

February 16, 2011

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

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

SUBJECT: Kimberly Sullivan v. Department of Labor and Industries
Allocation Review Request ALLO-10-042

Director's Determination

This position review was based on the work performed for the six-month period prior to March 17, 2010, the date the Department of Labor and Industries (L&I) Human Resources Office (HR) received Kimberly Sullivan's request for a position review. As the Director's Review Investigator, 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 his assigned duties and responsibilities, I conclude her position is properly allocated to the Information Technology Specialist 4 (ITS 4) classification.

Background

On March 17, 2010, L&I HR received a Position Review Request (PRR) from Ms. Sullivan requesting reallocation of her position to the Information Technology Specialist 5 (ITS 5) classification. Both she and her manager signed the PRR. On July 22, 2010, L&I issued its allocation decision, concluding the ITS 4 best described the duties and responsibilities assigned to Ms. Sullivan's position (Exhibit B-1).

On August 18, 2010, the Department of Personnel received Ms. Sullivan's request for a Director's review of L&I's allocation determination. On January 13, 2011, I conducted a Director's review conference with Ms. Sullivan, Ms. Tana Gann Goforth, Council Representative, WFSE; Ms. Judy Lumm, Council Representative, WFSE; Ms. Jenny Warnstadt, HR Consultant, L&I; and Teresa Goldsby, Web & Claims Applications Manager, L&I.

The parties submitted additional information following the review telephone conference. The last information was received on January 27, 2011. This information has been added to the record and incorporated as exhibits to the file.

Summary of Ms. Sullivan's Perspective

Ms. Sullivan asserts her position reaches the ITS 5 class level by serving as the highest-level applications specialist with sole responsibility for the Claim & Account Center (CAC) application used in support of the Insurance Services division of L&I. Ms. Sullivan asserts that CAC is a mission-critical application for the agency. She contends CAC is a high-risk/high impact and large-scale application for multiple reasons including the size and complexity of the multi-tiered application, the number of registered users using the system; the increased size, scope, features and functionality of the application which includes the addition of the Quarterly Reporting and Express Filing sub-applications; the 24/7 availability of the system; and the size and scope of claims information accessible to end users including imaged claim files, payment information, wage rate and other quantitative information and other resources. (See Exhibit A-2 for a complete list of reasons).

Mr. Sullivan asserts that in addition to programming, troubleshooting, and maintaining the CAC application, she is responsible for independently overseeing the daily operations of the CAC application which includes providing expert-level technical support to project teams during system upgrades and other maintenance events (Exhibit A-2(f)).

Ms. Sullivan asserts the level of her decision-making authority, level of responsibility for serving as the CAC application expert for system upgrades and other projects, representing the CAC application on her supervisor's behalf at various meetings, and providing and reporting information to her supervisor on a weekly and monthly basis is consistent with the level of reporting required at the ITS 5 level (Exhibit A-2(g)).

Summary of L&I's Reasoning

L&I asserts the overall level and scope of duties and responsibilities assigned to Ms. Sullivan's position does not reach the ITS 5 level of responsibility. L&I contends the CAC application supports the business processes of the Insurance Services division only, and is therefore not considered an organization-wide, high-risk/high-impact application. L&I asserts that Ms. Sullivan's assignments are moderate in size and impact the business functions within the Insurance Services division which is consistent with ITS 4 level responsibility.

L&I contends it conducted a business impact analysis for all agency applications and placed CAC at tier 2 and therefore considers CAC to be an essential but not mission-critical application.

L&I asserts Ms. Sullivan uses established work procedures and manages the day to day maintenance of the CAC application. L&I asserts her position serves as a senior-level maintenance programmer for the CAC application, responsible for developing, enhancing and maintaining the existing application through service requests.

L&I acknowledges she uses expert-level knowledge to perform analysis, design, troubleshooting and problem solving for an existing application; however, Ms. Sullivan does not have responsibility for completing complex tasks or leading large-scale projects at the

ITS 5 level of responsibility. L&I asserts larger enhancement efforts are completed by project teams who later turn the maintenance function over to Ms. Sullivan for ongoing application maintenance support.

L&I asserts she is included in discussions about development of other applications that may involve CAC, but she does not have the authority to make decisions or change the design of CAC. While Ms. Sullivan represents the CAC application and provides technical support and consultation for complex projects, her position does not reach the ITS 5 level of responsibility for representing or acting on her supervisor's behalf. L&I asserts Ms. Sullivan's supervisor retains authority for making decisions with potential impact to the application or other computing projects.

