



STATE OF WASHINGTON

OFFICE OF FINANCIAL MANAGEMENT

STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM

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June 23, 2016

TO: Kristie Wilson
Rules and Appeals Program Manager

FROM: Christa Biasi
Director's Review Specialist

SUBJECT: Kara Johnson v. Washington State Parks and Recreation Commission (Parks)
Allocation Review Request ALLO-16-007

Director's Determination

This position review is based on the work performed for the six-month period prior to December 3, 2015, (June 3, 2015 – December 3, 2015 - October 8, 2015) the date Parks Human Resources (Parks HR) received Kara Johnson's request for reallocation. As the Director's Review Specialist, I carefully considered all the exhibits, any written communication provided and the information obtained during the Director's Review Conference. Based on my review and analysis of Ms. Johnson's assigned job duties; I conclude her position is properly allocated to an Office Assistant 3 (OA 3).

Background

On December 3, 2015, Ms. Johnson submitted a Position Review Request (PRR) to Parks HR (Exhibit B-2).

By letter dated December 29, 2015, Steven Loduha, Human Resource Consultant, Parks HR, notified Ms. Johnson that her position remained allocated to Office Assistant 3 (Exhibit B-1)

On January 28, 2016, Office of Financial Management, State Human Resources received Ms. Johnson's request for a written Director's Review of Parks HR's allocation determination (Exhibit A-1).

The Director's Review Conference was held on June 14, 2016, via conference call.

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).

Organizational Structure

This position is located in the Blue Mountain Area and is support for the Area Manager. In the Blue Mountain there are seven parks, two trails and three Retreat Centers.

Position Purpose

As summarized in the PRR (Exhibit B-2), Ms. Johnson's describes her position as follows:

"My position exists to assist the Area Manager with administrative tasks and duties that he would otherwise have to complete, to provide a main point of contact and information for public and agency staff and to assist other park staff with administrative and clerical tasks to aid them in their job duties."

Duties and Responsibilities/ Position Review Request (Exhibit B-2)

35% Major Duty: Function as the administrative communication hub for the area during regular business hours to include processing mail/email, answering phones and responding to inquiries on behalf of the Area Manager.

Responding to inquiries from parks staff, partnership groups, other agencies, and the public both verbally and in writing, drafting and submitting grant proposals for winter rec and the Blue Mountain Area parks, review mail and email for action items and carry out tasks, distribute mail, email and phone messages that require other staff, review written documents for accuracy and completeness, serves as primary point of contact during regular business hours.

35% Provide Direct Administrative Support to the Area Manager

Assist with scheduling, and maintaining Area Manager's outlook calendar, update calendars and train new employees, review applications for hiring, schedule interviews, assist with creation of interview questions, complete, review and submit hiring and separation paperwork, drafting and submitting written responses to complaint letters for Area Manager and Region Manager approval, send approved complaint responses to complainant, Collect, review and submit timesheets for Area Manager, collect, review and submit annual PDPs for staff, collect and submit employee evaluations for area staff, submit annual paperwork for LOSS system to Army Corps.

20% Provide administrative fiscal support to the Area Manager by reviewing and processing financial records, and keeping expenditure reports up to date and accurate for Area.

Create, review and process payment documents including SPRs, A-19s and credit and purchase logs for all staff, track expenditures, monitor and evaluate budget status and resolve corrections, keep Area Manager apprised of status, maintain local store credit accounts, office change bag, petty cash logs, review fiscal reports from each shift for accuracy, investigate errors and correct to ensure agency compliance, bring issues to Area Manager's attention, reconcile compile and make deposits for 6 parks and 1 retreat, complete and submit CRTs, train other staff as necessary and monitor for accuracy, create, review and maintain all WEBS requests for Area to include position, editing announcements, receiving and reviewing bids, serve as WEBEREST administrator or area and ensure systems are operable, train seasonal employees on reservation system, troubleshoot reservation issues, process camper registrations and pass sales, make and cancel reservations

10% Provide complex administrative and routine clerical support functions to area.

