



**STATE OF WASHINGTON**  
**OFFICE OF FINANCIAL MANAGEMENT**

STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM  
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July 28, 2015

TO: Connie Goff, PHR  
Rules and Appeals Program Manager

FROM: Lucy Macneil  
Director's Review Program Investigator

SUBJECT: Cynthia Burton v Department of Corrections (DOC)  
Allocation Review No. ALLO-14-097

**Director's Determination**

This position review was based on the work performed for the twelve-month period prior to July 14, 2014, the date DOC Human Resource (HR) received Cynthia Burton's request for a position review. As the Director's designee, I carefully considered all of the documentation in the file, including the exhibits presented during the Director's review conference and the verbal comments provided by both parties. Based on my review and analysis of Ms. Burton's assigned duties and responsibilities, I conclude her position is properly allocated to the Correctional Records Supervisor classification.

**Background**

On July 14, 2014, DOC HR received a Position Review Request from Ms. Burton, requesting that her Correctional Records Supervisor (CRS) position be reallocated to the Records Management Supervisor (RMS) classification. (Exhibit B-2)

DOC HR conducted a review and notified Ms. Burton on September 11, 2014, that her position was properly allocated to the Correctional Records Supervisor (Exhibit B-1).

On October 6, 2014, Ms. Burton filed a request for review with State HR. (Exhibit A-1)

On April 21, 2015, I conducted a review conference with the parties. Present for the conference were Cynthia Burton; Tawny Humbert, Teamsters Representative; and Tina Cooley, Senior HR Consultant, DES 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 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).

### ***Duties and Responsibilities***

Ms. Burton is a Correctional Records Supervisor at Airway Heights Corrections Center.

Ms. Burton's duties are described in detail in the PRR submitted for reallocation. (Exhibit B-2) She describes the duties of her position as follows:

Interpret, on behalf of the agency, the legal documents that hold the offender within the Department of Corrections.

This position is responsible for the management and supervision of two Records Units at Airway Heights Corrections Center (AHCC). I am tasked by the agency to be the custodian of the offender records. My position is responsible to enter, audit, and/or interpret on behalf of the agency, the legal documents that hold the offender within Department of Corrections' facilities and/or under the jurisdiction for supervision with the Department of Corrections and charged to be in compliance with State and Federal Laws, Superior Court sanctions and agency policies. My position serves as the departmental or AHCC's records officer administering all activities involving the inventory, retention, and disposition of records in conjunction with the State Records Committee and the State Archives.

Develops, implements, and administers a totally integrated records management program in a large agency with two records departments under my direct supervision.

Her job duties are listed in the PRR as follows:

- 75% Manage and provide supervisory direction relating to operational effectiveness of two correctional records offices. Develops, implements, and administers a totally integrated records management program in a large agency or facility.
- 15% Provide assistance to the Correctional Records Program Administrator and the Correctional Program Manager by acting as the liaison with DOC staff statewide.
- 5% Maintain electronic and physical files.
- 5% Provide effective communication and thorough and timely request processing.

### ***Supervisor's Comments***

Ms. Burton reports to Terry Propeck, Correctional Programs Manager. Mr. Propeck completed the Supervisor portion of Ms. Burton's PRR before it was transmitted to DOC HR. He agreed that the information on the PRR is accurate and complete.

### ***Summary of Employee's Perspective***

Ms. Burton believes that her position should be reallocated to Records Management Supervisor. At the time that her position description was updated in 2012, she supervised one records office and two full-time Records Technicians. Shortly after the update, she was assigned a second office. She now manages two correctional records offices located in two different facilities at AHCC, and she supervises nine Correctional Records Technicians. Among her exhibits, she provided evidence of her statewide involvement in policy reviews for DOC (Exhibits A-7 & 8), and included the position description for the Records Management Supervisor position at Walla Walla (Exhibit A-9) for comparison to her duties. Ms. Burton also challenged DOC HR's reliance on two Personnel Resources Board decisions (Williams v. Department of Corrections, R-ALLO-10-009 and Iverson v. Department of Corrections, R-ALLO-13-009), noting that their scope of duties are limited in comparison to hers.

### ***Summary of DOC HR's Perspective***

Ms. Cooley based her determination that Ms. Burton's position is correctly allocated to the Correctional Records Supervisor classification on a comparison between Ms. Burton's 2012 position description (Exhibit B-4) and the Position Review Request submitted in 2014 (Exhibit B-2). Her assessment is that while Ms. Burton supervises more staff than she did previously, her duties have remained the same since she was assigned the additional records office. Ms. Burton provides input to statewide policy reviews, but she does not develop or implement integrated records programs. Among her exhibits, Ms. Cooley included the position description for Ms. Burton's supervisor (Exhibit B-6) showing that overall responsibility for ensuring that Records activities comply with all laws, rules and policies belongs to the Correctional Program Manager. In addition, Ms. Cooley submitted two Personnel Review Board decisions in support of her determination that Ms. Burton's position is correctly allocated. (Exhibits B-9 &10)

### **Comparison of Duties**

#### ***Comparison of Duties to Records Management Supervisor (RMS)***

The definition of Records Management Supervisor is

Develops, implements, and administers a totally integrated records management program in a large agency.

No Class Series Concept or Distinguishing Characteristics exist for this classification. The State HR **Glossary of Classification Terms** defines the nature of administrative work as

Determines or participates in making policy, formulates long-range objectives and programs, and reviews the implementation of programs for conformance to policies and objectives.

Ms. Burton manages two correctional records offices, but the Correctional Program Coordinator has the administrative responsibility for ensuring that Records activities comply with state laws, regulations, and agency policies. (Exhibit B-6).

