STATE OF WASHINGTON
OFFICE OF FINANCIAL MANAGEMENT
STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM
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April 24, 2014

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

FROM: Kris Brophy, SPHR
Director's Review Program Investigator

SUBJECT: Maggie Edler v. Department of Corrections (DOC)
Allocation Review Request ALLO-13-054

This position review was based on the work performed for the twelve-month period prior to December 14, 2011, the date DOC HR at Coyote Ridge Correction Center (CRCC) received Ms. Edler's request for a position review. As the Director's Review Investigator, I carefully considered all of the documentation in the file, the exhibits, and the written comments provided by both parties. Based on my review and analysis of Ms. Edler's assigned duties and responsibilities, I conclude her position is properly allocated to the Corrections Specialist 1 (CS 1) classification**.**

Background

On December 14, 2011, DOC HR received Ms. Edler's Position Review Request (PRR), requesting that her Corrections Specialist 1 (CS 1) position be reallocated to Corrections Specialist 3 (CS 3) (Exhibit B-2).

DOC HR conducted a position review and notified Ms. Edler on June 19, 2013 that her position was properly allocated to the CS 1 class (Exhibit B-1).

On July 22, 2013, State Human Resources, OFM received Ms. Edler's request for a Director's review of DOC's allocation determination (Exhibit A-1).

On March 26, 2014, I conducted a Director's review telephone conference with Ms. Edler and Ms. Sarah Conly, Human Resource Consultant, DOC.

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

Ms. Edler is the Community Partnership Program Coordinator (CPPC) at CRCC. The purpose of her position is to plan, organize and direct community-based volunteer programs and volunteer staff in support of re-entry programming for the inmate population at the facility. Her position supports re-entry efforts, family friendly programs and other community-based volunteer-facilitated programs and activities. Ms. Edler performs a variety of programmatic and administrative tasks in support of these programs.

Ms. Edler describes her major job duties in the PRR (exhibit B-2) as follows:

25% I manage, supervise and recruit volunteers who serve in program areas. I am responsible for volunteer processing, recruiting, training, personnel issues and position description development. I am responsible for yearly evaluations and background check for every volunteer. I am required to create, sustain and support inter and inter-department collaborations. I am responsible for accurate entry into the callout system.

15% I am required to provide program promotion, web page maintenance, development of related operational memorandums, procedural development. I am required to collect data, compile reports, review reports, and facilitate a positive program environment for inmates and their families. I ensure [there are] adequate rooms and adequate supplies to run the program for the offenders.

10% I am responsible for the administration and requesting of Offender Betterment Funds for all re-entry and self help programs. I manage all program donations. I am responsible for proper maintenance of facilities and property of CRCC program areas.

10% I make presentations to community organizations (public and private) to promote community understanding, awareness and support of the Department Mission. I establish and maintain community Partnerships. I serve as the agency liaison with special interest groups, community organizations and community officials. I coordinate community service projects that may be conducted, designed delivered, or prepared for non-profit organizations for the benefit of the community. I serve on the local chamber of commerce boards and committee and promote the business of the agency and to facilitate re-entry efforts.

10% I coordinate and facilitate family friendly programs and activities. I oversee family friendly programs and ensure adequate and enriching programs and activities are provided that enhance offender re-entry and strengthen familial relationships. I assist in the design and development of standardized, family based programs. I coordinate special events and activities for volunteer and facility sanctioned programs with facility Religious, Recreation, Education or other staff. I coordinate conferences or meetings as appropriate. I submit program proposals for consideration through [the] Prison Administrator or Designee responsible for volunteer programs. I participate in the monthly Family Council.

10% I assist in the development and implementation of programs with the intended outcome of facilitating the re-entry and family reunification. I oversee community based volunteers to assist re-entry efforts. I work with Re-entry specialist, Community Corrections officers, Classification Counselors, Chaplains, Volunteers, Offender Families, and community members to support re-entry planning.

5% I develop, direct and promote new and existing offender programs through the utilization of volunteers or outside agencies for 2 separate facilities of the institution with offender count of approximately 2600. This includes evaluation of existing programs, research of programs and program development based on offender, facility and Department needs.

