STATE OF WASHINGTON
OFFICE OF FINANCIAL MANAGEMENT
STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM
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April 13, 2016

TO: Connie Goff
WPPR&A Acting Section Chief

FROM: Kris Brophy
Director's Review Program Investigator

SUBJECT: Sally Raftery v. Bellevue College (BC)
Allocation Review Request ALLO-15-089

Director's Determination

This position review was based on the work performed for the twelve-month period prior to July 8, 2015, the date Bellevue College Human Resources (BC-HR) received Ms. Raftery's request for a position review. As the Director's Review Specialist, I carefully considered all of the documentation in the file, the exhibits and the verbal comments provided by both parties during the review telephone conference. Based on my review and analysis of Ms. Raftery's assigned duties and responsibilities, I conclude her position is properly allocated to the Program Support Supervisor 2 (PSS 2) class.

Background

On July 8, 2015, BC-HR received Ms. Raftery's Position Review Request (PRR) form, requesting that her position be reallocated to the Program Specialist 3 (PS 3) class. (Exhibit B-2)

BC-HR notified Ms. Raftery on October 7, 2015 that her position was being reallocated from Program Coordinator class to the Program Support Supervisor 2 (PSS 2) class. (Exhibit B-1)

On November 4, 2015, State HR - OFM received Ms. Raftery's request for a Director's review of BC's allocation determination. (Exhibit A-1)

On March 8, 2016, I conducted a Director's review telephone conference. Present during the call were Sally Raftery, BC; Rae Ellen Reas, Dean of Enrollment Services, BC; Aaron Hilliard, V.P. of Human Resources; BC-HR; and David Hall, Human Resource Consultant, BC-HR.

Rationale for Director's Determination

The purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which that work is performed.

A position review is a comparison of the duties and responsibilities of a particular position to the available class specifications. This review results in a determination of the class that best describes the overall duties and responsibilities of the position. *Liddle-Stamper v. Washington State University*, PAB Case No. 3722-A2 (1994).

Organization Structure

Ms. Raftery works in the Testing Services office located within the Enrollment Services department on the BC campus. Ms. Raftery reports to the Dean of Enrollment & Registrar Services, Rae Ellen Reas.

Position Purpose

Ms. Raftery coordinates and directs the day-to-day operation of the College's Testing Services Office. She supervises the testing center's support staff, directs daily activities and performs other administrative office tasks.

Ms. Raftery states the following in the Position Purpose section of the PPR (exhibit B-2):

> Testing Services provides necessary functions for various departments and entities within Bellevue College. Testing activities include COMPASS Math/English placements, TEAS (nursing entrance exam), proctoring class exams, and Chemistry placements. My position organizes/schedules/coordinates all services under general direction. Responsibilities include maintaining all test schedules, updating policies and procedures, supervising/scheduling 7 employees, maintaining the website, serving as main point of contact for Testing Services.

Duties and Responsibilities

Ms. Raftery describes her duties and responsibilities in the PRR as follows:

20% **Major Duty**:

> Training, supervision, coordinating schedules 1 full-time, 5 part-time includes hiring activities.

20% **Major Duty**:

> Sole College-wide responsibility for ensuring hardware, software, office supplies, personnel and physical environment of Testing Services is satisfactory and serves Bellevue College and its many departments in the best manner possible.
>
> Organization-wide responsibility to ensure the policies and procedures of Testing Services complies and coordinates well with the departments and entities that we serve. Provide technical assistance and specialized consultation to students, BC staff and instructors, and other program constituents.
>
> Represent Testing Services at meetings with Directors and Coordinators of other departments, such as OIE, Advising, DRC, High School Programs, IBIT, Nursing, and many others.

Attend as Bellevue College representative at professional meetings such as Assessment, Testing and Leaning organizations, coordinated through the SBCTC.

15% **Major Duty**:

Daily operations: answering phones, assisting students in testing activities. Set up remote placement testing as needed. Responding to emails.

