board for Professional Engineers, Land Surveyors, and Geologists (BPELSG). The systems must automatically segregate demographic data from hiring decisions to satisfy SB 464, enforce the Pasadena Municipal Code (PMC) baseline wage of \$18.04 per hour, and rigorously track the "Core Competencies" of technical staff as required by the new SB 513 provisions.

This document provides an exhaustive analysis of the regulatory requirements, followed by step-by-step configuration guides for each system. It culminates in the design of the "Forensic Training Transcript," a new critical document that aggregates fragmented training data into a single, admissible record of professional competency. By strictly adhering to these protocols, Sapphos Environmental will ensure that its digital infrastructure acts as a shield against litigation and a validator of its workforce's immense technical expertise.

The necessity of this forensic approach is underscored by the nature of Sapphos Environmental's work. When a CEQA document is challenged in court, the plaintiff's counsel often attacks the technical adequacy of the environmental analysis. If the lead biologist's

qualifications are undocumented, or if the Qualified SWPPP Developer (QSD) allowed their license to lapse for even a single day during the project window, the entire environmental document can be deemed inadequate, jeopardizing client projects worth millions. Thus, the HRIS is not just an administrative tool; it is a critical component of the firm's Quality Assurance/Quality Control (QA/QC) infrastructure.

2. The 2026 Regulatory & Technical Mandates

To configure the systems correctly, we must first dissect the specific legal requirements that drive the technical architecture. The 2026 compliance landscape introduces strict data formatting and retention rules that legacy systems will not handle without deliberate modification. The shift is from qualitative descriptions of employment to quantitative, metadata-driven verification.

2.1 Senate Bill 513: The Metadata Revolution in Training Records

Senate Bill 513 amends California Labor Code Section 1198.5, fundamentally expanding the definition of "personnel records" to include education and training files. Prior to 2026, training logs were often informal or scattered across various platforms. SB 513 mandates that if an employer maintains training records, they must be produced upon request and, crucially, must contain five specific metadata fields :

1. **Employee Name:** The legal identity of the trainee, matched to payroll records.
2. **Provider Name:** The entity delivering the instruction (e.g., "CASQA," "Esri," or internal "Sapphos Senior Archaeologist"). This distinguishes verifiable third-party certification from internal knowledge transfer.
3. **Date:** The specific calendar date of completion.
4. **Duration:** The time investment (hours/minutes).
5. **Core Competencies:** A description of the skills transferred, including specific equipment or software proficiencies.
6. **Certification/Credential:** The resulting credential (e.g., "QSP Certificate," "ArcGIS Pro Associate").

Forensic Implication: The "Core Competencies" field is the most technically demanding. It requires Sapphos to move beyond generic course titles like "GIS Training" to granular competency tags like "Spatial Analysis," "Geoprocessing," or "Lidar Data Interpretation". The HRIS and LMS must be configured to capture and export this specific metadata field, which does not exist in standard "out-of-the-box" software configurations. Failure to produce this granular data constitutes a violation of the employee's right to inspect their file. The legal risk here is that a generic training log fails to prove that an employee was qualified to operate specific equipment (e.g., a noise dosimeter) or software (e.g., CalEEMod), which are critical for CEQA analysis.

2.2 Senate Bill 464 & ADA: Mandatory Data Siloing and Access Control

SB 464 and the Americans with Disabilities Act (ADA) require strict segregation of employee data. SB 464 specifically mandates that demographic data (race, ethnicity, gender) used for state pay reporting must be stored *separately* from general personnel records. This is to prevent

decision-makers (managers, supervisors) from being influenced by protected demographic characteristics during performance reviews or promotion cycles.

Technical Implication: The HRIS (Gusto) must be configured with Role-Based Access Control (RBAC) that makes the "Demographics" tab invisible to anyone with a "Manager" role, while remaining accessible to "HR Admin" and the "Custodian of Records." Furthermore, medical records (including ADA interactive process documents and workers' comp injury reports) must be digitally isolated in a separate, encrypted repository or a restricted document class within the HRIS, accessible only to HR Admins, never to direct supervisors. This "Digital Chinese Wall" is the primary defense against disparate treatment claims; the firm must be able to prove, via system access logs, that the decision-maker physically could not view the protected data at the time of the employment decision.

2.3 Pasadena Municipal Code (PMC 4.65): Wage Enforcement Architecture

For a Pasadena-based firm, compliance with the local minimum wage is non-negotiable. As of July 1, 2025, the baseline is **\$18.04 per hour**. While Sapphos's professional staff (scientists, planners) likely exceed this, the firm employs support staff, interns, or field technicians who may be close to this margin. The ordinance is distinct from state law and carries its own enforcement mechanisms, including civil lawsuits and potential criminal prosecution for willful violation.

