

December 23, 2025

Yana Garcia, Secretary  
California Environmental Protection Agency  
1001 I Street  
Sacramento, CA 95814

Dear Secretary Yana Garcia,

In accordance with the State Leadership Accountability Act (Leadership Accountability), the Office of Environmental Health Hazard Assessment submits this report on the review of our internal control and monitoring systems for the biennial period ending December 31, 2025.

Should you have any questions please contact David Edwards, Chief Deputy Director, at (916) 261-3664, David.Edwards@oehha.ca.gov.

## **GOVERNANCE**

---

### **Mission and Strategic Plan**

The Office of Environmental Health Hazard Assessment's mission is to protect and enhance the health of Californians and our state's environment through scientific evaluations that inform, support and guide regulatory and other actions. OEHHA performs risk assessments for various California Environmental Protection Agency (CalEPA) programs, as well as for other state and local agencies. OEHHA provides these agencies and programs with the scientific tools and information upon which to base risk management decisions. Distinct programs within OEHHA focus on assessing health risks from exposure to chemicals in air, drinking water, food (including fish and shellfish) and consumer products. OEHHA also evaluates pollution burdens and vulnerabilities in California communities and tracks impacts of climate change in California.

The following four goals encompass the priorities OEHHA has established for our strategic plan and illustrate our responsibilities as well as our role as a national leader in the field of health risk assessment:

Goal 1: Improve the quality of the public's health and the environment.

Goal 2: Advance the science for the evaluation of risks posed to the public health and environment, and provide risk assessment leadership for the State of California.

Goal 3: Provide high quality information about environmental health hazards to the public.

Goal 4: Effectively and efficiently use our internal resources to accomplish our mission.

## **Control Environment**

OEHHA's Executive Office, which consists of the Director, Chief Deputy Director, Chief Counsel, three Deputy Directors, and one Assistant Deputy Director, provides the director and leadership necessary to plan, develop and administer programs and activities in OEHHA. Executive staff exercises appropriate levels of responsibility and authority to establish an effective control environment. Under general direction of the Chief Deputy Director the Deputy for Scientific Programs directs the activities of the Division of Scientific Programs, which is comprised of four branches: Community and Environmental Epidemiology Research; Air and Site Assessment and Climate Indicators; Reproductive and Cancer Hazard Assessment; and Pesticides and Environmental Toxicology. Each branch is comprised of sections overseen by Section Chiefs who report to one of the four Branch Chiefs. OEHHA's Office of External and Legislative Affairs provides information to the Legislature, the news media and the public, as well as implementation support of the Proposition 65 program. The Deputy Director of Administrative Services Division coordinates the work of its Administrative Services Division's four branches: Information Technology, Fiscal Services, Contracts and Business Services; and Human Resources. The Office of Chief Counsel provides legal support to various programs. The Executive Office communicates directly with other managers during a weekly meeting in the addition to alternate monthly meetings with branch chiefs and entire management team, respectively.

As outlined in the OEHHA's strategic plan, the following principles guide OEHHA in carrying out its mission:

- Accountability in programs and activities
- Credibility in scientific findings and reports
- Honesty in actions and communications
- Innovation across scientific disciplines
- Integrity in all arenas
- Objectivity and respect for a range of opinions
- Open and cooperative communication
- Respect for staff
- Stewardship for wildlife and ecosystems
- Rigorous scientific analysis
- Support for advancing environmental justice and tribal relationships

OEHHA's Executive Office and management team put continuing emphasis on these values and work hard to make sure they are at the core of our workplace culture. As a relatively small office, OEHHA executives, middle managers and staff know each other on a first-name basis,

---

and this has helped foster open communications, trust and the maintenance of a positive, open culture throughout the organization. OEHHA executives meet regularly with branch chiefs and the first-level supervisors who report to those branch chiefs to discuss issues of concern as well as reaffirm our workplace values.

OEHHA leadership, department managers and supervisors provide staff with a clear overview of duties and expectations of their position. Staff are held accountable for performing their duties, and complying with policies, procedures and processes. OEHHA's Human Resources Branch assists managers and supervisors in the appropriate and timely application of preventative and progressive discipline processes to address any concerns relating to job performance. All levels of staff also participate in the annual performance review process and any deficiencies identified are followed up on by management. Also, it is the policy of the department to evaluate the work and efficiency of a probationer at sufficiently frequent intervals to keep the employee adequately informed of progress on the job.

