



**STATE OF WASHINGTON
OFFICE OF FINANCIAL MANAGEMENT**

STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM
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April 2, 2014

TO: Robin Ledbetter, Council Representative
Washington Federation of State Employees (WFSE)

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

SUBJECT: Julia Nation v. Green River Community College (GRCC)
Allocation Review Request ALLO-13-052

On January 7, 2014, I conducted a Director's review telephone conference regarding the allocation of Julia Nation's position. You and Ms. Nation were both present for the conference, and Barbara Iribarren, Human Resource Generalist, represented GRCC. Ms. Nation's supervisor, Denise Bennatts, Director of Enrollment Services/Registrar, also participated in the conference.

Director's Determination

This position review was based on the work performed for the six-month period prior to November 26, 2012, the date Ms. Nation submitted her request for a position review to GRCC's Human Resources (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. Nation's assigned duties and responsibilities, I conclude her position is properly allocated to the Credentials Evaluator 3 classification.

Background

On November 26, 2012, Ms. Nation completed a Position Review Request (PRR) asking that her Credentials Evaluator 3 position be reallocated to a higher level classification in the Program series (Exhibit B-1).

On June 21, 2013, Ms. Iribarren issued an allocation decision, concluding Ms. Nation's position best fit the Credentials Evaluator 3 definition. Specifically, she determined the duties and responsibilities assigned to Ms. Nation's position required her to specialize in the degree and certificate conferral evaluation process (Exhibit B-4).

On July 19, 2013, Ms. Nation requested a Director's review of GRCC's allocation determination.

Summary of Ms. Nation's Perspective

Ms. Nation asserts she independently processes graduation applications for degrees and certificates for the campus population of names ending in N-Z. She points out that this includes both foreign and domestic students. As such, Ms. Nation contends she has responsibility for receiving graduation applications evaluating student records against degree requirements, notifying students of their evaluation, and verifying that requirements have been met. In addition, Ms. Nation contends her position independently processes transcript evaluations for names ending in N-Z and that she determines whether incoming transcripts have the correct credentials and eligibility to transfer to GRCC. In performing these duties, Ms. Nation indicates that she researches and analyzes content to determine course equivalency with GRCC and creates and maintains course transfer tables that other staff, faculty, and advisors access as well. Ms. Nation further asserts she administers the Degree Audit Program data and creates individual degree and certificate parameters and performs programming and input into the Degree Audit Program. Ms. Nation states that she assists students, staff, faculty, and advisers with program requirements and ensures degree requirements are updated and maintained in the system every year. Overall, Ms. Nation contends her duties and responsibilities exceed the Credentials Evaluator 3 classification.

Summary of GRCC's Reasoning

GRCC asserts that Ms. Nation specializes in the degree and certificate conferral evaluation process and that she reviews and audits student course records and other information. GRCC acknowledges that Ms. Nation also performs duties related to the Degree Audit Program software and that she creates transfer tables. However, GRCC contends the majority of Ms. Nation's duties involve the evaluation of transcripts and processing of graduation applications. GRCC notes that her position has delegated authority to make program decisions, interpret state graduation requirements, evaluate courses content, and recommend changes to credentialing requirements. GRCC indicates that Ms. Nation's position works under general direction but asserts that overall program responsibility resides with her supervisor, Ms. Bennatts as the Director of Enrollment Services/Registrar. In total, GRCC contends the preponderance of her position's duties and responsibilities best align with the Credentials Evaluator 3 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

In summary, the Position Purpose on the PRR includes the following (Exhibit B-1):

- Design, implement and maintain a systematic process of evaluation of the student's academic history in order to certify award of degree and certificates.

- Research and approve prior learning credit through a wide variety of military, domestic, and international credentials across academic programs in accordance with state, college and accreditation requirements.
- Advise students regarding degree deficiencies and assist them in completing requirements.
- Advise prospective transfer students in the evaluation of incoming credits and consult with faculty departments and other institutions regarding academic programs and policies.
- Implement and manage the degree audit system by encoding and translating degree elements into computer language. This enables students and advisors to use analysis of records for advising purposes.
- Validate graduation requirements and authorize, under authority of the Registrar, student awards of academic degrees and diplomas.
- Produce SBCTC [State Board for Community and Technical Colleges] required reporting such as degree completers for state report card and achievement and college funding initiatives.

The following summarizes the specific job duties and tasks described on the PRR:

30% Evaluation of transcripts from other colleges/universities, which includes:

- Receiving and processing all incoming transcript evaluation requests for students with the last names N-Z.
- Determining the transferability of courses from other institutions based on content and comparison with GRCC courses.
- Notifying students of transferred-in course equivalencies.
- Meeting with students to discuss evaluations and problem solve.
- Determining accreditation of institutions attended as defined by the American Council on Education (ACE), verify authenticity of transcripts and interpret grades awarded on a wide variety of grading scales.
- Updating the course equivalency database for the application of electronic transfers.
- Interpreting domestic and international grading systems for evaluation of educational credentials.
- Maintaining evaluation tables in Records database and entering completion dates of transcript evaluation requests.
- Maintaining hard copy, computer and microfiche library of catalogues and course descriptions.
- Researching other college/university online catalogs.