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).

In Byrnes v. Dept's of Personnel and Corrections, PRB No. R-ALLO-06-005 (2006), the Board 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." Citing to Flahaut v. Dept's of Personnel and Labor and Industries, PAB No. ALLO-96-009 (1996).

Duties and Responsibilities

Ms. Sullivan works as an Information Technology specialist within the Information Services Division, serving as the primary maintenance programmer for the CAC application used in support of services provided within the Insurance Services Division of L&I.

Ms. Sullivan reports directly to Ms. Teresa Goldsby, Web & Claims Application Manager. Ms. Sullivan does not supervise or lead others. Ms. Sullivan completed a Position Review Request Form (Exhibit B-2) to document her duties and responsibilities.

Ms. Sullivan describes her major job duties as follows: (summarized from Exhibit B-2)

- 60% Independently...oversee the daily operations of the large-scale application to include identifying, analyzing and resolving operational, functional, and performance problems in production, coordinating with other core teams as necessary. I perform data analysis and maintain a data repository for CAC's metadata. I also coordinate with other technical teams...regarding scheduled

and emergency technological events and assessing impacts to CAC where I independently create and execute testing strategies. ...I regularly provide after-hours and weekend support during DIS/L&I technical events (such as firewall upgrades, ADABAS maintenance, SQL maintenance, server patches, SAW/Transact upgrades, etc.).

At an expert level, I use my technical skills and knowledge to independently and proficiently perform all phases of analysis, system design, development/programming, unit testing, and implementation to support, maintain, troubleshoot, and enhance CAC. I complete estimations of effort providing alternative solutions outlining the pros and cons to each solution (where applicable) and make recommendations. I coordinate merging of source code, deployment, and testing with another core team who maintain code that makes up a subset of the CAC application. I enforce source code management and deployment principles to ensure a clean code base. I enforce source code management and deployment principles to ensure a clean code base. I also consult with other information technology staff (to include business representatives) regarding business rules, data integrity (and potential issues), and the location and use of data (which database does the data live in and the intended purpose of the data). I monitor and review the application usage statistics and maintain regularly scheduled jobs producing usage reports.

Tools/technologies I use to implement enhances/fixes of the large-scale application include Visual Studio 2005, Team Foundation Server 2005, SQL Server 2005 (including T-SQL), VB.NET, ASP.NET, Internet Information Service (IIS), Microsoft's messaging queuing (MSMQ), Red Gate, N20, ADABAS, Natural, JCL, NUnit, NAnt, and PeerNet.

- 15% I independently support four levels of environments for the application (development, integration, pre-production, and production and ensure all pieces of the application are functional in all environments (images, trend reports, claim list feature, transactions, etc.). This is important because the business users test in both integration and pre-production... and pre-production is used by business users, Health Services Analysis and other department staff for demonstrations and presentations. I am responsible for deploying all changes up through the various environments. I serve as the deployment coordinator for application changes, coordinating with other core teams and other necessary technical resources (such as WADS, SQL database administrators, EAI, and DIS). I support the business representatives in their functional and user acceptance testing...
- 10% I provide leadership, consultation and technical support by serving as the application expert for new technology projects looking to add further functionality into the application and integrate new technologies. I work directly with multiple ongoing projects ensuring standards are met regarding deployment and code management. I represent CAC during legislative

session, providing input with respect to bill analyses regarding impact to CAC including an estimation of effort.

- 10% I test CAC and evaluate its functionality for new operating systems, browsers, ADABAS, SAW, and other software upgrades, patches, and maintenance events, as well as server upgrades/replacements. I document findings, analyze and report issues, and work toward resolution, collaborating with necessary resources to resolve noted issues. I am also responsible for application migration for new technologies (such as the move to Visual Studio 2008 and Team Foundation Server 2008).
- 5% I train and/or provide knowledge transfer to other maintenance programmers for the application and the database and services it uses. I assist members on other core teams by providing technical coaching and mentoring.

