

Managing the Use of Part-time and Temporary Employees

*Presented for the Association of Chief Human Resources Officers and Equal
Employment Officers*

Co-Presenter: Jacques Whitfield
Former Chief Human Resources Officer,
Yuba Community College District/HR Consultant

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Disclaimer

The following information is designed to be a
general guide and should NOT be considered
legal advice. For questions about specific
situations, please consult an attorney.

Disclaimer

The following information does not necessarily represent the views of the Yuba Community College District or its Board of Trustees.

Purpose of the Workshop

Provide an overview of the laws governing the use of part-time and temporary employees in Community College Districts.

Prepare participants to identify proper uses of part-time and temporary employees and avoid potential violations of the Education Code limitations on the use of part-time and temporary employees.

Workshop Overview

- I. Part-time and Temporary Academic Employment**
 - A. Instruction for Less than 67% of Full-time
 - B. Limited Duration for Specified Need
- II. Temporary Classified Employment**
 - A. Short-Term Assignments
 - B. Substitute Employees
 - C. Work Excluded from the Classified Service
- III. Categorically Funded Employment**
 - A. Categorically Funded Academic Employment
 - B. Categorically Funded Classified Employment
- IV. Examples and Common Problems**

I. Part-time and Temporary Academic Employment

Temporary Academic Employment

- A community college district is required to employ each academic employee as a contract, regular, or temporary employee. (Educ. Code § 87604; Stryker v. Antelope Valley Community College Dist. (2002) 100 Cal. App. 4th 324.)
- A district may temporarily employ a qualified person to fill short-term needs. (Haase v. San Diego Community College District (1980) 113 Cal. App. 3d 913, 919.)
- Temporary employees may generally be released at the end of a day or week. (Educ. Code § 87665.)

Temporary Academic Employment

- Because temporary classifications are not guaranteed procedural due process, temporary positions are narrowly defined by statute and are strictly interpreted. (Balen v. Peralta Junior College District (1974) 11 Cal.3d 821.)

Temporary Academic Employment

- The Education Code is silent on what happens to temporary faculty when their workload exceeds the requirements for temporary employment.
- According to case law, a temporary faculty member whose workload exceeds the statutory limitations of temporary employment is no longer within the definition of temporary under the Education Code. (Peralta Federation of Teachers v. Peralta Community College Dist. (1979) 24 Cal.3d 369.)
- A temporary employee who does not fall within a temporary faculty employment exception, or is not properly classified as a temporary employee from the date of hire, is entitled to be reclassified as a contract employee. (Stryker v. Antelope Valley Community College Dist. (2002) 100 Cal. App. 4th at 330-333.)

Types of Temporary Academic Employment

- Generally, two types of academic employees may be designated as temporary:
 - 1) Those hired on a part-time basis to teach 67 percent or less of a full-time workload (Educ. Code § 87482.5; Balasubramanian v. San Diego Community College Dist. (2000) 80 Cal. App. 4th 977; Peralta Federation of Teachers v. Peralta Community College Dist. (1979) 24 Cal. 3d 369); and
 - 2) Those hired for a limited time to meet certain specified needs of the District. (Educ. Code §§ 87478, 87480, 87481, 87482.)

Part-Time (Adjunct) Employment

Part-Time (Adjunct) Employment

- Education Code Section 87482.5, known as the “67% Rule” provides that a community college district may employ temporary teachers for “not more than 67% of the hours per week considered a full-time assignment for regular employees.” (Educ. Code § 87482.5.)
- These employees are typically referred to as “adjunct,” “part-time,” or “associate” faculty.

Part-Time (Adjunct) Employment

- Service in “professional ancillary” activities including governance, staff development, grant writing, and advising student organizations is not used in calculating a temporary employee’s load. (Educ. Code § 87482.5(c)(1).)
- Service as a “day-to-day” substitute is not used to calculate a temporary employee’s eligibility for contract or regular status. (Educ. Code § 87482.5.)

Part-Time (Adjunct) Employment

- A temporary employee’s load calculation under the 67% Rule is based upon what constitutes a full-time load for a full-time faculty member. (Theiler v. Ventura County Community College Dist. (2011) 198 Cal.App.4th 852.)
- A district has some latitude in how it defines a regular full-time teaching load. (Womack v. San Francisco Community College District (2007) 147 Cal.App.4th 854.)

