



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

STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM  
P.O. Box 40911 · Olympia, WA 98504-0911 · (360) 407-4101 · FAX (360) 586-4694

September 9, 2015

TO: Connie Goff, PHR  
Rules and Appeals Program Manager

FROM: Lucy Macneil  
Director's Review Program Investigator

SUBJECT: Ronald (Rahn) Doty v Department of Corrections (DOC)  
Allocation Review No. ALLO-14-110

**Director's Determination**

This position review was based on the work performed for the twelve-month period prior to March 18, 2014, the date DOC HR received Ronald Doty'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 Mr. Doty's assigned duties and responsibilities, I conclude his position should be allocated to the Mail Processing-Driver Lead classification.

**Background**

On March 18, 2014, DOC HR received Position Review Requests from Mr. Doty and other mail room staff, requesting that their Office Assistant 3 positions be reallocated to the Mail Processing-Driver position classification. (Exhibit B-4)

DOC HR conducted a review and notified Mr. Doty on October 21, 2014 that his position was reallocated to the Mail Processing-Driver classification effective March 18, 2014 (Exhibit B-1).

On November 17, 2014, Mr. Doty filed a request for review with State HR. (Exhibit A-1)

On May 12, 2015, I conducted a review conference with the parties. Present for the conference were Ronald Doty; Tawny Humbert, Teamsters Representative; Nicole Baker, HR Consultant, HR Classifications Unit at DOC; Julie Holford, HR Consultant at Airway Heights; and Sergeant Tom Orth.

## **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***

Mr. Doty is a Mail Processing-Driver at Airway Heights Corrections Center.

Mr. Doty's duties are described in detail in the PRR submitted for reallocation to Mail Processing-Driver Lead. (Exhibit B-2) He describes the duties of his position as follows:

Under the supervision of a Corrections and Custody Officer 3, has a greater knowledge of all mailroom functions so as to train all other staff in the operations of mail equipment and ensures the correct implementation of policies and procedures and is the point of contact for inside and outside facility entities as well as being the first line of protection for the facility through inspection of all incoming and outgoing packages and mail. This includes the physical, visual and electronic search of all packages, mail, periodicals, books and legal documents. The searches are to identify and confiscate any contraband being smuggled into the facility; to include but not exclusive to, explosive devices, illegal narcotics, escape plans and/or paraphernalia, and many other items not allow under the RCW, WAC and/or DOC Policy. They are also responsible for operating postage and processing equipment.

His job duties are delineated in the PRR (Exhibit B-2):

60% *Training and directing the work of staff in the interpretation of applicable DOC Policies assuring standards are met and performing all the same duties of mailroom staff as well as training new Sergeants in Mailroom procedures and protocols*

*Maintaining a working knowledge of applicable US Postal Regulations as well as shipping procedures and compliance to protocols and directs mailroom staff in all procedures and updates as they occur*

Opening, inspecting and X-raying incoming mail, packages and electronic documents for illegal narcotics, dangerous weapons and/or contraband

Insuring that all inmate mail, packages and J-Pay electronic documents are in compliance with all RCW's, WAC's, DOC policies, court issued sanctions, and restraining orders.

Chemically testing suspicious unknown substances which arrive in the mailroom

Visually scanning all incoming mail and packages for outward signs that they may contain explosives devices

Visually scanning of print material for contraband

Ensuring that all contraband is properly documented and cataloged

Ensuring proper disposal of all contraband or rejected property is documented

15% *Training and directing staff in the operation of applicable machinery and software; US postal rates and regulations; and requirements for shipping via FedEx Ground and other courier services. .*

*Conducting secure deliveries of sensitive items/evidence to outside departments*

Removing, verifying, documenting and processing negotiable instruments

Investigating attempts to deposit funds to more than one offender account

Completing and forwarding receipts of funds received to offenders

Processing all offender property for tracking and delivery

Processing outgoing mail

Verifying the availability of funds to ship excess offender property

10% *Training and directing staff in the use of machinery, software and processes required to accomplish task as well as performing all the same duties and performing troubleshooting and minor maintenance and updates of machinery or software as needed*

*Updating offender roster changes daily*

Processing all incoming and outgoing mail for offenders and staff

Processing and forwarding mail and property to offenders that have transferred or released; retaining mail for offenders who have temporarily left the facility; and logging and storing property that cannot be shipped

10% *Training and directing staff in the correct procedures for completing reports and documents*

*Maintaining all electronic mailroom records, compiles and maintains report data and productions records*

Independently generates reports and documents; generates daily reports and logs

5% Responds to offender inquiries and performs requested actions if required

Orders and maintains supply inventory for Mailroom

Picks up and delivers mail to US Post Office

Performs other duties as assigned

It is important to note that the contents of the March 18 and April 7 PRRs have a great deal of commonality. In each of the categories above, the italicized sections appear on the April 7 PRR only. The rest of job duties are the same in both PRRs.

