



STATE OF WASHINGTON
OFFICE OF FINANCIAL MANAGEMENT

STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM
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July 10, 2014

TO: Kathleen James

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

SUBJECT: Kathleen James v. Department of Corrections (DOC)
Allocation Review Request ALLO-13-048

On April 15, 2014, I conducted a Director's review telephone conference regarding the allocation of your position. You and your direct supervisor, Correctional Program Manager (CPM) Michael Klemke, Airway Heights Corrections Center (AHCC), both participated in the conference. Human Resources Consultant Sarah Conly represented DOC. Classification & Compensation Manager Tina Cooley and AHCC Associate Superintendent Ron Haynes also participated in the conference.

After the Director's review conference, the parties submitted additional information via email, and on May 14, 2014, we had a follow-up telephone conference. You and CPM Klemke were both present for the follow-up conference. In addition, Human Resources Consultants Sarah Conly and Julie Holford, AHCC; Classification & Compensation Manager Tina Cooley; and AHCC Superintendent Maggie Miller-Stout participated in the follow-up conference.

Additional email correspondence was submitted from April 28, 2014, through May 19, 2014 (Exhibit C).

Director's Determination

This position review was based on the work performed for the twelve-month period prior to May 23, 2013, the date AHCC's Human Resources 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 Secretary Senior classification.

Background

On May 23, 2013, you completed a Position Review Request (PRR) form asking that your Secretary Senior position be reallocated to the Administrative Assistant 3 (AA 3) classification (Exhibit B-2). At the same time, your supervisor, CPM Klemke, updated a Position Description Form (PDF) for your position also asking that your position be reallocated to the AA 3

classification (Exhibit B-3). During the Director's review conference, CPM Klemke stated that he initiated the request for your position to be reviewed for reallocation.

On June 27, 2013, Ms. Conly determined your position did not meet the definition of the AA 3 classification. Although your position performs complex secretarial duties, Ms. Conly determined your position had not been delegated authority at a level involving substantive duties or decision-making required of the AA 3 class. Instead, Ms. Conly concluded the duties you perform in support of the CPM are "secretarial in nature and include fairly routine processes or clerical functions." Overall, Ms. Conly determined the Secretary Senior classification best described your position's duties and responsibilities (Exhibit B-1).

On July 15, 2013, you requested a Director's review of DOC's allocation determination (Exhibits A-1 and A-9). CPM Klemke also submitted a letter supporting your request (Exhibit A-3).

The following summarizes your perspective as well as your employer's:

Summary of Ms. James' Perspective

You assert you provide support for multiple departments and programs at AHCC and report directly to the CPM but perform duties at an institution level. You contend your position has been granted authority to manage the statewide callout system for the facility and as a result you determine who gets access, the level of access, and you assign the security group for staff. In addition you indicate that you coordinate, organize, and direct the operation of the callout program and represent AHCC management as the primary contact. You further contend your position has responsibility for all offender phones in the institution and that you serve as the liaison between the facility and the contractor. Further, you assert that your position has responsibility for telephone complaints from offenders and their families.

You further state that you screen incoming forms and ensure multidisciplinary teams complete required sections. You assert your position screens incoming offenders for gang related activities and forwards information to the investigations unit. You indicate that your other institution-wide responsibilities include serving as the Resource Program Management (RPM) coordinator and that you assist the Correctional Specialist 3 position with offender jobs in the Minimum Security Unit (MSU) which is separate from the main institution but under the CPM's responsibility. You contend your duties relating to Callout, RPM, and the offender phone system are facility-wide processes outside of working as the CPM's secretary. Therefore, you believe the AA 3 classification best describes your position's overall duties and responsibilities.