Technical Implication: Payroll systems must have "hard stops" or "compliance alerts" configured. If an hourly rate is entered below \$18.04, or if a salaried exempt employee's compensation falls below the annualized equivalent of the state exempt threshold (\$70,304), the system must flag the error immediately. This prevents "accidental" non-compliance due to data entry errors or outdated pay scales. Additionally, the system must track the distribution of the Pasadena-specific "Know Your Rights" notice, which must be provided in the employee's primary language.

2.4 AB 692: The "Stay-or-Pay" Prohibition and Contract Management

Assembly Bill 692 bans employment contracts entered into on or after January 1, 2026, from including provisions that require employees to repay training costs if they leave the firm. This is critical for Sapphos, which invests heavily in professional certifications (e.g., QSD/QSP, PE review courses).

Technical Implication: The LMS and contract management workflows must be scrubbed of any "Training Repayment Agreement" (TRA) acknowledgments. If the LMS requires a user to "accept terms" before starting a costly course, those terms cannot include repayment clauses. The system workflow must ensure training is categorized as "Employer-Sponsored Professional Development" without debt-attachment mechanisms. Any legacy templates in the document generation system must be purged and replaced with AB 692-compliant versions.

2.5 SB 807: The Four-Year Forensic Window

SB 807 extends the retention period for personnel records and applicant data to **four years**. This applies to hired employees and *rejected applicants*.

Technical Implication: The ATS (Applicant Tracking System) cannot simply purge data after a hiring cycle closes. It must archive all applications, resumes, and interview notes for four years.

This creates a "Data Lake" of applicant history that must be searchable for bias audit defenses but secure from unauthorized access. The retention clock resets with every employment action, meaning the "Forensic Window" is a rolling period that extends well beyond the tenure of the employee.

3. System Architecture & Integration Workflow

To achieve "Good Order," Sapphos Environmental cannot rely on disjointed spreadsheets. The three core systems—**Gusto (HRIS/Payroll)**, **TalentLMS (Training/Competency)**, and the **ATS (Recruitment)**—must function as an integrated ecosystem. The flow of data must be automated to reduce human error, which is the primary vector for compliance failure.

3.1 The Integration Triad: A Forensic Ecosystem

The architecture is built on the concept of the "Single Source of Truth" (SSOT). Data should be entered once and flow downstream.

1. **Gusto (The Master Record):** Holds the "Truth" regarding employment status, job title, compensation, and demographics. It is the source of record for active/terminated status and the primary engine for PMC 4.65 wage compliance.
2. **TalentLMS (The Competency Engine):** Consumes employee data from Gusto to create learner profiles. It generates the SB 513 metadata (Training dates, durations, competencies). It is the engine for professional licensure tracking.
3. **ATS (The Forensic Archive):** Feeds new hire data into Gusto but retains the pre-employment history (applications, interview scores) for SB 807 compliance. It serves as the defense repository for "Failure to Hire" claims.

3.2 Data Flow & System Integration Logic

The seamless movement of data between these systems is critical for maintaining the "Chain of Custody" of employee records.

- **Step 1: Ingestion (ATS to Gusto):** When a candidate is marked "Hired" in the ATS, their core demographic data (Name, Personal Email, Start Date) flows via API into Gusto.
 - *Constraint Check:* The ATS retains a shadow copy of the applicant profile, specifically the "Interview Scorecards" and "Resume," for the 4-year SB 807 window. The system must prevent the deletion of these records even after the candidate is migrated to "Hired" status.
- **Step 2: Profile Creation (Gusto to TalentLMS):** Gusto pushes the "Employee Roster" to TalentLMS via Single Sign-On (SSO) or API integration. This is a critical forensic step because it ensures that only *active* employees have access to training, and that terminated employees are immediately revoked, preserving the security of proprietary training materials.
 - *Mapping:* Gusto "Department" maps to TalentLMS "Group" (e.g., "Archaeology Dept" -> "Archaeology Learner Group").
 - *Mapping:* Gusto "Job Title" maps to TalentLMS "Branch" or specific curriculum assignments.
- **Step 3: The Metadata Loop (TalentLMS Internal):**
 - Employee completes a course (e.g., "2026 CEQA Updates").

