



**STATE OF WASHINGTON**  
**OFFICE OF THE STATE HUMAN RESOURCES DIRECTOR**  
DIRECTOR'S REVIEW PROGRAM  
*521 Capitol Way South, P.O. Box 40911, Olympia, WA 98504-0911*  
*(360) 664-0388 · FAX (360) 586-4694*

February 15, 2012

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

FROM: Kris Brophy, SPHR  
Director's Review Investigator

SUBJECT: Byron Eagle v. Department of Social and Health Services (DSHS)  
Allocation Review Request ALLO-11-034

**Director's Determination**

This position review was based on the work performed for the six-month period prior to June 2, 2011, the date the DSHS Classification & Compensation (Class/Comp) unit 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 conference. Based on my review and analysis of Mr. Eagle's assigned duties and responsibilities, I conclude his position is properly allocated to the Residential Rehabilitation Counselor 4 classification.

**Background**

In a separate action in May 2011, SCC management submitted to the DSHS Classification & Compensation unit a request that Mr. Eagle's position be reviewed for reallocation to the Program Manager A class (see section 5 supervisor's comments - exhibit B-2).

On June 2, 2011, DSHS Class/Comp unit received Mr. Eagle's Position Review Request Form (PRR) (Exhibit B-2), requesting his Residential Rehabilitation Counselor 4 (RRC 4) position be reallocated to Program Manager A, Security Guard 3, or be considered for inclusion to a former allocation within the Washington Management Service (WMS) as an Assistant Program Service Manager (APSM).

On June 9, 2011, the DSHS Class/Comp Unit received an updated Position Description Form (Exhibit B-1) for Mr. Eagle's position from Ms. Cathi Harris, Assistant Superintendent, and Mr. David O'Conner, Security Operations Manager (Mr. Eagle's supervisor). The form includes a handwritten notation stating Mr. Eagle declined to sign the form on the basis the form does not accurately reflect the percentage of time the duties are performed and are also outside of his job classification.

As part of my review, I considered both the PDF (Exhibit B-1) submitted by SCC management and the PRR (Exhibit B-2) submitted by Mr. Eagle. Based on the totality of information

presented and the comments provided by Mr. Eagle during the review conference, I found the PRR more accurately reflects the body of work and percent of time he performs his duties. This is further supported by an analysis of the OSS work schedule submitted by DSHS for the beginning of January 2011 through the end of April 2011. The schedule confirms that on average, Mr. Eagle performed OSS duties approximately 45% of the time for that period (Exhibit B-7) which also corresponds to the percentage of time he identifies on the PRR.

DSHS notified Mr. Eagle on July 8, 2011, that his position did not meet the WMS inclusion criteria and determined that his position was properly allocated as a Residential Rehabilitation Counselor 4 (Exhibit A-4).

On August 2, 2011, the Department of Personnel received Mr. Eagle's request for a Director's review of DSHS's allocation determination (Exhibit A-1).

On December 15, 2011, I conducted a Director's review conference. Present during the meeting were Byron Eagle, Steve Chenoweth, Counsel Representative, WFSE; and John Black, Classification and Compensation Specialist, DSHS. During the course of the review conference, I informed Mr. Eagle that the scope of the Director's review is limited to a review of classifications within the Washington General Service (WGS).

### **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**

Mr. Eagle works in the Special Commitment Center (SCC) on McNeil Island. Mr. Eagle is the Security Supervisor of one of three security units which provide security coverage for all areas outside of the residential living areas. Mr. Eagle's duties include shift supervision of ten to twelve staff. Of this group, four or five are assigned to serve on a Quick Response Team which is designated to diffuse urgent and emergent situations at the facility.

A portion of Mr. Eagle's time is spent serving as the central communication On-Site Supervisor (OSS) for the SCC facility. The OSS coordinates communication and residential rehabilitation security functions within the SCC. It is a rotational duty station shared among several security supervisors, including Mr. Eagle.

Mr. Eagle's employees are allocated to the Security Guard 2 class. These employees were recently reallocated from Residential Rehabilitation Counselors (RRCs) in April 2011. During the review conference, Mr. Eagle clarified that with the advent of the closing of McNeil Island

Corrections Center (MICC) the RRC security employees at SCC were trained and given additional responsibility in medical, security, and fire support functions which resulted in the reallocation of their positions to the Security Guard 2 class. Please note, however, the employees are identified and referred to in the PRR as Residential Rehabilitation Counselors.

Mr. Eagle's duties and responsibilities are summarized as follows.