In the Supervisor Review section of the PRR, Ms. Goldsby disagrees with Ms. Sullivan's assertion that she should be allocated to the ITS 5 class. Ms. Goldsby asserts Ms. Sullivan serves as the primary maintenance programmer for CAC, independently responsible for developing, enhancing, and maintaining the CAC application from service requests, which is consistent with the ITS 4 level of responsibility (See Exhibit B-2, Part 9).

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 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.

The Class Series Concept for the Information Technology series states in relevant part:

"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, Capacity Planning, Business Analysis and/or Process Re-Engineering...IT Project Management, Systems Software, Web Development, or Voice Communications."

Ms. Sullivan's position performs professional technology application maintenance support functions across multiple information technology disciplines; and therefore should be allocated to a class within the Information Technology series.

Comparison of Duties to Information Technology Specialist 5

The Definition for this class states:

This is the supervisory or expert level. Provides expert consultation and specialized analysis, design, development, acquisition, installation, maintenance, programming, testing, quality assurance, troubleshooting, and/or problem resolution tasks for major organization-wide, high risk/high impact, or mission-critical applications computing and/or telecommunication systems, projects, databases or database management systems; support products, or operational problems.

Performs highly-complex tasks such as conducting capacity planning to determine organization-wide needs and make recommendations; designing complex agency- or institution-wide enterprise systems crossing multiple networks, platforms or telecommunication environments; overseeing the daily operations of large-scale or enterprise systems; identifying and resolving operational problems for major high risk systems with centralized, organization-wide functions; testing multi-dimensional applications, providing quality assurance; developing standards or enhancing existing, high risk and impact, mission critical applications; integrating business solutions, or writing feasibility studies and decision packages for high visibility/impact initiatives.

Provides leadership and expert consultation for large-scale projects or enterprise systems that often integrate new technology and/or carry out organization-wide information technology functions, or impact other institutions or agencies. Provides project management leadership, technical expertise and demonstrates knowledge of project management practices, principles, and skills.

May supervise information technology specialists or function as a recognized expert who is sought out by others in resolving or assessing controversial or precedent-setting issues.

While a portion of Ms. Sullivan's work involves certain aspects of the ITS 5 level class, in total, the majority of her work does not reach the level of responsibility required by the Definition of this class.

Incumbents at the ITS 5 level spend a majority of their time performing highly-complex, expert-level tasks. These tasks require highly-specialized technical knowledge and understanding of complex computing environment(s) and their client's needs. Incumbents perform expert-level tasks such as designing enterprise-level or other large-scale systems which extend beyond an assigned area of responsibility as seen at the ITS 4 level and cross multiple networks, platforms or environments within the organization; directing or leading large-scale, enterprise or mission-critical projects; conducting organization-wide capacity planning and making recommendations; and writing feasibility studies and decision packages for high visibility/impact initiatives.

At this level incumbents have discretion and are delegated authority in their role as an expert-level specialist to resolve the most complex operational problems for major high-risk systems that often have centralized or organization-wide functions; have delegated authority to make decisions affecting project or operational outcomes which often go beyond divisional lines. Performance at this level is evaluated in terms of adherence to

program goals, budgetary limitations, compliance with laws and regulations and general organizational policy.

The scope of Ms. Sullivan's position does not fully reach this overall level of responsibility.

Organization-wide, high risk, high impact, or mission-critical system.

The CAC application supports the business processes of Insurance Services; a major division within L&I. CAC is a large, complex application which uses multiple databases, several web services, and a remote service. It uses several SQL databases, utilizes the agency's mainframe, uses several shared services, and uses multiple platforms and frameworks (see Exhibit A-2(b)).

However, based on the business impact analysis document presented (Exhibit A-4(1)) and comments provided by Ms. Goldsby during the telephone review conference, L&I does not consider the CAC application to be a high-risk, high-impact, or mission-critical system. Based on the results of the business impact analysis, CAC is considered an essential but non mission-critical application. The CAC application supports the business processes of one division of the agency, Insurance Services. While large and complex, it does not fully reach the size or scope of application anticipated at the ITS 5 level involving organization-wide or enterprise-level systems. Further, the CAC application does not serve centralized, organization-wide functions.

Highly-complex & Expert-level Tasks

Ms. Sullivan serves as the highest-level applications specialist for CAC. She is the designated maintenance programmer for the system, using her technical expertise to perform all phases of analysis, systems design, development/programming, unit testing and implementation. She oversees the daily operations of CAC, identifies and resolves operational problems, performs testing functions, provides quality assurance; and develops coding standards. While Ms. Sullivan provides expert-level technical support to the CAC application, the overall scope her position does not involve performing a majority of highly-complex tasks as stated in Distinguishing Characteristics for this class.