Summary of DOC's Reasoning

DOC asserts the majority of your position's duties involve verifying information, entering data, tabulating and compiling reports, composing and drafting documents, responding to requests for information, ordering supplies, logging and tracking information, and maintaining files. DOC contends your duties regarding the callout system involve performing data entry and assigning security groups based on a master list of positions approved by the Superintendent. DOC further notes that Office Assistant 3 positions in other facilities also perform data entry into the callout system, which has been described as an Access database. Similarly, DOC contends you perform data entry by inputting offender job information into offender databases. DOC recognizes you perform a large volume of work and that you provide assistance when needed in other areas like the investigations unit or when coordinating callout or offender job activities. DOC further recognizes the value of your work at AHCC. However, DOC contends your

position's overall duties and level of assigned responsibilities best fit the Secretary Senior 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

Your position provides complex secretarial and administrative support to CPM Klemke, who reports to the Associate Superintendent at AHCC. CPM Klemke has oversight of programs in the main institution and the minimum security unit (MSU), which are both living units, as well as offsite offender crews, management of offsite contracts, and all offender jobs. (Exhibits A-7 and B-4). During the Director's review conference, you and CPM Klemke stated that the work assigned to his position had previously been handled by two CPM positions.

The Position Purpose/Objective identified on both the Position Review Request (PRR) and the Position Description Form (PDF) states the following (Exhibits B-2 and B-3):

This position exists to provide complex secretarial duties such as independently planning, organizing and prioritizing work, completing reports and maintaining data base management for the CPM over programs. Some of the duties are to relay messages and instructions from the supervisor to others, establish or revise electronic or manual files, establish office procedures, standards and deadlines, and use various operating systems and software.

Both the PRR and the PDF list the same breakdown of duties; however, the PDF provides more detail. In summary, the duties and responsibilities described on the PDF include the following:

25% Facility Callout Coordinator. Tasks include:

- Providing access and training to staff and input locations and reasons into drop down boxes.
- Overseeing that all schedules coincide with policy criteria.
- Answering callout questions facility wide and [ensuring] the times put into callout match the facility movement schedule.

During the Director's review conference, the parties explained that the callout system tracks offender movement. It is a computer based program that identifies an offender's location and does not allow an offender to move from one building to another without being placed on callout. It is a statewide system that is used in all DOC facilities, and your level of involvement is specific to AHCC.

Both CPM Klemke and Associate Superintendent Haynes affirmed your position has authority to make changes to the security group level of access granted to individual

positions within their areas of responsibility in the institution. CPM Klemke emphasized that your position has been authorized as the callout coordinator to make changes in the system and that you only require his approval for unusual situations. DOC describes these duties as performing data entry in the system and assigning the correct code based on a position's job, location, and area of responsibility approved by Superintendent Miller-Stout.

CPM Klemke acknowledged that the Superintendent approved the "original list of names, but Kathy assigned the security groups that they were placed in and continues to assigned security groups as needed" (Exhibit C-7).

20% Manage offender phones for the facility. Tasks include:

- Responding to all Telephone Action Forms.
- Communicating with offender families regarding phone issues.
- Reporting and scheduling phone maintenance concerns.
- Communicating with offender telephone contract providers.

During the Director's review conference, the parties clarified that you work with the Intelligence & Investigations Unit (IIU) when following up on telephone related complaints or issues. For telephone maintenance issues, your position works with the third party vendor who manages the offender phone system.

20% Clerical support for CPM of programs. Tasks include:

- Performing RPM [Resource Program Management] entries for CD [Chemical Dependency].
- Maintaining programming space availability for the MSU [Minimum Security Unit]
- Scheduling meeting space for the MSU.
- Providing the monthly ERD [Early Release Date] report to HQ [Headquarters] when requested.
- CI [Correctional Industries] job tracking.
- Daily DAR [Daily Attendance Report] vacation tracking for the program (*time and attendance for CPM's direct reports*).
- Updating policy manuals kept in the CPM's office.
- Tracking offsite contracts and their due dates.
- Assisting with GMAP formatting.
- Answering phones, taking messages, and typing reports.
- Taking meeting notes.

10% RPM content expert. Tasks include:

- Inputting into RPM all offenders that are assigned to CD.
- Assisting the MSU Correctional Specialist 3 (CS3) position with RPM entries.
- Acting as the facility contact for RPM when changes are made by HQ.

During the Director's review conference and in a follow-up email, CPM Klemke clarified that your position serves as the facility RPM Coordinator for the main institution and the MSU. He wrote, in part, "Kathy does the RPM entries for CD both in the main and the MSU along with assisting the CS3 when he requires help or is

gone" (Exhibit C-7). During the Director's review conference you and CPM Klemke further clarified that you enter offender job information for the MSU and assist the CS3 as needed, while the AA3 position under CPM Klemke's supervision enters offender job information for the main institution.