12.5% **Major Duty**:

Organization wide responsibility for:

- "Elevated" situations which present themselves in our department, e.g., Anomalies, particularly difficult or time-intensive students.
- Time taken to serve particular students and sometimes parents to understand particular policies, and/or remove specific roadblocks to their ability to proceed. Sometimes involves accompanying student to Enrollment, Advising, High School Programs, Development Education/ESL departments.
- Take over with difficult/challenging students to ensure mutual goals of service, compliance with policies, and achieve student satisfaction with our service.

10% **Major Duty**:

Organization wide responsibility for:

- Scheduling, coordinating testing activities-involves coordinating with other BC departments such as High School Programs, Nursing, OIE, CEO, GED, Advising, IBIT, Math and English Department.
- Interface with test software entities as necessary such as COMPASS, TEAS, Pearson Vue, [and] Quia.

10% **Major Duty**:

Organization wide responsibility for:

- Documentation - Create/modify paper forms and documents provided to students and other offices
- Documentation - Internal policies, procedures and best practices
- Providing data and reports to higher-level staff and other departments

7.5% **Major Duty**:

- Keep Website updated with calendar and policy information - sole responsibility for Testing Services website.

5% **Major Duty**:

Organization wide responsibility for:

- Testing accommodations for documented disabilities
- Respond to and coordinate accommodated testing as needed
- Coordinate with test software entities such as ATI for TEAS testing, and COMPASS
- Interface with BC's Disability Resource Center

Supervisor's Comments

Dean Reas completed the supervisor portion of the PRR. She indicates in exhibit B-2 that Ms. Raftery's description of her assigned work activities is accurate and complete. Dean Reas fully supports Ms. Raftery's request to be reallocated to the PS 3 class.

In her comments in the PRR, Ms. Russell states the following regarding the scope of Ms. Raftery's duties:

> Sally Raftery is solely responsible for all operations pertaining to the Testing Center. She may use professional judgement when working with students and is authorized to make exceptions, waive requirements within required college, state and accreditation regulations, and establish processes and procedures as she sees fit, and which improve the operations of the office. She is free to establish employee schedules, take action to address employee issues, authorize leave, and provide professional development opportunities for her and her staff. She supervises one full-time employee and is responsible for completing the required employee evaluation, in addition to evaluations of part-time and student employees. She may also use her own judgement to purchase supplies and other items needed to run the department. If her reclassification is approved, I will give her official budget authority over the budgets associated with the Testing Center.

Summary of Ms. Raftery's Perspective

Ms. Raftery asserts her position should be reallocated to the PS 3 class. She states in her comments in exhibit A-1:

> I hold sole college-wide responsibility for managing the Testing Services office and all its many components. I am a specialist who manages all components of the program, under general direction. I report to the Dean of Enrollment & Registrar Services and have delegated decision and budget authority. As Dean Rae Ellen Reas states in her submission, "no one else on campus does what Sally does."
>
> I am solely responsible for assessing program participants' needs and to provide the specialized services which serve them.

In addition, in exhibit A-5 Ms. Raftery provides the following comments regarding the scope of her duties:

> It may be helpful in reviewing this reallocation request and HR finding, to understand some background and evolution of this Department in the 7 years I have worked here.

- In 2008 when I first started here, our office was called "Assessment and GED" office, because those were the only 2 functions that took place there. Students were handed their COMPASS reports and immediately sent to Advising under the "One Stop" model. This "one stop" model changed a few years ago, so now students must come back some time later for "group Advising."
- Around 2011-12, our name was changed to "Testing Services" to reflect additional responsibilities and functions which were: Chemistry placements, Proctoring Services, IT101 testing, English Challenge Tests.
- Eventually more functions were taking place in this office, including TEAS (nursing exam) – and placements via "State Reciprocity". The Reciprocity policy requires complex policy interpretation and important judgement while fulfilling the spirit of reducing obstacles to students' education and at the same time serving the department's needs.
- The process of Assessment and placement itself evolved, under my purview, to entail a level of 'placement and entry advising' – This model replaced the previous mechanical method of handing students a report. We have increasingly served as a de facto information center as we execute faithfully our "No Wrong Door" policy.
- Additional Alternative placement methods have also been added to our options and workloads, including administering a writing evaluation to borderline placements + accepting TOEFL score reports for placements. Every supplementary function adds to the complexity and level of responsibility, demand for judgement and specialized knowledge.
- There are currently more complex placement modes being developed, which will include High School Transcripts, Smarter Balanced Reports and ultimately SAT Reports. The complexity of this position has tripled since in the past 7 years.
- I have reported to 3 different Managers, or Deans, in the time I have been here. Over those years the level of oversight has decreased as the levels of responsibilities have grown.
- It is also significant that many of our surrounding colleges do have staff with titles of Directors who fulfill similar roles at their institutions.

