

Duty Statement

Department of Managed Health Care

OFFICE: Office of Enforcement	EFFECTIVE DATE:
CLASSIFICATION: Senior Legal Analyst	DATE APPROVED: 7/31/2025
POSITION: 409-411-5333-013	TELEWORK DESIGNATION: <i>Remote-Centered</i>
WORKING TITLE: eDiscovery Paralegal	

DEPARTMENT OBJECTIVE:

The mission of the California Department of Managed Health Care (DMHC) is to protect consumers' health care rights and ensure a stable health care delivery system. The DMHC accomplishes its mission by ensuring the health care system works for consumers. The Department protects the health care rights of more than 29.8 million Californians by regulating health care service plans, assisting consumers through a consumer Help Center, educating consumers on their rights and responsibilities and preserving the financial stability of the managed health care system.

PROGRAM OBJECTIVE:

The Department has a unique and important role in the protection of the health and wellbeing of Californians. The Knox-Keene Health Care Service Plan Act (the Act) requires the Department to ensure that enrollees are provided with timely access to quality health care services and is one of the only stand-alone watchdog healthcare agencies in the nation, mandated by the Legislature to protect and promote the interests of enrollees in healthcare service plans. The Department's Office of Enforcement (OE) investigates allegations of wrongdoing and prosecutes those found to be in violation of the Act.

GENERAL DESCRIPTION:

Under direction of an attorney who shall accept full responsibility for the tasks performed, and supervised by a Staff Services Manager I (SSM I), the incumbent is assigned to the Division of Legal Administration's Legal Services Branch and performs the full range of the more responsible, varied and complex legal analyst duties which are analytical in nature and provides consultative services to management and others in connection with the enforcement of the Act. The eDiscovery paralegal is responsible for consultative services to the legal teams relating to planning, design, development, application and implementation of technology and database systems, particularly Relativity. The eDiscovery paralegal performs work related to litigation and legal technology, including electronic data processing and document management. The incumbent must be knowledgeable in administrative and civil procedures, legal research, legal procedures and case management.

TYPICAL DUTIES:

Employee must be able to perform the following duties with or without reasonable accommodation.

<u>PERCENTAGE</u>	<u>JOB DESCRIPTION</u>
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Essential (E)/Marginal (M)

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|----------------|---|
| 35% (E) | Manage the eDiscovery lifecycle within the Relativity platform and provide essential support to attorneys throughout the process. Consults with attorneys on all aspects of eDiscovery from the initial identification and preservation of data to the collection, review, and production of documents. Set up and organize the Relativity workspace and assist in developing strategies for data collection and processing, crafting search concepts and advise on optimal approaches for data filtering, review, and production workflows based on litigation needs. Identify errors and research resolutions in the processing environment. Maintain a strong focus on accuracy, compliance, and effective collaboration with all stakeholders involved in the eDiscovery process. Manage assigned litigation caseload through the OE's eDiscovery application. Assess legal issues and evaluate all documents submitted as part of discovery to determine evidentiary value and ensure each case successfully progresses through the eDiscovery process. Run requested reports from the ProLaw and eDiscovery applications during the investigation and prosecution stages of a case. Provide initial and ongoing training to OE's legal staff on the workflows associated with the eDiscovery process. Attend eDiscovery training sessions and meetings to stay informed about recent developments and best practices. |
| 25% (E) | Bates-stamp, index, and summarize documents submitted with case referral. Summarize and categorize deposition transcripts and analyze and summarize trial evidence. Draft Department response to a health plan's discovery for review and approval by attorney. Arrange for submission of responses. Review and summarize a health plan's responsive documents for final approval by an attorney. Provide direction to legal secretaries and legal assistants in the gathering, Bates-stamping, and reviewing of discovery initiated by a health plan; forward discovery to other Department offices and coordinate office responses; ensure office responses input into ProLaw and eDiscovery applications. Create issue log to document evidence supporting potential violations; and review with attorney. Index and summarize deposition transcripts. Prepare initial draft of pre-accusation letter and accusation for attorney review. Assist attorney in litigation on the most complex cases. Conduct legal research on applicable case law, including statutory and regulatory law in both federal and state jurisdictions; identify potential violations and defenses and identify strengths and weaknesses of case; discuss case strategy with attorney. Undertake initial |

legal research and analysis of issues for memoranda including the penalty justification memorandum.

- 25% (E)** Develop, update, and maintain, in coordination with the SSM I, comprehensive training documents and instructional materials that clearly outline the procedural steps for the technical tasks performed by LSB members. Facilitate training sessions for new employees, ensuring they understand LSB's operational procedures and expectations. Utilize a variety of training methods including presentations, live demonstrations, and interactive activities to enhance learning and retention. Monitor and assess the effectiveness of the LSB's training program through feedback from participants and performance metrics. Make necessary adjustments to training content and/or delivery methods to improve outcomes. Provide ongoing support to new employees during their onboarding process and as needed, thereafter, addressing questions and offering guidance on LSB procedures. Identify training needs, ensure written training materials are consistently and accurately update to reflect the most current process, and to foster a collaborative learning environment.
- 10% (E)** Attend any trial or hearing and provide logistical support to the primary attorney and litigation team. Assist with trial or hearing preparation, including marshalling evidence, preparing exhibits, communicating with trial witnesses, preparing and serving subpoenas for witnesses, arranging for court reporters and transcript deliveries; attend witness preparation meetings and litigation team meetings; review and confirm docketed trial dates. Provide direction to legal secretaries as needed to prepare trial materials and logistics of transporting volumes of documents, binders and trial exhibits to hearing location.
- 5% (M)** Performs research and analysis on special projects as assigned and other related duties.