7.5% Assist IIU with clerical support. Tasks include:

- Running reports and maintaining their STG [Security Threat Group] board, screening incoming offenders for STG affiliation prior to arrival at the facility.
- Printing and posting all hit sheets from law enforcement agents.
- Filing when needed.

7.5% Manage the daily C1 duties. (C1 is a building location). Tasks include:

- Supervising the C1 offender porter.
- Daily mail distribution in C1.
- Providing technical support to staff that work in C1.
- Liberty Coordinator/trainer.
- Ordering supplies for C1.
- Assisting the MSU lieutenant with maintaining the Key Watcher Personal Information Data Base.

5% Scan weekly MDT [Multidisciplinary Team] Incoming Checklists into Liberty (system), which includes reviewing for completion, editing prior to scanning, and scanning them into Liberty.

CPM Klemke emphasized that Callout, RPM, and the offender phone system are facility-wide processes, and your duties and responsibilities related to these processes are not typical duties assigned to the CPM's secretary (Exhibit C-7).

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 **Administrative Assistant 1 (AA 1)** definition states the following:

Provides para-professional administrative and staff assistance to a professional supervisor by reviewing, controlling, prioritizing and coordinating the work of the supervisor's professional staff; or performs technical work which is directly delegated from a professional position.

AA 1 distinguishing characteristics include coordinating the professional supervisor's work and delegation of a technical portion of the professional supervisor's duties. Your duties and responsibilities fall within this scope of responsibility; however, your position's focus of providing complex secretarial duties such as independently planning, organizing and prioritizing work more closely aligns with the Secretary Senior class.

The **Administrative Assistant 2 (AA 2)** has been defined as providing “administrative and staff support services for a section or unit with delegated authority to act in supervisor's absence in areas of substance.” The AA 2 distinguishing characteristics state the following:

These positions may be distinguished from lower level classes by addition of the delegation of authority to act for or in the regular place of the superior in substantive areas . . . and a formal reporting alignment identifying the position as the principal administrative assistant to the superior who is at the first professional supervisory level or above.

At the **Administrative Assistant 3** level, “[p]ositions perform varied administrative and secretarial support duties or positions are responsible for one or more major program activities under a second line supervisor.”

Your position performs a variety of complex secretarial and administrative support functions. In this respect, aspects of your position's duties overlap between the AA classes and the Secretary classes. In addition, you perform work “under a second-level professional supervisor, manager or administrator in WMS Band II or above . . .” as noted in the AA 3 distinguishing characteristics. However, the level of administrative support does not fully reach the higher level anticipated by the distinguishing characteristics. For example, the distinguishing characteristics note that AA 3 positions have been delegated higher level administrative duties such as budget development, personnel administration, or records management. Your position has not been assigned higher-level administrative responsibilities in those areas. Although aspects of your position's duties and responsibilities fall within the AA 3 class, a significant portion of your work fits within the Secretary Senior class, which includes independently performing complex secretarial duties and coordinating office operations. When considering the totality of your position's duties and responsibilities, the Secretary Senior class provides a better overall fit.

Secretary Class Series Concept

In support of a supervisor and/or staff members, provides secretarial services and assistance for the purpose of facilitating the supervisor's and/or staff members' own work and relieving the supervisor and/or staff members of day-to-day clerical detail. Applies knowledge of supervisor's and/or staff members' work commitments including status of projects and nature of contacts.

...

The **Secretary Senior** definition states, in part, the following:

Perform complex secretarial duties such as independently planning, organizing and prioritizing work . . . compiling reports . . . developing, modifying, and/or maintaining data base management, office record keeping, or filing system(s), establishing office procedures, standards, priorities, and deadlines, and coordinating office operations. Positions initiate action to ensure work unit and/or office goals are met and have frequent contacts with clients, the public, staff members from other departments . . .

Assignments and projects are of a complex nature. Independent performance of complex secretarial assignments requires substantive knowledge of a variety of regulations, rules, policies, procedures, processes, materials, or equipment. Problems are resolved by choosing from established procedures and/or devising work methods. Guidance is available for new or unusual situations. Deviation from established parameters requires approval. Work is periodically reviewed to verify compliance with established policies and procedures.

