

MATTHEW RHODES

Unity

LD 2180

Concerns Regarding LD 2180 – Civil Service Appeals Process

Dear Representative SALISBURY of Westbrook

I'm writing to share some concerns about LD 2180, the bill making changes to the Department of Administrative and Financial Services, the Bureau of Human Resources, and the State Civil Service Appeals Board.

While I understand the intent may be administrative efficiency, I believe this proposal could have unintended consequences for both fairness and taxpayer exposure.

The Civil Service Appeals Board functions as a quasi-judicial body. These cases often involve statutory interpretation, employee rights, and procedural standards that can have long-term implications. At some point in that process, there should be legal expertise involved to ensure consistency, proper interpretation of the law, and protection of due process.

Allowing the State to be represented by non-attorneys in these proceedings may seem cost-effective in the short term. However, employment disputes are rarely simple. If cases are mishandled procedurally or legally, the result could be appeals to court, inconsistent decisions, or reversals — all of which ultimately increase costs to taxpayers.

There is also a practical concern about structure and balance. A system grounded in legal standards acts as a gatekeeper. When that structure is loosened, the risk increases that complaints — whether weak, technical, or improperly developed — consume additional administrative time and resources. That does not serve employees or taxpayers well.

In addition, changes to grievance timelines and procedures should be approached carefully. Procedural shifts can significantly affect access to remedies, even if the underlying rights remain unchanged. Clarity and fairness must remain the priority.

In my view, efficiency should not come at the expense of legal rigor in matters involving employment rights and public funds. For these reasons, I would urge caution and serious reconsideration of LD 2180.

Thank you for your time and your service.

Respectfully,
Matthew Rhodes