



STATE OF WASHINGTON
OFFICE OF THE STATE HUMAN RESOURCES DIRECTOR
DIRECTOR'S REVIEW PROGRAM
P.O. Box 40911, Olympia, WA 98504-0911
(360) 902-9820 · FAX (360) 586-4694

April 5, 2013

TO: Pamela Iverson

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

SUBJECT: Pamela Iverson v. Department of Corrections (DOC)
Allocation Review Request ALLO-12-019

On November 30, I conducted a Director's review telephone conference regarding the allocation of your position. Present during the Director's review conference were you and Nicole Baker, Human Resources Consultant, representing DOC.

Director's Determination

This position review was based on the work performed for the twelve-month period prior to October 5, 2011, the date you submitted your request for a position review to the Human Resources (HR) Office at Stafford Creek Correction Center (SCCC). 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 is properly allocated to the Correctional Records Supervisor classification.

Background

Your position is assigned to Stafford Creek Corrections Center, and you report directly to Liza Rohrer, Correctional Program Manager (CPM), who reports to the Associate Superintendent (Exhibit B-5). On October 5, 2011, you completed a Position Review Request (PRR) form asking that your Correctional Records Supervisor position be reallocated to the Records Management Supervisor classification (Exhibit B-2). On November 7, 2011, an updated Position Description Form (PDF) was submitted to SCCC's HR Office as well (Exhibit B-3).

On March 7, 2012, HR Consultant Nicole Baker denied your request for reallocation. Ms. Baker concluded the primary focus of your position and the majority of your assigned duties involved managing the Correctional Records Office at SCCC and supervising Correctional Records

Office staff. As a result, she determined your position was appropriately allocated to the Correctional Records Supervisor classification (Exhibit B-1).

On March 30, 2012, you requested a Director's review of DOC's allocation determination. The following summarizes your perspective as well as DOC's rationale for the agency's decision:

Summary of Ms. Iverson's Perspective

Ms. Iverson asserts that every Records Supervisor position located in a DOC facility requires the same knowledge and level of responsibility. However, she states that Records Supervisors located in other facilities have been reallocated to the Records Management Supervisor classification. Ms. Iverson emphasizes that regardless of the distinctions between facilities, the offender records process and chain of command are the same. Ms. Iverson contends she is a working supervisor who carries a caseload in addition to managing SCCC's records office. As a result, she contends her position retains a great deal of responsibility and liability to ensure offender records and release times are accurate and according to laws and policies. Ms. Iverson contends her position carries the same liability for legal release of offenders with the same risk potential as other Records Supervisors allocated to the Records Management Supervisor class.

Ms. Iverson asserts the primary distinction at SCCC is that all records are housed in one location since it is a newer facility. She explains that when a busload of offenders arrives at the institution, the offender files are logged in, offender identification is checked, and the files then go to the administration building. She states that she then assigns a caseload to the CRTs, which she manages in addition to her own. She points out that multiple security levels exist at SCCC as well. Ms. Iverson contends it is unfair to reallocate some Records Manager positions but not others, and she asserts her position should also be reallocated to the Records Management Supervisor job class to reflect her duties and overall level of responsibility.

Summary of DOC's Reasoning

DOC recognizes the value of Ms. Iverson's work and her contributions to the agency's mission to ensure public safety. DOC further acknowledges the overall job tasks and reporting relationships for Records Manager positions are similar for each facility. However, DOC contends the Records Management Supervisor positions at larger institutions have responsibility for more than one records office, which operate like two separate facilities with separate staff. As a result, DOC contends these positions have greater complexity, uniqueness, as well as supervisor span of control, which affects decision making. DOC asserts there are increased levels of complexity and liability in processing higher volumes of records with multiple security levels.

DOC emphasizes the primary focus of Ms. Iverson's position, as well as her overall duties and responsibilities, fit within the definition of the Correctional Records Supervisor classification. DOC contends her position's duties include managing and supervising the records office in addition to entering, auditing, and interpreting offender legal documents and ensuring offender records and release times are processed according to policies and procedures. DOC contends the Correctional Records Supervisor class is the appropriate fit for Ms. Iverson's overall duties and responsibilities.

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

In summary, the position objective and primary purpose of your position, as described on the PRR and PDF include the following:

- Serve as custodian of offender records at SCCC and manage a correctional records office.
- Supervise nine staff in the records office.
- Enter, audit, and interpret legal documents included in offender files and ensure compliance with the appropriate laws and agency policies.
- Contribute to the agency's mission to improve public safety.

The majority of duties described on the PRR as 65% include the following (Exhibit B-2):

- Enter, audit, and interpret the legal documents that hold an offender in the facility and/or other jurisdictions for supervision and ensure compliance with state and federal laws, Superior Court sanctions and agency policies.
- Review and verify the accuracy of legal documents related to convictions and sentencing.
- Provide legal interpretation of case data per Attorney General opinions.
- Develop and implement identification procedures for staff, offenders, contractors, volunteers [at SCCC].
- Control and release confidential, personal, and statistical criminal history data, including escapes, paroles, work release placements, and Victim/Witness Notification.
- Prepare files for Indeterminate Sentence Review Board hearings.
- Serve as Superintendent's designee for computation of time and time adjustments on all offenders at SCCC, including liability with high impact.

These duties are also included on the PDF, which emphasizes the majority of duties as supervising and managing staff performing similar functions, as well as reviewing and verifying offender sentence structures and criminal history information contained in offender records (Exhibit B-3).

