

June 24, 2009

To: Teresa Parsons  
Director's Review Program Supervisor

FROM Meredith Huff, SPHR  
Director's Review Investigator

SUBJECT: (Mryl) Ana Roney v. Spokane Community College (SCC)  
Allocation Review No. ALLO-08-083

On behalf of Ms. Roney, Ms. Desiree Desselle, WFSE, requested a Director's Review of Ms. Roney's position's allocation by letter received November 7, 2008. On May 7, 2009, I conducted a Director's review conference by phone. Present by phone were Ms. Roney, employee; Ms. Desiree Desselle, Senior Field Representative, WFSE, representing Ms. Roney; Ms. Christy Doyle, Workforce Education & Development Director, Ms. Jill Shanker, Associate Dean for Financial Aid and Student Employment, and Michael Lenker, Human Resource Consultant for the District Human Resources Office, representing SCC.

### **Director's Determination**

The Director's review of SCC's allocation determination of Ms. Roney's position is complete. The review was based on written documentation, classifications and information gathered during the review conference. As the Director's investigator, I have carefully reviewed all of the information provided and concluded that as a best fit of her overall duties and responsibilities, Ms. Roney's position is properly allocated to the Program Coordinator class.

During the review conference, there was discussion about a position at Spokane Falls Community College (operated by the same district as SCC) which handles veterans GI Bill benefits. That position is located in Financial Aid and was recently upgraded to a Program Specialist. Ms. Roney noted on the PRR that she was requesting reallocation to Program Specialist based on her SFCC counterpart's position being allocated to that class. In this review process, I have not compared Ms. Roney's position with the SFCC position or other position as comparison of positions is not allocation criteria. See *Flahaut v. Depts of Personnel and Labor and Industries*.

### **Background**

Ms. Roney submitted a Position Review Request (PRR) dated September 2, 2008 requesting that her Program Coordinator position be reallocated to a Program Specialist 2. On October 16, 2008, Human Resources Representative Michael Lenker informed Ms. Roney that he had determined her position should remain allocated to Program Coordinator. On November 10, 2008, the Department of Personnel received Ms. Desselle's letter requesting a Director's Review of SCC's determination on behalf of Ms. Roney. This position review was based on the work performed for at least the six-month period prior to September 2, 2008.

### **Summary of Ms. Roney's Comments**

Ms. Roney indicated that she administers the VA education program which involves application of several chapters of the federal GI Bill for eligible military veterans. She stated she develops individual policies to guide and assist herself in her work. She noted that under general supervision she changes or develops new procedures, presentations for students and informs veterans through newsletters and flyers.

Ms. Roney discussed the Veterans Administration's (VA) requirement of an evaluation of prior credits earned which frequently involves obtaining transcripts from other colleges. As part of the Audit Process, the transcripts need to be shown to the auditor.

To keep the veteran students informed, Ms. Roney produces handouts such as a student guide, newsletters and flyers. She also creates PowerPoint presentations for students to provide information on changes in VA awards. She indicated that she is involved with regional veteran agencies and mentors people in those organizations. SCC is also the host of a regional taskforce group that networks to provide service to veterans. When Ms. Roney is concerned about a veteran student's health or condition, she will refer the student to the Veteran Outreach Center for those resources.

Ms. Roney described the differences when dealing with vocational rehab veterans who receive a disability benefit. Those students can qualify for a program that pays for tuition and supplies and provides a stipend. She estimated that about 51% of the veteran students receive basic allowances.

Ms. Roney indicated that she will keep her supervisor apprised of situations when there is a student problem, changes in the regulations or interpretations of the regulations and when there are issues that are of concern. She receives permission from her supervisor to attend community meetings, to decide processes or pursue specifics of a program.

When dealing with veteran students, Ms. Roney indicates that she makes recommendations to a student as the GI Bill only pays for specific programs. She helps the students to find ways to get the classes they want/need and maintain the stipend. Ms. Roney emphasized that she may allow a tuition deferment for a veteran student when the circumstances merit that action. She noted that she will interview the student,

determine if he/she is a good risk or if its been too much time, and then send a report to the Dean for review. She stated the length of time for the deferment will vary.

