

December 10, 2010

TO: Sandra Taylor

FROM: Teresa Parsons, SPHR  
Director's Review Program Supervisor

SUBJECT: Sandra Taylor v. Department of Health (DOH)  
Allocation Review Request ALLO-10-012

On September 29, 2010, I conducted a Director's review conference regarding the allocation of your position. You and Human Resources Consultant Rozanne Stewart participated in the Director's review conference.

### **Director's Determination**

This position review was based on the work performed for the six-month period prior to December 30, 2009, the date DOH's Human Resources (HR) Office received your Position Description Form (PDF). As the Director's designee, I carefully considered all of the documentation in the file, the exhibits presented during the Director's review conference, and the verbal comments provided by both parties. Based on my review and analysis of your assigned duties and responsibilities, I conclude your position is properly allocated to the Customer Service Specialist 4 classification.

### **Background**

Your position is assigned to the Call Center within the Office of Customer Service in the Division of Health Systems Quality Assurance (HSQA) at DOH. You report to Call Center Manager Joshua Shipe, who reports to Customer Service Director Shannon Beigert. Ms. Beigert reports to HSQA's Chief Administrator, Shannon (Sam) Marshall. On December 30, 2009, a PDF signed by Mr. Shipe and Ms. Beigert was submitted to DOH's HR Office requesting reallocation of your Health Services Consultant 1 position (Exhibits A-3 and B-3). During the Director's review conference, both parties clarified that Mr. Shipe and Ms. Beigert had originally requested that your position be reallocated to the Health Services Consultant 3 classification. However, after reviewing the PDF, Ms. Stewart recommended reallocation to the Customer Service Specialist 4 (CSS 4) classification. By email dated February 1, 2010, Ms. Marshall asked Ms. Stewart to move forward with the reallocation of

your position to the CSS 4 classification (Exhibit B-1). On March 5, 2010, Ms. Stewart notified you she was approving the request to reallocate your position to the CSS 4 classification (Exhibit A-2).

On March 29, 2010, you requested a Director's review of DOH's allocation determination.

### **Summary of Ms. Taylor's Perspective**

You assert your position serves as the assistant manager of the Call Center, which serves customers statewide. As such, you assert you supervise staff providing health services to the public. You describe Call Center services as providing health program support. You assert that staff providing customer service in the Call Center assist with the regulation and credentialing of health care providers and facilities. You describe health care provider and facility credentials as health services delivery products. You contend that you and the staff you supervise provide important services to the public by ensuring health professionals are properly licensed. As a result, you emphasize that your staff needs to be well trained and knowledgeable about a wide variety of information, including rules, regulations, policies, and procedures relating to the credentialing of health professionals and facilities.

As the supervisor, you contend your position plans and evaluates the delivery of Call Center services and that you track workload production and coordinate shared services, policies and procedures with other state agencies. You further contend that you participate as a member of the HSQA extended management team working across division offices to develop and improve policies and procedures. You point out that similar positions in the Office of Customer Service have been reallocated to the HSC 2 level. You contend your position should remain in the HSC class series, and you believe the HSC 3 is the appropriate level allocation for your position.

### **Summary of DOH's Reasoning**

DOH recognizes the Call Center processes a high volume of work and that the work is very important to HSQA. DOH also acknowledges that some of the work performed in the Office of Customer Service had previously been performed in other program areas. However, DOH indicates that the HSQA Division reorganized approximately two years ago and that the reorganization resulted in centralizing services like customer service. DOH asserts the Call Center within the Office of Customer Service does not function as a health program. Rather, DOH describes the Call Center function as providing customer service support for the credentialing and regulatory functions that occur within HSQA. DOH agrees that calls regarding HSQA funnel into the centralized Call Center in the Office of Customer Service and that your position has the responsibility for supervising these positions. However, DOH notes that your position does not supervise positions located throughout the state. DOH contends your position supervises Customer Service Specialist positions working at the front counter assisting walk-in customers and answering telephones and assisting callers. Therefore, DOH asserts the CSS 4 is the appropriate classification for your position.