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 **Records Management Supervisor** definition states that the position “[d]evelops, implements, and administers a totally integrated records management program in a large agency.”

The Records Management Supervisor typical work statements include the following:

- Directs activities of personnel engaged in the design, analysis, specification development and acquisition of all forms and graphics; disposition of records; establishment and maintenance of filing systems;
- Serves as departmental records officer administering all activities involving the inventory, retention and disposition of records in conjunction with the State Records Committee and the State Archives;
- Plans and coordinates the development of a uniform system of filing and document retrieval for the Department;
- Participates in paperwork management planning programs with appropriate departmental and other Washington State personnel;
- Develops policy and procedures relative to the ordering, production, and stocking of forms;
- Visits institutions to acquaint staff with forms and records management program;
- Establishes committees within Department to achieve maximum efficiency in forms and records management programs.

Your position is assigned to SCCC. There are aspects of your job that fit within the Records Management Supervisor job classification, such as directing activities of records staff, administering all offender records at SCCC, and planning and coordinating the processing of those records. However, as a whole, your position's assignment of work and scope of responsibility more appropriately align with the Correctional Records Supervisor classification, and your duties are specifically included within that job specification.

The **Correctional Records Supervisor** definition states that the position “[m]anages a correctional records office and supervises at least one Correctional Records Technician 1 or 2.

Your position fits this definition. You supervise seven Corrections Records Technicians and two Office Assistant 3s in SCCC's correctional records office. Therefore, the work assigned to your position fits the Correctional Records Supervisor definition.

In addition, the Correctional Records Supervisor typical work statements that closely align with the duties and responsibilities of your position include the following:

- Interprets Supreme, Appellate, and Superior Court decisions, RCWs and Indeterminate Sentencing Review Board Redeterminations to properly compute/recompute release date for offenders;

- Trains staff on use of offender database systems; application of Public Disclosure laws (RCW 42.17), Criminal History Record Information laws (RCW 10.97), and implementation/revision of operational responsibilities resulting from changes in law, court decisions, administrative regulations, departmental policy, etc.;
- Determines the legal service/financial obligations prior to release from institution or a work/training release facility;
- Reviews and verifies all pertinent documents relative to the offender's sentence in order to prepare release documents (e.g., Notification of Release);
- Verifies Offender Based Tracking System information against source documents and resolves problems that relate to sentence computations;
- Testifies in court as expert witness regarding the validity of offender records and identity;
- Certifies, for the department, sentence reduction credits to the sentencing court and/or the Indeterminate Sentencing Review Board;
- Takes fingerprints and photographs; assigns offenders DOC numbers.

Your duties and responsibilities are further supported by the typical work examples described above.

Although I considered your key points about the allocations of the other Records Manager positions to the Records Management Supervisor class, the Personnel Resources Board (PRB) has consistently held the following:

While 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. Byrnes v. Dept. of Corrections, PRB No. R-ALLO-06-005 (2006), citing to Flahaut v. Dept's of Personnel and Labor and Industries, PAB No. ALLO 96-0009 (1996).

Further, the Board has concluded "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." Dudley v. Dept. of Labor and Industries, PRB Case No. R-ALLO-07-007 (2007).

Finally, the PRB addressed the concept of allocation to a specific rather than a general classification in Waldher, Firouzi, Makari, and Korndorfer v. DOT, PRB Nos. R-ALLO-08-026, R-ALLO-09-005, R-ALLO-09-006, and R-ALLO-09-09, concurring with prior Board decisions as follows:

When 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 with the definition that includes the position Mikitik v Depts. of Wildlife and Personnel, PAB No. A88-021 (1989).

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. Alvarez v. Olympic College, PRB No. R-ALLO-08-013 (2008).

It is not intended for a more generic classification to be used to allocate a position where the duties and responsibilities of the position are more precisely described by a more specific classification. Cerna v. Employment Security Dept., PAB No. ALLO-03-0014 (2003) and Nance v. Eastern Washington University, PAB No. 3769-A2 (1995).

It is clear your work is highly valued by the agency. A position's allocation does not diminish the quality of work performed and is not a reflection of performance. Rather, an allocation is based on the majority of work assigned to a position and how that work best aligns with the available job classes. The overall duties and responsibilities assigned to your position specifically fit the Correctional Records Supervisor definition, and they are further supported by the typical work examples. Therefore, your position is properly allocated to the Correctional Records Supervisor 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 on the 4th floor of the Insurance Building, 302 Sid Snyder Avenue SW, Olympia, Washington. The main telephone number is (360) 902-9820, and the fax number is (360) 586-4694.

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

c: Nicole Baker, DOC
Lisa Skriletz, OSHRD

Enclosure: List of Exhibits

PAMELA IVERSON v. DOC
ALLO-12-019

A. Pamela Iverson Exhibits

1. Letter of request for Director's Review March 30, 2012 received
2. Job bulletin for Correctional Records Supervisor
3. Job bulletin for Records Management Supervisor
4. February 2010 WSP Position description for Correctional Records Supervisor
5. May 2011 HQ Position description for Records Management Supervisor
6. March 2007 Monroe Position description for Correctional Records Manager 2
7. November 2009 AGO Position description for Records Management Supervisor

B. DOC Exhibits

1. March 7, 2012 allocation determination letter
2. Position Review Request October 5, 2011
3. Position Description Form submitted for reallocation November 7, 2011
4. Classification Questionnaire October 25, 1999
5. SCCC Organizational Chart for Associate Superintendent of Programs – includes SCCC Records Department
6. Correctional Records Supervisor class specification
7. Records Management Supervisor class specification