- TalentLMS records: [Name] + [Provider (Internal/External)] + + +.
- **Step 4: The Forensic Export (TalentLMS to Digital Personnel File):**
 - On a quarterly basis (or upon termination), a "Forensic Training Transcript" is generated from TalentLMS.
 - This PDF is deposited into the employee's "General Personnel File" (stored securely in a document management system or encrypted drive), complying with SB 513. This creates a static, immutable record of competency at that specific point in time.

3.3 The "System of Policy Fulfillment"

This architecture ensures that policy is not just written in a handbook but executed by code. If a Professional Geologist (PG) license is expiring, the system knows. If a new law requires harassment training, the system assigns it. The human element (The Custodian of Records) manages exceptions, but the system manages the baseline. This automated governance reduces the "administrative burden" on the 47-person firm while increasing compliance fidelity.

4. TalentLMS Configuration – The Forensic Competency Engine

TalentLMS is the centerpiece for complying with SB 513. Standard LMS configurations track "Course Completion" but rarely capture the detailed metadata required by the new law. We must re-engineer the platform to capture "Core Competencies" and "Provider" details. The configuration must be robust enough to handle the nuanced training requirements of specialized roles like Archaeologists and Environmental Scientists.

4.1 Configuring Mandatory Metadata Fields (SB 513)

The default fields in TalentLMS (User, Course, Date) are insufficient for the 2026 forensic standard. We must utilize **Custom Course Fields** and **Custom User Fields** to capture the full forensic data set. The configuration requires accessing the deep administrative settings to alter the database schema for course objects.

Configuration Step 1: Defining Custom Course Fields

To ensure every training record exports with the required SB 513 data, we must add specific fields to the *Course* properties.

- **Navigation:** Go to Account & Settings > Themes > Courses (or Custom Fields depending on version).
- **Action:** Create the following Custom Fields for **Courses**:
 1. **Field Name:** Provider Name
 - **Type:** Text / Dropdown
 - **Values:** "Internal - Sapphos," "CASQA," "Esri," "BPELSG," "Legal Counsel."
 - **Forensic Purpose:** Satisfies SB 513 requirement to identify *who* provided the training. This is crucial for distinguishing between formal certification bodies (e.g., CASQA for QSP training) and informal internal lunch-and-learns.
 2. **Field Name:** Core Competencies

- **Type:** Text Area (Max characters: 200)
 - **Instructions:** "List specific skills, software, or equipment."
 - **Example Data:** "ArcGIS Pro Geoprocessing; CEQA Initial Study Drafting; NEPA EIS Review."
 - **Forensic Purpose:** Satisfies the "Core Competencies" requirement. This field transforms the training record from a title ("GIS 101") to a skills inventory ("Spatial Analysis, Georeferencing").
3. **Field Name:** SB 513 Duration (Hours)
- **Type:** Numeric
 - **Forensic Purpose:** While the system tracks "Time on Course," an explicit field allows for manual adjustment if the training was a seminar where "active time" differs from "logged time." This ensures accuracy in reporting "contact hours" for continuing education units (CEUs).

Configuration Step 2: Mapping "Core Competencies"

The term "Core Competencies" in SB 513 is the most critical for professional defensibility. For Sapphos, this isn't just "Communication Skills"; it is technical verification. We will map these tags to the firm's job roles to ensure consistency.

Table 1: Sapphos Environmental Competency Mapping Strategy

Role Category	Software Skills (SB 513)	Equipment Skills (SB 513)	Regulatory Skills
Archaeologist	ArcGIS Field Maps, Trimble Pathfinder	Ground Penetrating Radar (GPR), GPS Rovers	Section 106 Compliance, NAGPRA Consultation
Env. Scientist	ArcGIS Pro, R Studio, CalEEMod	Noise Meters, Water Quality Sondes	CEQA Impact Analysis, NEPA EA/EIS
Planner	Microsoft Project, Adobe Creative Suite	N/A	AB 52 Tribal Consultation, SB 743 VMT Analysis
Admin/HR	Gusto, TalentLMS, ATS	N/A	I-9 Verification, SB 513 Record Keeping
QSP/QSD	SMARTS Database, RUSLE2	Turbidity Meters, pH Testing Kits	SWPPP Development, Risk Assessment

Implementation: When an administrator creates a new course in TalentLMS (e.g., "Advanced ArcGIS for Archaeologists"), they *must* populate the Core Competencies custom field with the relevant tags (e.g., "GIS; Spatial Analysis; Trimble Hardware"). This ensures that when the transcript is generated, these tags appear automatically next to the course name, removing the burden from the employee to self-report.