Ms. Roney indicated that two student employees report to her. She noted that she is the point of contact for the military veteran students and she uses broad, independent judgment to apply the rules and determine eligibility of students. She indicated her work is like putting puzzle pieces together with the students.

Ms. Desselle discussed Ms. Roney's interaction with the veteran population and others on campus. She stated that Ms. Roney is a known resource, on and outside of the campus, to advocate and educate about the veteran students and the regulations applicable to their situation. She noted that Ms. Roney has represented SCC and taken actions on its behalf over and over. She emphasized that Ms. Roney's position could not be performed without extensive training.

### **Summary of SCC's Comments**

Mr. Lenker emphasized that Ms. Roney is very knowledgeable and has a lot of experience dealing with students who attend college under the GI Bill. He noted she is very passionate about the veteran students and is known as a resource for information on financial assistance for veterans. He confirmed that Ms. Roney makes decisions and recommendations using her professional judgment. He noted that Ms. Roney deals with about 300 veteran students compared to about 6000 total students at SCC. He emphasized that he had reviewed several classes during the SCC review process and had determined the Program Coordinator class is the best fit for Ms. Roney's position's responsibilities.

Ms. Doyle indicated that Ms. Roney may develop internal procedures, rather than policies. Ms. Doyle confirmed that she reviews changes in procedures. She further noted that policies must be reviewed by the Vice President. Ms. Doyle also noted that Ms. Roney does not evaluate transcripts. The evaluations are done by the SCC Counseling Dept. using a SMART transcripts program.

### **Rationale for 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 accomplished, 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. See Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

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 Allegrì 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.

"While a comparison of one position to another similar position may be useful in gaining a better understanding of the duties performed by and the level of responsibility assigned to an incumbent, allocation of a position must be based on the overall duties and responsibilities assigned to an individual position compared to the existing classifications. The allocation or misallocation of a similar position is not a determining factor in the appropriate allocation of a position." Flahaut v. Depts of Personnel and Labor and Industries, PAB No. ALLO 96-0009 (1996)

Glossary of Classification, Compensation and Management Terms (Glossary)

In reviewing this position, I considered the following terms defined in the Glossary. The Glossary weblink is:

<http://www.dop.wa.gov/CompClass/CompAndClassServices/Pages/HRProfessionalTools.aspx>

**Coordinate.** Independently organize, monitor, evaluate, and make adjustments for a program or activity without supervisory responsibility.

**Specialist.** Duties involve intensive application of knowledge and skills in a specific segment of an occupational area.

Position Review Request (PRR)

Ms. Roney noted on the PRR that her position exists to (copied in part):

- Administer VA education programs as assigned under Title 38, US Code...
- Maintain compliance with Federal, State, and Institutional laws ... create methods to assure adherence to government regulations.
- Guide, inform and assist veteran students with GI Bill paperwork...
- Promote and maintain positive working relationships with other local federal, state, county and city veteran agencies and other Washington State colleges.

Ms. Roney describes her main duties and the percentage of time spent on each as follows, in part:

- **36%** Student Interaction (campus)
- **18%** Student interaction (telephone/email activity)
- **9%** Application Paperwork/Web processing
- **7%** Student enrollment review (class checks)
- **6%** SCC Campus/Department Interaction
- **6%** Grade Procedures/Academic Processes
- **4%** Creation and Production of Forms, Newsletter, Letters and Written materials
- **3%** Curriculum /Program Approval Process (SCC, State and VA)
- **3%** Interaction with the Dept. of Veterans Affairs, Federal and Washington State Veteran Agencies

- 2% Interaction with other Colleges and Outside Agencies
- 2% Processing Chapter 31 (Vocational Rehabilitation)
- 2% Other Quarterly Related Tasks
- 2% Veteran Web Site, Evaluation of Military Credit, Tuition Waivers

Ms. Doyle signed the PRR as the immediate supervisor and noted that she provides supervision to Ms. Roney's position at the level of "Little, employee responsible for devising own work methods." Ms. Doyle also indicated that Ms. Roney makes decisions about: "Evaluation of veteran student military credits; creation of forms, newsletters and other written materials; applying mandated State and institutional guidelines and using professional judgment related to the tuition waivers; and development of student processing systems." (Exhibit C-1)

#### Classes Reviewed

##### Veterans Benefit Assistant (class code 163S)

**Definition:** "Assists a Veterans Benefit Specialist and/or a Field Office Manager in advising, counseling, and assisting veterans, their family members, and beneficiaries to obtain benefits granted under Federal or State laws."

