



**STATE OF WASHINGTON**  
**OFFICE OF THE STATE HUMAN RESOURCES DIRECTOR**

DIRECTOR'S REVIEW PROGRAM  
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October 15, 2012

TO: Christine Tufts

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

SUBJECT: Christine Tufts v. Central Washington University (CWU)  
Allocation Review Request ALLO-11-118

On July 24, 2012, I conducted a Director's review telephone conference regarding the allocation of your position. In addition to you, Stephen Sarchet, Human Resources Representative, participated on behalf of CWU.

**Director's Determination**

This position review was based on the work performed for the six-month period prior to May 6, 2011, the date CWU's Human Resources (HR) Office received your request for a position review. As the Director's designee, 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 your assigned duties and responsibilities, I conclude your position should be reallocated to the Forms and Records Analyst 3 classification.

**Background**

On May 6, 2011, CWU's HR Office received your request for a position review, asking that your Forms and Records Analyst 2 position be reallocated to the Forms and Records Analyst 3 classification (Exhibit B-1). Mr. Sarchet met with you on several occasions between August 4 and September 1, 2011 to review your request. At the time Mr. Sarchet issued his determination, he had not received input from your supervisor and had not been successful in his attempts to schedule time with your supervisor. On November 22, 2011, Mr. Sarchet determined your position was properly allocated to the Forms and Records Analyst 2 class. He concluded the level of support and duties you perform did not rise to the level of complexity envisioned by the Forms and Records Analyst 3 class specification and that your position did not specialize in two or more system areas. He further concluded your position did not oversee the work of subordinate staff or coordinate the day-to-day delivery, distribution, access, maintenance and retention of manual and/or electronic forms or records (Exhibit A-2).

On December 19, 2011, the Office of the State Human Resources Director received your request for a Director's review of CWU's allocation determination (Exhibit A-1).

### **Summary of Ms. Tufts' Perspective**

You assert your position's purpose is to manage records for the Facilities Department, which has four distinct divisions with different functions (e.g. administration, central stores, custodial, and construction) and serves 100 employees providing services to the entire campus community. As such, you contend your position serves as a permanent consultant to the Facilities Administrator and the directors, managers, and supervisors of each division. You contend your position works directly with the Financial Services and Administration Manager and that you participate in strategic decision making for managing all of the department's records. You further emphasize your position's responsibility to manage rather than assist. You assert the complexity of the records management systems have evolved and increased since your last position review and that the construction documents you manage are complex, technical documents.

As an example, you indicate that you created a document management system from the ground up to identify, label, track, and retain construction drawings (as built) so the individuals using them know the exact stage of the process and where to locate the drawings. You assert you created the system to process, use, and maintain these records and that project management files have a long retention period. You further assert the procedures you developed for imaging and managing the documents provide critical steps in the closeout process. You describe your position as a subject specialist and contend that the diverse records as well as in-house records retention for the department meet the definition of two system areas. Therefore, you contend your position fits the Forms and Records Analyst 3 classification.

### **Summary of CWU's Reasoning**

CWU asserts your position serves as the records coordinator for the Facilities Department but recognizes your position has a lot more specialized work than other departments. CWU acknowledges the Facilities Department is more complex than the average department on campus and requires a full-time records position. CWU agrees that Facilities is the only department on campus that produces such a large volume of records and that the construction documents are more technical in nature. However, CWU views Facilities as one department and therefore does not consider the records management function separate from the business program. CWU also acknowledges that your position provides consultation and creates processes and mechanisms to keep records straight and that you provide very detailed and thorough guidance and direction to department staff and work in collaboration with the managers. However, CWU asserts your position does not create or fix systems and that your overall duties and responsibilities fit the journey level described by the Forms and Records Analyst 2 classification.

### **Rationale for Director's Determination**

The purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which that work is performed. A position review is a comparison of the duties and responsibilities of a particular position to the

available classification specifications. This review results in a determination of the class that best describes the overall duties and responsibilities of the position. Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

### Duties and Responsibilities

You work in the Facilities Management Department, which is divided into four sections identified as Plant Operations and Maintenance, Facilities Planning and Construction, Financial Services and Administration, and Academic Custodial and Grounds Services. Your position is assigned to the Archives Unit under Financial Services and Administration, and you report directly to the Financial Services and Administration Manager, Mickey Parker (Exhibit B-2).

