



**STATE OF WASHINGTON**  
**OFFICE OF THE STATE HUMAN RESOURCES DIRECTOR**  
DIRECTOR'S REVIEW PROGRAM  
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March 9, 2012

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

FROM: Kris Brophy, SPHR  
Director's Review Investigator

SUBJECT: Stephen Stout v. WA State Parks and Recreation Commission (Parks)  
Allocation Review Request ALLO-11-018

**Director's Determination**

This position review was based on the work performed for the six-month period prior to December 21, 2010, the date Parks HR received Mr. Stout's request for a position review. As the Director's Review Investigator, I carefully considered 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 Mr. Stout's assigned duties and responsibilities, I conclude his position is properly allocated to the Parks Interpretive Specialist classification.

**Background**

On December 21, 2010, Parks HR received Mr. Stout's Classification Questionnaire form (CQ) (Exhibit B-1), requesting his Parks Interpretive Specialist (PI-Specialist) position be reallocated to the Parks Interpretive Consultant (PI-Consultant) class.

Parks notified Mr. Stout on April 6, 2011, that his position was properly allocated to the PI-Specialist class (Exhibit A-2).

On May 6, 2011, the Department of Personnel received Mr. Stout's request for a Director's review of PARK's allocation determination (Exhibit A-1).

On January 5, 2011, I conducted a Director's review telephone conference. Present during the meeting were Stephen Stout, Joan Gallaher, WFSE Field Representative; Joe Vidales, Human Resources Consultant; and George Price, Human Resource Classification Manager Parks.

Following the review conference, the parties submitted additional information. Parks submitted a final rebuttal reply on January 30, 2012. This information has been added to the record and incorporated as exhibits herein.

### **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).

Position are to be allocated to the class which best describes the majority of the work assignment. Ramos v DOP, PAB Case No. A85-18 (1985).

### **Duties and Responsibilities**

The purpose of Mr. Stout's position is to direct operations and carry out the functions of the Goldendale Observatory State Park (GOSP). Mr. Stout works independently and reports directly to Goldendale Area Manager, Mr. Richard P. Davis.

Mr. Stout develops and presents interpretive programs about astronomical telescopes and general astronomy. Mr. Stout revises program topics on a monthly, weekly, or sometimes daily basis depending upon changing sky conditions. He also occasionally develops programs for special events such as Halley's comet, meteor showers, and eclipses.

Mr. Stout's supervisor, Mr. Richard Davis, completed and signed the supervisor's section of the form on December 9, 2010. Mr. Davis indicated that Mr. Stout's description of duties and responsibilities are accurate and complete. Mr. Davis stated that Mr. Stout's position, "...requires a unique skill set that is above and beyond the average skills of the Parks Interpretive Specialist class" and supports Mr. Stout in his request. In addition, Mr. Davis provided extensive comments to Mr. Vidales regarding Mr. Stout's assigned duties and responsibilities (Exhibit B-5(b)). Mr. Davis's clarifying comments are incorporated in *italics* below.

Mr. Stout's duties and responsibilities are identified in the Classification Questionnaire as follows.

- 40% Set up, develop and implement observatory programs. As the Interpretive Astronomer, directs use of telescope viewing, develops astronomy and other interpretive programs (slide shows), videos, exhibits, power point presentations and demonstrations, etc.) Schedules observatory user groups. Develops 'special' observatory programs and arranges for guest speakers. Coordinates activities of local astronomy clubs. Facilitates implementation and operation of EIP programs (Self-sustaining Interpretive Programs and Donation Box). Reads Astronomy publications, maintains photographic, video equipment, computers and maintains a science library.

*Mr. Davis clarified the Mr. Stout developed the EIP program in the mid 1990's under the SSIP (Self-Sustaining Interpretive Program) category.*

- 20% Assist area manager in preparation and maintenance of Observatory records, reports, and correspondence. Implements business plan and operates park store. Disseminates information to news media. Writes grant proposals to fund observatory upgrades.

*Mr. Davis clarified Mr. Stout developed the overall park business plan in 2005. He states the business plan gives an overview of revenue and expenditure trends and how it relates to the park's facilities, staffing and visitation.*

- 15% Trains, supervises and evaluates observatory seasonal staff and volunteers. Prepares work schedules and assigns appropriate duties and work projects. Performs clean-up work as required. Renders emergency first aid assistance as required. Enforces park rules and regulations within scope of authority.