Ms. Roney does not provide assistance to a Veterans Benefit Specialist or a Field Office Manager as required by the Definition of the Veterans Benefit Assistant. The focus of Ms. Roney's position is to provide assistance to SCC students who are veterans and are eligible for GI Bill benefits. Ms. Roney's position does not reach the scope or breadth of impact anticipated by this class. The Veterans Benefit Assistant class is not the best fit for Ms. Roney's overall duties and responsibilities.

##### Veterans Benefit Specialist (class code 163T)

**Definition:** "Assists veterans or their family members in determining eligibility and applying for benefits and entitlements in accordance with federal or state laws."

While not allocating criteria, the Typical Work provides further description of the work typically performed by incumbents allocated to the Veterans Benefit Specialist classification. In summary, the breadth of work performed by a Veterans Benefit Specialist typically is at the level of:

- Interviews and counsels veterans, dependents, and beneficiaries on rights, privileges, and benefits provided under the existing laws;
- Advises contacts of applicability of numerous and varied laws, methods needed to substantiate eligibility and methods and procedures used in filing applications for claims; provides information on benefits payable under old and new laws and consequences of selecting appropriate entitlement;
- Obtains various supporting documents required for completion of claims and researches sources of documents and substitute documents which may be acceptable;
- Contacts and maintains liaison with veterans in institutions such as prisons, nursing homes, soldiers' homes and outlying communities, etc., when necessary;

This class covers employees who are discussing a broad range of benefits, rights and privileges with veterans and veterans' dependents and beneficiaries and providing assistance in applying for those benefits and entitlements. Ms. Roney's position provides services to a specific group of veterans who are using GI Bill benefits to attend college. Ms. Roney assists a much smaller and specific group of veterans whose benefits are encompassed within the GI Bill. The scope and breadth of impact of Ms. Roney's position's responsibilities do not meet the intent of this class. The Veterans Benefit Specialist 1 class is not the overall best fit for the duties and responsibilities of Ms. Roney's position.

#### Program Specialist

The DOP's Glossary provides that the language in the class specifications has priority when explaining or defining the language in the glossary. In this case, the Class Series Concept for the Program Specialist classes has priority over the program definition in the glossary. The Class Series Concept for the **Program Specialist** classes states: *"Positions in this series coordinate **discrete, specialized programs** consisting of **specific components and tasks that are unique to a particular subject** and are **separate and distinguished from the main body of an organization**. Positions coordinate program services and resources; act as a program liaison and provide consultation to program participants and outside entities regarding functions of the program; interpret, review and apply program specific policies, procedures and regulations; assess program needs; and develop courses of action to carry out program activities. Program coordination also requires performance of tasks and application of knowledge unique to the program and not transferable or applicable to other areas of the organization.*

*Examples of program areas may include, but are not limited to: business enterprises, fund raising, volunteer services, community resources, election administration and certification, juvenile delinquency prevention, recreational education and safety, energy education, aeronautic operations and safety, student housing, financial aid, and registration."* (emphasis added)

The intent of the Program Specialist series is further clarified by considering the *specialist* definition found in the Glossary which say, *specialists* ". . . involve intensive application of knowledge and skills in a specific segment of an occupational area."

Ms. Roney's position is responsible for coordinating the activities of the Veterans Education unit of the Workforce Department at SCC. This Department includes a variety of separate units, including Worker Retraining, WorkFirst, Employer and Job Seeker Services as well as the Veterans Education. As such, Ms. Roney's position is not separate and distinguished from the main body of the organization and she does not coordinate program services and resources for a program as a whole. Rather, her position is a component of the Workforce Education and Development services. Ms. Roney's position does not fit within the Class Series Concept of the Program Specialist classifications.

