

Per California Code of Regulations, title 2, section 548.5, the following information will be posted to CalHR's Career Executive Assignment Action Proposals website for 30 calendar days when departments propose new CEA concepts or major revisions to existing CEA concepts. Presence of the department-submitted CEA Action Proposal information on CalHR's website does not indicate CalHR support for the proposal.

A. GENERAL INFORMATION

1. Date

2025-06-19

2. Department

California Privacy Protection Agency

3. Organizational Placement (Division/Branch/Office Name)

Public and External Affairs Division

4. CEA Position Title

Assistant Deputy Director - CEA A

5. Summary of proposed position description and how it relates to the program's mission or purpose. (2-3 sentences)

This Assistant Deputy Director, CEA provides program oversight for the implementation of the Delete Act and serves as the primary advisor to the executive team on all Delete Act related matters. The CEA will have decision-making authority over all things related to implementation of the Delete Act, including but not limited to: Delete Request and Opt-out Platform (DROP) operation and functionality; consumer and data broker education and outreach; troubleshooting and response standards and approach; budget analysis and needs, and rule making.

6. Reports to: (Class Title/Level)

Deputy Director of Public & External Affairs – CEA B

7. Relationship with Department Director (Select one)

- Member of department's Executive Management Team, and has frequent contact with director on a wide range of department-wide issues.
- Not a member of department's Executive Management Team but has frequent contact with the Executive Management Team on policy issues.

(Explain): Position works closely with Executive team for Senate Bill 362 (Delete Act) related initiatives and policy making, considerations, and implementation.

8. Organizational Level (Select one)

- 1st
- 2nd
- 3rd
- 4th
- 5th (mega departments only - 17,001+ allocated positions)

B. SUMMARY OF REQUEST

9. What are the duties and responsibilities of the CEA position? Be specific and provide examples.

Program Leadership and Strategic Implementation of the Delete Act

- Provide strategic leadership and oversight for the Agency's implementation of the Delete Act, ensuring alignment with statutory requirements and public policy goals.
- Serve as the primary advisor to the executive team on all matters related to the Delete Act, including program design, operations, outreach, compliance, and enforcement-referral strategy in coordination with the executive team.
- Direct and monitor the program's budget, staffing contracts, and resource allocation to support successful implementation and long-term sustainability.
- Represent the Agency in high-level engagements with stakeholders including, the CPPA Board, data brokers, consumer advocacy organizations, other state entities, and the legislature.
- Collaborate with the Legal, IT, and Policy & Legislation Divisions in the Agency to implement the Delete Act, including development and amendment of regulations, development and maintenance of DROP system functionality, and program adjustments due to changes in legislation, as necessary.
- Coordinate with Enforcement Division to ensure alignment between statutory requirements and program priorities, and enforcement referrals, investigations, and prosecutions.
- Oversee adoption, implementation, and amendment of all program-related policies and procedures, including DROP system operation, consumer response and appeal protocols, and data broker engagement standards.

Delete Request and Opt-out Platform ("DROP") Oversight & Administration

- In coordination with the Legal, Administration, and IT divisions, oversee all procurement, design, testing, and deployment for DROP, including system updates, maintenance, and redesign as appropriate.
- Ensure all DROP system components and operations meet applicable requirements under state law, including the Delete Act, the Information Practices Act, and state procurement requirements.
- Prepare and regularly update a detailed project plan, to include a timeline for DROP deployment, maintenance, and education, intra-Agency review and external presentations.
- Prepare reports, briefing materials, and public updates for executive leadership and oversight bodies based on DROP system performance and metrics.
- Manage user experience research, accessibility compliance, and complaints.

Outreach & Education

- Responsibility and oversight for all outreach and education information prepared for the DROP system and Delete Act, including program descriptions and updates for consumers and data brokers made through a variety of communication tools.
- Prepare and review talking points, informational materials, and other external communication content related to Delete Act/DROP for Agency use and reference.
- Support the development of communication strategies, training materials, and outreach efforts to ensure successful adoption of DROP by data brokers and consumers.
- Plan, promote and assist in the operation of outreach and education events relating to the DROP system and the Delete Act.

Supervision & Work Assignments

- Recruits, hires, trains, develops, and provides managerial review of subordinate staff.
- Supervises and directs the work of subordinate staff by providing guidance, planning, assignment, and review of staff work in order to carry out implementation of the Delete Act.
- Collaborates and works closely with Legal and IT Division staff dedicated to Delete Act implementation, including coordinating review and deployment of all DROP system components, and triaging data broker and consumer complaints and concerns.