Although the examples of typical work do not form the basis for an allocation, they lend support to the work envisioned within a classification. In the case of the Records Management Supervisor, the typical work statements clarify the nature of the work performed by incumbents in this classification:

*Typical Work*

Directs activities of personnel engaged in the design, analysis, specification development and acquisition of all forms and graphics; disposition of records; establishment and maintenance of filing systems;

Serves as departmental records officer administering all activities involving the inventory, retention and disposition of records in conjunction with the State Records Committee and the State Archives;

Plans and coordinates the development of a uniform system of filing and document retrieval for the Department;

Participates in paperwork management planning programs with appropriate departmental and other Washington State personnel;

Develops policy and procedures relative to the ordering, production, and stocking of forms;

Visits institutions to acquaint staff with forms and records management program;

Establishes committees within Department to achieve maximum efficiency in forms and records management programs.

Ms. Burton serves as the Records Officer for AHCC, but she does not direct personnel engaged in the design, analysis, specification development and acquisition of all forms and graphics. She follows state directives regarding the disposition of records. The majority of Ms. Burton's duties and responsibilities are not reflected in the typical work statements for the Records Management Supervisor classification.

In *Iverson v. Department of Corrections*, PRB Case No. R-Allo-13-009, the Board stated:

When read in its entirety, this class [Records Management Supervisor] encompasses positions that perform a broad scope of duties involving not only the administration/processing of records but the integration, design, development

and analysis of records and forms for a records management program. (Exhibit B-10)

Ms. Burton is not responsible for an integrated records management program.

### ***Comparison of Duties to Correctional Records Supervisor***

The definition of Correctional Records Supervisor is

Manages a correctional records office and supervises at least one Correctional Records Technician 1 or 2.

No Class Series Concept or Distinguishing Characteristics exist for this classification. The State HR **Glossary of Classification Terms** defines the nature of managerial work as

Plans, coordinates, integrates, executes, controls and evaluates activities and functions of an organization. This includes developing budgets, policies and procedures, service delivery, and staff supervision.

Ms. Burton manages and supervises two correctional records offices and supervises nine Correctional Records Technicians.

Although the examples of typical work do not form the basis for an allocation, they lend support to the work envisioned within a classification. In the case of the Correctional Records Supervisor, the examples clarify the nature of the work performed by incumbents in this classification:

#### Typical Work

Interprets Supreme, Appellate, and Superior Court decisions, RCWs and Indeterminate Sentencing Review Board Redeterminations to properly compute/recompute release date for offenders;

Trains staff on use of offender database systems; application of Public Disclosure laws (RCW 42.17), Criminal History Record Information laws (RCW 10.97), and implementation/revision of operational responsibilities resulting from changes in law, court decisions, administrative regulations, departmental policy, etc.;

Determines the legal service/financial obligations prior to release from institution or a work/training release facility;

Reviews and verifies all pertinent documents relative to the offender's sentence in order to prepare release documents (e.g., Notification of Release);

Verifies Offender Based Tracking System information against source documents and resolves problems that relate to sentence computations;

Testifies in court as expert witness regarding the validity of offender records and identity;

Certifies, for the department, sentence reduction credits to the sentencing court and/or the Indeterminate Sentencing Review Board;

Takes fingerprints and photographs; assigns offenders DOC numbers;

Performs other duties as required.

Ms. Burton serves as the Records Officer at AHCC. She interprets court decisions and state laws to compute release dates; she trains staff on the use of offender database systems, application of public disclosure laws; verifies database information against source documents and resolves problems relating to sentencing computations; and she testifies in court as an expert witness regarding the validity of offender records.

In *Byrnes v. Dept's of Personnel and Corrections*, PRB No. R-ALLO-06-005 (2006), the Board held that "[w]hile 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." Citing to *Flahaut v. Dept's of Personnel and Labor and Industries*, PAB No. ALLO - 96-0009 (1996).

Based on the above analysis of Ms. Burton's duties, her position is properly allocated to the Correctional Records Supervisor class.

### **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.

c: Cynthia Burton  
Tawny Humbert, Teamsters  
Tina Cooley, DOC HR

List of Exhibits

A. Cynthia Burton Exhibits

1. Letter from me requesting a review of my position and a desk audit
2. Organizational Chart (updated)
3. Position Description (Action: Reallocate) received by the agency on July 14, 2014
4. Aerial Photo of Airway Heights Correctional Center (with notes) (132 pages)
5. Sample of Central File Spreadsheet for AHCC Main
6. Current Position Description CRS 2897 (Action: Update) on file, received by the agency on November 18, 2014
7. Policy Review email—Teletype Notification (with attachments) sent to me-all CRMS for review and input
8. Policy Review email—Victim Services (with attachments) sent to me-all CRMS for review and input
9. Position Description reallocation from CRS to RMS for Washington State Penitentiary

B. Department of Corrections Exhibits

1. Allocation determination letter dated September 11, 2014
2. Position Review Request Form requesting reallocation, received by the agency on July 14, 2004
3. Justification for request to reallocate position received by the agency on July 14, 2014
4. Current Position Description on file, received by the agency on May 31, 2012
5. Organizational Chart
6. Supervisor's Position Description, received by agency on October 29, 2007
7. Correctional Records Supervisor Class Specification
8. Records Management Supervisor Class Specification
9. Personnel Resources Board case decision Williams v. Department of Corrections, PRB No. R-ALLO-10-009
10. Personnel Resource Board case decision Iverson v. Department of Corrections, PRB No. R-ALLO-13-009

C. Class Specifications

1. Correctional Records Supervisor
2. Records Management Supervisor