### **Rationale for Director's Determination**

During the Director's review conference, both parties indicated that one of HSQA's primary responsibilities is to regulate health care professionals and facilities. Besides the Office of Customer Service, HSQA also includes the Office of Legal Services, Office of Investigation and Inspection, and the Office of Community Health Systems. The Office of Customer Service supports the regulation, licensing, and credentialing of health care professionals and facilities. This may include answering questions from health providers about licensing and credentialing, as well as from the public inquiring or lodging a complaint about a medical provider or facility. The organizational chart illustrates the units within the Office of Customer Service, including the Call Center, Renewals and Revenue, Complaints and Intake, Credentialing, Operations, the Adjudicative Clerk, and Public Disclosure. Your position is assigned to the Call Center (Exhibit A-4).

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**

In the Position Objective on the PDF submitted for reallocation, your position has been described as an assistant manager of a statewide health program (Exhibit B-3). The organizational chart shows that you and two other supervisory positions report directly to Mr. Shipe, as the Customer Service Call Center Manager. The Position Objective further indicates that you manage a high volume call center and walk-in counter for health profession and facility customers. The PDF notes that the HSQA Call Center serves as the primary contact office for many statewide public health programs and services and that staff also redirects customers to other divisions or agencies as needed. During the Director's review conference, you clarified that the Call Center was within HSQA and not DOH as a whole.

The Position Objective on the PDF also describes your position as managing and directing frontline customer service staff answering the most widely used telephone number in the department. Ms. Stewart noted that HSQA is one of the largest divisions within DOH. Your staff handles frontline calls, emails, and in-person services for customers seeking information or processing paperwork related to health professions and facilities. For example, Call Center staff assists with a high volume of credentialing related inquiries on a daily basis. As the supervisor, you coordinate staffing schedules and training needs to assure all customers receive quality and efficient service. You also evaluate work for compliance with agency policies and procedures, conducting regular evaluations and provide performance measurement data to staff and management. Your position is responsible for providing resolution to customer service related problems in an effort to

meet customer expectations. A portion of your supervisory duties includes regular analysis of services provided to customers.

The PDF describes 55% of your work as the functioning assistant manager of the statewide health program, which involves planning and evaluating the delivery of services. A closer look at the duties you perform in this capacity, as described on the PDF and Job Analysis Record, include the following (Exhibit B-3):

- Represent the unit in all call center and walk-in counter customer related meetings and inquires.
- Evaluate work for compliance with agency policies and procedures.
- Ensure proper cash and credit card handling procedures are followed by walk-in customer staff.
- Track call staff and counter staff workloads for compliance with process requirements, performance measures, and customer expectations.
- Perform "tier three" escalation point for angry, disgruntled callers and callers having complex requirements outside of standard call center processes.
- Monitor call center staff calls, customer comment cards, and public interactions as a quality assurance measures to ensure superior customer service is provided.
- Receive, compile, and organize data to create reports showing call staff activities.
- Conduct regular analysis of services provided and determine effectiveness and opportunities for improvements.
- Respond to and resolves inquires, issues, and customer service related problems from health care practitioners, health care employers, general public, state and federal agencies, other stakeholders, and HSQA staff.
- Notify HSQA programs of issues or concern to be addressed or resolved.
- Provide feedback to responsible parties about renewal or application processes, problems, concerns, and potential improvements.
- Coordinate with other state agencies such as DSHS and DOL to improve customer relations regarding shared or related services.

During the Director's review conference, you explained that regular analysis includes tracking and monitoring calls and email inquiries using an Excel spreadsheet, which you created. On a daily basis, you identify the number and types of inquiries, as well as the length of calls. You stated you also monitor calls using special software. You indicated that you report Call Center activities to your supervisor and other managers, as well as use the information to identify training needs or to recognize staff for performance. As an example of coordination with other state agencies, you indicated that you work with DSHS for a portion of the process relating to the certification of nursing assistants.

The PDF describes 30% of your work as supervising staff and the day-to-day operational work activities of the HSQA call center team. The PDFs for the customer service positions you supervise describe Call Center staff as "the face and voice of DOH Health Systems Quality Assurance" (Exhibit B-9). In summary, the positions you supervise respond to and resolve inquires, issues, and customer related problems from health care practitioners, general public, state and federal agencies and other stakeholders related to the renewal

and initial credentialing of health care professionals and facilities. Your staff answers high volumes of calls, responds to emails, and acts as a liaison between customers and HSQA by responding to customers regarding HSQA programs and services. Accordingly, your staff routes calls to the right person or section for issues such as renewing an application, filing a complaint, or requesting public disclosure. Your staff may also verify credentials by looking up information in a database or explain processes by referencing online instructions. You indicated that your staff answers questions to a point and then refers them to the appropriate person or section. Your staff also processes name and address changes received in writing.