Provide leadership for the PA division in the absence of the Deputy Director

B. SUMMARY OF REQUEST (continued)

10. How critical is the program's mission or purpose to the department's mission as a whole? Include a description of the degree to which the program is critical to the department's mission.

- Program is directly related to department's primary mission and is critical to achieving the department's goals.
- Program is indirectly related to department's primary mission.
- Program plays a supporting role in achieving department's mission (i.e., budget, personnel, other admin functions).

Description: On October 10, 2023, the Governor signed Senate Bill 362 into law (commonly referred to as "the Delete Act"). The law tasks the Agency with establishing, by January 1, 2026, a deletion mechanism that allows consumers to request from all data brokers the deletion of all non-exempt personal information related to the consumer through a single deletion request to the Agency.

The law also transferred the administration and enforcement of the Data Broker Registry from the Office of the Attorney General to the California Privacy Protection Agency ("Agency") as of January 1, 2024. The Agency now maintains the Data Broker Registry and posts publicly the required information disclosed by data brokers.

The Delete Act is one of two laws that the Agency is tasked with implementing and enforcing, and therefore this program is critical to the Agency's mission and to ensure its statutory compliance.

Position authority for this CEA A was granted through Budget Change Proposal (BCP) 1703-001-BCP-2022-GB, approved by Department of Finance.

B. SUMMARY OF REQUEST (continued)

11. Describe what has changed that makes this request necessary. Explain how the change justifies the current request. Be specific and provide examples.

As described in response to question 21, the Delete Act vested the CPPA with a number of new mission-critical responsibilities, including operation and administration of the Data Broker Registry, and, beginning in 2026, administration of the Delete Request and Opt-out Platform (or "DROP")--a first of its kind accessible deletion mechanism through which California consumers can submit a request to all registered data brokers to delete their personal information.

The DROP system will be used monthly by more than 500 data brokers, and all Californians are eligible to use it as well. In addition, beginning in 2028 data brokers will have to start completing triennial compliance audits, which still must be further detailed through regulation.

Administration of the Delete Act requires an executive-level leader to coordinate resources across the Agency and make day-to-day policy and operation decisions to carry out these new programs. Especially once the DROP is deployed in 2026, this position may be required to manage high volumes of data broker and consumer inquiries, issues, and complaints.

Position authority for this CEA A was granted through Budget Change Proposal (BCP) 1703-001-BCP-2022-GB, approved by Department of Finance.

C. ROLE IN POLICY INFLUENCE

12. Provide 3-5 specific examples of policy areas over which the CEA position will be the principle policy maker. Each example should cite a policy that would have an identifiable impact. Include a description of the statewide impact of the assigned program.

1. The CEA will set the policy for the Agency's outreach and education efforts to encourage consumers to use DROP. The policies and initiatives set as part of this effort will have an immediate and direct impact on how widely DROP is adopted by up to 40 million+ Californians, which will enhance privacy protections for consumers and reduce the amount of personal information being brokered about them nationally and internationally.

2. The CEA will set the policy for how the DROP is architected and operated, including which features to include and how to operationalize best practices for protecting consumer privacy. This will directly impact data broker compliance with Delete Act requirements, consumer experience with a state data base, and vulnerability of personal information collected and maintained within the DROP.

3. The CEA will set the policy for the scope and requirements of data broker compliance audits. These decisions will directly impact data broker compliance with the law's audit requirements, and also affect the usefulness and integrity of these audits in detecting non-compliance, which could lead to enforcement actions against registered data brokers.

C. ROLE IN POLICY INFLUENCE (continued)

13. What is the CEA position's scope and nature of decision-making authority?

The CEA will have day-to-day decision-making authority over all things related to implementation of the Delete Act, including but not limited to: DROP operation and functionality; consumer and data broker education and outreach; troubleshooting and response standards and approach; budget analysis and needs; supervision of at least two staff; and rulemaking.

14. Will the CEA position be developing and implementing new policy, or interpreting and implementing existing policy? How?

Both. The CEA will interpreting and implementing policies and decisions made by Agency leadership to date about the DROP, including system design decisions and implementing regulations. However, when the DROP launches in 2026, the CEA will need to develop and implement new policies concerning consumer support processes and standards, data broker enforcement, and compliance audit standards. Policies will be developed in partnership with appropriate division heads, including deputy directors over enforcement, legal, and IT.