The Position Description (PD) on file for your position is from March 2003. During the Director's review conference, Mr. Sarchet agreed this PD was outdated. In summary, the typical work included analyzing and designing filing systems; developing and maintaining records inventories; implementing and coordinating records retention; directing and coordinating the transfer storage and disposal of inactive records; maintaining files of important records and agreements; acting as liaison for the department's data; and providing maintenance and construction document support (Exhibit B-5).

You completed and signed a Position Review Request (PRR) on May 4, 2011, which CWU's HR Office received on May 6, 2011 (Exhibit B-1). Your supervisor did not sign the PRR, and Mr. Sarchet indicated he had not discussed your position's duties with your supervisor at the time of his decision, and his attempts to schedule time with your supervisor had been unsuccessful. However, Mr. Sarchet stated that he met with you on several occasions, and he does not have any issues with the duties you described on the PRR.

In summary, you described your position's purpose as follows:

My position exists to direct a department-wide records management program in the Facilities Management Department. I serve over 100 employees that provide services to the entire campus community, including the department administrator, and directors, managers, and supervisors in four distinct managerial divisions. I oversee all department activities involved in the management of the active, inactive, and vital records, and records retention; I direct operations for the transfer, storage, retrieval, and disposition of inactive records, and of active records that require controlled distribution; I develop new records management procedures and activities, to include establishing and meeting quality assurance and legal compliance objectives; I provide consultation to all levels of department staff, and I may direct the work of others who have been given records management assignments or responsibility; and I am a team builder and leader, promoting and encouraging participation in records management activities.

Your position reports directly to the Financial and Administrative Services Manager, and you lead and direct the work of classified and student staff positions and may also direct the work of project teams. You indicated that changes from the previous position review include reporting directly to the division manager rather than an Administrative Assistant 4 position; work performed at a senior level; and growing complexities in duties and responsibilities, which include implementation of new processes requiring strategic planning, research of best

practices; emerging technology; consideration of new case law; determinations on best use of limited new and existing resources; and development of new policies, procedures, and work flows that reflect the best course of action (Exhibit B-1, pages 3 and 4).

You described your position's job duties on the PRR as follows (Exhibit B-1):

40% **Direct and coordinate a department-wide records management program** for the Financial and Administrative Services Manager. In summary, duties related to program direction include the following:

- Writing, reviewing, and applying program-specific policies and procedures for department-wide records management work activities.
- Understanding, interpreting and applying program-specific federal and state regulations, university policies and procedures, new case law, existing and emerging best practices and technology, and Generally Accepted Recordkeeping Principles (GARP).
- Developing short-term and long-term strategic plans which assess and anticipate the needs of department managers and staff.
- Developing program-specific introductory training materials and presentations and adapt technical information into user-friendly format.
- Gaining trust of managers and staff and encouraging best practices to fully use program services and promoting records management as a resource for increasing effectiveness and productivity.

**Program coordination of projects** based on independent or managerial problem identification, which may be specific to internal operations or responsiveness to staff needs, and the scope may be isolated or broad. Implementation is typically one-time but may be completed over several phases or repeated for additional work groups. The activity is typically integrated at a maintenance level and continued as part of normal internal or office operations. In summary, duties related to program coordination include the following:

- Making determinations about projects to initiate and implement and organizing, phasing, and synchronizing work.
- Actively listening to all levels of staff and consulting on problem resolution.
- Leading and directing project teams.
- Directing own work to include prioritizing competing work demands, determining work methods and process, making independent decisions regarding the development of department-wide records managements processes and operations, providing consultation to managers and staff, determining allocation of limited resources, and determining work standards.
- Solving new and unusual problems without consultation from higher-level staff.
- Maintain and periodically review established systems.

50% **Formulate new records management procedures and work activities** throughout the department as they relate to development and implementation of new procedures and activities initiated by you or department staff. Management directives or requests for consultation typically provide the scope and purpose of assignments and responsibilities,

but the prescribed work method is typically “make it happen.” In summary, duties related to work flow processes include the following:

- Analyzing records and information relationships to work flow and identifying areas that impede the work flow.
- Providing consultation to improve the relationship of records to work flow and interviewing staff to determine specific needs and problem resolution related to dispersal of files and information that should be centralized.
- Analyzing and determining scope of work and feasibility of implementing shared records and information management systems and leading project teams, determining objectives and best method of phased implementation.
- Working with a project team to establish procedures and standards for completing and integrating projects.
- Providing consultation on the design of forms that meet work flow needs, identifying and creating automated forms and eliminating redundant forms.
- Establishing and maintaining a department forms directory.

