

January 6, 2010

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

FROM: Kris Brophy, SPHR  
Director's Review Investigator

SUBJECT: Kathi Paddy v. Clark College  
Allocation Review Request ALLO-10-024

### **Director's Determination**

This position review was based on the work performed for the six-month period prior to February 16, 2010, the date Clark College received the request for a position review. As the Director's Review Investigator, I carefully considered all of the documentation in the file, the exhibits, and the verbal comments provided by both parties during the review telephone conference. Based on my review and analysis of Ms. Paddy's assigned duties and responsibilities, I conclude her position is properly allocated to the Credentials Evaluator 3 classification.

### **Background**

On February 16, 2010, Clark College's human resource office received Ms. Paddy's Position Review Request (PRR) form asking that her position be reallocated to the Program Specialist 2 classification (Exhibit B-2). Ms. Paddy signed the form on February 12, 2010. Her supervisor completed and signed the supervisor's portion of the form on February 26, 2010.

On May 12, 2010 Clark College notified Ms. Paddy that her position was properly allocated as a Credentials Evaluator 3 (Exhibit B-1).

On June 4, 2010, the Department of Personnel received Ms. Paddy's request for a Director's review of Clark College's allocation determination (Exhibit A-1).

On November 10, 2010, I conducted a Director's review telephone conference. Present during the conference were Kathi Paddy; Lou Baker, Director of Contract Administration, WPEA, and Sue Williams, Associate Director of Human Resources.

The parties submitted additional information following the review telephone conference. The last information was received on November 22, 2010. This information has been added to the record and incorporated as exhibits to the file.

### **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. Little-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

### **Duties and Responsibilities**

Ms. Paddy is responsible for determining the status of degree and certificate completion for students. She conducts comprehensive reviews and audits of student course records and other information to determine whether or not a student is on track to complete or has completed their desired program of study prior to degree or certificate conferral. Ms. Paddy's position is also responsible for maintaining and managing the college's current internal electronic degree auditing system ("Degree Works"), and providing technical support to the college's migration to a new statewide web-based "Degree Audit" system through the State Board for Community and Technical Colleges (SBCTC).

Ms. Paddy's supervisor, Kim Marshel, is the college's Registrar. Ms. Marshel indicated that the description of work in the PRR accurately reflects her duties and responsibilities. Following the review telephone conference, Ms. Marshel submitted an additional statement concerning the degree of Ms. Paddy's involvement with the new auditing system. This has been added to the record as Exhibit B-7. In addition, Ms. Paddy provided a rebuttal which has been added to the record as Exhibit A-4.

In the position review request (PRR) submitted for reallocation, Ms. Paddy describes her duties as follows (Exhibit B-2):

- 60% My primary priorities are split between two main tasks that when working on take the same percentage of my time. The first priority is determining the status of degree and certificate completion for students through a comprehensive audit process with specialized knowledge of the degree or certificate being sought. The second priority is creating and programming the Washington State degree audit software to enable the department and the rest of the college to utilize an electronic auditing system to aid the campus in advising students.
- 30% Maintaining, updating, troubleshooting issues in both electronic auditing systems. This consists of updating all programs as a result of curriculum changes and program changes. Writing and programming new degrees and certificates into the electronic auditing system. Troubleshooting issues that arise such as the system going down or erroring out. It is my responsibility to get the system back on line and running properly. I schedule weekly maintenance of the system and run system

checks periodically. On our current electronic auditing system, we do not have a service contract with the vendor so I am the person on campus with the widest range of knowledge and I am responsible to make sure it is running properly.

- 10% Managing the department's timelines and making sure all processes are conducted in a timely manner such as deadlines for degree application, updating of application files, clearing of application files, diploma printing, graduation ceremony deadlines and timelines that affect the department. Preparing reports and statistical data for various departments such as the President's office and Communications and Marketing.

### Summary of Ms. Paddy's Perspective

Ms. Paddy contends the Program Specialist 2 class describes her position because of the specialized knowledge required to perform her job. Ms. Paddy asserts her position requires detailed knowledge of each of the college's degree and certificate programs which is unique to her department. Ms. Paddy asserts that while other positions are knowledgeable in their specific area of expertise, her position requires expertise in over 130 programs simultaneously, and that she must apply updates and changes to all programs affected.

She asserts she provides information and technical assistance to program participants by providing information regarding degree requirements to students, faculty and staff. She asserts she is well versed in program policies and provides clarification of policies to the campus. She asserts she also provides technical and usage assistance to users regarding the electronic auditing system, and serves as the primary point of contact for all the electronic systems.