Part-Time (Adjunct) Employment

- The Education Code does not specify if an adjunct instructor's load is calculated based on the hours worked during the full year or each semester. (Rooney v. San Diego Community College Dist. (1982) 129 Cal. App. 3d 977, interpreting the predecessor to Section 87482.5.)
- A part-time employee is properly classified as temporary if the weekly teaching load does not exceed 67 percent of a regular full-time assignment - calculated on the basis of the entire school year. (Id.)

Part-Time (Adjunct) Employment

Accordingly, a temporary adjunct instructor is permitted to exceed the 67% limit for one semester as long as the employee's annual load does not exceed 67% of a regular full-time load, as defined in the collective bargaining agreement, provided the load is stated annually. (Berkeley Fed'n of Teachers v. Berkeley Unified Sch. Dist. (1986) 178 Cal. App. 3d 775.)

Part-Time Priority Rehire Rights

- Adjunct instructors hold positions of a temporary nature and are technically dismissed each year with no guarantee of an assignment for the following semester. (Daniels v. Shasta-Tehama-Trinity J. Cmty. College Dist. (1989) 212 Cal. App. 3d 909.)
- However, under the Education Code, a District is required to negotiate rehire rights with part-time faculty. (Educ. Code § 87482.3(a)(1).)

Part-Time Priority Rehire Rights

The minimum standards for negotiation of part-time reemployment preference must include:

- The length of time part-time faculty have served.
- The number of courses part-time faculty have taught.
- Evaluations that can reliably be used to assess educational impact of temporary faculty as it relates to student success.
- The availability, willingness, and expertise of temporary faculty to teach specific classes or take on specific assignments that are necessary for student instruction or services.
- (Educ. Code § 87482.3(a)(2)(B)(i).)

Part-Time Priority Rehire Rights

Any agreement on part-time reemployment preferences must include a "regular evaluation process for part-time, temporary faculty pursuant to the requirements of Section 87663." (Educ. Code § 87482.3(b).)

Part-Time Priority Rehire Rights

- Removal from reemployment preference has been recognized as a permissive subject of bargaining. (Santa Monica College Faculty Assn. v. Santa Monica Community College Dist. (2015) 243 Cal. App. 4th 538.)
- However, the Education Code expressly grants the District discretion to terminate a part-time academic employee at the end of a day or week. (Educ. Code § 87665; and see Daniels v. Shasta-Tehama-Trinity J. Cmty. College Dist. (1989) 212 Cal. App. 3d 909, 921.)

Part-Time Priority Rehire Rights

The Court found that it was possible to harmonize the statute governing reappointment rights of part-time faculty and the District's discretion to terminate because non-reassignment (as opposed to termination) is subject to mandatory negotiation. (Santa Monica College Faculty Assn., 243 Cal. App. 4th at 552.)

Part-Time Office Hours

Part-Time Office Hours

- The District and part-time faculty may agree to paid office time for each 20 percent of a full-time load, or fraction thereof, as defined by the district. (Educ. Code § 87883(b).)
- Any negotiated office hours do not apply toward the 67% maximum for part-time faculty.
- Negotiated office hours do not count towards weekly hours of adult or community education teaching for tenure eligibility or fulfilling probationary hour requirements. (Educ. Code § 87884(b).)

Part-Time Benefits

Part-Time Benefits

- The Education Code incentivizes District's to offer part-time faculty employees health insurance benefits. (Educ. Code § 87860 *et seq.*)
- The Chancellor's Office reimburses Districts for fifty (50) percent of the expenditures for administering these programs, subject to proration based on the claims received. (CCCCO Fiscal Services Memo 17-03.)

Part-Time Sick Leave

Part-Time Sick Leave

The Education Code provides a part-time faculty member is entitled to pro rata sick days as follows:

- An employee employed for less than five schooldays a week shall be entitled, for a college year of service, to that proportion of 10 days' leave of absence for illness or injury as the number of days he or she is employed per week bears to five, and is entitled to those additional days as the governing board may allow for illness or injury to academic employees employed for less than five schooldays per week.
- Pay for any day of those absences shall be the same as the pay that would have been received had the employee served during the day.

(Educ. Code § 87781(a)(2).)

