



**STATE OF WASHINGTON
OFFICE OF FINANCIAL MANAGEMENT**

STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM
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October 22, 2013

TO: Lisa Goldschmidt, Council Representative
Washington Federation of State Employees (WFSE)

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

SUBJECT: Rita Nucciarone v. Department of Licensing (DOL)
Allocation Review Request ALLO-12-070

On July 31, 2013, I conducted a Director's review conference regarding the allocation of Rita Nucciarone's position. You represented Ms. Nucciarone, and you, Ms. Nucciarone, and WFSE Classification Manager, Sherri Clarke, were all present for the conference. Classification & Compensation Specialist Shelby Krismer Harada represented DOL. The following individuals were also present from DOL: Human Resources (HR) Policy and Systems Manager Virginia Hansen; Ms. Nucciarone's supervisor, Hearings & Interviews Administrator Toni Hood; Ms. Nucciarone's former supervisor, Hearings Examiner Manager Lori Provoe (formerly the Hearings & Interviews Administrator); and two of Ms. Nucciarone's direct reports, Kevin Ritzer and Marta Reinhold, both in Customer Service Specialist 2 (CSS 2) positions in the Hearings & Interviews unit.

In emails dated August 1 and August 5, 2013 the parties provided follow-up comments (Exhibit 36).

Director's Determination

This position review was based on the work performed for the six-month period prior to June 4, 2012, the date Ms. Nucciarone submitted her request for a position review to DOL's HR Office. 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 Ms. Nucciarone's assigned duties and responsibilities, I conclude her position is properly allocated to the Customer Service Specialist 4 (CSS 4) classification.

Background

Ms. Nucciarone's position is located in the Hearings and Interviews Section within the Programs and Services Division at DOL. The Programs and Services Division deals primarily with driving records, and the Hearings and Interviews Section provides due process for individuals pending some future action such as a suspension or revocation of a driver's license. Ms. Nucciarone indicated the majority of cases involve drivers whose licenses are in the process of being administratively suspended for driving under the influence (DUI).

Ms. Nucciarone reports to Hearings & Interview Administrator Toni Hood, and she supervises CSS 2 and Hearings Scheduler staff located at DOL Headquarters, as well as Hearings Scheduler staff located in field offices. Although Ms. Nucciarone previously supervised a Customer Service Specialist 3 (CSS 3) position that served as the leadworker, the position is vacant, and Ms. Nucciarone has assumed those lead duties in addition to her supervisory duties (Exhibits 6 and 7). In addition, Ms. Nucciarone and her staff work with Hearings Examiners who conduct hearings and interviews for drivers appealing actions that cancel, suspend, or revoke driving privileges (Exhibits C).

On June 4, 2012, DOL's HR Office received the Position Review Request (PRR) – Employee Portion, in which Ms. Nucciarone requested that her Customer Service Specialist 4 (CSS 4) position be reallocated to the Licensing Services Manager 1 (LSM 1) classification (Exhibit 5). Ms. Nucciarone also completed a supplemental document in response to specific questions about her position's duties and responsibilities (Exhibit 8). On October 5, 2012, DOL's HR Office received the Supervisor Portion of the PRR (Exhibit 9).

On November 14, 2012, Ms. Krismer Harada determined Ms. Nucciarone's position was appropriately allocated to the CSS 4 classification. Ms. Krismer Harada concluded Ms. Nucciarone's position did not meet the LSM 1 definition of managing a statewide licensing service program. Instead, she determined Ms. Nucciarone's primary duties and responsibilities involved supervision of Customer Service Specialist 2 and Hearing Scheduler positions in a customer service program (Exhibits 1 and 33).

On December 11, 2012, the State Human Resources Division (SHRD) received Ms. Nucciarone's request for a Director's review of DOL's allocation determination (Exhibit B).

Summary of Ms. Nucciarone's Perspective

Ms. Nucciarone asserts she manages the Hearings & Interviews programs, which she views as two distinct programs, and that she supervises staff in each program. Ms. Nucciarone acknowledges her supervisor, Ms. Hood, has administrative oversight but contends Ms. Hood serves as the administrator and she (Ms. Nucciarone) serves as the manager. Ms. Nucciarone points out that she no longer has a lead position reporting to her and states that she now manages all duties previously performed by the lead position in addition to her supervisory responsibilities.