5% I plan, organize, and execute the Volunteer Appreciation Event.

5% Supervise Office Assistant who is shared by two other staff.

Supervisor's Comments

Mr. David Bailey, Associate Superintendent, completed the supervisor's portion of the PRR and indicates that Ms. Edler's description of her assigned duties and responsibilities is accurate and complete. In his comments, Mr. Bailey states that Ms. Edler has the authority to make decisions for the following without his prior review: "Budget development decisions related to family friendly activities; allocation of resources (volunteers, rooms, equipment, etc.) for accomplishing family friendly activities, offender diversity committee activities, etc."

He also indicates that CRCC is the largest prison in DOC with respect to the number of beds within the facility. He states that the volunteer program has hundreds of volunteers and Ms. Edler must schedule three of the same family friendly activities within two internal facilities to accommodate the demand within the CRCC.

Summary of Ms. Edler's Perspective

Ms. Edler asserts her position meets the requirements of the Definition of the CS 3 class by preparing comprehensive reports and making recommendations for management regarding volunteer reentry programming activities. She asserts her position performs senior level work by developing, coordinating and implementing various volunteer programs to increase the number of successful reentries of inmates to their families and communities.

Ms. Elder asserts she interprets and explains applicable laws, rules, regulations and policies to volunteers, inmates and staff; monitors program activities for compliance, and reviews and develops field instructions relevant to assigned program areas.

Ms. Edler asserts she establishes training goals and objectives and coordinates orientation and reorientation training for all volunteers. This includes scheduling training, arranging for trainers, preparing lesson plans and materials, evaluating training and trainers and maintaining training records and preparing reports as necessary.

For these reasons Ms. Edler asserts her position should be reallocated to the CS 3 class to more accurately reflect the level of responsibility and scope of duties in her position.

Ms. Edler also asserts determining the job class level at the CS 1 and CS 2 level based solely upon the number of volunteers at the facility is not appropriate for determining the scope and level of responsibility assigned to a position. Ms. Edler asserts that although the CPPC's perform the same general duties, the focus of each facility differs. Ms. Edler contends that while facilities with larger numbers of volunteers may focus much of their time on training and paperwork, those having less volunteers spend more time recruiting volunteers, supervising programs, gathering resources, managing larger family friendly programs, and performing more diverse functions.

During the review telephone conference Ms. Edler stated the size of the facility and/or the number of programs that are in place should also be considered when allocating a position to a level within the class series.

For these reasons Ms. Edler asserts the scope of her duties reach journey level responsibility and at a minimum her position should be reallocated to the CS 2 class level.

Summary of DOC's reasoning

DOC asserts there is no progression identified in this class series to the CS 3 level. DOC asserts the CS 3 class denotes positions which perform specialized duties associated with specific program areas identified in the definition of this class which does not include community involvement programs. DOC further asserts the sole allocating factor between the CS 2 and CS 1 level involving these programs is the number of volunteers participating at the facility.

DOC acknowledges that Ms. Edler is responsible for the CRCC community and citizen involvement program. She acts as the liaison between the community and the institution on community involvement issues and volunteer administration which includes recruitment, coordinating activities and events for volunteers and facility programs, providing training to volunteers, and maintaining records for approximately 417 volunteers. DOC acknowledges Ms. Edler's work developing new and existing offender programs through the use of volunteers, and that she is knowledgeable of applicable laws, rules, directives, policies, procedures and volunteer participation requirements.

DOC asserts that although the majority of her work includes planning, organizing, directing and managing multiple volunteers within two separate security perimeters; and that she coordinates, facilitates and develops family centered programs and activities within the facility and monitors program activities for compliance; the scope of her position falls within the CS 1 level class by having less than 500 registered volunteer staff working at the facility.

For these reasons, DOC contends Ms. Edler's position is properly allocated to the CS 1 level class.

Comparison of Duties

When comparing the assignment of work and level of responsibility to the available class specifications, the Class Series Concept (if one exists) followed by the 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.