  …

Ms. Raftery asserts the scope of her position falls within the PS 3 level responsibility and her position should be reallocated to that class.

Summary of BC's Perspective

BC asserts Ms. Raftery's duties best fit within the PSS 2 class. In its determination in exhibit A-3, BC states the following:

> The incumbent works under general supervision of the Dean of Enrollment & Registrar Services. The responsibilities involve supervising one full-time employee, one part-time employee and student workers; hiring, training, and coordinating work schedules. One of the primary responsibilities is to advise

> program participants and other departments on campus of current policy and procedures. Although the incumbent does advise some campus offices and program participants regarding current policy and procedures, other documents such as ABE/GED/ESL departments, Office of International Education, Cashiering, Workforce Education, Disability Resource Center, and Evaluations are advised by the Dean.
>
> Currently, the incumbent manages the dally operations of the Testing Center, which includes, but not limited to ensuring computer hardware and software are in working condition for testing, order office supplies; schedule and coordinate testing activities, and respond to testing accommodation requests; advise the Dean of issues or problems that arise and recommend courses of action regarding compliance requirements. The incumbent works directly with the students and provides specific information to them about process and policy, advises them of their placement results, and handles complaints or other issues related to Testing Services.
>
> The incumbent changes the content on the website and updates basic information such as office hours, but the Dean controls the content; obtains approval for the development of new policies and procedures. The Dean makes decisions on how students are placed, and the services that will be offered in the Testing Services Office, the incumbent advises the Dean. The statewide initiatives are around how students are placed into math and English classes. The main test the incumbent administers (COMPASS) will no longer be available during the fall quarter. The incumbent currently handles two of three aspects of placement, but the remainder of the work currently resides in the Evaluations Office.
>
> The incumbent repeatedly emphasized to me in email that she was a Program Specialist 3. Although the incumbent works under general direction; manages one component or assist higher levels in two or more components of the program; coordinates all aspects of the program; provides technical assistance, the incumbent does not assess program participants' needs and develop specialized services and training unique to the program.
>
> Based on information from the Dean, the incumbent will report to a new director position under the restructure of Testing Services that will be over a new Welcome Center, which includes Testing Services. The incumbent runs the Testing Center, and administers tests, but does not administer the program as a whole.
>
> Based on the analysis of the information provided, the classification that best fits the scope of work is the Program Support Supervisor 2 classification.

For these reasons, BC asserts Ms. Raftery's position is properly allocated to the PSS 2 class.

Comparison of Duties to Class Specifications

When comparing the assignment of work and level of responsibility to the available class specifications, the class series concept (if one exists) followed by definition and distinguishing characteristics are primary considerations.

While examples of typical work identified in a class specification do not form the basis for an allocation, they lend support to the work envisioned within a classification.

Comparison of Duties to the Program Series

The State HR *Glossary of Classification Terms* defines a program as:

> A specialized area with specific complex components and tasks that distinguish it from other programs (or the main body of an organization). A program is specific to a particular subject and has a specific mission, goals, and objectives. A program typically has an identifiable funding source and separate budget code.
>
> The specific components and specialized tasks involve interpretation of policies, procedures and regulations, budget coordination/administration, and independent functioning. Typically requires public contact relating specifically to program subject matter, clients, and participants.
>
> Duties are not of a general support nature transferable from one program to another. Performance of clerical duties is in support of an incumbent's performance of specialized tasks. Independent performance of these duties usually requires at least a six-month training period.