*Mr. Davis clarified that Mr. Stout is not a commissioned ranger, therefore he does not write citations. He speaks with the violator and encourages compliance with the regulation. Mr. Davis clarified the GOSP is a stand-alone park which is unlike all the other state interpretive centers and Mr. Stout maintains the complete facility which includes buildings and grounds.*

- 10% Establishes and maintains good relations with Observatory patrons, officials of government agencies and representatives of educational organizations. Represents the Observatory at appropriate astronomy functions and meetings.

*Mr. Davis clarified Mr. Stout's relationship with external patrons, agencies, and organizations involve responding to specific requests for assistance with Astronomy-related topics. Mr. Stout periodically attends the local city chamber of commerce meetings which occur outside of his regular schedule. Mr. Stout gets invited to present programs at other Parks, schools and organizational meetings.*

- 10% Performs electrical, mechanical, carpentry and plumbing tasks to repair and service Observatory building, structures and equipment. Performs repairs/maintenance tasks required to keep telescopes and other scientific equipment in good operating condition.

- 5% Performs other duties as assigned.

In Exhibit A-3, Mr. Stout states that during the review period he was directed by his supervisor to develop and conduct energy audits of the Goldendale Area state Parks to identify the types of outdoor lighting fixtures used at the facilities. Mr. Stout states he developed an energy inventory plan and designed a form to determine what items to include in the inventory. He conducted on-site park energy inventories at Brooks Memorial State Park, Maryhill State Park,

and Horsethief Lake within Columbia Hills State Park. Mr. Stout clarified the information was used to recommend changes and upgrades to the outdoor light fixtures at the Parks which resulted in saving energy. Mr. Stout clarified the changes had a positive result in also improving and preserving the natural dark night sky environment in each of those Parks.

Mr. Scott Griffith, [Eastern] Regional Operations Manager, completed and signed the Department Head's statement section. Mr. Griffith clarified that Mr. Stout's title is not "Interpretive Astronomer," and stated that Mr. Stout informs visitors of park rules but does not have an enforcement role in the agency. He also clarified that Mr. Stout's operations role is specific to the interpretive center and that some State Park functions for the Goldendale Observatory are performed by other Parks personnel.

#### Summary of Mr. Stout's Perspective

Mr. Stout asserts he is the only full-time staff at the Goldendale Observatory State Park and is responsible for running all components of the Park's large and unique interpretive program. Mr. Stout asserts he originally developed and created the Goldendale Observatory Interpretive master plan and program. Mr. Stout asserts no other individual consulted with him on the design or development of the master plan. Mr. Stout asserts he is responsible for updating the Observatory's master plan. Mr. Stout asserts he developed and has updated the park's general business plan, although he acknowledges no updates have been made to the plan for several years due to the economy.

Mr. Stout contends he assists other Parks in developing astronomy-related topics for their interpretive programs upon request. Mr. Stout asserts he worked with several other local Parks on outdoor lighting as part of an agency-assigned energy conservation program. Mr. Stout asserts this included helping them assess how to conserve energy and use outdoor lighting in their Parks. Mr. Stout asserts he coordinates and consults with private and non-profit groups and state and federal agencies, and serves as a liaison for local groups. Mr. Stout asserts that based on the level of his administrative and maintenance duties his position should be reallocated to the Parks Interpretive Consultant classification.

#### Summary of Parks Reasoning

Parks asserts the majority of Mr. Stout's duties do not encompass the full breadth of duties and scope of responsibility described by the Parks Interpretive Consultant classification. Parks acknowledges that both job classes research, develop, and implement site interpretive master plans and programs. However, Parks asserts the Consultant level was developed to describe a position located at Parks Headquarters. Parks asserts this position performed interpretive consultation to the Commission on the development and construction of interpretive programs and displays statewide.

Parks asserts the typical work statements of the class are indicative of state-wide programs with increased authority in performing statewide inspections at interpretive centers and recommending appropriate actions for upkeep and changes of existing displays. Parks contends the Parks Interpretive Consultant requires developing methods of interpreting historical data, natural history and natural settings for the Washington State Parks and Recreation Commission and in recommending designs and the types of displays for the agency during the construction phase of agency interpretive center projects.

Parks asserts the Consultant level class has a broader scope than the site specific work completed by Mr. Stout at Goldendale State Park. Parks asserts Mr. Stout's position does not have responsibility for planning, researching, developing, and implementing master plans and programs at the statewide level for the Commission as a whole.