Additionally, Ms. Roney's position does not meet the Glossary definition of a specialist. Her duties and responsibilities do not require intensive application of knowledge and skills in a specific segment of an occupational area. Rather she provides and applies knowledge and skills to the Veterans Education unit, a component of the Workforce Department. For the reasons discussed, Ms. Roney's position does not fit within the Program Specialist class series.

#### Program Coordinator

The Class Series Concept for the Program Coordinator classification states: "Perform work requiring knowledge and experience that is specific to a program. Organize and perform work related to program operations independent of the daily administrative office needs of the supervisor. Represent the program to clients, participants and/or members of the public.

A program is a specialized area with specific complex components and discrete tasks which distinguish it from the main body of an organization. A program is specific to a particular subject. The specialized tasks involve interpretation of policies, procedures and regulations, budget coordination/administration, independent functioning and typically, public contact. Duties are not of a general support nature transferable from one program to another. Performance of clerical duties is in support of incumbent's performance of specialized tasks."

The **Definition** states: "Coordinate the operation of a specialized or technical program."

Ms. Roney's position fits within the Class Series Concept and the basic function of the Program Coordinator classification. In addition, the duties and responsibilities assigned to her position are encompassed by the Glossary's definition of *coordinator*.

The **Distinguishing Characteristics** for the Program Coordinator classification state: "Under general direction, perform work using knowledge and experience specific to the program. Exercise independent judgment in interpreting and applying rules and regulations. Independently advise students, staff, program participants and/or the public regarding program content, policies, procedures and activities; select/recommend alternative courses of action and either:

(1) project, monitor, maintain, initiate and/or approve expenditures on program budgets

OR

(2) have extensive involvement with students, staff, the public and/or agencies in carrying out program activities, and coordinate, schedule and monitor program activities to determine consistency with program goals.

Ms. Roney uses knowledge specific to the Veterans Education unit of the Workforce and Education Department services. She utilizes her authority to make decisions and has extensive involvement with students and others in carrying out Veterans' Education activities such as reviewing each veteran student's classes to determine applicability to his/her study program; interacting with students, department and campus staff in

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person, by phone or e-mail; and creating forms, newsletter and other written materials. Ms. Roney follows established processes and methods contained in state and federal laws to complete her work.

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. The classification that is the best fit overall for Ms. Roney's position's assigned duties and responsibilities is the Program Coordinator.

### **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."*

### **Please note telephone and address changes:**

June 26 through July 3, 2009, the offices of the Director's Review Program and Personnel Resources Board Appeals Program will move to the Department of Personnel building located at 600 South Franklin in Olympia. Starting June 26, 2009, the main phone number for the two programs will be **360-664-0388**. The fax number remains the same, **360-753-0139**.

All requests for Director's Reviews and appeals to the Personnel Resources Board must be filed:

<b><u>In person at:</u></b>	<b>OR</b>	<b><u>By mail at: (unchanged)</u></b>
600 South Franklin		Mail Stop 40911
Olympia, WA 98504-7530		Olympia, WA 98504-0911

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

cc: Desiree Desselle, WFSE  
Michael Lenker, SCC  
Lisa Skriletz, DOP

Enclosure: Exhibits List

Exhibits List

**A. Ana Roney Exhibits**

1. Letter of request from Desiree Desselle, WFSE, November 7, 2008.
2. Position Review Request, unsigned and undated.
3. SCC allocation determination, October 16, 2008.
4. Program Coordinator class specification (107N)
5. Program Specialist 2 class specification (107I)

**B. Letter of support from Michael Ball dated October 30, 2008**

**C. Forwarded by HR Spokane Community College January 29, 2009 for Ms. Roney:**

1. Position Review Request Form signed and dated September 2008
  - a. With Organizational Chart attached (workforce dept.)
2. Classification Specifications
  - a. Program Specialist 2 Class Specification (class code 107I)
  - b. Program Coordinator Class Specification (class code 107N)
  - c. Veterans Benefit Assistant Class Specification (class code 163S)
  - d. Veterans Benefit Specialist 1 Class Specification (class code 163T)
3. Community Colleges of Spokane Review Decision
4. Policies and Procedures
5. Supporting Documents