Ms. Nucciarone indicates that her staff reviews driving record information and coordinates coding with other Driving Records units to ensure no errors occur. Ms. Nucciarone contends the supervisors of these other units have been reallocated from CSS 4 positions to LSM 1s and

that her staff regularly interacts with Driving Records staff to perform similar duties and work in sync with them to process actions affecting driver records/abstracts. Ms. Nucciarone states that she regularly attends meetings with the LSM 1s to discuss "licensing reciprocity" matters and ensure programming (coding) issues are in compliance. She also points out that she works directly with the Information Systems group and submits work orders to update coding in accordance with changes in regulations.

Ms. Nucciarone emphasizes the importance of the information she and her staff review and enter into the system, which also goes into a national database of driving records. Ms. Nucciarone asserts there are multiple laws and regulations that frequently change and that she maintains membership in the American Association of Motor Vehicle Administrators (AAMVA), which she describes as necessary to fully understand her job. Ms. Nucciarone contends the depth and complexity of her duties have increased, including the need for strong technological abilities, citing her example of working directly with Information Systems to ensure programming changes occur and are correctly reflected in the system. She indicates that she also develops universal templates and forms and that she serves as a liaison between headquarters and Hearings staff located throughout the state. In summary, Ms. Nucciarone contends she is "solely and directly involved in every aspect of managing the Hearings Unit Support Staff" (Exhibit B-5, page 1). Therefore, Ms. Nucciarone asserts her duties and level of responsibility are best described by the LSM 1 classification.

Summary of DOL's Reasoning

DOL agrees that hearings and interviews are two separate functions but considers them part of one program (Hearings & Interviews). DOL acknowledges that Ms. Nucciarone independently oversees the day to day functions of her headquarters staff and supervises customer service and hearings scheduler staff in headquarters and field locations. However, DOL asserts Ms. Hood, as the administrator, retains program management responsibilities and ultimate authority for program decisions such as issues pertaining to budget. In addition, while DOL recognizes Ms. Nucciarone has a strong working knowledge of laws, regulations, policies and procedures, the agency contends there are other positions specifically designated to monitor legislative changes and issues pertaining to AAMVA. While DOL recognizes Ms. Nucciarone's membership in AAMVA helps to keep her informed, the agency emphasizes that she is not required to monitor changes reported by AAMVA or to perform additional research on the AAMVA website. DOL characterizes Ms. Nucciarone's willingness to gain knowledge and additional information about licensing standards and regulations reported by AAMVA as "going the extra mile" but not a requirement of her job.

In addition, DOL recognizes Ms. Nucciarone's skills and abilities in working with technology and creating forms and macros to improve business processes. DOL acknowledges that she independently creates work orders and works with Information Systems staff to ensure system coding is correct. However, DOL emphasizes the primary function of Ms. Nucciarone's position is to provide supervision to Customer Service Specialist 2s and Hearing Schedulers in a customer service program. DOL contends Ms. Nucciarone oversees the daily functions of the Hearings & Interviews program and supervises staff who schedule hearings and interviews, prepare case packets, and respond to customer inquiries. DOL asserts the duties and responsibilities assigned to Ms. Nucciarone's position do not fit the requirements of the LSM 1 classification. While DOL agrees her position is responsible for interpreting licensing laws and regulations and ensuring that processes followed are in compliance, the agency asserts her

position is not responsible for negotiating contracts, developing policies, or developing and monitoring budgets. In total, DOL contends Ms. Nucciarone's position is appropriately allocated to the CSS 4 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

The Programs & Services Division "provides support services to Customer Relations staff and county agents and subagents." The division as a whole also provides "direct services, information, and training to Licensing Services Representatives, courts, law enforcement, local and federal government agencies, and private businesses" (Exhibit C, copy of web page).