#### Security Unit Supervisor

Approximately fifty percent of Mr. Eagle's time is spent working as a Security Unit supervisor. Mr. Eagle provides guidance and supervision to staff in their day-to-day supervision and accountability of SCC residents. Mr. Eagle states he directs the RRC staff in assuring that residents comply with facility policy, standard operating procedures, and unit and program rules. He communicates and documents matters/incidents to the Program Manager or Investigator for action. He maintains a supervisor's file documenting all verbal and written performance meetings. He prepares shift assignment rosters and post assignments, and directs and coordinates security searches.

Mr. Eagle states he instructs and encourages residents regarding policies, procedures, protocols and rules. He ensures his staff follows SCC Emergency Response Procedures regarding resident aggression, fire, riot, hostage, escape, natural disaster, and medical and hazardous materials. Mr. Eagle writes accurate, detailed reports such as incident reports, log entries, resident census updates, behavior management reports, and other documents as required.

#### On-Site Supervisor

As stated in the PRR and supported in the OSS work schedule (Exhibit B-7), Mr. Eagle spends approximately forty-five percent of his time working as the On-Site Supervisor. He states that while serving as the OSS, he works under the delegated authority of the Superintendent for the full spectrum of institutional concerns, as well as the safety and security of the entire McNeil Island. Mr. Eagle ensures the entire shift is properly staffed. He issues overtime as necessary.

Mr. Eagle contacts and reports to on- or off-site administrators when urgent and emergent situations occur at the facility. Mr. Eagle provides direction to ensure all shift staff follow SCC and DSHS policies. Mr. Eagle states he is responsible for managing all urgent and emergent situations that arise on McNeil Island according to SCC policy as the designated Incident Commander. In emergent situations he directs staff which includes providing overall direction and coordination to deploy QRT and ERT response teams and to contact outside agency support.

Mr. Eagle assesses the level of force used against combative or non-compliant residents and obtains authorization for the use of force outside his scope of authority, if required. He makes independent decisions to adjust programming in residential areas. He ensures accurate resident head counts are taken within the SCC, and he ensures performance and behavior issues related to unit staff, security staff, and first-line supervisors are reported. Mr. Eagle conducts investigations on resident mistreatments, allegations of abuse and determines the level of intervention needed according to policy.

Mr. Eagle submits Onsite Supervisor shift reports to upper management. Mr. Eagle states he is responsible for and gives direction to first-line supervisors and holds them accountable for the supervision of their staff. He is responsible for contacting outside resources as directed by off-site administrators, if necessary including the FAA, State troopers, and the State Coroner's office, etc.

Mr. Eagle's supervisor, Mr. David O'Conner, did not complete or sign the supervisor's section of the form. However, Ms. Cathi D. Harris, Associate Superintendent, completed and signed the supervisor's section of the form on June 2, 2011. Ms. Harris does not agree that the description of duties and percentages of time Mr. Eagle presented in the PRR are accurate and complete.

In her response to Mr. Eagle's description of duties, Ms. Harris listed the duties and percentages of time in verbatim from the PDF submitted to the Classification & Compensation Unit on June 9, 2011 (Exhibit B-1). Additionally, Ms. Harris states the SCC submitted a request to the Classification and Compensation unit requesting Mr. Eagle's position be reviewed for reallocation to Program Manager A, but that the request was denied.

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

Mr. Eagle asserts his Security Supervisor and OSS duties should be considered as separate entities. Mr. Eagle asserts that while he is working as a Security Supervisor his direct supervisor is the OSS, and while he is working as the OSS his direct supervisor is the Security Operations Manager (Mr. O'Conner) or the Assistant Superintendent (Ms. Harris).

Mr. Eagle asserts that while working as the OSS, he is responsible for higher level administrative management of the SCC facility, and ensuring the safety and security of the entire operation to include McNeil Island. Mr. Eagle asserts his duties meet the definition of the Program Manager A class by performing similar duties, by having the same delegation of authority, and by having oversight of first-line supervisors. Mr. Eagle asserts the OSS duties were previously performed by WMS Assistant Program Service Manager (APSM) positions. Mr. Eagle asserts the OSS duties were assumed by the RRC 4's when these positions were eliminated.

Mr. Eagle asserts that SCC management recognizes the OSS function as a critical duty, separate from the current RRC 4 positions and performed at a higher level of work as noted by its request to receive assignment pay for performing that work (Exhibit A-6).

