



STATE OF WASHINGTON

OFFICE OF FINANCIAL MANAGEMENT

STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM

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May 23, 2016

TO: Kristie Wilson
Rules and Appeals Program Manager

FROM: Nancy Jacobski
Director's Review Specialist

SUBJECT: Peggy Goucher vs. Department of Corrections
Allocation Review Request ALLO-15-093

Director's Determination

As the Director's Review Specialist, I carefully considered the documentation in the file and the exhibits provided by both parties. Based on my review and analysis of Peggy Goucher's assigned duties and responsibilities, I conclude her position is properly allocated to Office Assistant 3 (OA 3).

Background

On October 7, 2015, Ms. Goucher submitted a Position Review Request (PRR) to the HR Office at Department of Corrections (DOC) in Olympia requesting reallocation from OA 3 to Patient Services Representative (PSR).

By letter dated December 3, 2015, Rozanne Stewart, Human Resource Consultant, DOC, notified Ms. Goucher that her position was reallocated to OA 3 (Exhibit B-1).

On December 3, 2015, OFM State HR received Ms. Goucher's request for a Director's review of DOC's allocation determination (Exhibit A-1). Ms. Goucher agreed to a written decision of the director's review. In her request, Ms. Goucher stated she believes the duties of her position best fit the Patient Services Coordinator (PSC) job class.

On May 9, 2016, I emailed Karen Forss, Health Services Manager; Rozanne Stewart, HR Consultant; and copied Ms. Goucher, Appellant; Ms. Goucher's supervisor, Joelle Ray, Forms and Records Analyst 3 (FRA 3); Ruby Wise, OA 3; and Peggy Goucher, OA 3. The purpose of the email was to request clarification on the organizational structure of the Health Services Division. I received a response back from Ms. Ray on May 9, 2016, and a response from Ms. Forss on May 16, 2016.

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 classification 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).

Positions are to be allocated to the class which best describes the majority of the work assignment. *Ramos v DOP*, PAB Case No. A85-18 (1985).

Organizational Structure

As evidenced in the organizational chart (Exhibit B-5), the Health Services Division at Washington State Penitentiary employs medical professionals, managers, technical staff and clerical staff. The division includes a medical records unit managed by Karen Forss, Health Services Manager. Reporting to Ms. Forss is Joelle Ray, FRA 3, who supervises one FRA 2 and five OA 3s, one of whom is Ms. Goucher.

Position Purpose

As stated in her Position Review Request (PRR), Ms. Goucher transfers medical records to and from other facilities and medical providers. She sorts and files confidential materials and charts; initiates and maintains the organization of the offender medical charts from past and present correctional facilities and periods of incarceration; and performs a variety of clerical duties in support of the medical records unit.

Duties and Responsibilities

According to the PRR submitted to DOC HR on October 20, 2015, Ms. Goucher's duties and responsibilities are divided by the following percentages:

35%

- Coordinate schedules of healthcare areas to establish and maintain appointments and availability of medical records.
 - Work with clinical staff from all satellite offices to ensure medical records are available for appointments.
- Investigate and research discrepancies on OMNI and confidential documents, follow through and assist when needed to correct the discrepancies.
 - Transposed DPC numbers, spelling of name, incorrect dates, etc.
- Coordinate and provide support services for patients, families and staff.
 - Locating medical information and contact information, verification of valid "Release of Information" on file.
- Provide directions to inmates to specified areas such as x-ray, dental and optical.
- Using effective interpersonal communication, working well with the chain of command to include clear verbal and written communication skills.
- Follow the health information management protocols and federal, state and departmental procedures for the management of health records.
 - Must be familiar with the IPAA privacy rule, thinning guidelines, health disclosure rules, etc.