30% Process graduation evaluations for all GRCC degrees and certificates, which includes:

- Receiving and processing all degree and certificate graduation requests for students with last names M-Z.
- Independently analyzing student's graduation status and determining correct degree and catalog year.
- Advising students of graduation status.

- Meeting with students to discuss degree requirements and advising on what actions to pursue.
 - Posting degree/certificate to student's transcript and mailing diploma to student.
 - Determining and processing code four and nine completers [certificates of completion] each quarter, which enhances GRCC's state report card and identifies program completion rates.
 - Maintaining degree certificate requirement information in Degree Audit Tool and maintaining graduation tables in Records database.
 - Assisting with training for staff/faculty on GRCC Degree Audit tool used in advising.
 - Tracking changes in programs of study.
 - Advising students, faculty and Educational Planners on transfer issues, program eligibility and student record inquiries.
- 20% Manage the Degree Audit Module for all transfer degrees, including proofing new catalog information, inputting degree parameters and requirements for each transfer degree, analyzing product output and making modifications, and troubleshooting problems campus wide.
- 10% Manage quarterly code-4 process, which includes running reports by program and quarter, developing and maintaining specific code-4 degree audit per program, running and analyzing each student's report against the degree audit, adding students to the graduation database, and posting students' certificate completions to their transcripts.
- 5% Enrollment Services tasks that include serving as Co-Chair on Exceptions Committee [when students petition a denial of transfer credits for a particular course or program], supervise part-time, hourly employees, troubleshoot registration and records problems, and assisting with student commencement.
- 5% Database management for enrollment services, including maintaining statistics for reporting purposes.

During the Director's review conference, Ms. Nation's supervisor, Denise Bennatts, explained her position's decision-making authority, which she also emphasized on the PRR. Ms. Bennatts indicated that Ms. Nation independently processes incoming transcript evaluations and determines transferability. She further indicated that Ms. Nation independently processes graduation evaluations for degrees and certificates, posting credits to student transcripts. Her duties involve researching, analyzing, and making determinations about student records such as course equivalencies for transfer students or whether or not students applying for graduation have met all requirements. Ms. Bennatts noted that GRCC was the first college "to go live with the SBCTC [State Board of Community and Technical Colleges] degree audit" and that Ms. Nation's position played an integral role in making the degree audit program successful. She further highlighted Ms. Nation's role in assisting with the advising process, providing necessary information to faculty, staff, international programs, educational planners, deans and students (Exhibit B-2, page 6). Ms. Bennatts and the Dean of Enrollment & Completion, Jessica Gilmore, both support reallocation of Ms. Nation's position (Exhibit A-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.

The **Program Specialist** class series concept states the following:

Positions in this series coordinate discrete, specialized programs consisting of specific components and tasks that are unique to a particular subject and are separate and distinguished from the main body of an organization. Positions coordinate program services and resources; act as a program liaison and provide consultation to program participants and outside entities regarding functions of the program; interpret, review and apply program specific policies, procedures and regulations; assess program needs; and develop courses of action to carry out program activities. Program coordination also requires performance of tasks and application of knowledge unique to the program and not transferable or applicable to other areas of the organization.

Examples of program areas may include, but are not limited to: business enterprises, fund raising, volunteer services, community resources, election administration and certification, juvenile delinquency prevention, recreational education and safety, energy education, aeronautic operations and safety, student housing, financial aid, and registration.

The **Program Specialist 2** definition states, in part, the following:

Positions at this level work under general supervision and plan, organize, direct and coordinate operations for programs such as the business enterprise, volunteer services and community resources, elections examination/administration programs. Incumbents oversee day-to-day program operations, function as the program representative and resource, have extensive contact with program participants and outside entities, and resolve problems within a delegated area of authority. . . .

The **Program Specialist 3** definition states, in part, the following:

Positions at this level work under general direction and typically have organization-wide program responsibility. For programs with statewide impact, incumbents are specialists who manage one component or assist higher levels in two or more components of the program. . . . components are comprised of specialized tasks (e.g., reservations, administration, and budget coordination) within a specialty program. Incumbents assist higher-level staff by coordinating all aspects of program services, providing technical assistance and specialized, consultation to program participants, staff and outside entities, and recommending resolution for complex problems and issues related to the program. Incumbents assess program participants' needs and develop specialized services and training unique to the program and are responsive to the needs of participants.

There are no distinguishing characteristics identified for either class.

In general, allocation to the program series requires an assignment of work that is unique and specific to a particular program but not work that is specifically described by another existing class specification. If there is a class that encompasses the body of work, allocation to the specific class must take primary consideration.

This is further supported by Personnel Resources Board (PRB) decisions in which the Board has concluded that 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. In Alvarez v. Olympic College, PRB No. R-ALLO-08-013 (2008), the Board held that “[w]hen 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 that specifically includes the position.” [See Mikitik v Depts. of Wildlife and Personnel, PAB No. A88-021 (1989)].