#### Summary of DSHS's Reasoning

DSHS asserts the primary focus of Mr. Eagle's position is the supervision of a security unit within the SCC facility. DSHS asserts the majority of Mr. Eagle's work consists of serving as a Security unit supervisor, and his work serving as the OSS is consistent with the RRC 4 level class. DSHS asserts the OSS function is a recurring rotational assignment shared among staff and not a designated position and therefore does not meet the definition of a supervisor within the context of supervising other supervisors or employee-level staff.

DSHS asserts the duties Mr. Eagle performs while working as the OSS does not meet the DOP definition of administrative or managerial required for allocation to the Program Manager A classification. DSHS asserts the principal function of the OSS is to be a central communication

post charged with coordinating security relative to residential activities within the SCC. DSHS asserts that for the majority of times that Mr. Eagle is serving as the On-Site Supervisor, members of the SCC management team are physically on site and available to provide direction. Additionally, DSHS asserts Mr. Eagle's rotational assignment to fill the On-Site Supervisor post is described in the RRC 4 description of duties.

DSHS asserts Mr. Eagle's position meets the scope of the Security Guard 3 definition but with the additional OSS responsibility his position is more accurately described by the RRC 4 class. In total, DSHS asserts Mr. Eagle's position is properly allocated to the RRC 4 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 the Program series

The Office of the State HR Director's Glossary of classification terms defines a program as:

A specialized area with specific complex components and tasks that distinguish it from other programs (or the main body of an organization). A program is specific to a particular subject and has a specific mission, goals, and objectives. A program typically has an identifiable funding source and separate budget code.

The specific components and specialized tasks involve interpretation of policies, procedures and regulations, budget coordination/administration, and independent functioning. Typically requires public contact relating specifically to program subject matter, clients, and participants.

Duties are not of a general support nature transferable from one program to another. Performance of clerical duties is in support of an incumbent's performance of specialized tasks. Independent performance of these duties usually requires at least a six-month training period.

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.

The Residential Rehabilitation Counselor series specifically address the body of work under review in this appeal. Since these classes specifically describe the nature and scope of work performed by Mr. Eagle, allocating his position to a class within the Program series is not appropriate.

This is 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)."

Additionally, the scope of Mr. Eagle's position does not reach the level of responsibility required for allocation to the Program Manager A class.

#### Comparison of Duties to Program Manager A

The Definition for this class states:

Supervises a division of a major administrative department, operating unit or program undertaking relieving the senior official of operating and administrative detail. Plans, coordinates and implements all functions required by the activity.

The Distinguishing Characteristics for this class states:

Program Managers administer, supervise, direct and advise on activities involved in providing an essential management service within the institution. They are responsible for advising and assisting, with minimal direction, the senior official and other administrators in the organization on matters pertaining to the program. The primary purpose of these positions is to achieve the goals and objectives of the program by providing, obtaining, and/or coordinating activities as they affect the institution. [Emphasis added]

Positions in this class involve a wide scope of complex duties and responsibilities in the management of a program which may involve a combination of two or more of the following services: Project management, funds management, contract administration, management analysis, property management, space management, program management, budget planning, public information, faculty, administrative, classified staff and student services administration, personnel administration, and staff supervision. Program Managers exercise independent judgment, and have been delegated decision-making authority. Program manager at the "A" level are typically first-line supervisors, and are characterized by their total responsibility for a program or management services to an administrative supervisor. [Emphasis added]

Program Managers at the "B" level are typically second- or third-line supervisors and are distinguished by their responsibility for total control of a program for a particular academic or administrative unit.

The Office of the State Human Resources Director's (OSHRD's) Glossary of classification terms further defines "Administrative" and "Managerial" as follows:

**Administrative**—Determines or participates in making policy, formulates long-range objectives and programs, and reviews the implementation of programs for conformance to policies and objectives.

**Managerial**—Plans, coordinates, integrates, executes, controls and evaluates activities and functions of an organization. This includes developing budgets, policies and procedures, service delivery, and staff supervision.

The scope of Mr. Eagle's work serving as the OSS does not meet the OSHRD Glossary's definition of administrative or managerial, nor does the scope of responsibility of those tasks meet the requirements of the definition and distinguishing characteristics of the Program Manager A classification. The principal function of the OSS is to be a centralized post charged with coordinating centralized communication and residential rehabilitation security functions within the SCC. It is a rotational duty station which is shared among several security supervisor staff, including Mr. Eagle. No one individual is delegated responsibility to determine or participate in the full scope of SCC administrative activities including making policy; formulating long range objectives; or planning, executing, controlling and evaluating activities which includes responsibility for developing budgets, policies and procedures, or performing other management-level functions.