Ms. Sullivan's position does not have primary or lead responsibility for designing enterprise-level systems crossing divisional lines with multiple networks, platforms, or telecommunication environments. She does not have primary responsibility for developing project plans and directing large-scale projects. Ms. Sullivan is not responsible for conducting capacity planning to determine organization-wide needs.

Although Ms. Sullivan provides technical information and consultation to project teams, she does not develop feasibility studies or make technical recommendations to executive administration on CAC system initiatives or decision packages.

Project leadership/Expert consultation

Incumbents at the ITS 5 level provide leadership and expert-level consultation for large-scale projects or enterprise systems that often integrate new technology and/or carry out organization-wide information technology functions, or impact other agencies. Incumbents exercise broad discretion and authority in their role as expert-level specialists and are generally delegated decision-making authority across divisional lines. Ms. Sullivan's position does not reach this level of responsibility.

Ms. Sullivan's scope of responsibility involves providing technical guidance and advice concerning programming issues to project teams primarily during systems upgrades and enhancements. Ms. Sullivan serves as the deployment coordinator for application changes, coordinating with other core teams and other necessary technical resources (such as WADS, SQL database administrators, EAI, and DIS). She supports business representatives in their functional and user acceptance testing. Ms. Sullivan works in collaboration with other agency and L&I Network Operations staff to provide technical support during system upgrades or enhancements but does not lead these efforts.

Ms. Sullivan reports to her supervisor and provides regular updates regarding project status. Ms. Goldsby stated during the review telephone conference that Ms. Sullivan's decision making authority is limited to providing technical recommendations within the confines of the application's system requirements. Ms. Sullivan is also included in discussions about other applications that may impact CAC, but she does not have authority to make decisions or change the design of CAC.

Ms. Goldsby stated during the telephone review conference that she retains decision making authority for decisions which impact project completion. Ms. Sullivan's decision making authority is limited primarily to deploying all changes up through the development, integration, pre-production, and production environments. Ms. Sullivan performs her work independently and is expected to carry out the majority of her work in accordance with the policies and objectives her supervisor has established. Further, Ms. Goldsby is responsible for ensuring that projects and functions align with organizational policies.

Mr. Sullivan works with IT Change Status workgroups to implement CAC system upgrades and end user requests. Ms. Sullivan does not lead work teams or provide project leadership for these efforts. Ms. Sullivan stated during the conference that she provides expert-level technical support to complex system projects which indicate the mission-criticality of the application within the Industrial Insurance division operations related to claims management.

However, from the information and exhibits presented, Ms. Sullivan's responsibilities are tactically focused, primarily modifying and upgrading programming code as a result of system user requests or following the implementation of maintenance events or systems upgrades. The scope of this work did not include working with division technical and management staff to plan what is needed and develop the initial work requests. Ms. Sullivan's position is tactical in nature involving providing technical information and consultation regarding the application system. Overall, the scope of her

work does not reach the ITS 5 level of responsibility for project leadership and guidance.

In total, Ms. Sullivan's position does not have the scope of individual responsibility for performing ITS 5 level work. This is supported in Pogue and Goshorn v. Labor and Industries, PRB Case Nos. R-ALLO-07-017 & R-ALLO-07-018 (2008) which states in relevant part:

... Appellants do not perform highly-complex tasks with the breadth of impact envisioned by the ITS5 classification. While Appellants' work impacts all employers and recipients of certain benefits, their work does not impact L&I on an organization-wide level. For example, Appellants do not conduct capacity planning to determine organization-wide needs; design complex agency-wide enterprise systems crossing multiple networks, platforms or telecommunication environments; or identify and resolve operational problems for major high risk systems with centralized, organization-wide functions. While Appellants provide leadership and expert consultation in their assigned areas, they do not perform these functions for large-scale projects or enterprise systems involving organization-wide information technology functions. Duties performed at an organization-wide level would potentially impact all business areas within an agency. Appellants' work impacts Claims Administration; their work does not impact all of L&I's business areas.

Overall, the appellant's position does not encompass the full scope and level of responsibility required by this class. For these reasons, Ms. Sullivan's position should not be allocated to the Information Technology Specialist 5 class.