I recognize there is overlap between the Secretary Senior and the AA 3 classes. The performance of complex secretarial duties appears in both the AA 3 and Secretary Senior class specifications. For example, the AA 3 definition includes performance of varied administrative and secretarial support duties. Further, the AA 3 typical work statements include coordinating with other departmental staff members on administrative practices and procedures; serving as a liaison between supervisor and other staff; relaying assignments and requesting status information; and providing secretarial support to supervisor; coordinating office operations; and screening calls and visitors. Similar duties are described in the Secretary Senior class, which includes performing complex secretarial duties and coordinating office operations. In addition to being complex, Secretary Senior assignments require substantive knowledge of a variety of regulations, rules, policies, procedures, and processes.

Your duties include coordinating facility-wide processes for Callout, RPM functions and the offender telephone system. While it is understood Superintendent Miller-Stout retains ultimate authority at the institution level, CPM Klemke has daily oversight in a variety of program areas for the main institution and the MSU. During the Director's review conference, he stated that he delegated the Callout function to your position at the time relevant to this review and that your position coordinates and assigns security groups to staff facility-wide (Exhibit C-7). This was further supported by Associate Superintendent Haynes during the first review conference. As such, your position's level of responsibility extends beyond performing clerical data entry into the Callout database. Although you perform higher-level administrative Callout functions, these duties are not a majority of your position's work.

CPM Klemke also stated that your position has primary responsibility as the RPM coordinator for the facility and that you perform RPM training and troubleshooting, which involves higher-level duties (Exhibit C-7). The PDF indicates that 10% of your duties involve serving as RPM content expert. CPM Klemke explained that your position is responsible for coordinating and entering all offenders assigned to CD for both the main institution and the MSU and that you assist him with offender jobs and backup the CS 3 position in the MSU. While these are higher-level administrative functions, they are not a majority of your position's work.

In addition, your duties and responsibilities regarding the offender telephone system provide a mix of support functions, such as processing and responding to Telephone Action Forms, representing the CPM and AHCC when communicating with offender families and telephone contractors, and scheduling system maintenance. At times, you may assist the IIU in following up on telephone complaints, and you provide clerical support to the IIU when needed. Although investigation of offender complaints with the phone system reaches a higher level of work, the majority of your duties in this area are clerical and secretarial in nature. For example, your duties responding to and processing Telephone Action Forms, communicating with offenders and families, and working with third party vendors align with Secretary Senior duties. In performing these duties, you work within established parameters and initiate action to ensure goals are met. You also have frequent contact with offenders and their families and explain DOC policies and procedures regarding offenders' use of the telephone system.

While I acknowledge that some of your duties associated with Callout security assignments, RPM functions, and investigations of offender telephone complaints exceed the Secretary Senior level, the overall focus and majority of your position's work involves complex secretarial duties. Your position facilitates the work and relieves the CPM of daily clerical details involving programs and functions under his responsibility. You assist him in coordinating office operations at AHCC and relay information between the CPM and other staff members as well as contractors and others working with offender programs, including jobs and the CD program. Your position also coordinates, organizes, compiles, tracks and monitors a variety of information while ensuring processes adhere to policies and regulations. Much of your work is largely process-oriented and includes duties ranging from routine clerical to more increasing levels of administrative support.

When considering your position's duties and responsibilities as a whole, there are aspects that fit within the AA 1 and AA 2 level classes, and some of your duties are described in the AA 3 class. However, the primary focus and majority of your position's work involves performing complex secretarial support functions. These include independently planning, organizing and prioritizing work, completing reports and maintaining database management for the CPM over programs. Your responsibilities include relaying messages and instructions on behalf of the CPM, establishing and revising electronic files (offender database records) establishing office procedures, and using a variety of software and systems to accomplish your work. You complete complex assignments while applying substantive knowledge of a variety of regulations, rules, policies, procedures, and processes consistent with the Secretary Senior level.