Further, when Mr. Eagle is serving as the On-Site Supervisor, members of the SCC management team, including Mr. O'Conner or Ms. Harris, are physically on-site or available by phone to provide administrative or managerial direction. Finally, as indicated in the PRR and supported in the OSS work schedule (Exhibit B-7), Mr. Eagle's rotational assignment to fill the On-Site Supervisor post does not constitute the majority of his work. It is not the primary focus of his position.

For each of these reasons, Mr. Eagle's position should not be reallocated to the Program Manager A class.

### Comparison of Duties to Security Guard 3

The Definition for this class states:

Supervises security staff who provide protection and security of buildings, grounds and their residents, staff or visitors. Assists security staff in the patrolling and inspection of buildings, grounds and equipment. Enforces rules of behavior in buildings and grounds.

There are no Distinguishing Characteristics for this class.

This class generally describes Mr. Eagle's responsibility for supervising security staff within the SCC facility. Mr. Eagle's Security unit posts security guards in assigned areas within the SCC. However, this class does not fully address the scope of responsibility of those employees who additionally perform specialized residential rehabilitation counselor activities while providing security within their assigned areas. During the review conference, Mr. Eagle stated that his employees also perform rehabilitation counselor activities in conjunction with their security duties.

While serving as the Security unit supervisor, Mr. Eagle is responsible for handling complex, sensitive issues and initiating proactive interventions as needed, and providing reports on staff performance and disciplinary issues to his supervisor. Further, Mr. Eagle's additional responsibility for serving rotationally as the OSS is more accurately and more fully described by the Residential Rehabilitation Counselor series. The Security Guard 3 class is not the best fit for Mr. Eagle's position.

#### Comparison of Duties to Residential Rehabilitation Counselor 4

The Definition for the Residential Rehabilitation Counselor 4 classification states:

Within the Special Commitment Center, under the supervision of mental health professionals, supervises Residential Rehabilitation Counselors in providing for the specialized care and security of civilly-committed adult, violent sexual predators.

The Distinguishing Characteristics for this class states:

Supervises Residential Rehabilitation Counselors and performs security work to ensure the safety and security of the total confinement facility, less secure transition facility, program area, residents, staff and the public. Monitors implementation of resident treatment plans and addendums to support residential treatment. Positions supervise staff assigned to escort residents off the island for medical or court appointments.

In total, the scope of Mr. Eagle's position and majority of his duties as a whole meet the Definition and Distinguishing Characteristics of this class.

The primary thrust of Mr. Eagle's position is to supervise Security Unit employees who participate in providing specialized residential care and security to residents within the SCC. This is consistent with Mr. Eagle's clarification during the review conference that his employees perform rehabilitation counselor duties in conjunction with their security functions.

Thus, approximately fifty percent of Mr. Eagle's time involves supervision of one of three SCC Security Units. Mr. Eagle supervises employees who are responsible for providing specialized residential rehabilitation care and security functions. This includes assisting with the specialized care of residents regarding their treatment plans; assuring compliance with standard operating policies and procedures; and following unit protocols, rules, and regulations. This reaches beyond the singular scope of the Security Guard 3 class of providing security of residents and grounds within an institutional setting.

According to the PRR, approximately forty five percent of Mr. Eagle's time is spent serving in a secondary role as the SCC OSS which involves providing security oversight work for the entire SCC facility, which is supported by the OSS work schedule (Exhibit 7).

Mr. Eagle's rotational assignment as the OSS, while not fully anticipated by the RRC 4 class, is addressed in the RRC 4 definition's statement: "Supervises Residential Rehabilitation Counselors

and performs security work to ensure the safety and security of the total confinement facility”.  
[Emphasis added]

This statement is consistent with Mr. Eagle's OSS responsibilities including: assigning staff to appropriate work locations to ensure adequate and proper security coverage in the total confinement facility (i.e. SCC); responding to and coordinating all urgent and emergent situations that arise according to institutional policy and standard operating procedures; completing the On-Site Supervisor's report during the shift to document incidents and actions taken; acting as a liaison between SCC and the administrative, clinical, and facilities duty officers; completing documentation for resident seclusion assignments; and reviewing all Incident Reports written during the assigned shift.