During the Director's review conference, the parties explained that when drivers get ticketed or some other action affecting a driver's license/record occurs, another unit within Programs & Services enters a code into the system, which then generates a letter that notifies the driver of a pending action, such as suspension, and the driver's right to request a hearing or interview. The Hearing & Interviews unit receives their work when drivers request a hearing or interview.

Ms. Nucciarone indicated that her staff checks the paperwork to ensure everything is correct and puts a hold in the system that stops the action (such as suspension) until after the hearing or interview takes place. She supervises staff performing these functions, providing guidance to staff, interpreting licensing laws and regulations, and alerting the correct individuals when coding or system issues need resolution or changes.

Ms. Nucciarone also supervises Hearings Schedulers who work directly with Hearings Examiners to schedule and coordinate hearings and interviews, as well as one CSS 2 position who works with appeals in Superior Court and acts as a liaison between Driver Records, the Attorney General's Office (AGO) and Superior Court.

The Position Description Form (PDF) on file for the Customer Service Specialist 4, Supervisor (position #1431) describes the job summary as follows (Exhibit A and B-11):

Supervises and trains customer service specialist and other support program staff within the Hearings Unit of the Department of Licensing. Changes drive records as appropriate. Develops and administers processes to ensure that unit activities are controlled and meet legal and agency requirements.

In summary, the majority of work described on the PDF includes:

- 40% Supervises and trains customer service specialist and other support staff in the Hearings Unit. Under supervision of this position, the CSS 2 staff responds to inquires from customers regarding hearings and interviews to contest driver license suspensions, prepares administrative hearing scheduling notices, certifications of licensing records, and agency suspension and revocation orders, changes drive records as appropriate, schedules hearings, requests documentation from law enforcement, schedules interpreters when necessary, prepares record of administrative hearing when appealed and drafts correspondence.
- 20% Plans and directs the unit's work; recommends, approves and monitors work plans to provide customer service; reviews work processes, and work distribution for continuous improvement and compliance with business requirements; prepares and submits recommendation to administrator on revising systems to accommodate changes in program.
- 20% Develops and administers processes to ensure that unit activities are controlled, and meet agency and other legal requirements . . .

In her Position Review Request (PRR) Employee Portion, Ms. Nucciarone describes her position's purpose as providing "first level managerial supervision to hearing schedulers and customer service specialist 2's and 3 of the Hearings and Interview Unit" (Exhibit 5). Ms. Nucciarone's supervisor, Ms. Hood, agrees with a portion of the position purpose, as she indicated in the PRR Supervisor Portion. However, Ms. Hood disagrees with some of the other statements used to describe Ms. Nucciarone's duties. In the Supervisor Portion of the PRR, Ms. Hood wrote, in part, "I am not aware of several of the items [Ms. Nucciarone] listed under duties and responsibilities . . ." (Exhibit 9).

The following summarizes other duties described in the Position Purpose Section of the PRR followed by clarifying comments in italics:

- Accurate and timely monitoring of the scheduling of hearings and interviews
- Preparing case packets
- Updating and ensuring proper coding to driver abstract
- Providing technical assistance, interpretation of RCW's and WAC's and ensuring statutory compliance.
- Writing and implementing policies and procedures

During the conference the parties clarified that Ms. Nucciarone is not responsible for writing and implementing DOL policies but that she does establish procedures in the work unit for headquarters and field staff.

- Responding to customer inquires

Customers include legislators; legislative aides; prosecuting and defense attorneys; customer service center; law enforcement agencies; information systems [staff]; state, federal and municipal entities; and other programs within DOL.

- Staff training and resources
- Implementing process changes
- Working with regional managers regarding budget

During the Director's review conference, Ms. Hood clarified that Ms. Nucciarone discusses the impact of new regulations on staffing issues affecting budget and that she also signs off on revenue refund documents (Exhibit I), but that she (Ms. Hood) retains ultimate responsibility for the budget as the unit's administrator.