Coordinate, collect, review and submit resource tracking data and vehicle usage data for area, coordinate, collect, review and submit attendance data for 7 parks, 1 trail and 3 retreat centers, review bulk fuel records and vehicle usage reports and compare with Voyager reports to a count for all fuel expenditures, report any discrepancies to Area Manager, file and maintain all area records to meet agency and state records retention requirements and policies, maintain inventory and park publications for area, maintain inventory and order office and cleaning supplies as needed, maintain inventory and order volunteer supplies as needed, maintain, review and process inventory transfer slips per agency policy, assist other staff with purchasing activities, serve as key administrator for office equipment, troubleshoot and resolve issues with office equipment, arrange for repairs and services, maintain desk manuals and plans

Summary of Park's Perspective

Allocation Determination Letter Dated January 8, 2016, Exhibit B-1

On December 29, 2015, Parks provided Ms. Johnson with their response to her PRR, Mr. Loduha outlines his reasoning for not approving Ms. Johnson's reallocation request as follows:

- On the Employee Position Review Request Form you submitted, under Major Duties, you indicate that you provide a variety of administrative support to the Area Manager; Responding to inquiries, reviewing mail, reviewing email and phone messages, reviewing and submitting paperwork to include fiscal support, purchase logs, employee/staff information, other written correspondence and responses to request for information/inquiries. These duties are clearly identified in the Definition and Distinguishing Characteristics outlined in the Office Assistant 3 job class specification, which states in part: 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 and composing correspondence. Administrative Assistants can be distinguished from clerical positions by formal delegation and regular exercise of higher-level professional support duties; their work is not clerical or secretarial in nature.
- Positions allocated to the Administrative Assistant 1 classification control professional staff's work by directing changes, prioritize professional staff's workload and coordinating professional staff's work within the agency.

Your position does not independently authorize exceptions to gain compliance and has no delegation to independently exercise changes as noted above.

- Positions allocated to the Administrative Assistant 2 classification have delegated authority to act in supervisor's absence in areas of substance and have authority to act in the regular place of the superior in substantive areas.
- Positions allocated to the Administrative Assistant 2 position are principal administrative Assistants to the superior who is at the first professional supervisory level or above. Although you report to the Area Manager, your position is in support of functions/assignments to the Blue Mountain Area, furthermore, you do not possess the authority to act in for or in regular place of the Area Manager in areas of substance. You also do not supervise professional or several clerical staff.

Mr. Loduha also states, "based on the fact that the majority of the work assigned your position is complex clerical in nature and under general supervision of the Area Manager, the overall duties and responsibilities identified are best reflected in the Office Assistant 3 class specification."

Summary of Ms. Johnson's Perspective

In Ms. Johnson's PPR (Exhibit B-2) she states the duties as:

"I provide administrative support to the Area Manager for 7 parks, 2 trails and 3 Retreat centers. Many of my duties are administrative duties that have been delegated from the Area Manager and are completed in addition to the clerical duties assigned to my position. These include reviewing and processing financial records, managing expenditure reports, documenting and responding to complaint letters and inquiries, drafting and submitting grant proposal , assisting with scheduling, training new employees, reviewing applications for hiring, scheduling interviews, completing hiring paperwork, reviewing and correcting timesheets for all employees, reviewing PDPs for signatures:' and completeness, reviewing and submitting employee evaluations, serve as key administrator for all office equipment, schedule service for parks such as pest control, installations etc., serve as key administrator for contact with Head Quarter (HQ) staff and Region staff, assist Region and HQ staff with their projects by providing data from each of the parks."

Ms. Johnson also stated the Administrative Assistant 2 classification is more fitting for the duties she performed during the relevant timeframe and the "more complex duties that I have been performing exceed the clerical duties that are relevant to the Office Assistant 3 position."

In her request for a Director's Review (Exhibit A-1) Ms. Johnson states, "I perform administrative duties and have delegated authority from my supervisor to act in his absence."

Summary of Director's Review Conference June 14, 2016

During the Director's Review Conference Ms. Johnson reiterated her belief that she had been performing duties that are confidential in nature and she has delegated authority in the absence of the Area Manager.

This delegated authority came in the form of examples provided and exhibits produced by Ms. Johnson (Exhibits A-2, A-9, A-13 and A-15). She also discussed this belief during the Review Conference.

- Exhibit A-2 is an email from Scott Griffiths who is the Regional Manager over the Eastern Region which also encompasses the Blue Mountain Area. In the email Mr. Griffiths states, "With Gary [Vierra (Area Manager for Blue Mountain)] out, I am emailing you and hoping you know his desire [related to the continued recruitment of a Park Ranger 3 position]."
- Exhibit A-9 is from Mr. Griffiths who is seeking information related to the disbursement of money while Ms. Johnson's supervisor is out of the office.
- Exhibit A-13 is an email regarding an open recruitment where Ms. Johnson received the applicants. It is her position that this email speaks to the confidential nature of her position.
- Exhibit A-15, Ms. Johnson contends is an email where she has been given authority to proofread and make changes to an employee's Performance Development Plan.