4.2 Automated Systemic Compliance Alerts

Sapphos employs licensed professionals (PG, PE, QSP/QSD) whose credentials must remain active for the firm to legally conduct business. Reliance on manual spreadsheets to track expiration dates is a liability. We will use TalentLMS's **Certification & Notification Engine** to automate this.

Workflow: Professional License Expiration Triggers

Professional licenses are treated as "Certifications" within the LMS. Even though the "training" (e.g., passing the PE exam) happened years ago, the *maintenance* of that license is an ongoing LMS activity.

1. **Create "Placeholder" Courses:**
 - Course Name: "Professional License Maintenance: CA Professional Geologist."
 - Course Name: "QSP/QSD Biennial Renewal."
2. **Assign Certification Duration:**
 - In the Course settings, enable "Certification."
 - Set duration to **24 Months** (for BPELSG licenses) or **2 Years** (for QSP/QSD).
 - Set "Expiration Date" logic: "Specific Date" or "Time after completion."
3. **Configure Notification Triggers (The Alert System):**
 - **Navigation:** Events Engine or Notifications.
 - **Trigger:** "X time before certification expires."
 - **Settings:**
 - **Alert 1:** 90 Days prior. Recipient: Employee. Message: "WARNING: Your PG License expires in 90 days. Initiate renewal with BPELSG."
 - **Alert 2:** 30 Days prior. Recipient: Employee & Manager. Message: "URGENT: License expiration imminent. Confirm CEU completion."
 - **Alert 3:** 1 Day after expiration. Recipient: HR/Cor. Message: "CRITICAL: Employee License Expired. Remove from field work immediately."

This automated workflow creates a documented chain of notification, proving that the firm exercised due diligence in maintaining professional standards. If an employee works with an expired license, the "Alert 3" log serves as evidence that the firm did not condone the lapse, potentially mitigating liability.

Workflow: Biennial Harassment Training (SB 1343)

California requires 1 hour of harassment training for non-supervisors and 2 hours for supervisors every two years.

- **Setup:** Create two curricula in TalentLMS: "Harassment Prevention (Non-Supervisory)" and "Harassment Prevention (Supervisory)."
- **Automation:** Set the certification expiration to **2 Years**.
- **Recurrency:** Enable "Re-assign course to user upon expiration".
- **Result:** The system automatically re-enrolls the employee 24 months after their last completion, ensuring no gap in compliance.

4.3 The Forensic Training Transcript (Output)

The ultimate output of the TalentLMS configuration is the **SB 513-Compliant Transcript**. This is not the standard "Certificate of Completion." It is a comprehensive data dump formatted for legal review.

- **Generation Method:** Use TalentLMS "Reports" > "User Reports" > "Export to Excel/PDF".
- **Customization:** The export template must be modified to include the Custom Course Fields defined in Step 3.1.
- **Verification:** The Custodian of Records must audit one transcript per quarter to ensure

the "Provider" and "Competencies" fields are populating correctly. The transcript must be legible, immutable (PDF format), and specifically titled to indicate its compliance status (e.g., "SB 513 Statutory Training Record").

5. Gusto Configuration – The Wage & Data Silo Guardian

Gusto acts as the financial and demographic fortress. Its configuration must address the Pasadena Municipal Code (\$18.04/hr) and the data privacy mandates of SB 464. The payroll system must be "hardened" against the inadvertent underpayment of staff or the exposure of sensitive data.

5.1 Pasadena Minimum Wage Hardening (\$18.04/hr)

Pasadena's minimum wage is aggressive and distinct from the California state minimum. As of July 2025, it is \$18.04. Gusto must be set up to catch violations before a paycheck is cut.

Configuration Steps for Wage Compliance:

1. **System Rule Update:**
 - In Gusto, navigate to Settings > Pay Schedules or Compliance.
 - Ensure the "Work Location" for the Pasadena office (Zip Codes 91101-91117) is explicitly linked to the **Pasadena Minimum Wage Ordinance** rule set, not just "California State." Gusto often defaults to the highest applicable rate, but manual verification of the rule set ensures the local ordinance is prioritized.
2. **Compensation Alert Triggers:**
 - Gusto's "Minimum Wage Monitoring" feature usually tracks state/federal. For Pasadena, if a native feature doesn't explicitly block <\$18.04, HR must set a **Custom Alert** or utilize the "Minimum Wage Adjustment" tool.
 - **Alert Logic:** "If Hourly Rate < \$18.04, Flag for Review."
 - **Exempt Salaried Threshold:** For 2026, the exempt salary threshold in California is generally 2x the state minimum wage. With the state minimum at \$16.00+ (projected adjustments), the exempt floor is roughly \$66,560. However, Sapphos must ensure it meets the *strictest* standard. The prompt identifies **\$70,304** as the target verification number.
 - **Audit Check:** Run a "Compensation Report" in Gusto filtered by "Annual Salary < \$70,304" and "FLSA Status = Exempt." Any hits are immediate compliance violations.