Full-time Temporary Faculty

Filling Specified Temporary Needs

- The Education Code authorizes a District to hire temporary employees on a full-time basis to fill particular needs specified in the statutes, including:
 - Substitute service after September 1st (§ 87478);
 - Short-term, day-to-day teaching (§ 87480);
 - Emergency service to prevent the stoppage of district business (§ 87480);
 - Long-term substitute for full-time faculty on leave (§ 87481); and
 - Additional need due to increased enrollment or long-term illness of full-time faculty (§ 87482).

Full-time Temporary: After September 1st

Districts may hire temporary day-to-day substitutes for vacancies arising after September 1 of an academic year to fill the full-time position for the remainder of the academic year of a regular employee absent from service or positions for which no regular employee is available.

(Educ. Code § 87478.)

Full-time Temporary: After September 1st

- The District is required to demonstrate no regular employee is available, including retired teachers. (Id.)
- A temporary employee hired for at least 75% of the school year who is reemployed the next year in a faculty position is deemed a contract employee with the prior year of service counted as contract employment.

(Educ. Code § 87478.)

Full-time Temporary: Short-term Day-to-Day Substitutes

- Districts may hire full-time temporary faculty to teach temporary classes on a day-to-day basis during the first three school months or for certain classes of not more than four months in duration, such as to:
 - teach temporary classes which will not be offered after the first three months,
 - perform duties that will not last more than three months, and
 - teach four-month special day and evening classes for adults or migratory populations. (Educ. Code § 87480.)

Full-time Temporary: Short-term Day-to-Day Substitutes

Temporary full-time faculty may also be hired as day-to-day substitutes for up to 20 working days "to prevent the stoppage of district business when an actual emergency arises and persons are not immediately available for contract classification."

(Educ. Code § 87480.)

Full-time Temporary: Substitute

- Education Code Section 87481, allows Districts to employ a temporary employee as a substitute "for a complete school year, but not less than one semester or quarter during a school year unless the date of rendering first paid service begins during the second semester or third quarter and prior to March 15th." (Educ. Code § 87481.)
- The District's reason for hiring a temporary employee must be based on the need for additional faculty during the particular semester or due to a full-time faculty member's semester-long leave or long-term illness. (Id.)

Full-time Temporary: Substitute

- Under Section 87481, if a temporary employee is re-employed for the following school year in a “vacant” position, the faculty member must be classified as a contract employee and have his or her previous year as a temporary employee be deemed a year of employment as a contract employee.
- However, vacancies do not include filling in for another employee on leave. (*Id.*)
- The number of temporary employees hired under this section is limited to the number of full-time faculty granted leave or experiencing a long-term illness.

Full-time Temporary Faculty: Increased Enrollment

The District can hire a temporary employee to teach “for a complete school year, but not less than a complete semester or quarter during a school year”:

- Due to higher enrollment of students during a semester or quarter as compared to the other semester or quarter in the academic year, or
- Due to the need for additional faculty during a particular semester or quarter because a faculty member has been granted leave, or is experiencing long-term illness. (Educ. Code § 87482(a)(1).)

Full-time Temporary Faculty: Increased Enrollment

- Temporary employees hired full-time under this section may not be employed by the District for more than two semesters or three quarters within any period of three consecutive years. (Educ. Code § 87482.)
- Temporary employees under this section are limited to the number necessary to meet the need, as determined by the governing board. (Id.)
- A faculty member may be employed under this section pursuant to a contract fixing a salary for an entire semester or quarter.

Consequences of Exceeding Temporary Employment Limits

Consequences of Exceeding Temporary Employment Limits

- If an employee exceeds the limits set forth in a statute permitting temporary faculty employment, or is rehired in a vacant position the next year, often the employee will be deemed a contract or tenure-track employee. (See Educ. Code §§ 87478, 87480, and 87481.)
- Accordingly, it is essential that the employee's contract and/or notice of assignment expressly classify the employee as temporary, and state the length of the assignment and the reason for the assignment.