Ms. Paddy also asserts her responsibilities for maintaining and updating the coding for the college's current electronic auditing system, writing complex programming models for the new electronic auditing system, and maintaining all electronic programs used in the department is a better match for a class within the Information Technology Specialist series.

Ms. Paddy asserts she serves as more of a manager in her area by seeing that the department functions properly and that timelines and deadlines are met. She asserts she has responsibility for supervising part-time employees even though she is not listed as their supervisor.

### Summary of Clark College's Reasoning

Clark College asserts the preponderance of Ms. Paddy's work falls within the Credentials Evaluator 3 class by spending a majority of her time determining the status of degree and certificate completion and creating and programming the degree audit software. Ms. Williams stated during the review telephone conference that when she was looking at the percentages of work, the technical maintenance portion of her work aligns with the credentials function. She acknowledged there is some programming work, but does not feel it was a majority of her work. Further, she stated the Program Specialist 2 class doesn't address the IT work she performs, and describes positions which have more of a day-to-day operations responsibility such as outside interaction and outreach to others. Ms. Williams asserts Ms. Paddy does not have this type of responsibility in her position.

### Comparison of Duties to 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. 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.

### Comparison of Duties to Program Specialist 2

The Class Series Concept for this class 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.

The Definition for Program Specialist 2 states:

Positions at this level work under general supervision and plan, organize, direct and coordinate operations for programs such as the business enterprise, volunteer services and community resources, elections examination/administration programs. Incumbents oversee day-to-day program operations, function as the program representative and resource, have extensive contact with program participants and outside entities, and resolve problems within a delegated area of authority. Unusual problems, probable outcomes and solutions are presented to higher levels for resolution. Incumbents may be delegated limited authority to approve budget expenditures and may assist higher-level staff with developing and coordinating statewide program activities.

There are no Distinguishing Characteristics for this class.

Allocation to the "Program" series requires an assignment of work that is unique and specific to a particular program but not work that is specifically described by another existing class specification. If there is a class that encompasses the body of work,

allocation to the specific class must take primary consideration. Allocation to a "Program" class should only occur when there are no other viable options for allocation. There are classes which specifically address the body of work under review in this appeal. Since these classes specifically describe the scope of work and specific duties performed by Ms. Paddy, allocating her position to a class within the Program series is not appropriate. For this reason, Ms. Paddy's position should not be allocated to the Program Specialist 2 class.

This is further supported by Personnel Resources Board (PRB) decisions in which the Board has concluded that while one class appeared to cover the scope of a position, there was another classification that not only encompassed the scope of the position, but specifically encompassed the unique functions performed. In Alvarez v. Olympic College, PRB No. R-ALLO-08-013 (2008), the Board held that "[w]hen there is a definition that specifically includes a particular assignment and there is a general classification that has a definition which could also apply to the position, the position will be allocated to the class that specifically includes the position. [See Mikitik v Depts. of Wildlife and Personnel, PAB No. A88-021 (1989)."

### Comparison of Duties to the Information Technology Series

The Class Series Concept for the series states:

Positions in this category perform professional information technology systems and/or applications support for client applications, databases, computer hardware and software products, network infrastructure equipment, or telecommunications software or hardware.

This category broadly describes positions in one or more information technology disciplines such as: Application Development And Maintenance, Application Testing....

Positions which perform information technology-related work to accomplish tasks but are non-technical in nature would not be included in this occupational category.

Ms. Paddy's overall position focus does not meet the intent of the Information Technology (IT) series. Incumbents in this series provide professional information technology systems, programming, installation, maintenance and/or systems support in one or more applied IT disciplines for client hardware, software, applications, databases, or other equipment. The primary focus of Ms. Paddy's position is to specialize in the degree/certificate conferral evaluation process at Clark College.

Ms. Paddy is responsible for determining the status of degree and certificate program completion for students. She conducts comprehensive reviews and audits of student course records and other information to determine whether or not a student is on track to complete or has completed their desired program of study prior to degree or certificate conferral. In overall support of this function for the department, approximately 30% of Ms. Paddy's work involves maintaining and updating the college's current internal electronic degree auditing system (i.e. DegreeWorks). Ms. Paddy stated in the PRR that this system does not have a service contract with the vendor and she is responsible for maintaining and keeping the system online. Ms. Paddy is responsible for performing making basic programming code changes within the system as a result of curriculum or other degree program changes, which is technical IT work. Ms. Paddy's supervisor, Kim Marshel, states in her statement

that, "Each time there is an update to a program requirement, class title, credit amount, etc. Kathi is the one who updates the system so that our audits run correctly" (Exhibit B-7).

