

December 23, 2010

TO: Jaclyn Rabourn

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

SUBJECT: Jaclyn Rabourn v. Department of Health (DOH)  
Allocation Review Request ALLO-10-014

On October 14, 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 Renewal and Revenue Unit within the Office of Customer Service in the Division of Health Systems Quality Assurance (HSQA) at DOH. You report to Customer Service 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 (Exhibit 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-2). On March 5, 2010,

Ms. Stewart notified you she was approving the request to reallocate your position to the CSS 4 classification (Exhibits A-2 and B-5).

On April 1, 2010, you requested a Director's review of DOH's allocation determination.

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

You assert your position manages the Renewal and Revenue Unit. You describe the Renewal and Revenue Unit as a health program that manages the manual renewal of 70,000 health care practitioner registrations, certifications and licenses statewide and posts over 110,000 payments annually. You contend that you direct the day-to-day operational work activities of the Renewal and Revenue teams and that you track workload production and staffing levels to ensure proper delivery of a health service product. You describe the health practitioner credentials as health service delivery products and assert you supervise the staff responsible for reviewing and processing renewals and posting related payments.

As the supervisor, you assert you play a primary role in the development and implementation of procedures and new business processes and that you train staff within your two units, as well as staff across the division. Additionally, you indicate that you play a key role in implementing new rules and legislation by ensuring changes are reflected in the computer system used to process renewals. You contend that you participate as a member of the HSQA extended management team and other agency work groups, working across division offices to develop and improve policies and procedures. You emphasize that your position had been an HSC 1 prior to the reorganization and that you now have the added responsibility for the Revenue Section. 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 Renewal and Revenue Unit 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 Renewal and Revenue Unit and 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 Renewal and Revenue Unit resides within the designated Office of Customer Service and does not function as a health program. Rather, DOH asserts the Renewal and Revenue Unit provides customer service and fiscal support for the licensing and regulation of health practitioners and facilities. DOH asserts your position supervises Customer Service Specialist and Fiscal Technician positions processing credentialing renewals and payments. DOH contends the Customer Service Specialist classes provide a more specific fit than the Health Services Consultant classes, based on the work performed in the Renewal and Revenue Unit. Overall, 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 Office of Customer Service also processes renewals and refunds. 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 Renewal and Revenue Unit (Exhibits A-4 and B-8).

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 direct the day-to-day operational work activities of the HSQA Renewal and Revenue Unit teams. The Renewal and Revenue Unit is within HSQA and not DOH as a whole. Ms. Stewart noted that HSQA is one of the largest divisions within DOH. In addition, the Position Objective on the PDF describes your position as managing and directing frontline customer service staff responsible for processing health profession and facility renewals and refunds for more than 70 health professions statewide. This includes bulk mailings for HSQA, such as licenses, renewals, and applications. Your position also manages and directs revenue staff responsible for posting, adjusting, and reconciling daily payments received in the ILRS [Integrated Licensing and Regulatory System] suspense account. As the supervisor, you coordinate the daily activities in both the renewal and revenue units and provide mentoring, guidance, quality assurance reviews, and feedback to staff. Your position also has the responsibility for conducting regular evaluations and providing statistical performance data to staff and management.

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 renewal and revenue process related meetings and inquiries.
- Provide guidance, management expertise, and quality assurance reviews of renewal, revenue, and refund work products.
- Act in the Approver role for the automated system (ILRS) workflows.
- Review and approve refund requests, and daily HSQA revenue reconciliations.
- Perform "tier three" escalation point for angry, disgruntled callers and callers having complex requirements outside of standard renewal, refund, or revenue processes.
- Respond to and resolve inquiries, issues and customer service related problems from customers, health care practitioners, general public, state and federal agencies, other HSQA staff, and other stakeholders.
- Notify Customer Service Center Manager and HSQA programs of issues or concerns to be addressed and resolved.
- Provide feedback to responsible parties about renewal or revenue processes, problems, concerns, and potential improvements.
- Manages mailing of health profession renewal notices, licenses, and applications through Consolidated Mail Services.

The PDF describes 30% of your work as supervising staff and the day-to-day operational work activities of the HSQA Renewal and Revenue Unit teams. In summary, the CSS 3 lead and CSS 2 positions you supervise provide customer service relating to the renewal and regulation of health care practitioners' licenses, registrations, and certifications. These positions have been described as working in a designated customer service unit. Your position also supervises Fiscal Technician (FT) staff, including a lead position. The Fiscal Technician staff provides journey level fiscal support functions relating to the revenue generated from health care practitioner credential and facility license applications and renewals. A summary of the fiscal duties includes processing payments, refunds, non-sufficient funds (NSF) entries, and performing suspense account and other reconciliation functions, as well as creating reports (Exhibit B-9). As the unit supervisor, your position tracks performance measurement data and reports statistical results to staff and management. You assign work and track hours to determine sufficient staffing, maintain supervisor files, complete annual staff evaluations, identify needs and create plans for staff training to build capacity and offer opportunities for professional growth and development.

