

February 1, 2011

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

FROM: Kris Brophy, SPHR
Director's Review Program Investigator

SUBJECT: Niza Puckett v. Department of Corrections
Allocation Review Request ALLO-09-030

Director's Determination

This position review was based on the work performed for the six-month period prior to September 25, 2009, the date the Department of Corrections' Washington State Penitentiary Personnel Office (DOC-WSP) 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. Puckett's assigned duties and responsibilities, I conclude her position is properly allocated to the Office Assistant 3 classification.

Background

On September 25, 2009, DOC-WSP Personnel Office received Ms. Puckett's Position Description Form (PDF) asking that her position be reallocated to the Secretary Senior classification. Ms. Puckett signed the form on September 18, 2009. Shirley Conrad, her supervisor at that time, signed the form on September 18, 2009. Ms. Puckett's current supervisor is Jacalyn Hoppen.

By letter dated June 23, 2010, DOC notified Ms. Puckett that her position was properly allocated as an Office Assistant 3 (Exhibit B-7).

On July 14, 2010, the Department of Personnel received Ms. Puckett's request for a Director's review of DOC's allocation determination. In the letter, Ms. Puckett requested that her position be reallocated to the Secretary Senior (Exhibit A-1).

On December 15, 2010, I conducted a Director's review telephone conference. Present during the call were Niza Puckett; Jacalyn Hoppen; Nicole Baker, Human Resource Consultant, DOC HQ; Joanne Harmon, Human Resource Consultant, DOC HQ; and Ross Hamann, Human Resource Consultant, DOC WSP.

Rationale for Director's Determination

The purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which that work is performed. A position review is a comparison of the duties and responsibilities of a particular position to the available classification specifications. This review results in a determination of the class that best describes the overall duties and responsibilities of the position. Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

Duties and Responsibilities

Ms. Puckett provides administrative clerical support to the West Complex Records Unit and staff at the DOC Washington State Penitentiary. Ms. Puckett independently performs a variety of complex clerical tasks including processing and distributing incoming daily mail to staff. She also sorts, files, researches and tabulates documents and maintains files for the Offender Central Files filing system. She prepares and distributes weekly and bi-monthly Batch Reports. She responds to office procedural inquiries and checks incoming e-mail for importance and replies as needed. She builds transfer orders for offenders for internal or external movement. She performs data entry functions. She runs background checks and runs NCIC wants/warrants for offenders transferring to Work Release. She processes Social Security Card applications, and she is responsible for preparing documents and performing other clerical tasks in support of Indeterminate Sentencing Review board hearings.

Ms. Puckett's supervisor, Shirley Conrad (who has subsequently retired), signed the Position Description form indicating the described job duties are an accurate reflection of the work performed.

Ms. Puckett's duties and responsibilities are summarized from the PDF (Exhibit B-2) as follows:

- 70% Under [the] direct supervision of the CRS 2 performs independent records/office/clerical duties within a correctional setting. Check E-mail for importance and reply in a timely manner. Pick up incoming/outgoing mail on a daily basis, date stamp sort, research and distribute to appropriate CRT's/supervisor... Process/schedule offender I.D. picture updates/replacements, and processing for I.D. to be picked up...Maintain the WOMS Program and Badging Machine... Process incoming Chain twice a week... Build Transfer Orders for offender's internal/external movements when required. Responsible for creating a manifest and distributing, and for pulling and boxing Central Files...for daily and weekly transfers. Responsible for entering on OMNI receiving and sending Offender Central Files... Check Fax machine for documentations and forward to appropriate CRT's/supervisor/department... Process/pull the Central File for the Psych Doctor for review in a timely manner when notified.
- 15% Maintain the "ISRB Desk for West Complex/BAR/IMU" units for the ISRB Hearings of offenders by gathering documents requested by the board from staff and Offender Central File in a timely manner to forward to the East Complex Records Board Desk in the specified timeframe requested.

Verifying, escorting, and setting up room for the hearings and distributing memos and dockets for upcoming hearings. Responsible in Section 3 and 4 for maintaining filing system for Offender Central Files and sorts, files, research, and tabulate various documents into Offender Central Files. Process End of Sentence Packet when required by counselors. Process background check on citizens, volunteers, contract, staff needing access when required by counselors. Process background checks on citizens, volunteers, contract staff needing access to WSP premises. Run NCIC wants/warrants for offenders transferring to Work Release as requested. Process/update/take photo for volunteers, contracts, and staff as requested and download on TAS/WOMS. Process Social Security Card applications and mail to Social Security Office as required. Make out cards for Central Files that are coming from East Complex Records Department when needed.

- 10% Provides direct support to the West Complex Records Supervisor and caseload carrying staff. Process/archive Offender Central Files every 6 months as required and archive Medical Records with Central File in the Archive Room. Process/schedule/maintain/repair copy machine, scanner/monthly meters when needed.
- 5% Maintains ACCESS Level 1 Certification as required by the Washington State Patrol and FBI in order to notify law enforcement of offender movement and as an operator to run criminal background checks as requested. All other duties as assigned by supervisor.

