



STATE OF WASHINGTON
OFFICE OF FINANCIAL MANAGEMENT

STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM
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March 7, 2014

TO: Susan Bowman

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

SUBJECT: Susan Bowman v. Department of Corrections (DOC)
Allocation Review Request ALLO-13-046

On December 19, 2013, I conducted a Director's review telephone conference regarding the allocation of your position. In addition to you, Human Resources (HR) Consultant Renee Mason from Coyote Ridge Corrections Center (CRCC) also participated in the conference. Sarah Conly, HR Consultant from the HR Classification Unit represented DOC, and HR Consultant Jonathan Smith observed the conference.

Director's Determination

This position review was based on the work performed for the twelve-month period prior to May 13, 2013, the date CRCC's 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 is properly allocated to the Correctional Records Supervisor classification.

Background

Your position is assigned to Coyote Ridge Corrections Center (CRCC), and you report directly to a Program Manager (CPM), who reports to the Associate Superintendent (Exhibits A-6 and B-4).

During the Director's review conference, you indicated that you had previously submitted a request for a position review to CRCC's HR Office in 2010, which CRCC's HR Office did not process (Exhibit A-3). You subsequently completed a Position Description (PD) form, dated December 14, 2011 (Exhibit B-3).

On May 13, 2013, 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). This PRR was forwarded to DOC's Classification Unit, and Ms. Conly reviewed it along with the December 2011 PD (Exhibits B-2 and B-3). On June 12, 2013, Ms. Conly denied your request for reallocation. She concluded the primary focus of your position and the majority of your assigned duties involved managing the Correctional Records Office at CRCC and supervising Correctional Records Technician staff and a Secretary Senior position. As a result, she determined your position was appropriately allocated to the Correctional Records Supervisor classification (Exhibits B-1 and A-2).

On July 10, 2013, 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. Bowman's Perspective

You assert that every Records Supervisor position located in a DOC facility performs the same duties and responsibilities with the exception of the Washington Corrections Center in Shelton where offenders are initially processed. You point out that Records Supervisors located in other facilities have been reallocated to the Records Management Supervisor classification. For example, you indicate the Records Supervisors at the Washington State Penitentiary and Monroe Correctional Complex (Exhibit A-5) have been reallocated to the Records Management Supervisor classification. You assert your position performs the same duties and that the offender records process and chain of command are the same. You contend your position also has the responsibility for ensuring offender records and release times are accurate according to laws and policies.

You assert the only distinction at CRCC is that all records are located in one building rather than two separate buildings. However, you assert the records cover three institutions at CRCC, which include R01 Medium Custody and Minimum 3, R02 Minimum Custody Facility, and R03 Work Ethic Camp. You further contend CRCC's superintendent supports your position's reallocation. In addition, you emphasize that your position supervises other CRT 1 and 2 positions and office staff and that you perform records review and auditing in addition to managing the records office. You contend your position should be reallocated to the Records Management Supervisor classification to reflect the assigned duties and level of responsibility.

Summary of DOC's Reasoning

DOC values your position and recognizes your performance is highly competent. DOC also 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 asserts the primary focus of your position, as well as your overall duties and responsibilities, fit within the definition of the Correctional Records Supervisor classification. DOC contends your 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 your position's 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).

In summary, the position objective and primary purpose of your position, as described on the PRR and PDF include the following (Exhibits B-2 and B-3):

- Serve as custodian of offender records at CRCC and manage a correctional records office to ensure compliance with appropriate laws and agency policy.
- CRCC consists of Medium Custody, Minimum Custody and Work Ethic Camp.
- Minimum Facility includes assisted living section, which sees about three to four deaths per year and requires position to complete fingerprints, identifications, and Release of Body forms at any time of day.
- Contribute to the agency's mission to improve public safety by entering, auditing, and interpreting legal documents included in offender files.

In summary, the majority of duties described on the PRR and PDF include the following (Exhibits B-2 and B-3):

- Manage and provide supervisory direction to correctional records office (supervise CRT 1 and 2 positions and Secretary Senior) including planning and assigning work, evaluating, and training staff.
- In addition to supervision, perform the work of the records office.
- Respond to records requests from Statewide Records Manager and the Public Disclosure Unit at CRCC and Headquarters.
- Respond to offender kites, providing effective communication and timely processing.
- Enter, audit, interpret, and verify 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.
- Implement operational adjustments within the correctional records office resulting from changes in laws and policies and advise management and staff.
- Prepare files for Indeterminate Sentence Review Board hearings.
- Interpret Indeterminate Sentence Review Board redeterminations to compute or re-compute release dates for offenders.
- Review and verify offender sentence structure and criminal history information.
- Verify and audit electronic database information and offender records against sources documents.
- Verify identification of offenders to law enforcement.
- Maintain electronic and physical files.

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 CRCC. 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 CRCC, 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 Corrections Records Technicians at the 1 and 2 levels and a Secretary Senior in CRCC'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: Sarah Conly, DOC
Lisa Skriletz, SHR

Enclosure: List of Exhibits

SUSAN BOWMAN v DOC
ALLO-13-046

A. Susan Bowman Exhibits

1. Letter requesting Director's Review received July 10, 2013 (1 page)
2. June 12, 2013 DOC allocation determination letter (3 pages)
3. September 19, 2013 memo regarding the process since initially requesting the reallocation of July 10, 2010 (3 pages)
4. Position Review Request updated 09-19-13 (7 pages)
5. Current RMS Position Description dated 08-06-13 (5 pages)
6. Current Organizational Chart (1 page)

B. DOC Exhibits

1. Allocation determination letter (3 pages)
2. Position Review Request (7 pages)
3. Position Description December 2011 (6 pages)
4. Associate Superintendent Classification Organizational Chart (1 page)
5. Correctional Records Supervisor Classification Specification
6. Records Management Supervisor Classification Specification

C. Class Specifications

1. Correctional Records Supervisor Classification Specification 112G
2. Records Management Supervisor Classification Specification 112M