

## CHANGES WITHOUT REGULATORY EFFECT STATEMENT OF REASON

Description of Regulatory Change and Explanatory Statement:

Pursuant to 1 CCR § 100 (a), CALPIA is submitting changes without regulatory effect to be published in the California Code of Regulations without complying with the rulemaking procedure specified in Article 5 of the APA because the changes do not materially alter any requirement, right, responsibility, condition, prescription or other regulatory element of any California Code of Regulations provision.

Pursuant to Title 1, CCR, section 100(a)(4), the California Prison Industry Board (PIB) proposes to make non-substantive changes to Sections 8200, and 8205, Title 15.

The proposed changes delete reference to 11349 of the Government Code in the Authority section of the text. Gov. Code sec. 11349(e) is a statute within the Administrative Procedure Act, which defines the “reference” standard, and is unrelated to CalPIA’s regulations. The proposed changes also add descriptive language in the title of section 8200 to state Personnel Testing Program Purpose and Goals instead of only Purpose and Goals to more accurately described section 8200 as the purpose and goals of the Personnel Testing Program. In addition, Government Code, cited as Gov’t Code, is added to the Authority of Section 8205.

These proposed changes do not materially alter any requirement, right, responsibility, condition, prescription or other regulatory element of any CCR provision because the proposed changes do not alter the text of the meaning of the regulations, nor in this case, change the meaning of the content of the regulations.

Adding the descriptive *Personnel Testing Program* to the title of Section 8200 does not materially alter any requirement, right, responsibility, condition, prescription or other regulatory element of any CCR provision because it is only an explanatory descriptive phrase of the nature of the section and to identify what purpose and goals are being referenced in this Section, as shown by the language under subsection (a) stating “the purpose of CALPIA’s testing program is . . . “

Deleting an incorrect authority and correcting a typographical error adding the relevant source of the Government Code does not materially alter any requirement, right, responsibility, condition, prescription or other regulatory element of any CCR provision pursuant to Section 100 because these changes are grammatical, typographical and editorial revisions consistent with the California Style Manual and to correct a typographical error.