The services provided by the Testing Services Office at BC meets the general definition of a program. The office's policies, procedures and specialized student testing activities are distinct and not generally transferable to other departments or services at BC. Ms. Raftery's position should be allocated to a class within the Program series.

Comparison of Duties to Program Specialist 3 (PS 3)

The Definition for the Program Specialist 3 class states:

> Positions at this level work under general direction and typically have organization-wide program responsibility. For programs with statewide impact, incumbents are specialists who manage one component or assist higher levels in two or more components of the program. Programs include but are not limited to voter registration programs; boating, concession, or winter recreation programs; minority and women's business enterprise programs; and aeronautics programs.
>
> Program components are comprised of specialized tasks (e.g., reservations, administration, and budget coordination) within a specialty program.
>
> Incumbents assist higher-level staff by coordinating all aspects of program services, providing technical assistance and specialized, consultation to program participants, staff and outside entities, and recommending resolution for complex problems and issues related to the program.
>
> Incumbents assess program participants' needs and develop specialized services and training unique to the program and are responsive to the needs of participants.

There are no Distinguishing Characteristics for this class.

This class is intended to describe positions which are responsible for organization-wide or large statewide programs. For statewide programs, incumbents have responsibility for managing one component, or assisting higher levels in managing two or more components of the program.

Program components at this level include having responsibility for performing specialized tasks within the program specialty in addition to coordinating all aspects of program services such as budget coordination and other higher level administrative tasks.

As a whole, the Testing Services program function and the scope of activities performed do not fully reach the size and scope of program operations anticipated by this class. In addition, Ms. Raftery's position duties do not fully reach the level of responsibility required for allocation to this class.

First, it is acknowledged that the Testing Services office provides campuswide student testing services for the College. Ms. Raftery's position provides a variety of specialized student testing services and related administrative support to the college's academic departments. However, student testing is one of several student enrollment and registration support functions provided by the Enrollment Services organizational unit. As such, the student testing function does not constitute a fully separate program with specialized functions and discrete activities which separates it from main body of the College at the size and scope of program operations anticipated by this class.

In addition, positions at this level have independent responsibility for coordinating all aspects of program services operations for specialized programs. Incumbents coordinate services and resources, assess program needs, and develop courses of action to carry out program functions and activities. While a portion of Ms. Raftery's duties reaches aspects of this level of work, her position does not fully meet this level of responsibility. Ms. Raftery's primary tasks involve coordinating the Testing Services office's daily operations and testing activities, as well as directly working with students, staff, faculty and program administrators, rather than having organization-wide, program-level responsibility.

For example, while Ms. Raftery supports student success activities, her position does not have the breadth of responsibility for establishing standards and implementing courses of action to carry out the program's functions at the level anticipated by this class. Ms. Raftery is supportive to these efforts and provides input to Dean Reas regarding the development of the testing services and related administrative support tasks; however, responsibility for the implementation and coordination of this overall function rests with the Dean. In exhibit A-2, Dean Reas states that:

> … I am new to the college, but I have experience as a Dean in overseeing the operations of a Testing Center. I do have ideas and a direction I would like Testing Services to go in. But this direction is more about the big picture of how we serve students and how we use resources. Ms. Raftery does consult with me especially if a new initiative or service is proposed. She also advises me and asks my opinion on various issues that come up. This is a normal part of a supervisor/employee relationship.

Therefore, Dean Reas retains overall responsibility for the Testing Office's overall program goals and priorities. During the review period Dean Reas retained responsibility for developing and overseeing the department's budget. However, it is uncontested that Ms. Raftery works under general direction and has delegated authority to coordinate the testing center's daily operations.

Further, the Testing Services testing policies and procedures are prescribed at the College, state and federal level and cannot be adjusted fully independently. Ms. Raftery's level of decision making authority therefore involves making decisions within established guidelines and testing requirements. In addition, during the review period Ms. Raftery did not have full, independent responsibility for coordinating other program activities including budget coordination and development.

In total, the PS 3 class describes certain examples of work that may reach certain aspects of Ms. Raftery's duties such as providing technical assistance and specialized consultation to program participants regarding student testing services and developing specialized testing services and providing training on issues unique to the program.