OEHHA's control environment is multi-faceted. Our scientific assessments undergo a rigorous internal- review process to ensure they are thorough and based on the best science. This process often involves interbranch reviews to ensure consistency of assessments across OEHHA's different programs. It also ensures accountability among staff scientists. We highly recommend and encourage staff to complete Individual Development Plans and support reasonable requests for training to ensure our staff can perform at their highest level.

OEHHA has documented in its SLAA reports over the years the risks it has identified and steps it has taken to mitigate those risks. Succession planning has been a high priority in OEHHA, given the high percentage of our staff that are at retirement age. Revamping an ongoing recruitment program, maintenance of high standards for potential hires, and our reputation for scientific integrity has enabled us to backfill retiring staff with qualified replacements. Additionally, we have also made cultural diversity and inclusion a priority when hiring new staff.

OEHHA ensures that its policies and procedures are available to all staff and the employees are well acquainted with the policies and procedures that pertain to staff job responsibilities. To ensure greater efficiency and uniformity, especially in middle of a pandemic with changing circumstances, OEHHA's Human Resources Branch is collaborating with the other Boards, Department, and Offices within CalEPA on development and implementation of new policies. In addition, we take audits and feedback from control agencies seriously and address shortcomings that they may find. We adhere to state-approved practices in our accounting, contracting, human resources and IT operations, and regularly review OEHHA's expenditures. The Executive Office insists on honest communications both internally as well as with external stakeholders, and guards OEHHA's reputation in the scientific and stakeholder communities as a credible and honest organization.

## **Information and Communication**

In order for OEHHA to achieve its objectives, management communicates frequently with its employees and external stakeholders. For example:

OEHHA management communicates changes in policies or department operations through email that are distributed to all employees. Policies are posted on the intranet for employee access. In addition, regular communication happens via the following:

1) Weekly Executive Staff meetings; 2) Weekly extended management team meetings; 3) Weekly/Monthly Branch and Section meetings; 4) We have increased the number of staff meetings; 5) e-mails to the extended management are used to share and communicate important information or requests focused on managers and supervisors; and 6) All staff e-mails are used to communicate important information to everyone. In addition, we started sending out regular newsletters with updates.

In addition, OEHHA executives maintain an "open door" policy through which staff at any level can share thoughts, ideas and concerns directly with executives. Staff typically report concerns to management through official channels (principally by expressing concerns to their supervisor or the human resources office), but these open-door meetings are also a way for staff to convey concerns to executives.

We place a high priority on being responsive to legislative and media inquiries. We report all legislative and media contacts to CalEPA to ensure our accountability. We all communicate our key activities to CalEPA and sister CalEPA programs through the agency's weekly and biweekly reports, and regularly meet with CalEPA and our sister agencies on topics of mutual interest and concern.

OEHHA has long had an "open door" policy with external stakeholders, who regularly meet with us to discuss their interests and views on OEHHA's activities.

## **MONITORING**

---

The information included here discusses the entity-wide, continuous process to ensure internal control systems are working as intended. The role of the executive monitoring sponsor includes facilitating and verifying that the Office of Environmental Health Hazard Assessment monitoring practices are implemented and functioning. The responsibilities as the executive monitoring sponsor(s) have been given to: Mike Gyurics.

The Office of Environmental Health Hazard Assessment's Executive Office is responsible for overall management of OEHHA. The Executive Office meets weekly to address assignments, priorities, timelines, and mandates and strategizes ways to address areas of concern. The

meeting topics include discussion of current and potential internal control issues that need to be addressed. In addition, monthly meetings are held with OEHHA mid-level managers to share information, raise issues and address concerns. In addition, Branches and Sections within OEHHA meet regularly to disseminate information and hear issues from staff. All-staff meetings are also regularly held to share vision, direction and to highlight progress.

The Administrative Services Division uses a system of checks and balances to address internal control within the procurement, contracting, budgets, and accounting functions via the roles assigned to staff within Fiscal. As OEHHA is a small department, some staff have multiple roles and at times those additional roles can appear to affect adequate separation of duties. In instances where staff are assigned multiple roles, OEHHA documents why staff must have a particular role. In most instances the role is assigned only for back-up purposes. In addition, the Information Technology and Human Resources functions operate similarly, only providing access to staff with a specific need and are set-up to maintain separation of duties as much as possible. As an organization OEHHA's internal controls and monitoring happen regularly.

OEHHA's controls are also monitored by outside Control Agencies through audits or reviews. The State Personnel Board conducts compliance reviews on a three-year cycle of OEHHA's personnel practices. The California Department of Technology conducts an information Security Program Audit on a four-year cycle. The California Military Department conducts cyber security independent assessments on a three-year cycle. Any findings or deficiencies found during these audits or assessments are addressed with department managers and staff.