Ms. Paddy states in the PRR that she spends approximately 30% of her time entering the college's degree program information into the Degree Audit program as part of the college's migration to the statewide auditing system hosted by SBCTC. Ms. Paddy states in her rebuttal statement (Exhibit A-4) that she has sole responsibility within her department for the successful implementation of the project. Ms. Paddy uses her specialized knowledge of the college's degree programs to establish and enter user-defined information as part of the new system's configuration process. This includes establishing and entering data using a set of 11 configuration pages to customize the Degree Audit program for use at the college (see Exhibit A-2(10)). While IT-related, this is non-technical IT work which does not reach the level of applications programming required by the IT series.

The percentages of work provided in the PRR indicate that the majority of her time is spent performing IT-related work. However, Ms. Marshel disagrees that she performs these duties a majority of the time, and that her IT-related duties are supportive to the overall credentialing function. Ms. Marshel, states in Exhibit B-7, that:

"Kathi's responsibility is to fulfill the duties of a Credentials Evaluator 3 first, and work on the project second. During the 6-month period of the review, the majority of work Kathi performed was not on the SMS Degree audit project. One of her functions has grown to include periodic updates to our current auditing system, Degree Works. ...In addition to the periodic updates to Degree Works, the work on the new Degree Audit continued. ..."

While a portion of her work involves performing technical IT work, the thrust of her position and the majority of work as a whole are non-technical in nature. Therefore, Ms. Paddy does not provide professional information technology systems applications programming and maintenance work as the major focus of her position. Thus, her position does not meet the intent of the class series concept for this series which states in part, "Positions which perform information technology-related work to accomplish tasks but are non-technical in nature would not be included in this occupational category." [Emphasis added].

Therefore, because the overall focus of Ms. Paddy's position does not meet the intent of the Class Series Concept, her position should not be allocated to a class within the Information Technology series.

### Comparison of Duties to Credentials Evaluator 3

The Definition for the Credentials Evaluator 3 class states:

Positions have responsibility for reviewing, analyzing and evaluating applicants for general or vocational teaching and administrative certificates, and approving or denying applicants' credentials; or have responsibility for evaluating a wide variety of education credentials for academic programs.

The Distinguishing Characteristics for this class state:

Positions work under general direction and evaluate a wide variety of education credentials for academic programs, or evaluate applicants for general or vocational

teaching and administrative certificates. Positions regularly assign, instruct and check the work of others or perform complex credentials evaluations work such as evaluating military documentation of test/training and international credentials. Positions have responsibility for approving or denying student admission and/or graduation, or issuance of teaching/administrative certificates.

The focus of Ms. Paddy's position matches the Definition and Distinguishing Characteristics of Credentials Evaluator 3 classification.

Ms. Paddy's position specializes in the degree/certificate conferral evaluation process at Clark College. The thrust of her position is to determine the status of degree and certificate program completion for students. She conducts comprehensive reviews and audits of student course records prior to degree or certificate conferral. This meets the Definition's statement for having responsibility, "for evaluating a wide variety of education credentials for academic programs."

Ms. Paddy indicates in the PRR (Exhibit B-2), that she spends 30% of her time performing this work. She also states she spends 10% of her time coordinating the department's timelines and making sure all processes are conducted in a timely manner such as deadlines for degree application, updating of application files, clearing of application files, diploma printing, graduation ceremony deadlines and timelines that affect the department. She prepares reports and statistical data for various departments such as the President's office and Communications and Marketing. In addition, the information technology-related work she performs configuring the new auditing system requires her to use her specialized knowledge of the college's degree programs to enter user-defined information into the new system. This work aligns with the credentialing function. Therefore the focus of her position and the majority of her duties meet the definition of this class.

Ms. Paddy works in the Registration/Credentials department. Based on the information provided, the primary focus of her position is to comprehensively review and audit student course records and other information. Her position specializes in the degree/certificate conferral evaluation process at Clark College. In support of that function a portion of her work involves performing technical and non-technical IT-related work. Approximately 30% of her time is spent performing technical IT work in support of the college's existing Degree Works program. Ms. Paddy maintains and updates the college's internal electronic degree auditing system (i.e. DegreeWorks). The portion of her work making basic programming code changes within the system as a result of curriculum or other degree program changes is technical IT work. However, this work is done in support of the credentialing function and does not represent the overall focus of her work. Further, the programming changes she makes are based on her knowledge of the academic programs rather than the technical programming of the system.