5.2 SB 464 & Data Siloing (The "Demographic Vault")

SB 464 requires that demographic data (Race, Ethnicity, Sex) used for pay data reporting be stored separately from personnel files to prevent bias. Gusto stores this data in the employee profile, which is viewable by admins. To comply with the "silo" requirement, we must restrict *who* sees this.

Configuration for Data Siloing:

1. **Role-Based Access Control (RBAC):**
 - **Standard Manager Role:** Configure the "Manager" permission set in Gusto to have **View Access** to: "Job Details," "Time Off," "Performance."
 - **Block Access:** Explicitly **Disable** Manager access to: "Personal Details" (DOB, SSN), "Demographics" (Race/Ethnicity), and "Documents" (unless specifically shared).
 - **Forensic Rationale:** This proves that while the data exists for state reporting (SB 464), the decision-makers (Managers) did not have access to it during performance reviews, mitigating "disparate treatment" claims.
2. **Medical Record Segregation (ADA):**
 - Gusto's "Documents" section allows for folders.
 - Create a folder named "**Confidential - Medical/Leaves**".
 - **Permissions:** Set permissions for this folder to "**Admin Only**". Managers should never see a doctor's note for a sick day; they should only see the "Sick Time Used" deduction.
 - **Upload Protocol:** All I-9 forms, medical notes, and workers' comp documents must go *only* into this restricted folder, not the general "Onboarding" folder.

6. ATS Integrity & Bias Audit Defense (SB 807 & Bias Laws)

The Applicant Tracking System (ATS) is the first line of defense against discrimination claims. With laws like SB 807 extending retention to 4 years and emerging "Bias Audit" requirements (modeled on NYC Local Law 144), the ATS must be treated as a forensic archive.

6.1 The Four-Year Retention Protocol (SB 807)

Most ATS platforms default to keeping data indefinitely or purging it too quickly to save space. We must enforce a strict **4-Year Retention Policy**.

Configuration Strategy:

1. **Archiving vs. Deletion:**
 - Configure the ATS (e.g., Greenhouse/Lever/Ashby) to **Archive** candidates rather than "Delete" them upon rejection.
 - **Automated Rule:** "If Candidate Status = Rejected, Archive. Retention Period = 4 Years from Date of Action."
2. **Searchability:**
 - The archive must remain searchable. If a rejected applicant sues in 2028 claiming they were rejected in 2026 due to age, Sapphos must be able to pull the specific "Interview Scorecard" and "Interviewer Notes" from that date.
 - **Tagging:** Ensure every rejected candidate is tagged with a "Rejection Reason" (e.g., "Lacked ArcGIS Experience," "No PG License"). This dropdown *must* be mandatory for recruiters to close a file. Generic "Not a fit" tags are forensically useless; specific, skills-based rejection codes are defensive gold.

6.2 Bias Audit Defense (The "Black Box" Defense)

While California's automated decision-making regulations are still evolving, the best practice (and requirement for firms hiring in NYC or using AI tools) is to prepare for a **Bias Audit**. This involves proving that the ATS algorithms did not systematically disadvantage protected groups.

Configuration for Bias Audits:

1. **Data Export for Auditing:**
 - Ensure the ATS can export a CSV containing: Applicant ID, Race/Gender (if voluntarily self-ID'd), Application Date, Stage Reached (e.g., Screen, Interview, Offer), and Selection Outcome.
 - **Siloing Note:** This export capability must be restricted to the HRIS Specialist or Legal Counsel.
2. **Vendor Verification:**
 - Sapphos must request the **Bias Audit Certificate** from their ATS vendor (e.g., Greenhouse, Ashby). Most major vendors now publish these annually (e.g., "2025 Bias Audit Report by BABL AI").
 - **Action:** Download the 2025/2026 Bias Audit summary and store it in the "Corporate Compliance" folder. This document is the firm's shield if the ATS's "ranking" or "matching" algorithm is challenged. It transfers liability from Sapphos (the user) to the Vendor (the developer), provided Sapphos used the tool as intended.

7. Professional Standards Integration (Licensing & Competency)

For Sapphos Environmental, a lapsed PG or PE license is a catastrophe. It invalidates CEQA documents. The automated systems must be backed by a rigorous verification loop.