II. Temporary Classified Employment

Types of Temporary Classified Employment

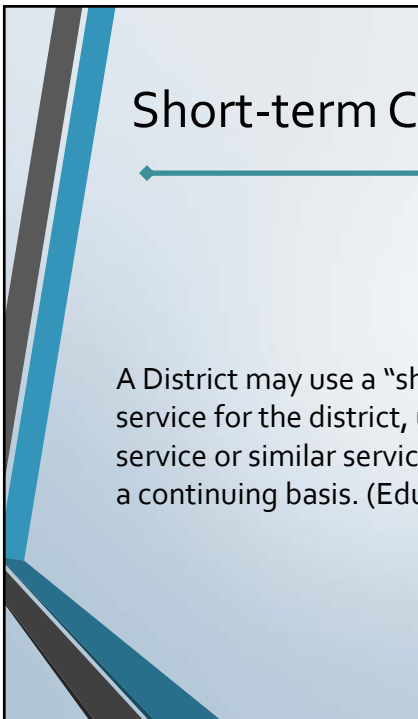
- A community college district can hire non-academic employees, but must classify all non-academic employees and positions. (Educ. Code § 88003(a).)
- Every position not defined by the board of governors as an academic position and not specifically exempted from the classified service under Section 88003 is part of the classified service. (Educ. Code § 88004.)
- A classified employee who has passed the required probationary period earns permanent status in that class. (Educ. Code § 88001.)

Types of Temporary Classified Employment

- The following types of assignments and services are specifically excluded from the classified service:
 - Academic employees,
 - Short-term and substitute employees paid less than 75% of a year,
 - Apprentices and professional experts employed for a specific project regardless of length, and
 - Full-time students employed part-time and part-time students employed through work-study or workforce programs.
- (Educ. Code § 88003(a).)



Short-term Classified Assignments



Short-term Classified Assignments

A District may use a "short-term employee" to perform a service for the district, upon the completion of which, the service or similar services will not be extended or needed on a continuing basis. (Educ. Code § 88003(c).)

Short-term Classified Assignments

Before employing a short-term employee, the governing board, at a regularly scheduled board meeting, shall:

- Specify the service required to be performed by the employee, and
- Certify the ending date of the service.

Short-term Classified Assignments

- The Board must specify the service required to be performed by the employee pursuant to the definition of "classification" in Education Code Section 88001(a).
- Under Section 88001(a), a "classification" requires:
 - a designated title
 - a regular minimum number of assigned hours per day, days per week, and months per year
 - a specific statement of the duties required to be performed by the employees in each such position, and
 - the regular monthly salary ranges for each such position.

Short-term Classified Assignments

The Board must also certify the ending date of the service.

- The ending date may be shortened or extended by the governing board, but shall not extend beyond 75 percent of a school year.
- The maximum term for a short-term employee is seventy-five percent (75%) of a year, which is defined as 195 working days.

Short-term Classified Assignments

- The working 195 day limit does not include weekends, but it does include "holidays, sick leave, vacation and other leaves of absences, irrespective of number of hours worked per day." (California Sch. Employees Assn. v. Trona Joint Unified Sch. Dist. (1977) 70 Cal. App. 3d 592.)
- Note: Ongoing and continuous work likely includes regular overflow needed throughout the year, but not special event or seasonal assignments.

Substitute Classified Employees

Substitute Classified Employees

- A District may hire a "substitute employee" when:
 - Necessary to replace any classified employee who is temporarily absent from duty; and
 - For up to 60 days, unless a longer time is permitted by the CBA, if the District has a vacant classified position and is engaged in a procedure to hire a permanent employee.
(Educ. Code § 88003(c).)
- If any individual substitute employee works more than 75% of a college year (195 working days), the employee becomes permanent. (California School Employees Assn v. Governing Bd. of South Orange County Community College District (2004) 124 Cal. App. 4th 574.)



Apprentices and Professional Experts



Apprentices and Professional Experts

←—————→

A District is expressly authorized to hire apprentices and professional experts who are “employed on a temporary basis for a specific project, regardless of length of employment.” (Educ. Code §88003.)

Student Workers

- ## Student Workers
- A District may also utilize student workers who meet the following requirements:
 1. The student must be employed part-time
 2. The student must be employed in a college work study program or in a work experience education program funded by state or federal funds; and
 3. Employment of the student cannot impair existing contracts for service or result in layoff, demotion, involuntary transfer, or time base reductions for classified personnel
(Educ. Code § 88003.)
 - Student workers cannot displace a classified employee by layoff, demotion, or involuntary transfer to a new classification or location (§ 88003.1.)



III. Categorically Funded Employment



Categorically Funded Academic Employment

Categorically Funded Academic Employment

- Categorically funded academic employment can provide Districts flexibility to hire faculty without having to keep those faculty members as tenured employees in the event the contract or special project funding ceases.
- However, categorically funded faculty cannot be terminated at will or hired for less than the duration of the categorically funded project.
- The categorical nature of a faculty member's employment must be clearly stated in a written employment contract.

