

May 14, 2007

Ms. Kathleen Oest
Employee Relations Specialist
Washington Public Employees Association
140 Percival Street NW
Olympia, WA 98502

RE: Richard Hall v. Department of Natural Resources
Allocation Review Request 06AL0074

Dear Ms. Oest:

On December 13, 2006, I conducted a Director's review meeting at the Department of Personnel, 2828 Capitol Boulevard, Olympia, Washington, concerning the allocation of Mr. Hall's position. Present at the Director's review meeting were you, Mr. Hall, and Lyle Loncosty, also with the Washington Public Employees Association (WPEA); Marty Graf and Tom Hoffer, Human Resource Consultants representing the Department of Natural Resources (DNR).

Background

On November 4, 2005, Mr. Hall submitted a Position Review Request (PRR), requesting that his Equipment Shop Assistant position be relocated to an Equipment Mechanic. On January 1, 2006, the Department of Personnel (DOP) implemented a class consolidation. Consequently, the Equipment Technician 2 classification replaced the Equipment Shop Assistant, and the Equipment Technician 3 replaced the Equipment Mechanic. When Mr. Graf conducted Mr. Hall's position review, he considered the class specifications relevant at the time Mr. Hall submitted the PRR, as well as the newly transitioned classifications of Equipment Technician 2 and 3.

In the Director's review request filed by WPEA's Assistant Director of Field Services, Marian Gonzales, on behalf of Mr. Hall, Ms. Gonzales mentioned the Maintenance Mechanic 2 classification in the Trades Helpers/General Maintenance Occupational Category. Positions in this category, however, relate to general repair and maintenance in skilled fields such as electrical plumbing, carpentry, welding, painting and machinist

work. In the Director's review meeting, we confirmed the relevant classifications for consideration were the Equipment Technician 2 and 3 within the Equipment Maintenance and Repair Occupational Category.

On February 15, 2006, Mr. Graf issued DNR's allocation determination, concluding Mr. Hall's position was properly allocated to the Equipment Technician 2 classification. After reviewing Mr. Hall's PRR and his previous Classification Questionnaire (CQ) Mr. Graf determined the duties were primarily the same with the exception of rebuilds, inspections, and repairs/replacements of small engines and pumps, generators, transmissions and differentials (Exhibit 2). Based on clarification from the Equipment Services Manager and Equipment Fund Assistant Manager, Mr. Graf concluded those additional tasks were incidental to his overall duties and the position's purpose was to install components onto DNR fire trucks and perform body work on DNR crew busses.

Mr. Graf also concluded that while all the duties described on the PRR could also fit into the Equipment Technician (ET) 3 class, the only difference with regard to Mr. Hall's position was "whether or not a position assists journey-level technicians." Mr. Graf did not believe Mr. Hall's position met the other criteria at the ET 3 level because he concluded Mr. Hall did not analyze specialized equipment needs, uses, and cost effectiveness; coordinate all statewide fleet operations; or participate in the formulation of policies and procedures governing the use of equipment.

On March 10, 2006, the Department of Personnel received Ms. Gonzales's request for a Director's review on behalf of Mr. Hall.

Summary of Mr. Hall's Perspective

Mr. Hall asserts his position far exceeds the original purpose of assisting an equipment mechanic "eventually approaching those [duties] done by journey-level persons" (Exhibit C). Mr. Hall contends his supervisor, Jean Petit, an Equipment Mechanic Supervisor, now assigns him a number of trucks to rebuild. Mr. Hall further contends he acts as a lead in his section and has trained mechanics in higher-level positions. Mr. Hall acknowledges he works with small engine mechanics at times but asserts he has been tasked with rebuilding fire engines in DNR fire trucks, which are a priority. Mr. Hall states he also performs mechanical work on busses when other mechanics are in the field.

In addition to building fire decks (Exhibit 11), Mr. Hall asserts he also does drawing and designing. For example, Mr. Hall asserts he designs and builds panels ahead of time so they are ready when trucks come into the shop. He also makes up kits for plumbing assemblies, which can be interchanged. Mr. Hall contends he now has a shop assistant, which allows him time to work on flow pumps and fire engines. Mr. Hall describes the rebuilding of a pump as essentially rebuilding an engine, which he asserts can be quite complicated. Mr. Hall believes he has been working at a higher-level class for a number of years and asserts his supervisor agrees that he devises his own work plans and

determines what repairs are needed. He further asserts his supervisor has assigned his position the responsibility of evaluating, repairing, and rebuilding fire engines, and as a result, he believes he performs journey-level work rather than at an assistant level. Therefore, Mr. Hall contends his position should be relocated to an Equipment Technician 3.

Summary of the Department of Natural Resources' (DNR's) Reasoning

DNR contends the primary responsibility assigned to Mr. Hall's position is to install components onto DNR fire trucks and perform body work on DNR crew busses. DNR describes Mr. Hall's work as specialized in nature because he rebuilds fire engine decks, which DNR categorizes as shop assistant level work rather than mechanic level work. DNR asserts that small engine rebuilds are not regularly assigned to Mr. Hall's position and states that Mr. Hall is tasked instead with rebuilding pumps for decks on DNR fire trucks. While DNR agrees that Mr. Hall is capable of rebuilding engines and performing higher-level mechanical work, DNR contends he has not been assigned those higher-level duties. Therefore, DNR believes Mr. Hall's position is appropriately allocated to the Equipment Technician 2 classification.