In this case, the Credentials Evaluator classes specifically address the body of work assigned to Ms. Nation's position. The overall scope of work and specific duties she performs specifically align with the Credentials Evaluator classes. For this reason, allocation of her position to the Program Specialist 2 or 3 classes is not the best fit.

The **Credentials Evaluator 1** class indicates the position “[e]valuates and processes education credentials for admission and/or graduation.”

At the **Credentials Evaluator 2** level, the position “[r]eviews, processes, evaluates, and approves a wide variety of credentials such as determining student admissibility or rejection, course transfer credit, course equivalency, class standing, graduation eligibility, and degree transfers.”

The **Credentials Evaluator 3** definition states the following:

Positions have responsibility for reviewing, analyzing and evaluating applicants for general or vocational teaching and administrative certificates, and approving or denying applicants' credentials; or have responsibility for evaluating a wide variety of education credentials for academic programs.

The Credentials Evaluator 3 distinguishing characteristics further describe the following:

Positions work under general direction and evaluate a wide variety of education credentials for academic programs, or evaluate applicants for general or vocational teaching and administrative certificates. Positions regularly assign, instruct and check the work of others or perform complex credentials evaluations work such as evaluating military documentation of test/training and international credentials. Positions have responsibility for approving or denying student admission and/or graduation, or issuance of teaching/administrative certificates.

The focus of Ms. Nation's position matches the definition and distinguishing characteristics of Credentials Evaluator 3 classification. Her position specializes in the degree and certificate conferral evaluation process at GRCC, and she reviews and audits student course records and other information. In that capacity, Ms. Nation conducts comprehensive reviews and audits of student course records prior to degree or certificate conferral, as well as transcripts and transfer

degrees from other colleges. This meets the distinguishing characteristic of evaluating "a wide variety of education credentials for academic programs."

Further, 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 following Credentials Evaluator 3 typical work statements further align with Ms. Nation's duties and responsibilities:

- Informs prospective students about eligibility and the application process including special academic programs; interprets and applies policies;
- Evaluates a wide variety of educational credentials for academic programs such as military tests/training documentation and international transcripts requiring knowledge of international grading systems;
- Determines applicant's level of education; determines accreditation of institution attended; interprets grades awarded on a wide variety of grading scales;
- Admits or denies student admission and/or determines graduation eligibility; advises students regarding the appeal procedure;
- Provides consultation for departments, students, other institutions, and the public on a variety of matters concerning admissions procedures and academic programs;
- Reviews and analyzes education and experience of applicants for general or vocational teaching and administrative certificates to determine eligibility; approves or denies issuance of certificate;
- Answers correspondence with educational and vocational institutions and individuals regarding evaluations and requests for information on certification requirements; approves difficult requests for renewal and restatement of certificates;
- Analyzes transcripts of college records of presently employed teachers and evaluates course content of both academic and education training courses;
- Recommends and formulates proposed changes in credential requirements.

The Personnel Resources Board has previously determined 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).

I recognize Ms. Nation performs valuable work, playing a key role in the degree audit program and developing processes to ensure correct transferability of course credits. She also ensures student transcripts are accurate and complete and degrees and certificates are properly awarded. It is clear Ms. Nation is an asset to the college, and her supervisor has highlighted the specialized knowledge, skills, and abilities required for her to perform her duties as a credentials evaluator. 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 scope of duties and responsibilities assigned to Ms. Nation's position specifically fit within the

Credentials Evaluator class series at the highest level. Therefore, her position best fits the Credentials Evaluator 3 classification.

Appeal Rights

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

An employee incumbent in a position at the time of its allocation or reallocation, or the agency utilizing the position, may appeal the allocation or reallocation to the Washington personnel resources board. Notice of such appeal must be filed in writing within thirty days of the action from which appeal is taken.

The mailing address for the Personnel Resources Board (PRB) is P.O. Box 40911, Olympia, Washington, 98504-0911. The PRB Office is located 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: Julia Nation
Barbara Iribarren, GRCC
Lisa Skriletz, SHR

Enclosure: List of Exhibits

JULIA NATION v GRCC
ALLO-13-052

A. Julia Nation Exhibits

1. Director's Review form received July 19, 2013 (3 pages)
2. J. Nation response to GRCC Determination (1 page)
3. Letter of Support from D. Bennatts and J. Gilmore (1 page)

B. GRCC Exhibits

1. Position Review Request (5 pages)
2. Position Review Request Supervisor page (1 page)
3. Registrar/Enrollment Services Organizational Chart
4. June 21, 2013 GRCC Internal determination statement (4 pages)

C. Class Specifications

1. Credentials Evaluator 3
2. Program Specialist 2
3. Program Specialist 3
4. Credentials Evaluator 1
5. Credentials Evaluator 2

D. Additional Document

1. Green River Community College Enrollment Services Records Department and International Programs: International High School Completion Procedures