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 Renewal and Revenue Unit. 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 noted that you participate as a member of the HSQA extended management team, which includes other supervisors and managers. You participate in other cross-agency work groups as well. You communicate issues regarding proposed and existing rules and policies with your supervisor and other program managers.

In addition, 5% of your overall duties include serving as back-up Customer Service Center Manager when needed.

During the Director's review conference, you explained that your renewal staff processes mail relating to licensing requirements by reviewing, sorting, and distributing mail to the appropriate section, including the revenue section. Revenue staff process payments for items such as new credentialing application fees, renewals, fines, and cost recovery. Occasionally, your staff may process payments sent in for other services such as training. Your staff reviews and verifies the documentation and posts to the appropriate accounts. Your renewal staff issues credentialing renewals but not new licenses. A large portion of the renewals are processed through the automated database system. However, you noted that your revenue staff has to verify that payments have been posted for both automated and manual renewals. You indicated that your position is considered a "super user" in ILRS and that you work with IT staff as needed to resolve issues and find solutions. Your position is also responsible for approving the workflow performed by your staff using ILRS.

### 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 oversee the renewal and revenue activities and supervise and manage the daily operations of the Renewal and Revenue Unit. Your staff performs processing functions by following standard guidelines and criteria. For example, your staff reviews renewals and supporting documents for completeness and accuracy, enters and verifies information in the ILRS database, responds to and resolves inquires regarding credentialing renewals, and processes payments electronically by posting to the appropriate account. You and your staff understand agency related laws, policies and procedures and respond to problems and issues that arise while processing renewals, payments, refunds, and other transactions. However, higher level functions involving 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 Renewal and Revenue Unit and ensures satisfactory delivery of service. Within HSQA, your position also manages the workflow in the ILRS system as it applies to processing renewals and related fiscal transactions. Although some aspects of your job may overlap with the Health Services Consultant series, the overall duties and responsibilities assigned to your position do not support allocation to this 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 Renewal and Revenue Unit within the Office of Customer Service. You supervise a CSS 3 lead and CSS 2 positions providing customer service regarding health practitioners’ licensing and credentialing renewals. You also supervise Fiscal Technician staff processing the associated fees, payments, and refunds. During the Director’s review conference, you explained that auditing procedures require that positions processing payments are separate from those issuing renewals. In addition, you report to a WMS Customer Service Call Center Manager. Overall, 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. 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. I also considered the **Fiscal Technician Supervisor** classification, defined in part as supervising staff assigned fiscal activities and planning, coordinating and determining methods and procedures utilized in the maintenance of controls, records, and reports. While your position does supervise Fiscal Technician positions and may fit within this class, your position also supervises customer service staff in a designated customer service program. Overall, the CSS 4 classification best aligns with the scope and level of duties and responsibilities assigned to your position.

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

**Jaclyn Rabourn v. Department of Health**

**ALLO-10-014**

List of Exhibits

**A. Jaclyn Rabourn**

1. Director's Review Request Form April 1, 2010
2. Allocation Determination letter March 5, 2010
3. Position Description Form (PDF) December 30, 2009
4. Organizational Charts – August 2009 and February 2010

**B. Department of Health Exhibits**

1. Position Action Request 12/30/09
2. February 1, 2010 email from Shannon (Sam) Marshall to Rozanne Stewart regarding reallocation of Ms. Rabourn's position.
3. Position Description and Job Analysis for Ms. Rabourn's position #70041423
4. January 2010 email communications between Joshua Shipe, supervisor, and Ms. Stewart regarding clarification of duties
5. Allocation Determination letter March 5, 2010
6. Email confirmation Allocation Determination delivered.
7. Email confirmation Allocation Determination read.
8. Organizational Chart – November 30, 2009
9. Position Descriptions for the direct reports to Ms. Rabourn's position (positions directly supervised by Ms. Rabourn).

**C. Class Specifications:**

1. Health Services Consultant 3 (283J)
2. Customer Service Specialist 4 (102D)
3. Customer Service Manager (103D)
4. Health Services Consultant 1 (283H)
5. Health Services Consultant 2 (283I)
6. Fiscal Technician Supervisor (148P)