The PDF describes 10% of your work as developing and implementing health systems policies, procedures, legislation, and providing ongoing quality assurance of HSQA processes. This includes reviewing and analyzing legislative bills and developing and revising unit policies, procedures, forms, and manuals based on agency, division, or customer service needs. This also includes implementing the process or policy changes affecting the Call Center. During the Director's review conference, you clarified that you provided input regarding bill analysis and that your supervisor, Mr. Shipe, actually performed the bill analysis. You also described your participation as a member of the HSQA extended management team. You indicated the management team, which includes supervisors and managers, meets approximately every two months in a round table format to discuss issues affecting the HSQA Division. You also communicate issues regarding proposed and existing rules and policies with your supervisor and other program managers. In addition, your position has been described as a "call center expert," and your duties regarding emergency preparedness are included in 5% of your overall work activities.

### Class Specifications

When comparing the assignment of work and level of responsibility to the available class specifications, the class series concept (if one exists) followed by definition and distinguishing characteristics are primary considerations.

The classes within the **Health Services Consultant** series describe positions which provide professional health-services related consultation, assistance, and management regarding public health programs.

The **Health Services Consultant 1** (HSC 1) has been defined as the "entry level" and states that positions must perform one or more of the following functions within the Department of Health;

- Maintains, monitors and updates specialized health databases regarding client eligibility, hospital patient data, vital statistics, enrollment, demographics and utilization.
- Promotes and assists with the evaluation of public health program effectiveness, compliance, and standards.

- Conducts public education outreach and/or prevention activities to improve public health.
- Maintains and distributes vaccine immunization biologicals and supplies.

The **Health Services Consultant 2** (HSC 2) definition states that positions provide “technical consultation and assistance to local health departments, clinics, community and other health services providers . . .” HSC 2 positions must meet one or more of the following functions:

- Disease prevention, health promotion, health education and training of providers and/or public, nutrition services, and health program policy.
- Assists management in the review, analysis and impact of health legislation, health policy, rule development, and fiscal management.
- Conducts assessment and/or data surveillance activities.

The HSC 2 distinguishing characteristics include working at the journey level of the Health Services Consultant series and working independently with the expectation to develop, innovate, and be responsible for the flow and completion of work. HSC 2 positions report to a higher level Health Services Consultant, equivalent position or a position in WMS.

The **Health Services Consultant 3** (HSC 3) definition describes this level as “an assistant manager of a statewide health program.” HSC 3 positions must perform more than one of the following functions:

- Preparing and managing budgets, contracts or grants.
- Coordinates division fiscal management.
- Program planning and evaluation of health service delivery products.
- Developing and implementing health policies and procedures.
- Managing health data systems.
- Supervising staff providing health services to the public.

OR

Manages a region for the Department of Health.

OR

Serves as a senior health services consultant in a specialty area to WMS Band 2 or higher. The specialty must be designated and conveyed in writing by the Department of Health appointing authority.

The HSC 3 distinguishing characteristics note that positions work at the senior level and report to Health Services Consultant 4's, equivalent, or to a position in WMS.

While examples of typical work identified in a class specification do not form the basis for an allocation, they lend support to the work envisioned within a classification. I recognize the HSC 3 typical work statements include assisting management in the administration and provision of services to regulated professions regarding nursing, as well as the administration and implementation of profession-specific rules, policies and procedures relating to licensure and complaint investigation. While some of your work contains aspects of the work described in the HSC 3 typical work statements, the overall level of work assigned to your position does not reach the managerial or budget-related responsibilities described in the HSC 3 definition.

Further, the primary focus of your position is to manage and supervise the daily operations of the Call Center. The services you manage relate to first response customer service and resolution for the services provided in HSQA. Your staff has the capability to look up and verify information, provide assistance by directing customers to other work units and program areas, providing customers with information about paperwork needed to complete applications or renewals, and guiding customers through online references. Your staff assists with processing functions and provides standard information regarding processes and procedures. You indicated that more intricate calls need to be passed on to other areas such as the Credentialing Unit. Higher level functions that include technical consultation, administration, and implementation of public health program services are handled within specific program areas. As the supervisor, your position manages the complexities of the Call Center and ensures satisfactory customer service is provided. Your fiscal responsibilities involve the daily balancing of monies received at the front counter. While some aspects of your job may overlap with the Health Services Consultant series, the overall duties and responsibilities assigned to your position best align with the Customer Service Specialist class series.