Director's Determination

This position review was based on the work performed for at least the six-month period prior to November 4, 2005, the date Mr. Hall submitted his Position Review Request to DNR.

As the Director's designee, I carefully considered all of the documentation in the file, the exhibits presented during the Director's review meeting, and the verbal comments provided by both parties. Based on my review and analysis of Mr. Hall's assigned duties and responsibilities, I conclude his position should be reallocated to the Equipment Technician 3 classification.

Rationale for Determination

At the time of Mr. Hall's position review request at DNR, the following classifications were applicable:

Equipment Shop Assistant (the classification of Mr. Hall's position at the time), which defined the position as *assisting* equipment mechanics by performing mechanical tasks, "eventually approaching those done by journey-level persons."

Equipment Mechanic 1, defined as a position that "[i]nspects diagnoses and makes major and minor mechanical repairs, and performs preventative

maintenance, on all types of equipment . . . or heavy and/or industrial/commercial equipment . . .” that includes power generators and pumps.

Mr. Hall's CQ, date stamped May 14, 2001, describes the position's duties as “sub-journey level work” and notes that the work is performed “under the supervision of mechanics . . .” (Exhibit E). The level of work identified on the CQ is consistent with the Equipment Shop Assistant class and supports Mr. Hall's characterization of the position's original purpose. In reviewing the PRR, however, (signed in October 2005) Mr. Hall's supervisor, Jean Petit, agrees the position performs journey-level work, including rebuilds on small engines and pumps. Mr. Petit also notes, in part, that Mr. Hall “determines [sic] repairs needed and completes journey-level repairs on DNR equipment in the shop and in the field up to \$1500.00.”

Although Mr. Hall described the position's purpose by using the Equipment Shop Assistant's definition on the PRR, the level of duties identified on the PRR go beyond sub-journey level work. For example, Mr. Petit indicates that Mr. Hall devises his own plan, organizes his own work area, leads one or two assistants, and schedules and coordinates fire truck rehabs. The level of responsibility assigned to Mr. Hall's position is also identified by Mr. Petit's statement that his “position is responsible for the evaluation, repair, and rebuild (rehab) of fire engines” (Exhibit A, Supervisor Review).

In his determination, Mr. Graf also noted that additional duties listed on the PRR include “complete rebuilds on small engines and pumps, inspecting and repairing pumps and generators, and repairing/replacing transmission and differentials” (Exhibit 2, page 3). Mr. Hall's Employee Development and Performance Plans (EDPPs) provide further evidence that his job entails designing, constructing, and rebuilding DNR fire engines and pumping systems (Exhibit 3). Although the Equipment Services managers had described those functions as incidental to his overall work, the Technician's Accountability Report for Mr. Hall's position lends support to his assignments of rebuilding fire engines and pump systems (Exhibit 10).

The type of work in conjunction with Mr. Petit's statements describing the level of decision-making relating to independently evaluating, repairing, and rebuilding engines, pumps, and generators meet the Equipment Mechanic 1 definition. In addition, the duties that relate to designing, documenting, and assembling accessory components; designing, building and installing air systems; and diagnosing, repairing and installing hydraulic systems demonstrate a level of work beyond the assistant level described by the Equipment Shop Assistant classification.

On January 1, 2006, the Equipment Technician 3 class replaced the Equipment Mechanic 1. When comparing Mr. Hall's assigned duties and level of responsibility indicated by his supervisor, Mr. Hall's position also fits the distinguishing characteristics of the Equipment Technician 3 classification, which read “[p]erforms journey-level inspection,

diagnoses and makes major and minor mechanical repairs, and performs preventive maintenance, on all types of equipment . . .” They also note, in part, that some positions analyze specialized equipment needs, uses, and cost effectiveness. The fire engines and pumps Mr. Hall rebuilds are unique to DNR fire trucks. While journey-level work can be performed by either the Equipment Technician 2 or 3 class, Mr. Hall’s role has evolved beyond the assistant level, though he may assist other mechanics in terms of providing backup for additional mechanical work coming into the shop when others are working in the field.

The Washington State Classification and Pay Administrative Guide states that a position’s allocation is based on a review and analysis of the duties and responsibilities of the position and is allocated **on a best-fit basis** as determined by the majority of work performed. In addition to performing journey-level duties, the level of responsibility and analysis related to inspection, diagnosis, drawing, documenting and designing assigned to Mr. Hall’s position #2823 best fits the Equipment Technician 3 classification.

Appeal Rights

WAC 357-49-018 provides that either party may appeal the results of the Director’s review to the Personnel Resources Board (board) by filing written exceptions to the Director’s determination in accordance with Chapter 357-52 WAC.

WAC 357-52-015 states that an appeal must be received in writing at the office of the board within thirty (30) calendar days after service of the Director’s determination. The address for the Personnel Resources Board is 2828 Capitol Blvd., P.O. Box 40911, Olympia, Washington, 98504-0911.

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

Sincerely,

Teresa Parsons
Director’s Review Supervisor
Legal Affairs Division

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Enclosure: List of Exhibits