*You provided an example of working on a project to image existing record drawings. You indicated the work flow improved information sharing and reduced the creation and distribution of hard copies. You stated that you worked with a project team to establish the procedures and standards for completing and integrating the project and that you lead the work of students and staff who image existing drawings and will continue to image new drawings. In addition, you noted that records and information management is closely tied to work flow. You provided an example of a work flow improvement involving the conversion, combination, and centralization of a project list index, project records file management, and small works and consultant roster databases, which share architect and contractor information.*

*Further, you explained that conversion of the drawings is a component of managing the records retention system. It filled gaps in several retention systems. Specifically, the imaging system, an electronic backup system for hard copies, conversion to a media conducive to off-site storage, an existing system that reduced handling of archival paper records, and the future conversion of digitized images to archival-quality microfilm (Exhibit A-4, page 2).*

The following duties apply to records in all media and involve initiating, directing, and providing consultation for projects that create or revise manual and electronic filing systems, as well as planning for active records in the divisions, offices, or other workgroups in the Facilities Department. The following summarizes duties related to achieving optimal results for the following functions:

**Records inventory and retention schedule activities.**

- Using records inventory forms, determine a designation for records series title and retention on to the state general schedule or department unique schedule.
- For records inventories that do not have a designate records series and retention, research and evaluate the records administrative, fiscal, legal, and historical value.

- Write new unique office retention schedules and justification for unique series and present to higher-level department staff for approval and follow standard procedures to submit to University Records Officer.

#### **Functionality of file systems.**

- Maintain master manual and electronic filing plans for the department, which may include instruction/procedural training and templates for labels and electronic folders.
- Assess revision requests and make determinations about whether to incorporate revisions and how best to incorporate them.
- Collaborate with the IT manager and staff regarding implementation of large-scale electronic files management systems and plans.

#### **Functionality of finding aids (databases and indexes).**

- Analyze data and information relationships in departmental recordkeeping systems, which may be shared across division, office, or work group lines.
- May design or provide consultation and direction for design of new or converted manual indexes or electronic databases.
- Analyze feasibility, effectiveness, and efficiency of using duplicative paper and electronic finding aids and determine which electronic finding aids must be accessible during power outages.
- Upgrade existing program-specific finding aids.
- Write and periodically review finding aid user and instruction manuals.
- For relational databases, document database design.
- For construction document databases may lead project to consolidate information for availability at one source point.
- May analyze the feasibility of purchasing commercial records management software.

#### **Essential records protection activities.**

- Identify records which are critical for the department to meet its operational, financial, and legal obligations.
- Prioritize critical records.
- Determine best method for protecting records, including alternate methods.
- Lead projects to implement protection plans and make determinates about whether projects are completed in-house or outsourced.
- Direct and coordinate work of assistants or outside vendors responsible for duplicating essential records.
- Maintain essential record protection systems after they are completed and incorporated.
- Direct, coordinate, and implement project to protect department's maintenance manuals and critical studies.
- May direct and coordinate disaster recovery response for records.

### **Imaging systems activities.**

- Working with managerial staff, identify paper records to share electronically and analyze feasibility of implementing imaging project.
- Select file format in which digital images are made and determine e-filing naming standards.
- Determine imaging requirements related to quality such as image resolution and use of tools such as de-speckling and de-skewing.
- Plan and develop imaging projects, develop procedures and work methods, coordinate activity. Document preparation and imaging will be carried out by students and outside vendors, while incumbent's position oversees quality control.
- Make determination about completing projects in-house or outsourcing.
- Direct and coordinate work of positions performing the imaging and perform imaging in the event staff is not available, typically after imaging systems reach maintenance level.
- Maintain imaging systems after completed and incorporated and institute requirements for imaging at point of receipt.
- Migrate images to newer storage media and file formats to retain long-term usability. Ensure electronic backup systems are in place.
- Direct and coordinate a project to image the department's maintenance manuals and critical studies and may lead or direct the work of others to implement it.
- May direct a project to convert the department's construction document images to microfilm. May set criteria for choosing an outside vendor and ensure quality of images meets contractual standards.
- May implement a project to examine the feasibility of implementing a Destruction after Digitization project in which paper records would be imaged and destroyed.

### **Maintenance of in-house storage space.**

- Maintain a knowledge base of optimal records center storage conditions. Be prepared to provide consultation on security, temperature control, load limitations in the current storage area.
- Anticipate storage space requirements and shortages and make recommendation for acquisition of shelving and storage equipment for drawings.
- May provide management consultation regarding design or acquisition of storage space.

