

Now: Civil Rights Council automated-decision rules (in effect since October 1, 2025)

- ☐ List every tool or rule that screens, ranks, or scores applicants. The rules name "Screening resumes for particular terms or patterns" as an automated-decision system task (2 CCR 11008.1(a)).
- ☐ Keep application records, selection criteria, and automated-decision system data for four years (2 CCR 11013(c)), and preserve them longer if a complaint is filed (11013(c)(4)).
- ☐ Test for bias and keep the results. Evidence, or the lack of evidence, of anti-bias testing is relevant, including its "quality, efficacy, recency, and scope" and "the response to the results" (2 CCR 11009(f)).
- ☐ For any screen with an adverse impact, document why it is job-related and consistent with business necessity (2 CCR 11017(e)).
- ☐ Get your vendor's testing documentation and data access terms in writing. The rules cover agents acting on an employer's behalf.

Now: CCPA risk assessments (required since January 1, 2026)

- ☐ Complete a risk assessment before using automated decision-making technology for hiring, review it at least every three years, and update it within 45 days of a material change (11 CCR 7155(a)).
- ☐ Keep each assessment for the longer of the processing period or five years (7155(c)). Assessments done in 2026 and 2027 are submitted by April 1, 2028 (7157(a)(1)).

By January 1, 2027: CCPA automated decision-making rules for hiring (11 CCR 7200(b))

- ☐ Give a Pre-use Notice at or before collecting the information: specific purpose, opt-out or appeal right or the exception relied on, access right, no retaliation, and how the tool works (7220).
- ☐ If you rely on the hiring exception, document that the tool assesses ability to perform the job and does not unlawfully discriminate (7221(b)(2)). Notice and access still apply.
- ☐ Prepare plain-language answers to access requests: purpose, the logic used, the output for that person, and whether it was the sole factor (7222(b)).

Ongoing: applicant and employee requests

- ☐ Confirm receipt within 10 business days and respond within 45 calendar days, extendable once to 90 with notice (11 CCR 7021). Offer at least two request methods (7020).
- ☐ Log every request and response for 24 months (7101).

By July 1, 2027: Senate Bill 947 (discipline and termination, not hiring)

- ☐ Do not rely solely on an automated-decision system for discipline or termination, and have a person corroborate decisions that primarily rely on one (Labor Code 1522).

TrueScan HR scores each resume against the job, shows the matched and missing skills behind every score, and keeps a scored record for each resume. Enterprise plans add certified weekly bias testing and a 4/5ths adverse impact report.