During the Review Conference Ms. Johnson stated when her supervisor was out of the office or on vacation, she was often turned to for guidance on matters that normally the Area Manager would handle. Sometimes it could be approving orders for the Park Rangers or the reposting of a recruitment. Ms. Johnson did indicate that she and her supervisor did not speak about her decision making authority nor did her supervisor ever formally give her decision making authority in his absence.

Ms. Johnson stated when the Blue Mountain Area was short a Park Ranger 3 the duties of the vacant position transferred to her. Ms. Johnson stated, "why should I not get paid as a Park Ranger 3 if I am performing those duties."

Parks indicated that although Ms. Johnson had given some examples of being provided delegated authority, they believe the authority is based more around Ms. Johnson's authority to gather information in order to complete forms and processes. However, for the majority of her work, Parks HR believes the complex nature outlined in the OA 3 class and the majority of the basis for the allocation determination meets the OA 3 class. Ms. Johnson did not have the delegated authority to act for or in place of the Area Manager.

Comparison of Duties to Class Specifications

I carefully reviewed the exhibits submitted by the parties. Allocating criteria consists of the class specification's class series concept (if one exists), the definition and the distinguishing characteristics. Typical work is not an allocating criterion, but may be used to better understand the definition or distinguishing characteristics.¹ The first consideration when allocating a position is ensuring it fits the class series concept. For this purpose I reviewed the class series concept of Office Assistant 3 and Administrative Assistant 1 and 2 classes.

¹ In *Norton-Nader v. Western Washington University*, PRB Case No. R-ALLO-08-020 (2008), the Personnel Resources Board (Board) stated that the following standards are the hierarchy of primary considerations in allocating positions: a) Category concept (if one exists); b) Definition or basic function of the class; c) Distinguishing characteristics of a class; and d) Class series concept, definition/basic function, and distinguishing characteristics of other classes in the series in question.

Administrative Assistant 1 and 2 (AA 1 and 2)

Administrative Assistant 1

The Administrative Assistant class does not have a class series concept; therefore I began by looking at the Definition and the Distinguishing characteristics of the Administrative Assistant 1 (AA 1) class.

Definition

Provides para-professional administrative and staff assistance to a professional supervisor by reviewing, controlling, prioritizing and coordinating the work of the supervisor's professional staff; or performs technical work which is directly delegated from a professional position.

Distinguishing Characteristics

Administrative Assistants can be distinguished from clerical positions by the formal delegation and regular exercise of the following responsibilities:

- reviewing the work of professional staff for completeness, to assure that input-output is in compliance with laws, rules, policies, procedures and standards;
- controlling the professional staff's work by directing changes, corrections and authorizing exceptions to ensure compliance with the supervisor's schedules and priorities;
- prioritizing the professional staff's workload within established guidelines; and
- coordinating the professional staff's work within an agency, between agencies, with the public and/or other governmental entities.

OR

The technical work addressed in the definition is distinguished by a professional position fully delegating a technical portion of the position's duties which in turn encompasses the majority of the Administrative Assistant's work and can be traced to originate directly from a professional position's duties and responsibilities. Administrative Assistant positions do not report to a Clerical Supervisor. Their work is not clerical or secretarial as stated in those class specifications. However, only positions at this level in the class series may be assigned some clerical and/or secretarial duties not to exceed 25% of the total work.

Administrative Assistant 2

Definition

Provide administrative and staff support services for a section or unit with delegated authority to act in supervisor's absence in areas of substance.

Distinguishing Characteristics

These positions may be distinguished from lower level classes by addition of the delegation of authority to act for or in the regular place of the superior in substantive areas, and/or supervision of some professional or several clerical subordinates and a formal reporting alignment identifying the position as the principal administrative assistant to the superior who is at the first professional supervisory level or above.

The scope of Ms. Johnson's position does not include responsibility for providing administrative support duties at the level required by the Definition and Distinguishing Characteristics of this class. She does not "provide para-professional administrative and staff assistance to a professional supervisor by reviewing, controlling, prioritizing and coordinating the work of the supervisor's professional staff" nor does she perform technical work which is directly delegated from a professional position.