10% Manage the department's in-house transfer storage, retrieval, and disposition operations, including the controlled distribution of construction documents (drawings, specifications, maintenance manuals, studies, and reports).

For the Director's review, you provided an additional document that condenses and summarizes the above duties, with a major focus on directing records management for Facilities, including planning, organizing, coordinating, analyzing, developing, and implementing new records systems and then overseeing or performing the tasks that support the record systems (A-3). You also clarified that during the time relevant to this review, you had responsibility for

overseeing the work of subordinate staff and coordinating the day-to-day delivery, distribution, access, maintenance, and retention of manual and electronic forms and records. Mr. Sarchet agreed that you have responsibility for handling all of the records in the Facilities Department, which has its own in-house storage and records retention system.

You also serve as the department's Records Coordinator for records going to the Records Retention Center offsite. Each department on campus has positions acting in that role, and those positions vary, depending on the other duties assigned. You send completed retention schedule requests to the Forms and Records Analyst 2 in the Business Services and Contracts Office, who coordinates the submittals and provides them to her supervisor, the University's Records Officer (Program Manager A, Business Services and Contracts Office) for approval. You also work with and transmit records to the University's Archivist.

### 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.

The **Forms and Records Analyst 2 (F&RA 2)** definition reads, in part, as follows:

Positions at this level provide consultation to managers and perform journey-level forms and/or records work such as analyzing manual, electronic and/or automated forms and/or records management problems, developing and implementing plans for rectifying system deficiencies, designing forms and coordinating forms production. Incumbents assist with and coordinate records retention, migration, transfer and disposition, utilize manual, electronic and/or automated systems, and provide consultation on forms and/or records management programs and system requirements. Incumbents conduct record inventories, assist with reviewing and updating record retention schedules and coordinate, retrieve information for and respond to public record requests.

Some of the F&RA 2 typical work statements include the following:

- Consults with management personnel, identifies and analyzes manual, electronic and/or automated records systems problems, and proposes solutions to meet program and system requirements;
- Designs manual, electronic and/or automated filing systems to meet specialized filing requirements and schedules and coordinates the implementation of plans for both standard and specialized systems;
- Assists with development of record retention schedules, essential records protection programs, and records disposition, transfer and microfilming systems and programs;
- Screens forms orders, expedites forms ordering, and provides production status information;
- Analyzes the feasibility and/or benefits of potential micrographics, electronic and/or automated applications;

- Researches, analyzes and tests electronic and/or automated forms, digital signatures, and workflow application software, hardware and related technologies;
- Creates, designs and revises manual and electronic/automated forms, layouts and screen; processes forms orders; maintains forms inventory;
- May assist in reviewing potential applications of electronic, automated, micrographics and/or imaging technology and assist in performing analysis to determine the feasibility and/or benefits of converting information to alternative formats;
- May lead or supervise lower level staff.

Your position fits within the definition and aligns with many of the typical work statements described at the F&RA 2 level. For example, you consult with managers in Facilities and you analyze and propose changes for processing and maintaining records. However, based on your description of work and clarification provided during the Director's review conference, your position extends beyond the journey level anticipated by the F&RA 2 class.

The Office of the State Human Resources Director's (OSHRD's) glossary of classification terms describes journey level as the "fully competent and qualified" level and senior level as "requiring the consistent application of advanced knowledge and requiring a skilled and experienced practitioner to function independently." Further, senior level work includes "devising methods and processes to resolve complex or difficult issues that have broad potential impact" and "full authority to plan, prioritize, and handle all duties within an assigned area of responsibility." Your position has this level of responsibility for managing to include coordinating, processing, retaining, and disposing of all of the diverse records within the Facilities Department. Your position does more than assist with these functions. Instead, you receive general direction and expected outcomes from the Financial Services and Administration Manager and then devise your own methods for creating processes, implementing projects, and managing department records.

The **Forms and Records Analyst 3 (F&RA 3)** definition states the following:

Positions at this level are specialists in two or more system areas such as financial records, student records, resident records, and/or health records, or function as a management consultant for complex manual and/or electronic forms and/or records problems, or provide management consultation and determinations on responses to public record requests. Incumbents may oversee the work of subordinate staff and coordinate the day-to-day delivery, distribution, access, maintenance and retention of manual and/or electronic forms and/or records.