Ms. Puckett's current supervisor, Jacalyn Hoppen, participated in the review telephone conference and fully supports Ms. Puckett's request. She stated during the telephone review conference that Ms. Puckett's work requires independent action and specialized knowledge that reaches beyond the Office Assistant 3 class which requires close supervision. She also stated Ms. Puckett performs some duties which are performed by Correctional Records Technicians in other units.

Summary of Ms. Puckett's Perspective

Ms. Puckett asserts she has been given more duties with additional responsibility which should be compensated at a higher level. She asserts her position is responsible for performing a variety of complex secretarial duties and that she provides secretarial services and assistance to facilitate her supervisor's and staff members' own work and relieving them of day-to-day work detail. She asserts she applies knowledge of her supervisor's and staff's work commitments including status of projects and nature of contacts.

Summary of Department of Corrections' Reasoning

DOC asserts the majority of Ms. Puckett's work involves performing complex clerical assignments to support operation of the West Complex Records Unit, and therefore falls within scope of her job classification as an Office Assistant 3. Ms. Baker asserted during the review telephone conference that the focus and majority of Ms. Puckett's work does not involve providing secretarial support as a secretary. DOC asserts that while the volume of her work has increased significantly over time, the nature of her work remains the same.

Comparison of Duties

When comparing the assignment of work and level of responsibility to the available class specifications, the Class Series Concept (if one exists) followed by the Definition and Distinguishing Characteristics are primary considerations. While the Typical Work examples listed in a class specification do not form the basis for an allocation, they lend support to describing the work performed by that classification.

Comparison of Duties to Secretary Senior:

The Class Series Concept for the Secretary series reads as follows:

In support of a supervisor and/or staff members, provides secretarial services and assistance for the purpose of facilitating the supervisor's and/or staff members' own work and relieving the supervisor and/or staff members of day-to-day clerical detail. Applies knowledge of supervisor's and/or staff members' work commitments including status of projects and nature of contacts. Secretarial duties include making travel arrangements, scheduling meetings, taking notes and transcribing minutes, screening calls and visitors, keeping supervisor's and/or staff members calendar(s) and committing supervisor's and/or staff members' time.

The Definition for Secretary Senior states:

Perform complex secretarial duties such as independently planning, organizing and prioritizing work, monitoring and evaluating budget(s) status and initiating corrections, developing travel itineraries, compiling reports, studies, and/or applications, developing, modifying, and/or maintaining data base management, office record keeping, or filing system(s), establishing office procedures, standards, priorities, and deadlines, and coordinating office operations. Positions initiate action to ensure work unit and/or office goals are met and have frequent contacts with clients, the public, staff members from other departments, students, and faculty.

Assignments and projects are of a complex nature. Independent performance of complex secretarial assignments requires substantive knowledge of a variety of regulations, rules, policies, procedures, processes, materials, or equipment. Problems are resolved by choosing from established procedures and/or devising work methods. Guidance is available for new or unusual situations. Deviation from established parameters requires approval. Work is periodically reviewed to verify compliance with established policies and procedures.

The Secretarial Classes are distinguished from Office Assistant classes by the primary focus of providing secretarial services and assistance to one or more individuals. In addition, secretarial positions typically facilitate their supervisor's own work, applying knowledge of their supervisor's work commitments, status of projects, nature of contacts, and will often make commitments for the supervisor's time. In contrast, positions in Clerical Office Support classes perform a variety of clerical duties in support of office or unit operations.

Ms. Puckett's position does not require knowledge of her supervisor's work commitments, projects, and contacts, nor does she have responsibility for facilitating her supervisor's work. During the review telephone conference, Ms. Puckett acknowledged that she is not

responsible for establishing or attending her supervisor's meetings, maintaining her calendar, or making travel arrangements on a regular basis.

She stated that while she does not have ongoing responsibility for composing correspondence on her supervisor's behalf, she does spend a small portion of her time responding to inmate kites such as updating offender personal characteristics, religious preferences, etc. She also prepares standard memos and letters for issues pertaining to operational matters such as photo identifications, social security card applications, public disclosure requests, and other information.

The primary focus of Ms. Puckett's position is to perform various specialized clerical support tasks in support of the West Record's Unit correctional records functions. Ms. Puckett's position primarily prepares and processes files, prepares prints reports, performs data entry, coordinates the preparation and dissemination of offender document files, and serves as the primary point of entry for responding to unit email's regarding clerical processes and procedures. The duties assigned to her position are more consistent with the Office Assistant 3 classification.

Comparison of Duties to the Office Assistant 3 class

The Class Series Concept for the Office Assistant series states that positions perform "a variety of clerical duties in support of office or unit operations." Ms. Puckett's position fits within this class series concept because she performs complex clerical assignments related to the West Complex Record's Unit operations.