Parks contends the focus and majority of Mr. Stout's responsibilities are limited to the development and implementation of Goldendale Observatory's site-specific interpretive program which focuses on general astronomy and telescope use. Parks contends Mr. Stout's consultation with internal or external staff happens intermittently and that external patrons, agencies and organizations do not contract with the Goldendale Observatory. Parks asserts the remainder of his duties including supervising one non-permanent employee, directing volunteers, and disseminating or sharing astronomy-related information with agency staff, organizations, and groups, and maintaining the Goldendale's technical equipment and science library are consistent with the Parks Interpretive Specialist class. Parks asserts there have been no changes to his duties in comparison to his previous CQ and that, in total, his position meets the Parks Interpretive Specialist class.

#### 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 Parks Interpretive Consultant (PI-Consultant)

The Definition for this class states:

Develops methods of interpreting historical data, natural history and natural settings for the Washington State Parks and Recreation Commission. Confers with architects, display fabricators, contractors, and field staff to assure compliance with the desired theme and specifications. Provides consultative services to other State, county, and municipal agencies. Plans, researches, develops, and implements site interpretive master plans and programs. [Emphasis added]

During the review conference, Mr. Price stated this class is intended to describe positions which provide interpretive consultation to the Commission at the agency level. Mr. Price noted that position was originally located at the Parks Headquarters office but was later vacated due to economic issues. In her comments, Ms. Gallagher stated, and later submitted, an e-mail from Christy Sterling, Parks HR Director, dated March 29, 2006, indicating Parks' willingness to change that exclusive use: "In the meantime, we will consider using the Parks Interpretive Consultant...classifications for positions in Parks and regions on a "best fit" basis." (Exhibit A-4)

Although the Typical Work statements are not allocating factors, they do provide support to the scope and level of responsibility intended for the classification. The following Typical Work statements further identify the expected level of work in this classification:

Serves as consultant for the Department as well as other State, county, city and community organizations for brochures, promotional, educational and interpretive displays; provides technical expertise in interpretive center design and layout;

Recommends design and type of displays in order for the Department to contract for construction; advises the contracting agency on changes in design and inspects finished products to ensure compliance with specification;

Performs inspections at interpretive centers and recommends appropriate action for upkeep and changes of existing displays;

Provides guidance and training in setting up park interpretive material for trail layout and evening programs for the visiting public in State Parks;

Supervises personnel engaged in interpretive programs; coordinates interpretive programs with other agencies and groups as required;

Secures materials, tools and other supplies used in construction of interpretive displays;

The overall scope of Mr. Stout's position, and the majority of his assigned duties and responsibilities as a whole, does not reach the requirements of the Definition of this class.

The Definition and Typical Work statements support Parks' argument that this classification is intended to describe positions which perform at the agency level and have a statewide focus planning, developing and implementing interpretive master plans and programs at various locations.

Mr. Stout's position does not regularly plan, research, develop, and implement site interpretive master plans and programs. Mr. Stout does not provide technical expertise in interpretive center design and layout for other State Parks or other interpretive centers or facilities.

He does not provide interpretive center and program design and display recommendations for construction contracts. He does not regularly confer with architects, display fabricators, contractors, and field staff to assure compliance with the desired theme and specifications for construction projects. He does not advise contractors on design changes. He does not inspect finished products to ensure compliance with contract specifications.

He does not provide interpretive consultation to other state, county, and municipal agencies. He does not serve as a consultant for the Department as well as other state, county, city and community organizations for brochures, promotional, educational and interpretive displays. Mr. Stout does not perform inspections at interpretive centers and recommend appropriate actions for upkeep and changes of existing displays. He does not provide guidance and training to staff in setting up park interpretive materials for trail layouts and evening programs for the visiting public in state Parks.

Mr. Stout's responsibilities do not have the breadth of impact and scope of responsibility intended by the PI-Consultant class. Mr. Stout's responsibilities are focused on the GOSP. His

responsibilities are focused on operating the facility and directing the astronomy interpretive program and special events for the GOSP. The extent of his consultation with other State Parks or Interpretive centers is limited to providing information and consultation regarding astronomy-related evening programs or events. In total, the Parks Interpretive Consultant class is not the best fit for Mr. Stout's position.