Comparison of Duties to Correctional Specialist

The Class Series Concept for the Correctional Specialist series states:

> Within the Department of Corrections, is responsible for various correctional programs as assigned, such as community service activities, institutional training, classification and treatment programs, offender grievances, institutional hearings, roster management for major institutions, contracted chemical dependency treatment services, deaf inmate program services, auditing of correctional programs, HQ intelligence and investigations, canine or; administers an

> investigative/intelligence operation at a major institution. Some positions may supervise lower level staff.

Ms. Elder's position serves as the Community Partnership Program Coordinator (CPPC) at CRCC. Ms. Elder plans, organizes, directs and trains community-based programs and volunteer staff in support of re-entry programming for the inmate population at the facility. Ms. Edler performs a variety of programmatic and administrative tasks in support of these programs. Her position therefore falls within the scope of this class series.

Comparison of Duties to Correctional Specialist 3

The Definition for the Correction Specialist 3 class states:

> This is the senior, specialist, or lead worker level of the series. Within the Department of Corrections, develops, coordinates, implements and/or evaluates various correctional program(s) as assigned. Prepares comprehensive reports and makes recommendations for management, identifies and projects trends, and monitors program expenditures for adherence to budgeted allocations. Positions in this class perform professional level duties covering one or more of the following correctional program areas: institutional training, CORE, COACH, offender grievances, institutional hearings (e.g., disciplinary, intensive management, administrative segregation), roster management for major institutions; administers an investigative/intelligence operation at a major institution, which may include other regional and community involvement.

The State HR "*Glossary of Terms*" defines the following terms as follows:

> **Lead.** An employee who performs the same or similar duties as other employees in his/her work group and has the designated responsibility to regularly assign, instruct, and check the work of those employees on an ongoing basis.
>
> **Senior -** The performance of work requiring the consistent application of advanced knowledge and requiring a skilled and experienced practitioner to function independently. Senior-level work includes devising methods and processes to resolve complex or difficult issues that have broad potential impact. These issues typically involve competing interests, multiple clients, conflicting rules or practices, a range of possible solutions, or other elements that contribute to complexity. The senior-level has full authority to plan, prioritize, and handle all duties within an assigned area of responsibility. Senior-level employees require little supervision and their work is not typically checked by others.
>
> **Specialist** - Duties involve intensive application of knowledge and skills in a specific segment of an occupational area.

The focus and scope of Ms. Edler's position does not reach the primary allocating factor of the definition of performing professional level duties in one of the specified program areas. Positions allocated to this class serve in senior, specialist, or lead level positions developing, coordinating, implementing and/or evaluating one or more of the following specialized correctional program or operational areas: institutional training, CORE, COACH, offender grievances, institutional hearings, roster management for major institution, or administering investigative/intelligence operations at a major institution. In conjunction with these activities incumbents prepare comprehensive reports and make recommendations for management, identify and project trends, and monitor expenditures to budgeted allocations.

In addition, while typical work statements are not allocating criteria, they provide guidance on the level of work typically performed within a class. The typical work statements for the CS3 level describe performing higher level programmatic duties and activities relative to the assigned program function. For example, her position does not perform work that includes directing offender grievance processes, coordinating and directing in-service training for all institution staff which includes preparing Human Resource Development Plans; developing master rosters for a major institution in accordance with DOC Custody Staffing Models; planning, directing, coordinating and supervising all functions within an investigation/intelligence unit; conducting administrative segregation hearings, or conducting disciplinary hearings which includes recommending changes in offenders' custody and classification; coordinating Correctional Worker CORE programs within an assigned region, or coordinating COACH on-the-job training programs.

Further, the scope of her assigned duties and responsibilities and the level of her decision making authority do not reach senior-level responsibility as required. It is uncontested that Ms. Edler independently devises methods and processes and uses her knowledge of community involvement program activities to develop solutions to resolve generally routine and/or recurring problems. However, the majority of work that Ms. Edler performs does not fall within the scope of responsibility for devising methods and processes to resolve complex or difficult issues that have broad potential impact. She does not perform work at the senior level for the programs identified at the CS 3 level.

Further, the overall scope of Ms. Edler's duties and the majority of time that she spends performing her work does not require the intensive application of knowledge and skills in order to complete her work as a specialist as required at the CS 3 level.