The Definition for Office Assistant 3 states:

Under general supervision, independently perform a variety of complex clerical projects and assignments such as preparing reports, preparing, reviewing, verifying and processing fiscal documents and/or financial records, composing correspondence such as transmittals and responses to frequent requests for information, establishing manual or electronic recordkeeping/filing systems and/or data base files, and responding to inquiries requiring substantive knowledge of office/departmental policies and procedures. Positions may perform specialized complex word processing tasks in a word processing unit or complex rapid data inquiry and/or entry functions.

The Distinguishing Characteristics for Office Assistant 3 include the following:

Assignments and projects are of a complex nature. Independent performance of complex clerical assignments requires substantive knowledge of a variety of regulations, rules, policies, procedures, processes, materials, or equipment. Problems are resolved by choosing from established procedures and/or devising work methods. Guidance is available for new or unusual situations. Deviation from established parameters requires approval. Work is periodically reviewed to verify compliance with established policies and procedures. . . .

Consistent with Ms. Puckett's position, Office Assistant 3 positions work under general supervision and independently perform a variety of complex clerical projects and assignments, including assignments requiring substantive knowledge of a variety of

regulations, rules, policies, processes and procedures related to monitoring offender movement. Her position requires substantive knowledge of the correct office procedures for maintaining files and performing various technically-related clerical duties in support of the West Complex Records unit functions such as pulling offender files for use by the unit's correctional records technician staff and forwarding documentation to other facilities.

Further, while not exact, the typical work examples describe the scope and level of responsibility assigned to her position:

- Resolving problems and responding to inquiries regarding rules, regulations, policies, department procedures;
- Reviewing documents and records for completeness, accuracy, and compliance with rules and determining or explaining action necessary to achieve compliance or approval;
- Reviewing, verifying for accuracy, and investigating discrepancies to ensure compliance with established procedures and policies;
- Establishing and maintaining complex electronic or manual file systems or data base files;
- Preparing or assisting in the preparation, compilation, and coordination of records;
- Compiling material requiring specialized knowledge and judgment in selection and treatment of data and format.

Consistent with the Office Assistant 3 job class, Ms. Puckett's position requires independent performance of duties while having substantive knowledge about the unit's functional services. She also works to resolve office procedural issues and problems and responds to inquiries through email, or directly to individuals at the WSP.

While a small portion of Ms. Puckett's duties may be similar in nature to aspects of work identified in the Secretary Senior class, such as composing form letters and arranging travel for her supervisor on one occasion, she may occasionally perform duties outside of her classification. The Personnel Resources Board (PRB) addressed such an issue in the following decision:

Most 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. See Dudley v. Dept. of Labor and Industries, PRB Case No. R-ALLO-07-007 (2007).

It is clear the work she performs is very important and valued. A position's allocation is not a reflection of performance or an individual's ability to perform higher-level work. Rather, it is based on a comparison of duties and responsibilities to the available job classifications. The Office Assistant 3 classification best encompasses the overall scope of work and level of responsibility assigned to her 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: Niza Puckett, DOC
Jacalyn Hoppen, DOC
Nicole Baker, DOC
Ross Hamann, DOC - WSP

Enclosure: List of Exhibits

Niza Puckett v. Department of Corrections
Allo-10-030

List of Exhibits

A. Niza Puckett Exhibits

1. Request for a Director's Review form, received by the Department of Personnel on July 14, 2010.
2. Department of Corrections Correctional Records Staff directory.

B. Department of Corrections Exhibits

1. Position Description Form for Office Assistant 3 position (WP36) effective July 12, 2007.
2. Position Description Form submitted by Niza Puckett for reallocation received September 25, 2009 by DOC-WSP.
3. Email from Robert Hutchins to Brian D. Hatley, et. al. regarding Records FTE staff recommendations, dated June 17, 2004.
4. Performance and Development Plan (PDP) evaluation for Niza Puckett, for performance period September 17, 2007 to October 2009.
5. Desk Audit/Work Review notes conducted by Nicole Baker and Mike Raich, dated April 15, 2010.
6. WSP DOC Unit Management Records organizational chart.
7. Allocation Determination letter from Nicole D. Baker Niza Puckett, dated June 23, 2010.
8. Desk Audit notes dated October 28, 2009.
9. Copies of work samples given to HR by Niza Puckett for the agency review:
 - a. Example 1 - SS-5 applications form letter for replacement Social Security number cards.
 - b. Example 2 – Population Count form for October 3, 2009.
 - c. Example 3 – Screen shot for the Offender Management Network Information database.
 - d. Example 4- WSP Final Manifest form for October 14, 2009.
 - e. Example 5 – WSP Facility Clearance Form for October 2, 2009.

C. Class Specifications

1. DOP Class Specification for Office Assistant 3 (100J).
2. DOP Class Specification for Secretary Senior (100T).