Categorically Funded Academic Employment

- Faculty employees may be temporarily hired to perform "services conducted under contract with public or private agencies, or other categorically funded projects of indeterminate duration." (Educ. Code § 87470(a)(1).)
- Categorically funded faculty may be hired for less than a college year and may be terminated at the expiration of the contract or specially funded project without regard to the requirements for termination of contract or regular employees. (Haase v. San Diego Community College Dist. (1980) 113 Cal App 3d 913.)

Categorically Funded Academic Employment

- The Education Code does not provide a definition of categorical employment.
- However, courts have held that “the defining characteristics are that the program be financed outside the base revenue limit with funds designated for a use specified by the particular program.” (Zalac v. Governing Bd. of Ferndale Unified School Dist. (Cal. App. 1st Dist. 2002) 98 Cal. App. 4th 838, interpreting Section 44909.)

Categorically Funded Academic Employment

- Categorically funded employees may be hired “under terms and conditions mutually agreed upon by the employee and the governing board” that are “reduced to a writing.” (Educ. Code § 87470.)
- To serve as a full-time categorically funded teacher, there must be a writing evidencing a “meeting of the minds” regarding the terms and conditions of the employee’s employment as a categorically funded employee specifically stating the employee is categorically funded. (Sullivan v. Calistoga Joint Unified School District (1991) 228 Cal.App.3d 1313 (interpreting a K12 statute).)

Categorically Funded Academic Employment

Because categorically funded employees are hired to perform services conducted under contracts with public or private agencies, or for other categorically funded projects, the law requires districts to employ categorical employees for the duration of the project for which they were hired, or as long as funding continues. (Stockton Teachers Assn. v. Stockton Unified School Dist. (2012) 204 Cal.App.4th 446, interpreting similar language in § 44909.)

Categorically Funded Academic Employment

- The statutes do not allow a district to hire a categorical employee under a contract that terminates on a date different from the expiration of the outside agency contract or project. (Stockton, Id.)
- If a district waives a categorically funded faculty member's temporary status by terminating him or her prior to the end of the funding or term of the project for which he or she was hired, the employee will be deemed probationary unless he or she has been employed with the district for more than four years, resulting in qualification for permanent status. (Stockton, at 465.)

Categorically Funded Academic Employment

- Termination of a categorical faculty member is permitted without regard to the termination requirements for other employees only at the end of the funding or project for which the employee was hired. (Stockton Teachers Assn., 204 Cal.App.4th at 451.)
- However, the Education Code faculty termination requirements are not waived for the termination of categorically funded faculty at a time other than the end of the project or funding. (Id.)
- Thus, categorically funded faculty can be terminated like temporary faculty only at the end of the project or funding.

Categorically Funded Academic Employment

- To terminate a categorically funded academic employee without due process, a District should be prepared to:
 - 1) show that the employee was expressly hired under a written agreement to perform services for a categorically funded project or contract with another public or private agency;
 - 2) produce a written agreement that expressly identifies the particular contract or project for which services were performed;
 - 3) produce a written agreement that expressly identifies the employee as being categorically funded; and
 - 4) show that the termination occurred upon expiration of the particular project contract or the end of project funding.(Educ. Code § 87470; Stockton, at 465; Sullivan, at 1318-1319.)

Categorically Funded Academic Employment

- If terminated prior to the expiration of the project or agency contract, a categorical employee must be granted the same notice, seniority rights, reemployment rights, and procedural protections as probationary or permanent employees. (Stockton Teachers Assn. v. Stockton Unified School Dist. (2012) 204 Cal.App.4th 446, 459 and 463.)
- The employee will be deemed probationary unless he or she has been employed with the district for more than four years, in which case he or she would be a permanent faculty member. (Stockton, supra at 451, 465.)

Categorically Funded Classified Employment

Categorically Funded Classified Employment

- Unlike academic employees, there is no distinction in the treatment of classified employees based upon the source of funding (i.e. categorical). (Educ. Code § 88005).
- Employees in classified positions hired to work on projects with categorical faculty are employed in the same manner and under the same conditions as other classified employees. (Id.)
- Accordingly, classified employees hired for categorically funded projects who have completed the probationary period can only be dismissed for cause or by layoff for a lack of funds or reduction or elimination of services. (Educ. Code §§ 88013, 88017.)