While not exact, the F&RA 3 typical work statements that most align with the overall scope and level of responsibility include the following:

- Schedules and coordinates manual and electronic forms and/or records management services including files consulting, records retention scheduling, essential records scheduling, and similar services, in one or a group of organizational units and negotiates service agreements with department personnel;
- Reviews records retention and essential records schedules to ensure conformance with legal requirements and state and agency or institution standards;

- Manages manual and/or electronic records retention, disposition, transfer, and storage systems and programs;
- Designs and develops electronic forms, layout and screens; analyzes work plan and/or process to determine required data elements, screen and automation concepts; determines audit requirements;
- Review, determine, and analyze potential applications of electronic, automated, micrographics and/or imaging technology and assist in performing analysis to determine the feasibility and/or benefits of converting information to alternative formats;
- May lead or supervise lower level staff.

During this Director's review conference, you emphasized the combination of records you manage, which require unique and differing skills. For example, you developed and implemented procedures for the imaging of records and helped design a records management system for asphalt drawings, put controls in place for tracking records used by project managers and staff, and implemented procedures to track and close final construction documents in a project management database. You provided research and consultation on best practices, and had oversight of the unique, technical drawings, including processing, scanning, storing, and updating database information.

You also manage records systems for the other divisions within the Facilities Department, including databases, imaging, storage and retrieval, and you manage the internal records retention process for the department. This is supported by Mr. Sarchet's acknowledgment that you provide consultation to management for all record areas in Facilities and that all records management for the department is performed in-house by your position. Mr. Sarchet also acknowledged the construction documents are technical in nature and more complex than documents processed in other departments. While your position's duties are encompassed in the F&RA 2 class, the overall complexity and diversity of systems reach a level consistent with the F&RA 3 class.

In reaching my determination, I also reviewed a more recent decision by the Personnel Resources Board (PRB) in which the Board concluded the Appellant fit the F&RA 3 class, in part, because he functioned as a management consultant for complex records problems and provided oversight and coordination of the day-to-day delivery, distribution, access, maintenance and retention of manual and electronic records. Johnson v. Department of Ecology, PRB Case No. R-ALLO-10-005 (2010).

When considering the totality of your position's duties and responsibilities, the overall level, scope and diversity of the work you perform best fit the Forms and Records Analyst 3 (F&RA 3) 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 521 Capitol Way South, Olympia, Washington. The main telephone number is (360) 664-0388, and the fax number is (360) 586-4694.

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

c: Stephen Sarchet, CWU  
Lisa Skriletz, OSHRD

Enclosure: List of Exhibits

**CHRISTINE TUFTS v. CWU**  
**ALLO-11-118**

**A. Christine Tufts Exhibits**

1. Director's Review Form received December 19, 2011 (4 pages)
2. CWU allocation determination dated November 22, 2011 (3 pages)
3. Ms. Tufts' listing of duties and percentages of time (2 pages)
4. Ms. Tufts' comments on CWU allocation determination (4 pages)
5. Additional exhibits submitted by Ms. Tufts
  - a. Supplemental organizational information (3 pages)
  - b. Cover pages and Records Management booklet (16 pages)
  - c. Examples of complex problem resolution (3 pages)
  - d. Project Deliverable Transfer Worksheet (1 page)

**B. CWU Exhibits**

1. Position Review Request signed by Christine Tufts May 2011 (20 pages)
2. Facilities Management Department Organizational Chart – includes managers/supervisors
3. FMD Financial Services and Administration Organizational Chart
4. Handwritten notes – Job Audit Changes (2 pages)
5. 2003 Position Description (2 pages)
6. Classification and Pay meeting agenda November 10, 2011 – revised definition of F&RA2 (2pages)
7. Records Transmittal Worksheet (1 page)
8. Records Transmittal Form (2 pages)
9. Archiving list (1 page)
10. Departmental Records Request form (1 page)
11. Departmental Records Request – basic (1 page)
12. Departmental Records Request – detailed (7 pages)
13. Disposition Procedure 2011 (1 page)
14. Samples of Project Deliverable Transfer Worksheets (6 pages)
15. PRB Board Order R-ALLO-11-004, 005, 006, 007, 008 (6 pages)
16. PRB Board Order R-ALLO-10-005 (5 pages)

**C. Class Specifications**

1. Forms and Records Analyst 2 (112J)
2. Forms and Records Analyst 3 (112K)
3. Records Management Supervisor (112M)
4. Program Coordinator (107N)
5. Program Manager A (107R)
6. Program Specialist 2 (107I)
7. Program Support Supervisor 1 (107P)