In total, the scope of Ms. Edler's position does not meet the level or breadth of work described in the CS 3 class. She serves as the Coordinator for the CRCC's community and citizen involvement program. She acts as the liaison between the community and the institution on community involvement issues and volunteer administration which includes recruitment, coordinating activities and events for volunteers and facility programs, providing training to volunteers, and maintaining records for volunteers. Ms. Edler's work does include developing new and existing offender programs based on volunteer involvement, and she is knowledgeable of applicable laws, rules, directives, policies, procedures and volunteer participation requirements. However, the focus of her position and the scope of her assigned duties and level of responsibility for directing the community involvement program at CRCC are fully and more accurately described in the CS 1 and CS 2 level classes. The CS 1 and CS 2 level classes specifically address the primary thrust of her position and scope of work under review in this appeal.

For these reasons Ms. Edler' position should not be allocated to the CS 3 class.

<u>Comparison of duties to CS 2 and CS 1</u>

The definition for these two classes is identical in stating that incumbents have, "…Primary responsibility for acting as a liaison between the community and institution on community involvement issues, volunteer administration, which includes volunteer recruitment, providing technical assistance to staff and management on the use of volunteers, providing mandatory training to volunteers, maintaining records for accountability, coordinating projects utilizing community or offender volunteers, and preparing reports."

The primary distinction between the two levels is identified at the CS 1 level for performing entry level work for a community involvement program with 500 or less registered staff while at the CS 2 level incumbents perform journey level work for programs with 500 or more registered volunteers.

The scope of Ms. Edler's position involves a combination of these factors.

The State HR "*Glossary of Terms*" defines the following levels of work as follows:

> **Entry** - Performs beginning level work under close or direct supervision. Incumbents typically work within narrowly established guidelines and parameters. Duties are often repetitive and routine and decision-making is limited. Clear work directions and parameters are provided and outcomes are reviewed by higher levels.
>
> **Journey** - Fully competent and qualified in all aspects of a body of work and given broad/general guidance. Individuals can complete work assignments to standard under general supervision. Also referred to as the working or fully-qualified level.

Ms. Edler performs journey level work. She is fully competent and qualified in all aspects of her work coordinating the community involvement program at CRCC. She works under the general guidance of her supervisor and completes her work assignments independently under minimal supervision. This is fully supported in the comments provided by her supervisor, Mr. David Bailey, Associate Superintendent of CRCC. He indicates that Ms. Edler has independent decision making authority for budget development decisions related to the institution's family friendly activities. She also has authority to allocate resources within assigned budget allotments for accomplishing family friendly activities, and she independently directs and participates in offender diversity committee and other related activities. Further, Ms. Edler must schedule the same family friendly activities for three internal units located within two separate facilities to accommodate the demand within the CRCC. This breadth of responsibility is fully consistent with performing journey level work as the CPCC for the facility.

However, although the size of the facility and the number and scope of volunteer-facilitated programs in place at the facility are factors to consider, the CS 2 definition requires that incumbents perform work for programs with 500 or more registered volunteers. During the review telephone conference, Ms. Edler stated that during the review time period, while the number of registered volunteers working at CRCC was approximately 417, the actual number of volunteers participating in volunteer-facilitated offender programs was closer to 300 individuals which is less than the number required the CS 2 level of 500 registered volunteers.

Although the examples of work do not form the basis for allocation, they lend support to the work performed by that class. The following typical work statements provide examples of work performed by incumbents at the CS 2level:

> …
>
> Confers with and advises state and local agency officials on agency needs, activities, and problems pertaining to volunteers; interprets agency policies and procedures pertaining to volunteers to agency management, employees, local officials, and volunteers;

> Assists in the development and maintenance of an agency classification plan for volunteer positions and in the development of accurate volunteer job descriptions;
>
> Provides volunteer staff training in volunteer operations, volunteer utilization, volunteer relations, volunteer benefits, and risk management;
>
> …

Ms. Edler does not confer with and advise state and local agency officials on agency needs, activities, and problems pertaining to volunteers. She does interpret agency policies and explains policies and procedures pertaining to the volunteer program to agency management, employees, local officials, and volunteers. She also makes presentations to community organizations (public and private) to promote community understanding, awareness and support of the Department Mission. She serves on the local Chamber of Commerce boards and committee to promote the volunteer program and to facilitate the program's re-entry efforts.