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

Mr. Doty reports to Sgt. Thomas Orth, Correctional & Custody Office 3. Sgt. Orth completed the Supervisor portion of both Mr. Doty's PRRs. Sergeant Orth signed the original March 18, 2014 PRR on March 28, 2014, indicating that he agreed that the information of the PRR submitted by Mr. Doty was accurate and complete. He did not provide any examples of decisions that Mr. Doty is authorized to make without supervisor prior approval.

Sergeant Orth did not agree with Mr. Doty's description of his job duties in the April 7 PRR. He disagreed that Mr. Doty had lead responsibilities over other mailroom staff, stating:

60% of the time for all of the mailroom staff is doing various duties in training other staff. That is why the position description of each mailroom staff member is the same...There is no one person leading another person.  
(Exhibit B-2)

He went on to state that all of the staff in the mailroom on any given day would be able to perform the duties necessary to complete the tasks and expectations of the mailroom. (Exhibit B-2)

### ***Summary of Mr. Doty's Perspective***

Mr. Doty states in his April 7, 2014 PRR:

For the past decade I have been training and directing the work of staff in the interpretation of applicable DOC Policies assuring standards are met as well as performing all the same duties of mailroom staff including the training of new Sergeants, officers and other temporary staff in Mailroom procedures and protocols.

He describes himself as the only staff member "completely versed" in the operation and maintenance of mailroom machinery and software. He creates and maintains all mailroom specific forms, spreadsheets and databases, and continuously devises new ways to improve mailroom procedures and streamline processes. He notes that the automated switchboard menu at AHCC directs all outside calls to the mailroom to his phone. He assists headquarters with the creation of new policies and procedures, resolves public disclosure requests in the mail room, and devises new ways to improve mailroom procedures and streamline processes. (Exhibit B-2)

Mr. Doty believes his job duties are closely matched to the typical work of the Office Support Supervisor classification, but he acknowledges that he does not perform the duties of a supervisor. (Exhibit A-1) He believes that the Mail Processing-Driver Lead classification is the best fit for his duties although he believes that the work performed by mailroom staff in the state correctional institutions is very different from the work in other agency mailrooms. (Exhibit A10)

In support of his appeal, he submitted a number of letters from individuals who worked in the AHCC mailroom on temporary assignments. In these exhibits, Mr. Doty is described as ...considered [the] lead staff member...(Exhibit A-3); ...the most knowledgeable staff member...(Exhibit A-5); ...the de facto lead...Exhibit A-6); ...the "Go To" person in the mailroom...(Exhibit A-9)

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

Ms. Baker reviewed the PRR form signed by Mr. Doty and his supervisor requesting reallocation to Mail Processing-Driver which was received by HR on March 18, 2014, along with PRR forms from Mr. Doty's co-workers making the same reallocation request. A desk audit was conducted with all of the mailroom Office Assistant 3s who had submitted PRRs. During the desk audit, eleven specific job duties were reviewed. The auditor noted that all staff perform six of the tasks (Nos. 3, 4, 5, 6, 8 and 13). Mr. Doty performs three of the duties (Nos. 10, 11, and 12) and two other staff members are each responsible for a task as well (Nos. 7 & 9). In addition, Mr. Doty orders supplies for the mailroom. (Exhibit B-9) No separate desk audit was conducted based on Mr. Doty's April 7, 2014 PRR.

Before making her determination, Ms. Baker reviewed the Office Assistant 3, Mail Processing-Driver, and Mail Processing-Driver Lead classifications. She agreed that Mr. Doty's duties were more accurately described by the Mail-Processing Driver classification, and reallocated his position effective March 18, 2014. Ms. Baker determined that, while Mr. Doty performed some of the typical work of Mail Processing-Driver Leads, he did not have Lead responsibility as defined in the Glossary of Classification Terms.

## **Comparison of Duties**

### ***Comparison of Duties to Mail Processing-Driver***

The definition of Mail Processing-Driver is:

Positions at this level independently perform mail services such as delivering, collecting and processing both foreign and domestic mail and resolving routine customer problems. Incumbents configure and operate routine and complex electronic mailing equipment, digital scanning and tracking equipment, and x-ray and biohazard scanners. When delivering and collecting mail, incumbents regularly operate pickup, panel, and other trucks up to one-ton capacity.

No Class Series Concept or Distinguishing Characteristics exist for this classification.

Mr. Doty independently performs mail services, including configuring and operating complex equipment such as x-ray and biohazard scanners.

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 this case, the examples clarify the nature of the work performed by incumbents in this classification:

#### Typical Work

Processes bulk and individual outgoing mail from departments to foreign and domestic areas that require postage and/or special mailing classifications;

Operates mail equipment such as inserters, folders, trimmers and bursters, tabbers, high-speed address printers, postage equipment address verification systems, small package manifest, and mail management systems;

Inspects, cleans, maintains, and troubleshoots mailing equipment and machines;

Answers inquiries from customers and resolves routine customer problems;

Makes deliveries for commercial surface or air transport services within the facility or local campus;

Determines most cost effective methods for sending mail and packages;

Directs the work of lower-level staff and assures mail quality control standards are met.