30%

- Verify that medical documents are complete.
 - Provider signatures on written, verbal and telephone orders, labs, PERs, outside records, etc.
- Review work of other professional staff to assure that input/output is in conformance with rules, laws, policies and standards.
- Collect and gather confidential documentation and information from all departments
 - Ensure patient information is kept private and routed to the correct personnel or proper patient chart.
- Process/audit patient care orders in a timely matter to ensure continually of patient care.
- Auditing charts and records for accuracy of all medical information following the Health Information Management Protocol.
 - Removing unofficial documents
 - Ensuring chart order is correct
 - Ensuring documents include all necessary points
 - Date stamped, signed offender name, date of birth and DOC number.
 - Ensure documents are in reverse chronological order by section.
- Tracking and documenting the whereabouts of health records.
 - Chronologically order received and sent charts.
 - Locating missing or misplaced files.
 - Work with other institutions to locate charts and overflows.
- Breakdown/thinning/merging and auditing of health records.
 - Follow the thinning guidelines.
 - Merge patient volumes from all incarcerations.
 - Check dates to ensure all documentation is included.
 - Archiving records of released and current offenders.
 - Chronological
 - Changed in volumes.
 - Chart location.
- Initiate, assemble and maintain the organization of patient charts according to health information management protocols and guidelines.
 - Assemble temporary charts when necessary.
 - Ensure current chart has all documentation necessary for patient care.

20%

- Special transports
 - Coordinate with transport officers and medical staff to ensure patient leaves with all necessary items to safeguard the continuity of emergent care.
 - Medications
 - Medical file
 - Transport envelope
- Transferring charts to other complexes of the facility for easy access by healthcare staff
 - Oversee and document movement of files for outgoing/incoming chains, court orders, IAD, WRITs tentative releases, work releases and ICEs.

- Tracking and distribution of charts as they are checked in and out to healthcare staff
 - Scheduled appointments, call-out chart reviews.
- Transferring and receiving of medical files/charts to/from other facilities
 - Chronological
 - Verify that all documentation is included.
- Review and audit transfer/release documentation including:
 - Prescriptions
 - Verify patient signature
 - Medication sheets
 - Health care summary report

15%

- Communicate various types of information to referral agencies, departments, physicians, and the community such as hospitals and correctional facilities.
 - Locate and provide specified information for patient care.
- Perform general clerical duties
 - Multi-line phone
 - Fax
 - Copier
 - Computer
- Use and work proficiently with DOC programs.
 - OMNI
 - Microsoft Word, Excel, Outlook
 - ATLAS
- Inventorying, ordering and stocking supplies
- Creating and maintaining manual/guidelines for training and quick reference of medical records.
- Perform specialized clerical and technical duties in patient care area to facilitate the delivery of service provided.
- Telephone and email correspondence with inside and outside agencies such as healthcare facilities, correctional facilities, doc staff, medical staff and providers, released offenders and their families.
- Attend monthly table top meeting with the medical records team and supervisor. Review, explains and interprets safety and security procedures concerning the given topic/situation such as floods, power outages and escapes.
- Perform all related duties as needed and required, with little or no supervision and in a timely matter.
- Multi-tasking and utilizing time proficiently in a fast paced environment, with little or no supervision.

Summary of Ms. Goucher's Perspective

In her request for a director's review, Ms. Goucher contends her complex duties and level of independence surpasses the expectations of the OA 3 job class. Ms. Goucher asserts her duties are best described in the Patient Services Coordinator class specification.

In her PRR, Ms. Goucher states, "The Patient Services Representative classification is more descriptive of the duties performed in the health records department." She says she responds to questions about patients by researching health records and relaying information to providers or other health services staff. This, she believes, is consistent with the class specification for Patient Services Representative.

Summary of HCA's Reasoning

Below are key statements from Ms. Stewart's Allocation Determination Letter:

...

During the work review teleconference with you on October 27, 2015, you indicated that you do not have direct contact with patients, but you do have direct contact with mental and medical health staff before patient appointments...Your work assignments do not include receiving patients, registering patients, triaging patient telephone calls to medical staff, point-of-service admission, transcribing physicians' orders, or scheduling patients for appointments.

...

Based on the clarification provided by your supervisor, you assign work or special projects to other employees in your work group as they come up, but not on a daily, regular or ongoing basis. You train other employees in your work group when needed and you answer questions if they come up, not on a daily, regular or ongoing basis. You do not check the work of other employees in your work group, nor do you have responsibility for planning and organizing the work of others.

...

When comparing the description of your duties with the Patient Services job classes, there are some similarities in the language used to describe the work. However, the primary focus of your position is to provide clerical support to the healthcare providers, not to assist patients seeking medical care.

...

Independent performance requiring substantive knowledge of a variety of regulations, rules, policies, etc. is consistent with the distinguishing characteristics for Office Assistant 3.

...