Rather Ms. Johnson provides support to the Area Manager by "responding to inquiries, reviewing mail, reviewing email and phone messages, reviewing and submitting paperwork to include fiscal support, purchase logs, employee/staff information, other written correspondence and responses to requests for information/inquiries."

Ms. Johnson's position does not provide high-level administrative support services to her supervisor. Higher level administrative duties are duties of a substantive nature that are appropriately performed by her supervisor, but have been delegated to the Administrative Assistant to perform. Her position does not have delegated responsibility to act on her supervisor's behalf in substantive areas at the level envisioned by this class. The scope of Ms. Johnson's position does not include responsibility for representing her supervisor's goals, interest, interpretation or explanation of her supervisor's policies or viewpoints to lower level staff.

For example, Ms. Johnson has not been delegated responsibility for any of the following administrative functions: budget development and/or management, expenditure control, office space management, equipment purchases, budget development and/or management, public relations, personnel administration, records management or report preparation. Ms. Johnson's duties more accurately consist of performing a variety of complex clerical duties and functions in support of the unit's security and other operational functions.

In total, Ms. Johnson's position does not meet the primary allocating criteria for allocation to the Administrative Assistant 1 or 2 classes. For each of these reasons Ms. Johnson's position should not be allocated to the Administrative Assistant class or other classes within the Administrative Assistant series.

Office Assistant 3

The Class series concept for the Office Assistant class states:

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

Ms. Johnson does perform a variety of clerical duties in support of the Area Manager for the Blue Mountain Area. Clerical is defined by the *Glossary of Classification Terms* as "Work that supports office operations."

In her position Ms. Johnson supports the Area Manager by ensuring inquiries from park staff, partnerships, other agencies and the public are responded to, whether it be in writing or verbally. She also provides fiscal support to the Area Manager by reviewing and processing financial records and keeping expenditure reports up to date. While these duties do not encompass all of Ms. Johnson's duties, they are seventy percent (70%) of her overall duties.

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.

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.

Positions typically provide work direction to lower level staff and may assist in training new staff.

According to the distinguishing characteristics, the OA 3 is expected to work under the general supervision and perform independently. According to the *Glossary of Classification Terms*, "general supervision" is defined as follows:

- 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.

This class describes positions which independently perform a variety of complex clerical duties in support of daily office or unit operations. Consistent with Ms. Johnson's position, OA 3 positions work under general supervision and independently perform a variety of complex clerical assignments requiring substantive knowledge of a variety of regulations, rules, policies, procedures, processes and materials. As a whole, Ms. Johnson's position closely aligns with this focus.

Ms. Johnson performs recurring assignments without daily oversight and her responsibilities are consistent with the definition of "general supervision." Ms. Johnson performs complex clerical assignments requiring substantive knowledge of the Blue Mountain Area and its processes, rules, regulations and procedures. This is consistent with the OA 3 definition and distinguishing characteristics.

When considering the totality of the duties Ms. Johnson performs, the majority of her work assignments fit within the Office Assistant 3 classification. Based on the overall duties and responsibilities, Ms. Johnson's position is properly allocated to Office Assistant 3.

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).

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 (PRB). 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 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: Kara Johnson, Appellant
Steve Loduha, Parks/HR
Gus Gonzalez, WFSE

Enclosure: List of Exhibits

KARA JOHNSON v PARKS
ALLO-16-007

LIST OF EXHIBITS

A. Kara Johnson Exhibits

1. Request for Director's Review
2. Email re: Posting of Vacant Positions
3. MMP 2015 worksheet
4. MEP List for review – Eastern Region, South
5. Camp Wooten Burn Permit
6. 2016 Small and Simple Grant Application
7. Education and Enforcement Application
8. Trail Grooming Application
9. 11/16/15 email re: Decision Making
10. Lewis & Clark Trail State Park Fire Protection
11. McNary Annual Management Plan-Sacajawea State Park
12. SPCC plan-Sacajawea State Park
13. 2/16/16 emails re: Vacant Position recruitment responsibilities
14. Fire Contract-Lyons Ferry
15. 5/15/15 emails re: confidentiality and documentation
16. PDP/PDF

B. PARKS Exhibits

1. Allocation determination letter, dated December 29, 2015
2. Position Review Request – Employee Portion
3. Position Review Request – Supervisor Portion
4. Email from Region Manager with comments
5. Kara Johnson's Position Description
6. Class Specification for Office Assistant 3
7. Class Specification for Administrative Assistant 1
8. Class Specification for Administrative Assistant 2