She stated during the review telephone conference that she provided assistance to headquarters staff in developing and maintaining the agency classification plan for volunteer positions which includes developing accurate job descriptions for volunteer positions. She also indicated that she trains volunteer staff on volunteer operations, volunteer utilization, volunteer relations, volunteer benefits, and risk management issues.

In total, with the exception of conferring and advising state and local officials, Ms. Edler's position aligns with the typical work statements at the CS 2 level.

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. See 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. Allegri v. Washington State University, PAB Case No. ALLO-96-0026 (1998).

Based on the information provided and the discussion held during the Director's review telephone conference, it is clear Ms. Edler has an important role in coordinating the community involvement program at CRCC. However, a position review is not an evaluation of performance. Likewise, it does not reflect an individual's ability to perform higher-level duties. Rather, a position review is limited to the duties and responsibilities assigned to a position and how the majority of those duties best fit the available job classifications.

Ms. Edler's position meets the CS 2 level of responsibility by performing journey level work serving as the liaison between the community and institution on community involvement issues and providing volunteer administration, which includes volunteer recruitment, providing technical

assistance to staff and management on the use of volunteers, providing mandatory training to volunteers, maintaining records for accountability, coordinating projects utilizing community or offender volunteers, and preparing reports.

Although Ms. Edler's performs journey level work planning, organizing, directing and managing multiple volunteers in addition to coordinating, facilitating and developing family centered programs and activities within the facility, her position falls within the CS 1 level class by having less than 500 registered volunteer staff working at the facility. Therefore, her position does not fully meet the requirement of the CS 2 definition.

Therefore, based on the overall scope of her work, the CS 1 classification more accurately describes her position. However, if at such time in the future that the number of volunteer staff increases, it would be appropriate to consider allocating her position to that level given the scope of her responsibility for performing journey level work as a CPCC for the Coyote Ridge Correctional Center.

Ms. Edler's position should remain allocated to the CS 1 class.

Appeal Rights

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

> The mailing address for the Personnel Resources Board (PRB) is P.O. Box 40911, Olympia, WA 98504-0911. 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 PRB Office is located on the 4th floor of the Insurance Building, 302 Sid Snyder Avenue SW, Olympia, Washington, 98501-1342. 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: Maggie Edler, DOC
Sarah Conly, DOC
Lisa Skriletz, OFM

Enclosure: List of Exhibits

MAGGIE EDLER v DOC

ALLO-13-054

List of exhibits

A. Maggie Edler Exhibits
   1. Request for Director's Review received by State HR on July 22, 2013 (1 page)
   2. Copy of the Position Review Request form for Maggie Edler (8 pages)
   3. Copy of the Position Description form (PDF) signed by Maggie Edler on December 10, 2008 (6 pages)
   4. Document completed by Dawn Taylor and used by CPPC group to ask for reallocation for all CPPC position (2 pages)
   5. Copy of a proposed PDF for a Stafford Creek Correction Center CPPC position (8 pages)
   6. Copy of a proposed PDF for a generic CPPC position (6 pages)
   7. State HR class specification for Corrections Specialist 4, 350D (2 pages)
   8. State HR class specification for Program Specialist 4, 107K (2 pages)

B. DOC Exhibits
   1. Allocation determination letter from Sarah Conley, HRC to Maggie Edler dated June 19, 2013 (4 pages)
   2. Position Review Request form for Maggie Edler received by CRCC HR on December 14, 2011 (8 pages)
   3. Position Description form (PDF) on file for Maggie Edler's position signed and date on December 10, 2008 (6 pages)
   4. Associate Superintendent Programs Organizational Chart (1 page)
   5. State HR class specifications for Corrections Specialist Series 1-3 (5 pages)

C. Director's Exhibits
   1. State HR class specification for Correction Specialist 1, 350A
   2. State HR class specification for Correction Specialist 2, 350B
   3. State HR class specification for Correction Specialist 3, 350C