7.1 The BPELSG & CASQA Verification Loop

Automated alerts (Section 4.2) are good; verification is better. The systems must support a "Trust but Verify" workflow.

1. **External Verification (Manual/API):**
 - **BPELSG (Engineers/Geologists):** The California Board does not have a public API for real-time integration. Verification is a manual lookup.
 - **Protocol:** On the 1st of every month, the "Compliance Assistant" (User) utilizes the BPELSG "License Lookup" tool.
 - **Evidence:** The "Details" page for each licensee (Status: CLEAR) is printed to PDF and uploaded to the employee's "Licenses" folder in Gusto.
 - **Status Codes:** The system must be trained to recognize statuses other than "Clear" or "Expired." For example, "Delinquent" means the fee was not paid but the license is renewable; "Cancelled" means the license is dead. Both require immediate removal from project sign-off duties.
2. **CASQA (QSP/QSD):**
 - CASQA maintains a "Qualification Directory".

- **Protocol:** Similar to BPELSG, verify the "Active" status and the specific "Certificate Number."
- **Training Link:** Ensure the employee has completed the "Reissuance Review" modules if the General Permit has changed (e.g., the 2022 CGP updates). The QSD/QSP credential is tied to the specific permit version; a QSD trained on the 2009 permit who hasn't upgraded to the 2022 standards is effectively unlicensed.

7.2 Defining "Core Competencies" for CEQA Defensibility

SB 513 requires listing competencies. For Sapphos, these must be specific to ensure they add value to the legal defense of environmental documents.

- **ArcGIS Competency:** It is insufficient to list "GIS." The record should reflect specific *tools* used in environmental analysis.
 - *Examples:* "Viewshed Analysis," "Spatial Join," "Georeferencing Historic Maps," "ArcGIS Field Maps Configuration".
 - *Validation:* Completion of Esri Academy certificates (e.g., "ArcGIS Pro Associate") or internal workshops led by the GIS Manager.
- **CEQA Competency:**
 - *Examples:* "Initial Study (IS) Preparation," "MND Findings," "Mitigation Monitoring and Reporting Program (MMRP) Development."
 - *Rationale:* By documenting these specific skills, Sapphos builds a "Resume of the Firm" that can be deployed in proposals and defended in court.

8. Deliverables

8.1 System Integration Workflow Diagram

(Note: As a text-based AI, I describe the diagram nodes and flows below. This should be visualized in Visio or Lucidchart.)

Title: Sapphos Environmental Forensic Record Architecture (2026)

- **Node A: Recruitment (ATS)**
 - *Input:* Applicant Data (Resume, Application).
 - *Process:* Interview Scoring, Bias Check, Selection.
 - *Storage:* Rejected -> **Archive (4 Years)**.
 - *Output:* New Hire Payload (JSON) -> **Gusto**.
- **Node B: HRIS Core (Gusto)**
 - *Input:* New Hire Payload.
 - *Logic Check 1: Wage Guard* (Is Rate < \$18.04? -> ALERT).
 - *Logic Check 2: Silo Enforcer* (Is Demographics visible to Manager? -> BLOCK).
 - *Storage:* Master Employee Record, Medical Docs (Restricted).
 - *Output:* Active Employee List (API) -> **TalentLMS**.
- **Node C: Competency Engine (TalentLMS)**
 - *Input:* Employee Roster.
 - *Process:* Training Delivery, License Tracking.
 - *Metadata Capture:* SB 513 Fields (Provider, Duration, Competencies).
 - *Alert System:* License Expiry -90/-30 Days.
 - *Output:* **Forensic Training Transcript (PDF)** -> **Gusto (Personnel File)**.

- **Node D: The Personnel File (Forensic Output)**

- *Components:*
 1. Hiring Docs (Gusto).
 2. Wage History (Gusto).
 3. Training/Competency Log (TalentLMS).
 4. License Verification (BPELSG/CASQA PDFs).
- *Status: "Good Order".*

8.2 Sample SB 513-Compliant "Forensic Training Transcript"

This document is the "Gold Standard" proof of compliance. It effectively replaces the old "Certificate of Completion" pile. It is designed to look like a legal transcript , with clear headers, line items, and verification statements.