Although the Typical Work examples do not form the basis for an allocation, they lend support to the work envisioned within a classification. The following statements indicate the level of work assigned to the Credentials Evaluator 3 class specification and are representative of Ms. Paddy's overall position duties:

Assigns, instructs, and checks the work of staff;

Determines applicant's level of education; determines accreditation of institution attended; interprets grades awarded on a wide variety of grading scales;

Provides consultation for departments, students, other institutions, and the public on a variety of matters concerning ... academic programs;

Reviews and analyzes education and experience of applicants for general or vocational teaching and administrative certificates to determine eligibility; approves or denies issuance of certificate;

Answers correspondence with educational and vocational institutions and individuals regarding evaluations and requests for information on certification requirements;

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).

In this case, the majority of the duties assigned to Ms. Paddy's position and her level of responsibility are best described by the Credentials Evaluator 3 classification. Ms. Paddy's position should remain allocated 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.

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: Kathi Paddy  
Lou Baker, WPEA  
Sue Williams, Clark College  
Lisa Skriletz, DOP

Enclosure: List of Exhibits

**Kathi Paddy v. Clark College**  
**ALLO-10-024**

List of Exhibits

A. Kathi Paddy Exhibits

1. Director's Review Form, received June 4, 2010 with attachments:
  - a. Allocation Determination from Sue Williams to Kathi Paddy, dated May 5, 2010.
  - b. Meeting notice indicating that the notification for the allocation determination should be corrected from May 5 to May 12, 2010.
2. Cover letter from Lou Baker to Sue Williams, dated August 5, 2010 enclosing WPEA's exhibits: (Note: Numbering maintained from original submittal).
  1. Position Review Request form for Kathi Paddy (undated copy).
  2. Allocation Determination from Sue Williams to Kathi Paddy, dated May 5, 2010.
  3. DOP Class Specification for Credentials Evaluator 3.
  4. DOP Class Specification for Program Specialist 2.
  5. A DegreeWorks Audit report (Noted: "Sample of Outcome").
  6. An example of programming language used by the Degree Works system (Noted: "Associate in Arts Degree" et. al.)
  7. Email from Kathi Paddy to David Sims et. al. regarding an audit system crash.
  8. A "Sample on-screen Degree Audit report (credit)" report for the new electronic audit system (Noted: "Small Sampling of New outcome Audit system & what it entails").
  9. A sample of the Degree Audit System manual - "Getting Started"
  10. A sample of the "Degree Maintenance Pages" for the Degree Audit system.
  11. A sample of "Course Descriptions" for Fitness Trainer.
  12. A sample of the instructions for the Degree Audit System – "Defining rule relationships".
  13. A copy of the "Course Action Requests (New Course)" form.
  14. A copy of course requirements for "Fitness Trainer – Associate in Applied Science Degree".
  15. A copy of a spreadsheet indicating Clark College Program titles.
  16. A copy of Kathi Paddy Business Card.

17. A copy of the ClarkNet Directory for the Credential Evaluations department (Noted: "Sample of Credentials being a Separate Program").
3. Cover letter from Lou Baker to Karen Wilcox, dated November 15, 2010 with attachments:
  - a. Copies of "Personnel Request For Temporary Hours and Classified Appointment" forms and "Temporary Classified Personnel Action Form" for Kelly Sharp, (7 pages).
4. Rebuttal to Supervisor Statement memorandum from Kathi Paddy to Kris Brophy, dated November 22, 2010.

B. Clark College Exhibits

1. Allocation Determination from Sue Williams to Kathi Paddy, with revised date of May 15, 2010.
2. Position Review Request form for Kathi Paddy, received by Clark College Human Resources on 2/16/10.
3. A Degrees and Certificates checklist form (Noted: "Example #1").
4. An example of programming language used by the Degree Works system (Noted: "Example #2 et. al.)
5. An example of the "Open Block (Host DB) input screen (Noted: Example #3 – Example of All Catalogs for AA Degree Alone).
6. Degree Audit Tree View list (Noted: "New Degree Audit – Example of all degrees and Certificates that require management and maintenance for all catalogs from 08-10 forward").
7. Supervisor statement memorandum from Kim Marshel to Kris Brophy dated November 19, 2010.
8. List of hours worked for Part-time Employees for employees working in the Credentials/Evaluations department.
9. Copies of student employee timesheets (16 pages).

C. Class Specifications

1. DOP Class specification for Credentials Evaluator 3 (254G).
2. DOP Class specification for Program Specialist 2 (107I).
3. DOP Class specification for Information Technology Specialist 1 (479I).