- Evaluating legislation

Ms. Hood clarified that Ms. Nucciarone is aware of legislative changes affecting Driver Records and that she works with her (Ms. Hood) and managers regarding the impacts of legislation. Ms. Hood affirmed that Ms. Nucciarone is always part of the team that discusses legislative impact but noted that as the unit's administrator, she (Ms. Hood) had ultimate responsibility for ensuring changes get implemented correctly.

Ms. Hood reiterated that Ms. Nucciarone works independently overseeing the day to day functions of her HQ staff. Specifically, "Rita supervises a large amount of staff and is responsible for a lot of moving pieces in the hearings unit" (Exhibit 9, page 2).

In addition, the majority of duties and responsibilities (65%) Ms. Nucciarone describes includes the following:

- Manage 12 FTE's within the Hearings Unit
- Serve as liaison between headquarters and 35 Hearings personnel located across the state (field staff)
- Provide coaching guidance and mentoring to unit staff responsible for providing quality customer service.
- Responsible for the efficient and effective operation of a multi program unit

Ms. Nucciarone views Hearings and Interviews as two distinct programs within the Programs and Services Division. During the conference, Ms. Hood and Ms. Krismer Harada agreed they are two separate functions but contend they are part of the same work unit. In reviewing the Strategic Business Plan (Exhibit C), it appears they are listed both separately (page 4) and together (copy of web page and page 12).

- Provide assistance in the interpretation of licensing, laws, federal regulations and guidelines, WACs, internal policies and procedures to staff, customers, law enforcement courts, and DOL stakeholders.
- Write and develop procedures for licensing service programs
- Develop training programs and provide training and technical assistance to customer service staff
- Monitoring legislation that impacts the Hearings Unit, specifically a driver's ability to operate a motor vehicle.

Further, 15% of Ms. Nucciarone's work involves overseeing the development of testing and implementation of the Hearings outgoing correspondence.

During the Director's review conference, the parties explained that when changes in laws and regulations affect driving records, the information system that generates letters based on specific actions needs to be updated to reflect current laws. All parties agreed that Ms. Nucciarone is very knowledgeable about the technology and coding used to generate specific documents given a particular scenario affecting individual driving records. The parties also agreed she is highly skilled in creating and modifying forms that are integrated into multiple processes related to the Hearing and Interview unit's work (Exhibit H). In addition, Ms. Nucciarone attends meetings with Licensing Services Managers (LSMs) in other areas of the Programs & Services Division to ensure programming (coding) issues are in compliance.

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.

The **Licensing Services Manager 1** (LSM 1) definition states the position "manages one or more statewide licensing services programs." Further, responsibilities include "planning, developing, monitoring, budgeting and evaluation."

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 LSM 1 class specification identifies the following typical work statements:

- Provides assistance in the interpretation of licensing laws and regulations;
- Provides guidance to staff responsible for quality customer service for assigned programs;
- Develops and coordinates implementation of program initiatives with other State agencies, Federal, State or local governmental jurisdictions;
- Negotiates agreements with other states and countries regarding tax collection and licensing reciprocity matters;
- Testifies at legislative hearings;
- Drafts and evaluates legislation for impact on program areas;
- Participates as a member of nation-wide committees on issues related to program area;
- Conducts public and stakeholder meetings on licensing laws and Department policies;
- Develops, justifies, and monitors budget for service program areas;
- Responsible for complex cost accounting expenditure reporting for program area;
- Develops policies for licensing services programs;
- Independently develops training programs and provides training and technical assistance to customer service staff.

Ms. Nucciarone's position is not responsible for managing the Hearings & Interviews program as a whole. Rather, her position supervises and manages the daily functions and processes performed by customer service and hearings scheduler staff in support of the unit's work. Although she does provide valuable input to Ms. Hood, the program's administrator, her position has not been assigned the level of work anticipated by the LSM 1 class. For example, her position has not been tasked with independently planning, developing, monitoring, budgeting and evaluation for the overall program.

The State HR Division's (SHRD's) Glossary of Classification Terms further defines **Program Manager** as having duties that involve authority over:

- Developing program goals and objectives.
- Developing timetables and work plans to achieve program goals and objectives.
- Developing program policies and procedures.
- Preparing program budgets, adjusting allotments and authorizing expenditures.
- Controlling allocation of program resources.
- Setting and adjusting program priorities.
- Evaluating program effectiveness.