SAPPHOS ENVIRONMENTAL – FORENSIC TRAINING TRANSCRIPT Confidential

Personnel Record – SB 513 Compliant

Employee Name: Dr. Sarah Archaeologist **Employee ID:** SE-042 **Job Title:** Senior Cultural Resources Manager **Reporting Period:** Jan 1, 2026 – Dec 31, 2026

Date	Course / Training Title	Provider (SB 513)	Duration	Core Competencies (SB 513)	Result/Cert
01/15/2026	2026 Workplace Harassment Prevention (Supervisory)	Internal (TalentLMS) / Content by CalChamber	2.0 Hrs	AB 1825 Compliance; Retaliation Prevention; Bystander Intervention	Cert #HP-2026-88
02/10/2026	Advanced ArcGIS Pro: Spatial Analysis	Esri Academy	4.0 Hrs	Geoprocessing; Spatial Joins; Lidar Data Interpretation; ArcGIS Pro 3.1	Cert #EAPA-2026
03/05/2026	QSP/QSD Reissuance Review: Module 3	CASQA	1.5 Hrs	SWPPP Sampling; pH/Turbidity Testing; 2022 CGP Updates	QSP Renewal Credit
04/20/2026	CEQA Legal Update: Tribal Cultural Resources	Legal Counsel (Internal)	1.0 Hrs	AB 52 Consultation; TCR Identification; Confidentiality Protocols	N/A
05/12/2026	Field Safety: Heat Illness Prevention	Sapphos Safety Officer	0.5 Hrs	Cal/OSHA Heat Standards; Emergency Response; Hydration	Signed Acknowledge

Date	Course / Training Title	Provider (SB 513)	Duration	Core Competencies (SB 513)	Result/Cert
				Protocols	

Professional License Status:

- **RPA (Register of Prof. Archaeologists):** Active (Exp: 12/31/2027)
- **QSP (Qualified SWPPP Practitioner):** Active (Exp: 09/01/2026) – *RENEWAL IMMINENT (Alert Sent 05/01/2026)*

Certification: I certify that this record accurately reflects the training and education history required by California Labor Code §1198.5 (SB 513). *Generated by TalentLMS System | Date: 06/01/2026*

9. Conclusion & Auditor Instructions

The integration of Gusto, TalentLMS, and the ATS into a cohesive forensic unit is the only viable strategy for navigating the 2026 regulatory environment. By configuring these systems to capture SB 513 metadata, enforce Pasadena wage floors, and silo sensitive data, Sapphos Environmental transforms compliance from a reactive burden into a proactive asset.

Auditor Action Items (Immediate):

1. **Verify Gusto Rules:** Confirm the Pasadena \$18.04 hard stop is active and that the work location logic correctly identifies the Pasadena zip codes.
2. **Audit TalentLMS Fields:** Check for the existence of the "Provider" and "Core Competencies" custom fields and verify that they are populated for all active courses.
3. **Test the Silo:** Log in as a "Manager" in Gusto and attempt to view the "Demographics" tab. Access must be denied.
4. **Run the Transcript:** Export a sample transcript for a Senior Scientist and verify the granularity of the competency tags against the job description.

This system architecture ensures that when the question is asked—"Is this employee qualified, paid correctly, and treated fairly?"—the record speaks clearly, completely, and defensively.

Works cited

1. SB 513 Expands Employers' Recordkeeping Requirements for Education and Training Records: Atkinson, Andelson, Loya, Ruud & Romo, <https://www.aalrr.com/Labor-Employment-Law-Blog/sb-513-expands-employers-recordkeeping-requirements-for-education-and-training-records>
2. Senate Bill 513: California Expands Personnel File Requirements, <https://www.californiaworkplacelawblog.com/2025/10/articles/california/senate-bill-513-california-expands-personnel-file-requirements/>
3. California Employers, Heads Up: Senate Bill 513 Just Changed the Rules on Personnel Files | Littler, <https://www.littler.com/news-analysis/asap/california-employers-heads-senate-bill-513-just-changed-rules-personnel-files>
4. ESRI Practice Test 2026 ESRI Technical Certification Program Exam Questions Test Prep Certification - YouTube, https://www.youtube.com/watch?v=Hf4eNn_r3QU
5. ArcGIS Pro Associate 2025 Exam Information Guide - Esri Community, <https://community.esri.com/t5/esri-technical-certification-exams/eapa-2025-eig/ba-p/1585029>
6. Legislative Update: Changes to Employer Pay Data Reporting (SB 464),