(marginal duties may not exceed 5% of the duty statement)

SUPERVISION EXERCISED OVER OTHERS:

Does not supervise others.

KNOWLEDGE, ABILITIES AND ANALYTICAL/SUPERVISORY REQUIREMENTS:

The employee should be familiar with DMHC mission, goals, organizational structure and major work programs. The employee must also have a demonstrated positive attitude and a commitment to conduct business in a professional manner in dealing with the public and department clients and provide quality customer service to all customers, and be able to deal tactfully, professionally and confidentially with all internal and external customers and contacts. In addition, the employee must have the:

Knowledge of: Basic legal concepts, terminology, principles and procedures; use of legal reference materials; role of a paralegal staff in a legal office.

Ability to: Reason logically; analyze situations accurately and recommend an effective course of action; write effectively; prepare reports and summary sheets which set forth a statement of the facts, applications of relevant law and conclusions; read and understand statutes, court decisions, legal documents and similar material; prepare drafts of pleadings; draft litigation discovery documents, such as interrogatories and motions; work cooperatively with attorneys, clerical staff, technical staff and the general public. Demonstrated ability to act independently, to communicate effectively both verbally and in writing, and to assume increased responsibility.

CONSEQUENCE OF ERROR/RESPONSIBILITY FOR DECISIONS:

The employee may have access to very sensitive and confidential information. Careless, accidental or intentional disclosure of information to unauthorized persons can have far-reaching effects, which may result in civil or criminal action against those involved.

PHYSICAL, MENTAL AND EMOTIONAL REQUIREMENTS:

Employees may be required to sit for long periods of time using a keyboard and video display terminal or traveling in a vehicle to other locations; must be able to organize and prioritize their work under deadline situations and adapt behavior and work methods in response to new information, changing conditions or unexpected obstacles; will be involved with sustained mental activity needed for analysis, reasoning and problem solving; must be able to develop and maintain cooperative working relationships, recognize emotionally charged issues, problems or difficult situations and respond appropriately, tactfully and professionally; and must be able to work independently. The employee must be able to create/proactively support a work environment that encourages creative thinking and innovation; understand the importance of good customer services and be willing to develop productive partnerships with managers, supervisors, other employees, and, as required, control agencies and other departments.

WORK ENVIRONMENT:

The DMHC utilizes a hybrid telework model to provide all employees with an avenue to telework while ensuring business and operational needs are met.

Remote-Centered employees are expected to maintain a safe and distraction free work environment at the approved alternate work location. Remote-Centered employees agree to adhere to the state telework policy, the DMHC's telework policy, and conditions cited in the Telework Agreement (STD 200).

Office-Centered employees are expected to maintain a dedicated workstation at a DMHC official worksite. Office-Centered employees are expected to work in a climate-controlled office or cubicle under artificial lighting.

POSITION REQUIREMENTS:

This position requires the incumbent maintain consistent and regular attendance; communicate effectively (orally and in writing if both appropriate) in dealing with the public and/or other employees; develop and maintain knowledge and skill related to specific tasks, methodologies, materials, tools and equipment; complete assignments in a timely and efficient manner; and, adhere to departmental policies and procedures regarding attendance, leave, and conduct.

State of California
Health and Human Services Agency
Department of Managed Health Care
DUTY STATEMENT
DMHC 62-137 New: 12/04 Rev: 12/2024

Note: Any business travel reimbursements will be done in accordance with the approved applicable Memorandum of Understanding (MOU).

ADDITIONAL REQUIREMENTS:

This position is required under the DMHC's Conflict of Interest Code to complete and file a Form 700 within 30 days of appointment and annually thereafter.

SIGNATURES:

The statements contained in this duty statement reflect details as necessary to describe the principal functions of this job. It should not be considered an all-inclusive listing of work requirements. Individuals may perform other duties as assigned, including work in other functional areas to cover absence of relief, to equalize peak work periods or otherwise to balance the workload.

Employee: I have read and understand the duties listed above and can perform them with/without Reasonable Accommodation (RA). *(If you believe you may require Reasonable Accommodation, please discuss this with the hiring supervisor. If you are unsure whether you require Reasonable Accommodation, inform the hiring supervisor, who will discuss your questions and/or concerns with the RA Coordinator.)*

Supervisor: I have discussed the duties with and provided a copy of this duty statement to the employee named above.

EMPLOYEE NAME (PRINT)		SUPERVISOR NAME (PRINT)	
Employee's Signature	Date	Supervisor's Signature	Date