After a careful review and analysis of the information provided within the position review request and position description for your position in comparison to the job class specifications, it has been determined that your duties and responsibilities best reflect the Office Assistant 3 class specifications.

Comparison of Duties to Class Specifications

Patient Services Series Class Series Concept

Coordinates and provides patient support services such as scheduling appointments, answering telephones, receiving patients, registering patients, and processing patient charge documents in a patient care area.

Ms. Goucher does not schedule appointments, receive patients, register patients and process patient charge documents in a patient care area, as stated in the class series concept for PSR. Ms. Goucher facilitates the audit, transfer and receipt of offender medical records from correctional facilities, other areas within Washington State Penitentiary and health care providers.

Patient Services Representative Definition

Provides support services in a patient care area such as scheduling patient appointments, triaging patient telephone calls to medical staff, registering patients, providing point-of-service admission, maintaining patient records and assembling patient charts, initiating and processing patient charge documents, and transcribing physicians' orders.

Patient Services Representative Distinguishing Characteristics

Under general supervision, performs specialized clerical and technical duties in a patient care area to facilitate the delivery of services provided.

The distinguishing characteristics specify the PSR performs "clerical and technical duties...to **facilitate the delivery of services provided...**" A PSR **facilitates medical care**, which includes receiving the medical chart from the correctional facility, registering the patient, scheduling and cancelling appointments for the patient, alerting medical providers of urgent patient issues and other tasks that prepare the patient for his/her medical appointment. While Ms. Goucher maintains offender medical records and assembles patient charts, as stated in the definition of PSR, this is only a portion of work performed by a PSR. While Ms. Goucher's focus is on medical records, the focus of a PSR is on patients.

Ms. Goucher's involvement with medical files ensures offender information is kept private and routed to the correct personnel or proper offender chart. According to the teleconference between Ms. Goucher and Ms. Stewart on October 27, 2015 (Exhibit B-6), Ms. Goucher indicated she does not have direct contact with patients, rather has contact with mental and medical health staff before offender appointments. Therefore, allocation of Ms. Goucher's position to Patient Services Representative is inappropriate.

Patient Services Coordinator Definition

Solely coordinates the daily patient flow in patient care areas and provides support services such as triaging patient telephone calls to medical staff, scheduling appointments, registering patients, maintaining patient records and assembling patient charts, and initiating and processing patient charge documents.

Patient Services Coordinator Distinguishing Characteristics

Under general direction, independently coordinates all operational support functions in a patient care area such as overseeing the environmental conditions of the office and patient waiting areas, coordinating non-medical equipment repairs, inventorying and ordering supplies, assisting in the orientation of new residents and staff to clerical procedures, and participating in the preparation and maintenance of policies and procedures.

The PSC coordinates all operational support functions in a patient care area, such as overseeing environmental conditions of the office and patient waiting areas. Ms. Goucher's duties and responsibilities do not fit the class series concept for the Patient Services series, nor the definition and distinguishing characteristics of the Patient Services Representative. This precludes allocation to the higher-level Patient Service Coordinator.

Forms and Records Analyst 1 Definition

Positions at this level provide assistance in all phases of manual, electronic and/or automated forms control, records management and/or public records disclosure. Incumbents work under the supervision of higher-level records and/or forms management staff. Incumbents follow established guidelines and perform tasks that are routine in nature and require the use of standard filing and indexing systems and related equipment and supplies. Decision-making authority is limited to choice of established methods or procedures and guidance is provided for new or unusual situations.

I considered the Forms and Records Analyst 1 (FRA 1) job class because of Ms. Goucher's work with medical records and because the unit is supervised by a FRA 3. Some of the duties Ms. Goucher performs that may be associated with a FRA 1 are as follows:

- Follows the health information management protocols and federal, state and departmental procedures for the management of health record.
- Auditing charts and records for accuracy....following the Health Information Management Protocol.
- Archiving records of released and current offenders.
- Works under the supervision of higher-level records and/or forms

While Ms. Goucher performs some duties of the FRA 1, she does not provide assistance in all phases of forms or records management and/or public records disclosure the majority of the time. Ms. Ray verified in her email to me on May 9, 2016, the OA 3s reporting to her do not assist with public disclosure requests and the work of the Forms and Records Analyst series is performed by Ms. Ray and a FRA 2. After analyzing all the duties in the PRR, I find the substantial majority of Ms. Goucher's work is to provide clerical support, not records analysis. Therefore, the duties and responsibilities of Ms. Goucher's position are not suitable for FRA 1 job class.