<http://www.rosascolawgroup.com/2025/10/22/22675/legislative-update-changes-to-employer-pay-data-reporting-sb-464/> 7. California Senate Bill 464 Sharpens State's Pay Reporting Teeth - Ogletree Deakins, <https://ogletree.com/insights-resources/blog-posts/california-senate-bill-464-sharpens-states-pay-reporting-teeth/> 8. Senate Bill 464: California Mandates Tougher Pay Data Reporting, <https://www.californiaworkplacelawblog.com/2025/10/articles/wage-and-hour/senate-bill-464-california-mandates-tougher-pay-data-reporting/> 9. Minimum Wage Rate - City of Pasadena, <https://www.cityofpasadena.net/planning/wp-content/uploads/sites/30/OFFICIAL-NOTICE-EFFECTIVE-JULY-1-2025-ENGLISH.pdf> 10. Federal, state, and local minimum wages - Gusto Help Center, <https://support.gusto.com/article/157240006100000/Federal-state-and-local-minimum-wages> 11. Adjust for minimum wage - Gusto Docs, <https://docs.gusto.com/embedded-payroll/docs/adjust-for-minimum-wage> 12. The Ever-Changing Landscape of "Stay or Pay" Employment Contracts: New Restrictions in California and Existing Restrictions in Every State - Duane Morris, https://www.duanemorris.com/alerts/ever_changing_landscape_stay_pay_employment_contract_s_new_restrictions_california_existing_1125.html 13. AB 692: Preparing for California's 2026 restrictions on "stay-or-pay" provisions, <https://www.aoshearman.com/en/insights/ab-692-preparing-for-californias-2026-restrictions-on-stay-or-pay-provisions> 14. Bill Text: CA SB807 | 2021-2022 | Regular Session | Chaptered - LegiScan, <https://legiscan.com/CA/text/SB807/id/2434254> 15. California Employers: Don't Get Caught Off Guard—5 Essential Record Retention Reminders, <https://www.californiaemploymentlawreport.com/2025/03/california-employers-dont-get-caught-off-guard-5-essential-record-retention-reminders/> 16. Archiving opportunities - Lever Help Center, <https://help.lever.co/hc/en-us/articles/20087373712541-Archiving-opportunities> 17. How to populate custom user fields via SSO in TalentLMS, <https://help.talentlms.com/hc/en-us/articles/9652247696796-How-to-populate-custom-user-fields-via-SSO-in-TalentLMS> 18. How to Set Up a Gusto Integration - RG Help Center, <https://success.rewardgateway.com/hc/en-us/articles/18423487290269-Integrations-How-to-Set-Up-a-Gusto-Integration> 19. How to add custom fields to user profiles in TalentLMS, <https://help.talentlms.com/hc/en-us/articles/9652321569436-How-to-add-custom-fields-to-user-profiles-in-TalentLMS> 20. API Documentation - market - TalentLMS, <https://market.talentlms.com/pages/docs/TalentLMS-API-Documentation.pdf> 21. How to work with certifications in TalentLMS, <https://help.talentlms.com/hc/en-us/articles/9651316373148-How-to-work-with-certifications-in-TalentLMS> 22. How to send reminders for completing a course in TalentLMS, <https://help.talentlms.com/hc/en-us/articles/9651467365916-How-to-send-reminders-for-completing-a-course-in-TalentLMS> 23. How to import/export data in TalentLMS, <https://help.talentlms.com/hc/en-us/articles/9651492281756-How-to-import-export-data-in-TalentLMS> 24. How to export course reports – TalentLMS Support - Help Center, <https://help.talentlms.com/hc/en-us/articles/9652213844892-How-to-export-course-reports> 25. Configure a data retention rule - Greenhouse Support, <https://support.greenhouse.io/hc/en-us/articles/360002418112-Configure-a-data-retention-rule> 26. NYC Eightfold Matching Model, <https://eightfold.ai/nyc-eightfold-matching-model/> 27. How iCIMS supports the NYC Automated Employment Decision Tools law, <https://www.icims.com/blog/how-icims-supports-the-nyc-automated-employment-decision-tools-law/> 28. Bias Audit for Ashby's Criteria Evaluation Model, <https://www.ashbyhq.com/downloadables/ashby-bias-audit-08-2024.pdf> 29. License Lookup -

Board for Professional Engineers, Land Surveyors, and Geologists,
https://www.bpelsg.ca.gov/consumers/lic_lookup.shtml 30. Qualification Directory | California Stormwater Quality Association, <https://www.casqa.org/training/casqa-qualification-directory> 31. QSD And QSP Resources | California Stormwater Quality Association, <https://www.casqa.org/training/cgp-training/qsd-qsp-resources> 32. 4 Excellent Deposition Transcript Samples (Plus Tips!) - SpeakWrite, <https://speakwrite.com/blog/deposition-transcript-sample/> 33. uniform format manual - examples - Texas Courts, <https://www.txcourts.gov/media/190753/UFM-Examples.pdf>