### ***Comparison of Duties to Mail Processing-Driver Lead***

The definition of Mail Processing-Driver Lead is

Positions allocated to this level regularly assign, instruct, and check the work of others and independently oversee and perform mail services including sorting, processing, delivering, and collecting mail, and operating mail management system. Incumbents typically interpret department and institutional rules and regulations concerning mail operations, resolve complex customer problems, recommend cost effective mailing methods, and address other special or complex mailing requirements and needs.

No Class Series Concept or Distinguishing Characteristics exist for this classification. The State HR **Glossary of Classification Terms** defines *Lead* as:

An employee who performs the same or similar duties as other employees in his/her work group and has the designated responsibility to regularly assign, instruct, and check the work of those employees on an ongoing basis.

Mr. Doty does not regularly assign and check the work of others, nor does he independently oversee the work of other mailroom employees. He does independently perform mail services and interpret rules and regulations, and he instructs others in mailroom practices. He also resolves complex customer problems, and interprets department and institutional rules and regulations.

The State HR **Glossary of Classification Terms** someone who *directs the work of others* as follows:

Provides work guidance or direction but is **NOT** a "lead"; does **NOT** have the responsibility of assigning, instructing and checking the work of others on a regular and ongoing basis. (Emphasis is in the original)

Mr. Doty does not assign, schedule or organize the work of others, but he provides work guidance and direction to his co-workers, and trains incoming staff at all levels, including Correctional Officers.

Again, the examples of typical work lend support to the work envisioned within a classification. In the case of the Mail Processing-Driver Lead, the typical work statements clarify the nature of the work performed by incumbents in this classification:

*Typical Work*

Directs the work of lower-level staff and assures mail quality control standards are met;

Schedules and organizes work for mailing services personnel; assigns delivery routes;

Oversees mail routes and delivery stops and recommends route changes;

Operates, maintains, and troubleshoots complex multi-station inserting equipment including intelligent, integrated technology mail equipment;

Delivers, collects and processes mail and loads and unloads vehicles;

Maintains production records; produces periodic reports;

Updates mail equipment hardware/software per internal guidelines;

Delivers library, building and office supplies, laboratory specimens, audio-visual equipment, tapes, books, U.S. and campus mail, and motor pool vehicles;

May make daily deliveries and pickups to off-site locations.

Mr. Doty does not organize work for mailroom personnel. He does assure that quality control standards are met. He maintains mailroom records and produces periodic reports, and updates mail equipment hardware and software. In addition, he delivers mail to off-site locations as needed.

Mr. Doty has responsibilities that exceed the level of Mail Processing-Driver. While he does not independently direct and assign the work of others, his duties are best described by the distinguishing characteristics and typical work of the Mail Processing-Driver Lead classification. His position should be reallocated to that 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.

Director's Determination  
Ronald (Rahn) Doty v Department of Corrections  
ALLO-14-110  
Page 9

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: Ronald Doty  
Tawny Humbert, Teamsters  
Tina Cooley, DOC HR

List of Exhibits

A. Ronald Doty Exhibits

1. Request for Director's Review Form received November 17, 2014
2. Letter of appeal
3. Testimonial from CCO Ron Carpenter
4. Testimonial from Sgt. Jack Richardson
5. Testimonial from Sgt. Lannie Gray
6. Testimonial from CO Michael King
7. Testimonial from CO Darrell Avery
8. Testimonial from APM Anne Guzman
9. Addendum

B. Department of Corrections Exhibits

1. Allocation determination letter dated October 21, 2014
2. Position Review Request (PRR) form requesting reallocation to Mail Processing-Driver (113K), received by the agency on April 7, 2014 with an accompanying not from second line supervisor, Lieutenant David Buss
3. Position Description form (PDF) requesting reallocation to Mail Processing-Driver Lead (113K) received by the agency on April 7, 2014, signed by the incumbent March 18, 2014 and not signed by the supervisor or other agency representative
4. PRR form requesting reallocation to Mail Processing-Driver (113J), received by the agency on March 18, 2014
5. PD requesting reallocation to Mail Processing-Driver (113J) received by the agency on March 18, 2014, signed by the incumbent and supervisor March 18, 2014
6. Current signed PD for the position received by the agency on June 20, 2013
7. Supervisor's PD signed February 6, 2013
8. Organizational Chart for the Airway Heights Corrections Center mail and property rooms, dated June 25, 2013
9. Work review notes from a site visit on June 10, 2014

C. Class Specifications

1. Mail Processing-Driver
2. Mail Processing-Driver Lead