Class Series Concept for the Office Assistant series (from OA 1 class specification)

Performs a variety of clerical duties in support of office or unit operations.

Ms. Goucher does perform a variety of clerical duties in support of the medical records unit. "Clerical" is defined by the *Glossary of Classification Terms* as "work that supports office operations." The operation of the unit includes the responsibility for managing offender health information. Ms. Goucher supports this operation by ensuring medical records are present and accounted for, updated, and ready for transfers within or outside of the institution. She verifies signatures are present on medical documents; assists in correcting discrepancies; breaks down, thins and merges health records; and tracks charts as they are checked in and out. In addition, Ms. Goucher handles inventorying of medical forms, answers and routes phone calls, faxes documents, makes copies, and performs a variety of other clerical tasks.

Office Assistant 3 Definition

Under general supervision, independently perform a variety of complex clerical projects and assignments such as preparing reports, preparing, reviewing, verifying and processing fiscal documents and/or financial records, composing correspondence such as transmittals and responses to frequent requests for information, establishing manual or electronic recordkeeping/filing systems and/or data base files, and responding to inquiries requiring substantive knowledge of office/departmental policies and procedures. Positions may perform specialized complex word processing tasks in a word processing unit or complex rapid data inquiry and/or entry functions.

Office Assistant 3 Distinguishing Characteristics

Assignments and projects are of a complex nature. Independent performance of complex clerical assignments requires substantive knowledge of a variety of regulations, rules, policies, procedures, processes, materials, or equipment. Problems are resolved by choosing from established procedures and/or devising work methods. Guidance is available for new or unusual situations. Deviation from established parameters requires approval. Work is periodically reviewed to verify compliance with established policies and procedures.

In her letter requesting a director's review, Ms. Goucher points out that her work is more complex than that of an OA 3 and her level of independence exceed the expectations of the OA 3 job class. According to the distinguishing characteristics, the OA 3 is expected to work under general supervision and perform independently. According to the *Glossary of Classification Terms*, "general supervision" means:

- Employee performs recurring assignments without daily oversight by applying established guidelines, policies, procedures, and work methods.
- Employee prioritizes day-to-day work tasks. Supervisor provides guidance and must approve deviation from established guidelines, policies, procedures, and work methods.
- Decision-making is limited in context to the completion of work tasks. Completed work is consistent with established guidelines, policies,

procedures and work methods. Supervisory guidance is provided in new or unusual situations.

- Work is periodically reviewed for compliance with guidelines, policies and procedures.

Ms. Ray attests to the level of independence expected of the OA3s in her unit, outlined in her email to me on May 9, 2016:

"...When they have questions they will come to me for clarification. This is a fast paced environment that requires the OA3s to be as independent as possible and have excellent problem solving skills. There are times when I ask them to complete tasks to help me out. This would include copying medical files..."

Ms. Goucher performs recurring assignments without daily oversight and her responsibilities are consistent with the definition of "general supervision."

Ms. Goucher performs complex clerical assignments requiring a substantive knowledge of medical regulations, rules, policies, procedures and processes, consistent with the OA 3 definition and distinguishing characteristics. In both the definition and distinguishing characteristics, the emphasis is on incumbents having substantive knowledge. The Office Assistant class series requires substantive knowledge of the unit they are supporting. In this case, Ms. Goucher must know health information management protocols and federal, state and departmental procedures for the management of health records. This emphasis is different than that of a PSR, who works extensively with patients, attends to urgent patient needs, triages medical urgencies and communicates the information to patients and medical staff.

The primary difference between an OA 3 and a PSR is that the PSR is focused on patients and medical records are a portion of their overall responsibility. The primary focus of Ms. Goucher's work is not on patients, but on the tracking and safeguarding of offender medical records.

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).

Based on the overall duties and responsibilities, Ms. Goucher's position is properly allocated to Office Assistant 3.

Appeal Rights

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

An employee incumbent in a position at the time of its allocation or reallocation or 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.

cc: Peggy Goucher, Appellant
Roxanne Stewart, Human Resource Consultant

Enclosure: List of Exhibits

Peggy Goucher vs. Department of Corrections

ALLO-15-094

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2. Office Assistant 2
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