Although examples of typical work identified in a class specification do not form the basis for an allocation, they lend support to the work envisioned within a classification. While not exact, the following Secretary Senior examples most align with your position's duties:

- . . . takes meeting minutes, composes letters, compiles and produces reports . . .;
- Resolves problems and responds to inquiries regarding procedures and services; answers telephones; receives, screens and refers visitors;
- Establishes office procedures, standards, priorities, and deadlines;
- Establishes or revises electronic or manual files;
- Attends meetings on behalf of supervisor(s) or work group; represents supervisor or work group in supervisor's absence;
- Relays messages and instructions from the supervisor(s) to others;
- Provides information related to supervisor's planning, organizing and operation of the department or unit;
- Orders supplies . . . arranges for facility and equipment maintenance and repair contracts and services;
- Maintains records of incoming and outgoing correspondence and documents and follows up on work in process;
- May use various operating systems and software to process technical [assignments].

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).

In Salsberry v. Washington State Parks and Recreation Commission, PRB Case No. R-ALLO-06-013 (2007), the Personnel Resources Board addressed the concept of best fit. The Board concurred with the former Personnel Appeals Board's conclusion that while the appellant's duties and responsibilities did not encompass the full breadth of the duties and responsibilities described by the classification to which his position was allocated, on a best fit basis, the classification best described the level, scope and diversity of the overall duties and responsibilities of his position. Allegrì v. Washington State University, PAB Case No. ALLO-96-0026 (1998).

It is clear you have a tremendous amount of knowledge regarding program operations, rules, and regulations at AHCC and that your work is highly valued by your supervisor and the institution. 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.

In total, the Secretary Senior classification most accurately addresses the extent and full scope of your position's duties and responsibilities at the time relevant to this review.

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 PO Box 40911, Olympia, Washington, 98504-0911. The PRB Office is located on the 3rd floor of the Raad Building, 128 10th Avenue SW, Olympia, Washington. The main telephone number is (360) 407-4101, 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

KATHLEEN JAMES v. DOC
ALLO-13-048

A. Kathleen James Exhibits

1. Letter requesting Director's Review received July 15, 2013 (1 page)
2. June 27, 2013 DOC allocation determination letter (5 pages)
3. Letter of support from Michael Klemke, supervisor
4. PD submitted for reallocation, unsigned May 17, 2013 (4 pages)
5. March 2010 PD with signatures (5 pages)
6. State HR Position Description form filled out in conjunction with PDP, no dates or signatures (6 pages)
7. Organizational Charts for the Correctional Program Manager (3 pages)
8. Emails from DOC Chief Investigators stating offender phone processes at their facilities (4 pages)
9. Director's Review Request Form received July 26, 2013 (2 pages)

B. DOC Exhibits

1. Allocation determination letter June 26, 2013 (5 pages)
2. Position Review Request date stamped May 23, 2013 (7 pages)
3. Position Description signed May 21, 2013 (4 pages)
4. CPM 2294 Main Organizational Chart (1 page)
5. Secretary Senior Classification Specification
6. Administrative Assistant 1 Classification Specification
7. Administrative Assistant 2 Classification Specification
8. Administrative Assistant 3 Classification Specification

C. Email Correspondence submitted by the parties after the Director's Review Conference

1. April 28, 2014 email from Sarah Conly, DOC, to Teresa Parsons, regarding follow-up from Superintendent Maggie Miller-Stout on Ms. James' delegated authority.
2. May 1, 2014 email from Teresa Parsons to parties asking specific questions based on comments during the first review conference.
3. May 2, 2014 email from CPM Klemke explaining Ms. James' level of responsibility regarding Callout, RPM.
4. May 2, 2014 email from Teresa Parsons to parties acknowledging clarification from CPM Klemke and providing DOC an opportunity to respond.
5. May 2, 2014 email from Sarah Conly, DOC indicating that DOC would be submitting follow-up comments.
6. May 6, 2014 email from Sarah Conly, DOC with DOC's response to CPM Klemke's comments in his May 2 email.
7. May 8, 2014 email from CPM Klemke providing additional clarification and requesting a follow-up conference.
8. May 16, 2014 email from Teresa Parsons to the parties acknowledging CPM Klemke's comments regarding the reporting relationship of Ms. James' position and the AA 3 also reporting to his position.
9. May 16, 2014 email from Sarah Conly regarding DOC's view on the reporting relationships.
10. May 19, 2014 email from CPM Klemke with final remarks.