Comparison of Duties to Information Technology Specialist 4.

The Definition for this class states:

Performs analysis, system design, acquisition, installation, maintenance, programming, project management, quality assurance, troubleshooting, problem resolution, and/or consulting tasks for complex computing system, application, data access/retrieval, multi-functional databases or database management systems, telecommunication, project or operational problems.

As a senior-level specialist in an assigned area of responsibility and/or as a team or project leader, applies advanced technical knowledge and considerable discretion to evaluate and resolve complex tasks such as planning and directing large-scale projects; conducting capacity planning; designing multiple-server systems; directing or facilitating the installation of complex systems, hardware, software, application interfaces, or applications; developing and implementing quality assurance testing and performance monitoring; planning, administering, and coordinating organization-wide information technology training; acting as a liaison on the development of applications; representing institution-wide computing and/or telecommunication standards and philosophy at meetings; or developing security policies and standards.

Incumbents understand the customer's business from the perspective of a senior business person and are conversant in the customer's business language. Projects assigned to this level impact geographical groupings of offices/facilities, and/or regional, divisional, or multiple business units with multiple functions. The majority of tasks performed have wide-area impact, integrate new technology, and/or affect how the mission is accomplished.

The primary thrust of Ms. Sullivan's position, and the majority of her duties as a whole, falls within the scope and level of responsibility stated by the Definition for this class.

Ms. Sullivan performs senior-level level IT applications maintenance work supporting the CAC application system used within the Industrial Insurance division of L&I. Ms. Sullivan's position provides support to an application that encompasses a division-wide area of operations which is consistent with the Definition of this class for independently resolving complex computing needs within an assigned area of responsibility. Ms. Sullivan's position encompasses an area of responsibility which impacts, "...divisional, or multiple business units with multiple functions."

Ms. Sullivan performs senior-level information technology systems specialist work as the designated maintenance programmer for the CAC application. She performs all phases of analysis, systems design, development/programming, unit testing and implementation. Ms. Sullivan states she spends 60% of her time overseeing the daily operations of CAC, identifying and resolving operational problems; performs testing functions, provides quality assurance; and develops coding standards. This level of responsibility is consistent with the Definition of this class.

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 provides an example of the level of work assigned to the Information Technology Specialist 4 class, as stated on the class specification:

Develops, codes, tests, and implements specifications for complex regional, divisional, or multifunctional applications;

Performs data analysis. Develops and maintains logical data models. Maintains data repository, including design and development of applications for maintaining and reviewing repository information. Trains and assists staff in use of repository;

Acts as a liaison on the development of applications and modifications to existing applications. Represents organization-wide computing standards and philosophy at meetings, and reports information back to unit administrators;

Develops and implements quality assurance testing and performance monitoring, utilizing quality assurance techniques and practices;

Conducts traffic studies, analyzes information and trends, makes recommendations and takes action to improve system performance and efficiency;

Conducts unit, system, or usability testing for applications;

Develops security policies and standards. Tests and installs security systems. Analyzes and designs security access. Establishes and implements security environments and risk-based access profiles such as firewalls. Analyzes security reports, billings, etc. to detect violations or intrusions. Provides required security access. Conducts security awareness training;

Ms. Sullivan's duties are consistent with these statements. Her responsibilities for managing the daily operations of CAC include maintaining currency with mandated changes including software/hardware upgrades, patches, network events, and service request implementations.

The samples of work provided by Ms. Sullivan show support for computing environment changes performed by L&I Network Operations staff and/or staff at Dept. of Information Services. This includes network and firewall maintenance. Ms. Sullivan also monitors the application and research application problems.

Ms. Sullivan is responsible for ensuring all aspects of the integration, pre-production, and production environments run appropriately, and to troubleshoot and resolve issues and coordinate with other resources and groups as necessary to resolve outages or other issues.

Ms. Sullivan attends "Change control" meetings as the representative for CAC. These meetings are conducted to discuss regular and ongoing maintenance and new implementation events (Exhibit A-2(f)).

Ms. Sullivan represents CAC during Incident Response Team events. Whenever there are complete or partial outages, she works with business representatives or information services help desk to resolve issues. She troubleshoots and coordinates with appropriate resource staff to resolve issues. She communicates with business representatives to provide status updates and follow up and provide updates at incident response team meetings. (Exhibit A-2(g)).