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. A portion of the typical work for the RRC 4 class includes the following statements:

- Consults with clinical staff in the evaluation, treatment and management of residents; participates in individual group counseling;
- Participates in supervisor, classification and team meetings; prepares reports as required;
- Supervises implementation of behavior management procedures when a resident is violent, suicidal or has behavior difficulties; monitors and evaluates Residential Rehabilitation Counselor staff proficiency of behavior intervention techniques;
- Provides for communication of information between shifts.;
- Assists in conducting investigations as the on-scene officer, answers questions of residents and visitors concerning rules, regulations and procedures.;
- Supervises random and specific searches/inspections of residents and visitors, resident housing, buildings, physical plant, supplies and residents personal property.;
- Coordinates the security and custody for residents on authorized leave from the less secure transitional facilities to community appointments and activities; coordinates staff to assist corrections and custody officers in the transport and security of residents to hospital or medical appointments, and scheduled court appearances outside the institution.;

Mr. Eagle's duties and responsibilities are fully consistent with these statements. Mr. Eagle ensures his assigned Security unit employees maintain order in their assigned areas. He provides ongoing in-service training to RRC staff. He instructs and encourages residents regarding policies, procedures, protocols and rules. He ensures his employees maintain a safe and secure environment, which includes performing routine inspections; monitoring residential interactions; securing resident rooms and common areas; and implementing appropriate verbal and physical behavior intervention.

Mr. Eagle's overall level of responsibility and decision making authority, as well as his responsibility for serving in rotation as the SCC On-Site Supervisor, fit within the Definition and Distinguishing Characteristics for the Residential Rehabilitation Counselor 4 classification.

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. Eagle's position and his level of responsibility and delegated authority are best described by the Residential Rehabilitation Counselor 4 classification. The Residential Rehabilitation Counselor 4 class specifically addresses the full scope of work performed by Mr. Eagle. 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: Byron Eagle, DSHS  
Steve Chenoweth, WFSE  
John Black, DSHS  
Lisa Skriletz, DOP

Enclosure: List of Exhibits

**BYRON EAGLE v DSHS**

**ALLO-11-034**

List of Exhibits

A. Byron Eagle Exhibits

1. Director's Review Request form from Byron Eagle, received by DOP on August 2, 2011.
2. Additional statement to Director's Review Request form by Byron Eagle dated July 23, 2011.
3. A copy of Position Description Form for Byron Eagle's position, written by management and signed by Mr. Eagle's supervisor, David O'Conner, May 24, 2011.
4. A copy of the DSHS allocation determination letter from John Black to Mr. Eagle dated July 8, 2011.

Additional exhibits submitted during the review conference

5. Memorandum from Kelly Cunningham, Superintendent SCC, to Byron Eagle dated June 20, 2011 regarding on-site supervisor responsibilities.
6. Email from Cathi Harris, to Byron Eagle, et. al. dated August 10, 2011 regarding OSS duty to pursue assignment pay for the On-Site Supervisor duties.

B. DSHS Exhibits

1. Updated Position Description Form (PDF) for Byron Eagle's position, submitted to the Class/Comp Unit on June 09, 2011 in response to Mr. Eagle's position review request. Signed by Mr. Eagle's supervisor, David O'Conner, and Cathi Harris, Assistant Superintendent on May 24, 2011, with handwritten notation of Mr. Eagle's refusal to sign the form.
2. Position Review Request (PRR) form for Byron Eagle, with attached Supervisor's section completed by Cathi Harris; received by the Class/Comp Unit on June 2, 2011.
3. PDF Byron Eagle's position dated January 26, 2006.
4. SCC Security Operations Organizational Charts dated January 17, 2006 and January 19, 2011, respectively. (two pages)
5. DSHS allocation determination letter to Byron Eagle from John Black dated July 8, 2011.
6. Email from Byron Eagle to John Black, Robert Swanson and Vicki Chambers dated June 18, 2011 regarding the position review request.
7. Email from Ellen Andrews to Robert Swanson and John Black dated June 23, 2011, with attached copy of the OSS staffing schedule for the period January 2011 through April 2011.

8. Email from Cathi Harris to Robert Swanson June 10, 2011 with enclosed response to a request for additional clarification of duties.
9. Memorandum from Henry Richards to Tim Brown dated March 8, 2005 regarding a 'Request to Establish WMS Position--Assistant Residential [Program] Services Manager--Swing Shift, Position #New.'
10. WMS Position Description for Position TY02, March 8, 2005, Working Title, "Assistant Residential Services Manager (Swing Shift)."
11. DOP Class Specification for Residential Rehabilitation Counselor 4 (347H).
12. DOP Class Specification for Program Manager A (107R)
13. DOP Class Specification for Security Guard 3 (385M)