IV. Examples and Common Problems

Scenario 1

The District hires a temporary employee in a classified position on a full-time basis for 100 days. Following completion of the assignment, the District seeks to hire the same individual in the same classification in a different department for 100 days, but only for 4 hours per day.

Would this be temporary employee use comply with the Education Code?

Scenario 1

- Answer: No the additional 100 day assignment would not be proper under the education.
 - The classification is defined by the types of duties performed and the skills required. Service in a different department would still count toward days served within the same classification.
 - Part-time service on an assignment does not permit an employee to work additional days. The 195 day limit remains, exclusive of the number of hours worked per day. Because the second assignment would exceed 195 days in one year, the employee would no longer be temporary and would earn permanent status in the classification.

Scenario 2

The District hires a temporary faculty employee for a full year as a full-time substitute for a permanent faculty member out on long-term illness leave. For the following Fall semester, the District seeks to hire the same individual on a one-year contract teaching 65% of a regular full-time load in each semester.

Would this be temporary employee use comply with the Education Code?

Scenario 2

- Answer: Yes, the successive temporary faculty assignments would comply with the education code.
 - A temporary faculty member may be hired on a full-time basis for one year as a substitute for a full-time faculty member on leave for a long term illness. Although the District could not reemploy the same individual in a vacant full-time position the following year while retaining the faculty member's temporary status, that limitation does not prohibit the individual from accepting adjunct work in a different year.
 - Because the second year of employment is limited to 65% of full-time load in each semester, the employee would qualify as a part-time, temporary faculty member regardless of having worked as a substitute in the District in a prior year.

Scenario 3

The District's full-time faculty CBA defines the regular teaching load as 30 credit hours per semester. The District wants to hire an adjunct instructor on a one-year contract to teach 10 credit hours during the Fall semester and 30 credit hours during the Spring semester, for a total of 40 credit hours, or 66% of the course load taught by a regular full-time faculty member each year.

Would this be temporary employee use comply with the Education Code?

Scenario 3

- Answer: Likely, no.
 - Load balancing of semester assignments to comply with the 67% rule has only been accepted by the courts where the full-time faculty load is defined in the faculty CBA on an annual basis.
 - Where full-time faculty load is defined on a semester basis, a temporary faculty member cannot exceed 67% of a full-time load in each semester. Accordingly, the Fall semester assignment would be a proper temporary assignment, but the Spring semester assignment would exceed 67% of a full-time load as defined by the District in the CBA.
 - Thus, the employee would be entitled to contract status for the one-year contract.

Scenario 4

The District hired a faculty employee and a classified employee for a two-year grant funded project. The contracts for both employees specify that the employment is categorically funded and may be terminated without cause or notice at the close of the two-year period. During the second year of the project, the District learns that the funding will not be renewed for the following year.

Can the District terminate the employment of both the faculty and classified employees at the end of the two-year term? Does the District need to provide notice to either employee before terminating the employment?

Scenario 4

- Answers:
 - Yes. The District is permitted to terminate the employment of the categorically funded faculty member if the funded project is ending. And, the District can terminate the employment of the classified employee if it will not continue to provide the same service or level of service following the project.
 - The District is not required to provide the categorically funded faculty member with any particular notice or follow a specific procedure for terminating the employment at the end of the project. The employment contract states notice is not needed.
 - The District must provide notice to the classified employee and the termination is only permitted as a layoff for reduction or discontinuance of the particular kind of service. Despite the purported waiver in the employment contract, the layoff must be conducted in accordance with Education Code requirements.

Summary/Conclusion

- Specific statutory requirements apply to each of the permissible types of temporary employment in community college districts.
- Because temporary classifications are strictly construed, each factor or requirement in the authorizing statute must be met for employment to qualify as temporary.
- If an employee fails to meet the requirements for temporary employment, he/or she may be entitled to reclassification to permanent status.
- It is imperative that the initial hiring documents correctly designate the temporary nature of employment.
- Districts must carefully track temporary employee use to ensure compliance with the Education Code requirements.

Tips to Avoid Violations

- Track temporary classified assignments by individual, classification, and duration.
- Track temporary academic assignments by load percentage and reason for temporary employment.
- Ensure employment contracts and assignment notices specify the temporary nature of the work offered.
- Ensure temporary classified assignments include an end date and are approved by the Board before beginning.
- Review temporary classified assignment use by classification and department to determine if the need for temporary employees is ongoing.



Any questions?

Thank You

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