However, when considering the primary allocating factors in the class definition including the size and scope of the designated program, the scope of responsibility for coordinating program services, and the overall level of Ms. Raftery's decision-making authority, there are other classes which provide a better fit for her position.

For these reasons, Ms. Raftery's position should not be allocated to the PS 3 class.

Comparison of Duties to Program Specialist 2 (PS 2)

The definition for the Program Specialist 2 class states:

> Positions at this level work under general supervision and plan, organize, direct and coordinate operations for programs such as the business enterprise, volunteer services and community resources, elections examination/administration programs. Incumbents oversee day-to-day program operations, function as the program representative and resource, have extensive contact with program participants and outside entities, and resolve problems within a delegated area of authority. Unusual problems, probable outcomes and solutions are presented to higher levels for resolution. Incumbents may be delegated limited authority to approve budget expenditures and may assist higher-level staff with developing and coordinating statewide program activities.

There are no Distinguishing Characteristics for this class.

This class generally describes the scope of duties performed by Ms. Raftery in her position. A significant portion of her work is consistent with the level of responsibility and scope of decision making authority stated in the Definition of this class.

For example, positions allocated to this class have independent responsibility for planning, organizing, directing and coordinating daily operations for specialized programs such as financial aid and registration, which requires a higher degree of specialized knowledge and complexity unique to a particular subject. Incumbents coordinate services and resources, assess operational needs and develop courses of action to carry out daily program functions and activities. Ms. Raftery's position aligns with this level of responsibility. The testing services functions assigned to Ms. Raftery's position involve scheduling, tracking and monitoring complex testing activities.

As stated in the definition, Ms. Raftery oversees day-to-day program operations and acts as the primary liaison between the program and outside organizations. Ms. Raftery serves as the Testing Center's primary resource and contact for internal faculty and staff and outside agencies regarding the Testing Services activities and functions.

She serves as the representative and resource to the program for others on campus. This class also addresses Ms. Raftery's responsibility for supervising staff in the performance of their assigned duties.

However, this class does not fully address the scope of Ms. Raftery's responsibility for assisting in the development of program policies and budgets. There is another class which better addresses the scope of her responsibility in this area. In total, the PS 2 class is not the best fit for her position.

Comparison of Duties to Program Support Supervisor 2 (PSS 2)

The definition for this class states:

> Supervise program support staff involved in the performance of duties associated with a highly specialized or technical program(s) **and** assist in the development of program policies and budgets. Act as liaison between the program and outside organizations. [Emphasis added]

The Distinguishing Characteristics for this class state:

> With delegated authority, interview and recommend selection of applicants, train new employees, assign and schedule work, act upon leave requests, conduct annual performance evaluations and recommend disciplinary action.
>
> Under general direction, perform work using knowledge and experience specific to the program. Assist in planning, implementing, and evaluating policies; devise and implement new procedures; develop information to support budgetary requests and project income and expenditures.

Positions in this class have independent responsibility for supervising program support staff and assisting in the development of program policies and budgets. As a whole, Ms. Raftery's position more closely aligns with the requirements of the Definition and Distinguishing Characteristics of this class.

First, it is uncontested that Ms. Raftery supervises the employees working in the unit. She works under general direction and independently establishes employee schedules, takes action to address employee issues, authorizes leave and provides developmental opportunities for staff.

Ms. Raftery independently oversees all daily operational program activities. This includes responsibility for the following activities:

- Placement using a variety of measures including transcripts and outside test scores
- Administering and proctoring exams for outside agencies, colleges and universities
- Administering and proctoring exams for instruction
- Administering the GED exam
- Complying with state; campus and outside agency requirements
- Advising Student, resolving conflicts and developing courses of action so that students are able to meet their academic goals

- All aspects of training and supervising staff

Ms. Raftery's duties also include providing input to her supervisor regarding the administrative procedural aspects of making operational changes to the testing process due to changes in testing requirements at the state, college or federal level. While the latitude for setting program goals for the testing services function is limited, she does make recommendations to the Dean regarding potential changes to the testing center's administrative testing processes and procedures. This includes making changes to address departmental and faculty needs.