Based on the level, scope and diversity of the overall duties and responsibilities assigned to Ms. Sullivan's position, her position is properly allocated to the ITS 4 classification.

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: Tana Gann Goforth
Kimberly Sullivan
Jenny Warnstadt, L&I
Lisa Skriletz, DOP

Enclosure: List of Exhibits

Kimberly Sullivan v. Labor and Industries (ALLO-10-042)

A. Kimberly Sullivan Exhibits

1. Director's Review Form, received August 18, 2009
2. Letter of explanation from Kimberly Sullivan dated August 18, 2010 with attachments:
 - a. Background Information
 - b. Claim and Account Center information
 - c. Lack of Investigation
 - d. Inconsistency on the definition of criticality of CAC
 - e. The positions offered as comparable are not
 - f. ITS5 job duties I consistently performed (and spent majority of my time performing)
 - g. Job requirements consistent with ITS5s on Ms. Goldsby's team
3. "Appendix 8" - Position Review Request (Note: unsigned) with attachments:
 - 1A Decision Package: "Internet Filing of Claims"
 - 1B Decision Package: "Online Reporting...."
 - 1C Decision Package: "Online Reporting...2"
 - 1D Decision Package: "Online Claim and Account Center"
 - 2 Steering Committee Application "Need for Strategic Planning....."
 - 3A "All Deployment Model (Physical View)" diagram
 - 3B "ORLI Software Architecture Layers – Version 1.3" diagram
 - 3C "CAC Functional Overview" model
 - 4 CAC Monthly Report for December 2009

"Appendix 9" - Attachments 1-100 (copies of work emails (100+ pages))

"Appendix 10", copy of agency Allocation determination, dated July 22, 2010
4. Letter of response to L&I's submittal of exhibits, from Kimberly Sullivan dated October 20, 2010 with attachment:
 1. "Business Impact Analysis Results 2010"
 2. "LNI Business Impact Analysis – ARCSysystem Summary"
5. Screen shot of L&I web page with "Claim & Account Center" login
6. Memo from Judy Shurke to LNI employees introducing the "Challenging Times Demand our Best" publication
7. A copy of the "Challenging Times Demand our Best" publication
8. Photos from the "Challenging Times Demand our Best" publication

9. Email describing the nature of work contained in Exhibit "Appendix 9" attachments 1 – 100), from Kimberly Sullivan to Kris Brophy dated January 14, 2011.
10. Email responding to L&I's comments to Exhibit A-9, from Kimberly Sullivan to Kris Brophy, dated January 26, 2011
11. Final response email from Kimberly Sullivan to Kris Brophy, dated January 27, 2011

B. Department of Labor and Industries Exhibits

Cover letter from Jenny Warnstadt to DOP dated September 17, 2010, enclosing attachments:

1. Agency Allocation Determination letter from Jenny Warnstadt to Kimberly Sullivan, dated July 22, 2010
2. Position Review Request form for Kimberly Sullivan, received by L&I HR on March 17, 2010.
3. Organizational Chart – "Information Services" dated September 17, 2010.
4. Allocation Interview spreadsheet comparing Kimberly Sullivan and Supervisor Teresa Goldsby's input.
5. Copies of comparable Position Descriptions as recommended by Kimberly Sullivan and Supervisor Teresa Goldsby:
 - a) Carrithers, Matthew
 - b) Hoffer, Dennis
 - c) Ouye, Yoshiro
 - d) Federspiel, Mathieu
6. "IT Positions Comparisons" chart completed by Jenny Warnstadt comparing the ITS4 & ITS5 job specifications with Ms. Sullivan's position (#235-4323) and other ITS4 & ITS5 positions located at L&I.
7. Position Description form for Kimberly Sullivan, received September 30, 2009.
8. Email from Jenny Warnstadt to Kris Brophy, dated January 19, 2011 enclosing two organization charts.
9. Email response from Jenny Warnstadt to Kris Brophy, regarding supplemental information submitted by Kimberly Sullivan, dated January 20, 2011.
10. Final email response from Jenny Warnstadt to Kris Brophy, dated January 27, 2011.

C. Class Specifications

1. DOP Class Specifications for Information Technology Specialist 4 (479L).
2. DOP Class Specifications for Information Technology Specialist 5 (479M).