#### Comparison of Duties to Parks Interpretive Specialist (PI Specialist)

The Definition of this class states: "Researches, develops and implements site interpretive master plans and programs." [Emphasis added]

Additionally, although 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 typical work statements for the PI-Specialist class include the following statements:

- Performs technical research which pertains to the development and implementation of interpretive programs at historic sites, natural areas, and interpretive centers;
- Develops and disseminates information on heritage sites and other historical and natural areas; provides technical assistance to field personnel, and other agencies and groups; develops site interpretive master plans and inventories;
- Collects, identifies and preserves objects of interpretive value; maintains accurate and up-to-date accession and artifact catalog records and trains personnel in their use;
- Prepares or assists in preparation of guides, booklets, studies, records, reports and other publications;
- Assists in the maintenance of files, pictures, maps, publications, abstracts, and other material relating to heritage sites and other historic and natural areas;
- Supervises and trains seasonal personnel engaged in interpretive programs;
- Assists as liaison between the agency and local groups regarding interpretation of historical, archaeological and natural areas; coordinates programs with other agencies and groups as required;

Mr. Stout's current duties and responsibilities as described on the CQ and confirmed in the comments from his supervisor, Mr. Davis, meet the requirements of this class. Mr. Stout's overall responsibility and level of decision making authority for directing GOSP operations and providing interpretive services fits within the Definition for the PI-Specialist classification.

Prior to the time period under review, Mr. Stout researched, developed and implemented the GOSP site interpretive master plan and program for the GOSP. He also developed the GOSP business plan in 2001 and corresponding updated in 2005 which remains in effect at this time. Mr. Stout independently operates and maintains the GOSP. He supervises seasonal employees. Mr. Stout has contact with local groups as well as the neighboring state Parks and provides technical consultation relative to the development of astronomy-related evening programs at those Parks. Mr. Stout periodically attends the local city chamber of commerce meetings. Mr. Stout occasionally presents programs at other Parks, schools and organizational meetings. Mr. Stout provided technical assistance to other agency personnel on an outdoor lighting project as part of an agency-assigned energy conservation program.

The overall scope and impact of Mr. Stout's responsibilities and activities are encompassed by the definition of the PI-Specialist classification. The Parks Interpretive Specialist class is the best fit for Mr. Stout's position.

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).

In this case, the majority of the duties assigned to Mr. Stout's position and his level of responsibility and delegated authority for directing the astronomy interpretive program and directing operations at the GOSP are best described by the PI-Specialist classification. This class more accurately addresses the full scope of work performed by Mr. Stout. Therefore, his 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.

You may file in person at 521 Capitol Way South, Olympia, Washington. Fax number (360) 586-4694.

For questions, please call (360) 664-0388.

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

c: Stephen Stout, Parks  
Joan Gallagher, WFSE  
Joe Vidales, Parks  
Lisa Skriletz, OSHRD

Enclosure: List of Exhibits

**STEPHEN STOUT v PARKS**  
**ALLO-11-018**

List of Exhibits

A. Stephen Stout Exhibits

1. Request for Director's Review form from Stephen Stout, received by DOP on May 6, 2011.
2. Parks allocation determination letter from Jose Vidales to Stephen Stout dated April 6, 2011.

Additional Exhibits submitted after the review conference

3. Email from Stephen Stout to Kris Brophy dated January 6, 2012 regarding energy audit projects conducted at other Park locations.
4. Email from Joan Gallagher to Kris Brophy dated January 9, 2012 enclosing a copy of an email from Christy Sterling dated March 29, 2006 regarding the interpretation of the use of the Parks Interpretive Consultant classification.
5. Email from Stephen Stout via Joan Gallagher to Kris Brophy dated January 9, 2012 enclosing a list of organizations contacted for interpretive services.

B. Parks Exhibits

Cover letter from Jose Vidales to Karen Wilcox enclosing the following:

1. Parks Classification Questionnaire for position Stephen Stout's position, Number 1038.
2. Parks allocation determination letter from Jose Vidales to Stephen Stout dated April 6, 2011.
3. DOP Classification Specification for Parks Interpretive Specialist.
4. DOP Classification Specification for Parks Interpretive Consultant.
5. Email from Rich Davis to Jose Vidales dated January 18, 2011, with attachments:
  - a. Organizational chart for Eastern Region
  - b. Supervisor's response to allocation questions from HR (9 pages)
6. Email from Rich Davis to Jose Vidales dated February 24, 2011 providing clarification to responses to Mr. Vidales' questions.

Additional Exhibits submitted after the review conference

7. List of original questions asked to complete the responses provided in Exhibit B-5(b).
8. HR response from Jose Vidales regarding additional exhibits submitted by Mr. Stout following the review conference (see exhibits A-4 and A-5).