The **Customer Service Specialist Class Series Concept** reads, in part, as follows:

Positions in this series provide assistance and problem resolution to agency clients/customers and are located in a designated customer service program. The intent of the series is to assist clients/customers in identifying agency processes and procedures, resolving client/customer problems related to agency programs and interpreting agency related laws, policies and procedures. Positions at all levels may be assigned lead or supervisory responsibility over lower level staff.

This series is not clerical in nature. Clerical support duties are incidental to the total work assignment (less than 10%).

The **Customer Service Specialist 4 (CSS 4)** definition states, in part, that a CSS 4 position “plans, organizes, and manages a designated customer service program for an agency sub-division or location” and “supervise[s] customer service staff . . .” Your position plans, organizes, and manages the work of the HSQA Call Center within the Office of Customer Service. You supervise a number of CSS 2 positions, one CSS 3 lead position, and you report to a WMS Customer Service Call Center Manager. In addition, the CSS 4 typical

work statements closely align with the duties and responsibilities assigned to your position. For example, your position performs similar functions as follows:

- Conducts continuing analysis of agency customer service and initiates corrective action to meet changing needs;
- Consults with agency management on client/customer relations issues; recommends changes to agency procedures to enhance access to agency services;
- Plans and directs the program of the unit; reviews work for compliance with agency policy;
- Develops and implements customer service training;
- Provides consultation and facilitates customer service problem resolution.

I also considered the **Customer Service Manager** classification. However, the class series concept describes positions managing agency-wide programs with the intent to develop agency wide policies and procedures relating to client/customer service. The typical work statements also include development and implementation of statewide customer relations policies and procedures for an agency. As the Customer Service Call Center Manager, your supervisor retains overall responsibility for work at this level, though I recognize you contribute to policy and procedure development and manage procedures within your unit. Overall, the CSS 4 classification best aligns with the scope and level of your position's duties and responsibilities.

During the Director's review conference, you had referenced other positions allocated to the Health Services Consultant series within the Office of Customer Service. Both the Personnel Appeals Board (PAB) and Personnel Resources Board (PRB) have consistently 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." Byrnes v. Dept's of Personnel and Corrections, PRB No. R-ALLO-06-005 (2006) citing Flahaut v. Dept's of Personnel and Labor and Industries, PAB No. ALLO 96-0009 (1996).

The PRB has also held that "[m]ost 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." Dudley v. Dept. of Labor and Industries, PRB Case No. R-ALLO-07-007 (2007).

It is clear the work you perform is highly valued and that your position is an asset to the Office of Customer Service and HSQA. A position's allocation is not a reflection of performance or an individual's ability to perform higher level work. Rather, an allocation is based on the majority of work assigned to a position and how that work best aligns with the available job classifications. The Customer Service Specialist 4 is the best fit for the overall duties and responsibilities assigned to your position.

**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 P.O. Box 40911, Olympia, Washington, 98504-0911. The PRB Office is located at 600 South Franklin, Olympia, Washington. The main telephone number is (360) 664-0388, and the fax number is (360) 753-0139.

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

c: Rozanne Stewart, DOH  
Lisa Skriletz, DOP

Enclosure: List of Exhibits

**Sandra Taylor v. Department of Health**  
**ALLO-10-012**  
List of Exhibits

**A. Sandra Taylor Exhibits**

1. Director's Review Form March 29, 2010
2. Allocation Determination letter March 5, 2010
3. Position Description, dated December 30, 2009
4. Organizational Charts – Office of Customer Service 2009 & 2010

**B. Department of Health Exhibits**

1. Position Action Request (PAR) December 30, 2009
2. February 1, 2010 email from Shannon (Sam) Marshall to Rozanne Stewart regarding reallocation of Ms. Taylor's position.
3. Position Description (position #70042154) dated December 30, 2009, with attached Job Analysis.
4. Allocation Determination letter March 5, 2010
5. Email confirmation of the Allocation determination letter was delivered.
6. Email confirmation the email was read March 5, 2010
7. Class Specifications:
  - Health Services Consultant 3
  - Customer Service Specialist 4
  - Customer Service Manager
  - Health Services Consultant 1
  - Health Services Consultant 2
8. Organizational Chart – Office of Customer Service
9. Position Descriptions for the direct reports to Ms. Taylor's position (positions directly supervised by Ms. Taylor).