I recognize that some of Ms. Nucciarone's duties touch on aspects of the LSM 1 class and Program Manager definition, such as interpreting and applying licensing laws and regulations and developing, prioritizing, and evaluating work processes and procedures that customer service and hearings staff use to accomplish the program's work. However, Ms. Nucciarone's position has not been fully tasked with managing the Hearings & Interviews program because overall program responsibilities and decisions rest with Ms. Hood. As the program administrator, Ms. Hood retains ultimate responsibility for the development of program goals and objectives and allocation of resources and program budgets. Therefore, allocation of Ms. Nucciarone's position to the LSM 1 classification is not appropriate.

The **Customer Service Specialist class series concept** states, in part, the following:

Positions in this series provide assistance and problem resolution to agency clients/customers and are located in a designated customer service program. The intent of the series is to assist clients/customers in identifying agency processes and procedures, resolving client/customer problems related to agency programs and interpreting agency related laws, policies and procedures. Positions at all levels may be assigned lead or supervisory responsibility over lower level staff.

This series is not clerical in nature. Clerical support duties are incidental to the total work assignment (less than 10%). . . .

This occupational category is considered a technical occupational category. Positions assigned to this occupational category have authority to accept, grant or deny agency services or may mediate between the business of the agency and the client (example: Attorney General's Consumer Protection Unit). . . .

The **Customer Service Specialist 4** definition reads, in part, the position "[p]lans, organizes, and manages a designated customer service program for an agency sub-division or location. Positions supervise customer service staff or volunteers."

The CSS 4 typical work statements include the following:

- Conducts continuing analysis of agency customer service and initiates corrective action to meet changing needs;

- Consults with agency management on client/customer relations issues; recommends changes to agency procedures to enhance access to agency services;
- Plans and directs the program of the unit; reviews work for compliance with agency policy;
- Develops and implements customer service training;
- Provides consultation and facilitates customer service problem resolution.

Ms. Nucciarone manages the daily work and supervises CSS 2 and Hearings Scheduler staff who process driver requests for hearings and interviews. As part of their duties, staff members make changes and updates to drivers' records and review documentation to ensure changes to drivers' records are in compliance with licensing laws, regulations, policies and procedures. In the process of preparing case packets and scheduling hearings or interviews, Ms. Nucciarone's staff responds to customer inquiries and assists customers in resolving problems. Customers may be internal or external and may include drivers, prosecuting and defense attorneys, law enforcement agencies, state, federal and municipal entities, and other programs within DOL. Ms. Nucciarone ensures the work completed is in compliance with licensing laws and regulations and that the coding in the system accurately reflects the intended actions. She also makes recommendations to her supervisor and other managers for process improvements.

Ms. Nucciarone pointed out that other positions previously allocated to the CSS 4 class had been reallocated to the LSM 1 class. In Byrnes v. Dept. of Corrections, PRB No. R-ALLO-06-005 (2006), the Board held that "[w]hile a comparison of one position to another similar position may be useful in gaining a better understanding of the duties performed by and the level of responsibility assigned to an incumbent, allocation of a position must be based on the overall duties and responsibilities assigned to an individual position compared to the existing classifications. The allocation or misallocation of a similar position is not a determining factor in the appropriate allocation of a position." Citing to Flahaut v. Dept's of Personnel and Labor and Industries, PAB No. ALLO 96-0009 (1996).

Further, the Board has previously noted that 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).

It is clear Ms. Nucciarone's work is highly valued by DOL. A position's allocation is not based on an evaluation of performance or an individual's ability to perform higher-level work. Rather, it is based on the majority of work assigned to a position and how that work best aligns with the available job classes. At the time relevant to this review, Ms. Nucciarone's overall duties and responsibilities best align with the Customer Service Specialist 4 (CSS 4) classification.