## **RISK ASSESSMENT PROCESS**

---

The following personnel were involved in the Office of Environmental Health Hazard Assessment risk assessment process: executive management, middle management, front line management, and staff.

The following methods were used to identify risks: brainstorming meetings, ongoing monitoring activities, audit/review results, other/prior risk assessments, consideration of potential fraud, and performance metrics.

The following criteria were used to rank risks: potential impact to mission/goals/objectives, timing of potential event, and potential impact of remediation efforts.

## RISKS AND CONTROLS

### Risk: Budgets and Funding

Several of OEHHA's programs and full-time permanent staff are supported by funds via reimbursement contracts from other Boards, Departments and Offices (BDOs). Recent year budget reductions are impacting staffing and program funding, severely reducing resources necessary to fulfill our mandates and mission. Additionally, eliminated contract funding also impacts our ability to finalize work products. If the state budget continues to decline and the other BDOs face additional budget cuts, it is unclear how that will affect OEHHA programs in the future.

#### Control: Control A

Continue ongoing communication with departments who fund OEHHA programs through reimbursement contracts.

#### Control: Control B

Work closely with Agency and Department of Finance to ensure adequate funding for OEHHA's existing programs and new activities required by legislation or executive order.

### Risk: Potential for Losing Scientific Edge

The science underlying OEHHA's risk assessments is changing and traditional assessments based on animal toxicology data will become increasingly outmoded. Therefore, it is important for OEHHA to keep up with the transformational scientific developments to make use of newer types of data and to facilitate accelerated assessments. New

scientific developments on the key characteristics of chemicals causing adverse health effects, susceptible and vulnerable populations, combined effects of multiple hazards, (including chemical, physical, and biological agents), and new approach methodologies (NAMs which include high throughput assays, non-mammalian systems and computational models) are becoming available and increasing in importance. If OEHHA's assessments do not account for these new scientific data and methods, they cannot effectively address the unassessed chemicals of importance to the State of California in a timely manner and could be regarded as being unable to support subsequent policy decisions to protect the health and environment of Californians. Keeping up with current science, technology and tools for exposure science and data science is crucial for our mandated missions as well as OEHHA's reputation as a national leader in health science. Failure to provide continuous training on key tools will reduce capability to perform analysis to protect environmental health. Scientific staff will need training to stay current with the latest advancements in risk assessment methodologies.

**Control: Control A**

OEHHA will continue to recruit scientists for our vacant positions who have knowledge of new assessment methods. OEHHA will continue to encourage its scientists to interact with other national and international experts in this area, this included sending scientists to scientific meetings.

**Control: Control B**

OEHHA will look for opportunities to collaborate with outside experts to develop scientifically defensible models and frameworks for the use of new assessment methods and data to support risk assessments.

## Risk: Loss of Key Staff and Institutional Knowledge

Loss of key staff could delay work products, result in poor quality work products and missed deadlines.

Many staff at OEHHA are eligible to retire and some of those staff are in "key person dependent" positions. OEHHA has 102 scientist positions. Of the 102 scientists, 20 are eligible to retire. In 2025, OEHHA had four scientists retire and another five left the organization. This represents almost nine percent of the turnover in a single year. The scientific expertise and experience is challenging to replace, particularly then the position requires specialized expertise.

Key person dependencies also exist within the area of writing and editing for lay audiences. It has been difficult to recruit new hires who have expertise in management and specialty disciplines. The quality of OEHHA work products would suffer and our ability to communicate our work to policymakers, our non-scientific stakeholders and other non-scientific audiences would be compromised if we were to lose these key people.

### Control: Control A

OEHHA will continue cross-training, job shadowing, and mentoring in those areas anticipating a loss of staff due to retirement and OEHHA will focus recruitment efforts to address "key staff dependency" areas, i.e. expertise in carcinogenesis, cancer dose-response analysis, developmental and reproductive toxicity, strong writing skills, applied mathematics, and modeling.

### Control: Control B

OEHHA will continue to develop training opportunities to further develop existing staff, especially in the areas where key dependencies exist.

---

## **CONCLUSION**

---

The Office of Environmental Health Hazard Assessment strives to reduce the risks inherent in our work and accepts the responsibility to continuously improve by addressing newly recognized risks and revising risk mitigation strategies as appropriate. I certify our internal control and monitoring systems are adequate to identify and address current and potential risks facing the organization.

**Kristina Thayer, Director**

CC: California Legislature [Senate, Assembly]  
California State Auditor  
California State Library  
California State Controller  
Director of California Department of Finance  
Secretary of California Government Operations Agency