Ms. Raftery is authorized to make exceptions, waive requirements within required college, state and accreditation regulations. She establishes processes and procedures as necessary to improve office operations and testing procedures. She has authority to purchase supplies and other items as needed. Ms. Raftery also has responsibility for assisting in the development of program policies at the level anticipated by this class.

In addition, her position assists the Dean in the development of the department's program budget process. Ms. Raftery assists the Dean by developing and preparing information to support the budget process. During the review conference Dean Reas stated she meets with all of her supervisory staff in each unit to discuss the budget and provide input. Ms. Raftery indicated she provides information to the Dean to support the department's budget development process.

In total, the scope of Ms. Raftery's responsibility for directing the Testing Services functions and activities more closely align with the PSS 2 level which includes responsibility for supervising assigned staff and developing information to support budgetary requests.

In *Salsberry v. Washington State Parks and Recreation Commission*, PRB Case No. R-ALLO-06-013 (2007), the Personnel Resources Board addressed the concept of *best fit*. The Board referenced *Allegri v. Washington State University*, PAB Case No. ALLO-96-0026 (1998), in which the Personnel Appeals Board noted that while the appellant's duties and responsibilities did not encompass the full breadth of the duties and responsibilities described by the classification to which his position was allocated, on a best fit basis, the classification best described the level, scope and diversity of the overall duties and responsibilities of his position.

Most positions within the civil service system occasionally perform duties that appear in more than one classification. However, when determining the appropriate classification for a specific position, the duties and responsibilities of that position must be considered in their entirety and the position must be allocated to the classification that provides the best fit overall for the majority of the position's duties and responsibilities. See *Dudley v. Dept. of Labor and Industries*, PRB Case No. R-ALLO-07-007 (2007).

I recognize the PS 2 and the PSS 2 classes describe work that may apply to either class. However, when considering her level of supervision, both class definitions and the overall level of responsibility and decision-making authority for Ms. Raftery's position, the PSS 2 class provides a better overall fit for her position.

For these reasons, Ms. Raftery's position is properly allocated to the PSS 2 class.

Appeal Rights

RCW 41.06.170 governs the right to appeal. RCW 41.06.170(4) provides, in relevant part, the following:

> The agency utilizing the position, may appeal the allocation or reallocation to the Washington personnel resources board. Notice of such appeal must be filed in writing within thirty days of the action from which appeal is taken.

The mailing address for the Personnel Resources Board (PRB) is PO Box 40911, Olympia, Washington, 98504-0911. The PRB Office is located on the 3rd floor of the Raad Building, 128 10th Avenue SW, Olympia, Washington. The main telephone number is (360) 407-4101, and the fax number is (360) 586-4694.

If no further action is taken, the Director's determination becomes final.

c: Sally Raftery, BC
Aaron Hilliard, BC

Enclosure: List of Exhibits

SALLY RAFTERY v BELLEVUE COLLEGE

ALLO-15-089

LIST OF EXHIBITS

A. Sally Raftery Exhibits

1. Request for Director's Review, date-stamped (pages 1-6)
2. Letter from Rae Ellen Reas, Dean of Enrollment and Financial Aid Services, to Aaron Hilliard, VP of Human Resources, Bellevue College. Dated October 10, 2015. (pages 7-10)
3. HR letter to Sally Raftery RE: Position Review Findings (pages 11-16)
4. Position Review Request (pages 17-26)
5. Overview – Evolution of a Department (pages 27-28)

B. Bellevue College Exhibits

1. Position Review Approval Letter
2. Submitted Position Review Request Form
3. Organizational Chart
4. September 8-16, 2015 emails between Sally Raftery and Maria Woods
5. September 15-16, 2015 emails between Rae Ellen Reas and Maria Woods
6. September 21, 2015 emails from Sally Raftery to Maria Woods

C. State HR Class Specifications

1. Program Support Supervisor 2
2. Program Specialist 2
3. Program Specialist 3