Appeal Rights

RCW 41.06.170 governs the right to appeal. RCW 41.06.170(4) provides, in relevant part, the following:

An employee incumbent in a position at the time of its allocation or reallocation, or the agency utilizing the position, may appeal the allocation or reallocation to the

Washington personnel resources board. Notice of such appeal must be filed in writing within thirty days of the action from which appeal is taken.

The mailing address for the Personnel Resources Board (PRB) is P.O. Box 40911, Olympia, Washington, 98504-0911. The PRB Office is located 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: Rita Nucciarone
Shelby Krismer Harada, DOL HR
Brett Alongi, DOL HR
Lisa Skriletz, SHRD

Enclosure: List of Exhibits

RITA NUCCIARONE v DOL
ALLO-12-070

Rita Nucciarone Exhibits

- A. 2005 Position Description Form
- B. Request for Director's Review
- C. Strategic Business Plan
- D. Emails between Washington State Patrol regarding Hearing Request Forms
- E. AAMVA Membership/Goals
- F. Deferred Prosecution Form and communication emails
- G. Field Support Right Fax Transmission error communication emails
- H. Example of documents created
- I. Signature Authority
- J. Annual Performance Assessment/1 and 2
- K. Detailed Organizational Charts
- L. Examples of work created
- M. Manager meeting request for Rita's attendance
- N. Reallocation Request/PDF for L. Glassburn

DOL Exhibit: submission letter (exhibit 33 below) with attachments:

- 1. November 14, 2012 DOL allocation determination letter (4 pages)
- 2. Licensing Services Manager 1 Definition/Glossary of Classification Terms, Program
- 3. May 31, 2012, Email RE: Position Review Request with attachments
- 4. May 31, 2012, Letter to Toni Hood, Administrator RE: Position Review Request
- 5. Position Review Request Form for #70019541, should be #70019385
- 6. Organization Chart for the Hearings Processing Unit
- 7. Organization Chart for the Hearings and Interviews Administration Section
- 8. Position Review Supplemental Form for #70019541, should be #70019385
- 9. Position Review Request Supervisor Portion for Rita Nucciarone
- 10. DOL Signature Authority for Biennium 2011 – 2013, effective 4/1/2012
- 11. November 23, 2005, Position Description Form for position #1431 (70019385) w/SKH notes
- 12. July 15, 2002, Classification Questionnaire for position #1431 (70019385)
- 13. Customer Service Specialist 4 Class Specification
- 14. Licensing Services Manager 1 Class Specification
- 15. Customer Service Specialist 4 – Licensing Services Manager 1 comparison chart
- 16. September 12, 2012, SKH notes with questions for Rita Nucciarone
- 17. September 13, 2012, Email RE: your voice message
- 18. September 27, 2012, Email RE: Follow up questions for PRR #70019385
- 19. September 27, 2012, Email RE: FW: Follow up questions for PRR #70019385
- 20. October 3, 2012, Email RE: Follow up questions for PRR #70019385 (RN)
- 21. October 4, 2012, Email RE: Follow up questions for PRR #70019385 (SKH)
- 22. October 8, 2012, Email RE: Follow up questions for PRR #70019385 (RN)
- 23. October 9, 2012, Email RE: Follow up questions for PRR #70019385 (RN response)
- 24. Position Review Request, Employee Portion #70019385 with SKH notes
- 25. Reallocation Request Supplemental Information #70019385 with SKH notes

26. Position Review Request, Supervisor Portion #70019385 with SKH notes
27. October 9, 2012, Email RE: Follow up questions for PRR #70019385 (SKH notes)
28. "Due process of law" paper with SKH notes dated 10/30/2012
29. "Why doesn't it meet? LSM1, no program assigned" SKH notes dated 10/26/2012
30. September 1, 2011 – August 31, 2012, Annual Performance Plan, Rita Nucciarone
31. November 1, 2012, Position Review Request Statements #1 and #3 from Attachment 26
32. November 1, 2012, Why does the work NOT meet the definition for LSM1?
33. Letter submitting the above attachments

Class Specifications

34. Customer Service Specialist 4 102D
35. Licensing Service Manager 1 459I

Additional comments from the parties after the conference:

36. Email correspondence dated August 1 and August 5, 2013.