



STATE OF WASHINGTON
OFFICE OF FINANCIAL MANAGEMENT
STATE HUMAN RESOURCES | DIRECTOR'S REVIEW PROGRAM
P.O. Box 40911 · Olympia, WA 98504-0911 · (360) 407-4101 · FAX (360) 586-4694

June 30, 2014

TO: Dale Roberts, Council Representative
Washington Federation of State Employees (WFSE)

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

SUBJECT: Joshua Edwards v. Department of Health (DOH)
Allocation Review Request ALLO-13-059

On April 29, 2014, I conducted a Director's review conference regarding the allocation of Joshua Edwards' and Michael Hontz's positions. In addition to you, both Mr. Edwards and Mr. Hontz were present for the review conference. Human Resources Consultants Traci Black and Ron Key represented DOH and participated by telephone.

Director's Determination

This position review was based on the work described on Mr. Edwards' Position Description Form (PDF) submitted to DOH's Office of Human Resources on June 13, 2013. 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 Mr. Edwards' assigned duties and responsibilities, I conclude his position is properly allocated to the Forms & Records Analyst 1 (F&RA 1) classification.

Background

Mr. Edwards' position is assigned to the Scanning Unit within the Credentialing Section of the Customer Service Office in DOH's Health Systems Quality Assurance Division (HSQA) (Exhibits A-3 and B-3). On June 13, 2013, Tanya Mills, HSC3 Credentialing Supervisor, updated Mr. Edwards' PDF and requested his position be reallocated to the Forms & Records Analyst 1 (F&RA 1) classification (Exhibit B-2).

On July 9, 2013, Human Resources Consultant Stephanie Price notified Mr. Edwards that his position (#71031179) was being reallocated to the F&RA 1 classification (Exhibit B-1).

On August 8, 2013, Mr. Edwards requested a Director's review of DOH's allocation determination (Exhibit A-1).

Summary of Employees' (Edwards & Hontz) Perspective

The employees assert they perform daily responsibilities in support of higher-level credentialing staff by independently researching, analyzing, creating, and testing electronic and automated forms, digital signatures and use workflow application software for scanning documents. For example, the employees indicate they use Kofax scanning software, Nuance Personal Paperless Document Manager (PPDM), the integrated Licensing & Regulatory System (ILRS), Microsoft Office and Outlook in performing their assigned duties. The employees contend they independently make complex decisions using the PPDM and Kofax software to add, delete, create, combine and/or modify created electronic forms and records.

The employees assert their positions support higher-level credentialing staff by independently updating complex information and files, providing technical support, and maintaining accuracy of HSQA credentialing records. The employees contend they spend the majority of their work time reviewing and analyzing documents to ensure quality standards and compliance with established guidelines and practices. The employees point out that they have daily responsibilities for supporting documents and applications to maintain credentialing's 14-day turnaround time. The employees assert they perform their duties with very little supervision and that the overall duties and level of responsibility assigned to their positions best fit the F&RA 2 classification.

Summary of DOH's Reasoning

DOH asserts the primary focus of the employees' positions is to review and scan documents for the credentialing section and that the overall work is routine in nature. DOH contends the employees' positions do not have responsibility for interpreting the documents or making decisions about qualifications or certifications. Instead, DOH asserts the credentialing specialist positions handle issues related to an applicant or provider's qualifications. In addition, DOH contends the employees provide internal customer service to assist credentialing staff and other HSQA staff in support of the credentialing of qualified health care professionals and facilities. DOH contends the employees' positions are appropriately allocated to the F&RA 1 classification.

Rationale for Director's Determination

The purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which that work is performed. A position review is a comparison of the duties and responsibilities of a particular position to the available classification specifications. This review results in a determination of the class that best describes the overall duties and responsibilities of the position. Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

Duties and Responsibilities

The Position Objective for Mr. Edwards' PDF states, in part, the following:

. . . This position is responsible for performing work in support of credentialing within the centralized Credentialing section of the Customer Service Office within the DOH Health Systems Quality Assurance Division. Following guidelines, this position performs routine organizing, sorting, scanning, filing and indexing activities related to credentialing processes.

This position is closely linked to the Department's mission by performing activities in support of the credentialing of qualified health care providers, facilities and emergency medical personnel which tie directly to improving patient safety and fostering access to health care in Washington, important priorities for the Department of Health and Washington State.

Further, the majority of assigned work activities (60%) has also been described as performing "routine organizing, sorting, scanning, filing and indexing activities for credentialing applications and processes . . ." These duties are in support of the licensing of Health Professions, Emergency Medical Services (EMS) and Facilities credentialing functions. In summary, his position performs the following tasks:

- Receives, reviews, interprets and matches, sorts, collates, scans, indexes and processes health provider, EMS and facilities credentialing-related documentation, files records and application forms in a timely manner.
- Updates information, files, and maintains accuracy of HSQA credentialing information and records.
- Maintains filing systems and may contribute to the design of alternative, electronic systems to meet specialized credentialing application filing requirements.
- Provides technical support to higher level credentialing staff.
- Maintains the highest degree of accuracy and confidentiality in all aspects of work.
- Maintains a uniform filing system, both paper and electronic for in-process documents and long term storage.
- Assists in the transmittal, migration, reformatting, and disposition of documents, files and records.
- Assists higher level staff with the retrieval and inputting of information into system records.
- Assists higher level staff in the retrieval of records and/or requests to locate information, files or documents.
- Reviews work products for adherence to quality standards and compliance with established guidelines and practices.
- May identify potential opportunities for electronic, automated, and/or imaging technology and assist in performing analysis to determine the feasibility and/or benefits of converting information to alternate formats.

In addition, the PDF identifies 25% of Mr. Edwards' duties as providing written correspondence to customers, providers, employers, facilities, other jurisdictions and states that document the status of an individual applicant's Washington credential. During the Director's review

conference the parties clarified that Mr. Edwards and Mr. Hontz primarily provide internal customer service to assist credentialing specialists working with health care professionals.

The remaining duties on the PDF include supporting credentialing efforts to ensure timely reviews of provider applications by correctly identifying, locating, automating and producing critical credentialing documentation. Further, the PDF indicates that Mr. Edwards performs his duties under general supervision (Exhibit B-2).

During the Director's review conference, the employees emphasized that the three positions in the scanning unit work independently and resolve problems as a group before going to their supervisor. They also explained that at the time relevant to this review their positions had developed the processes the unit follows in scanning and processing credentialing documents. The employees explained that the documents are initially received by HUB staff and passed on to their unit for scanning. Prior to scanning, the employees prepare the documents and review them to ensure they contain required information such as an original signature or embossment. In addition, they indicated that they recognize certification requirements for particular health professions and point out information for credentialing and other staff and do not stamp documents as certified unless requirements are met. The employees provided examples of the documentation in exhibits A-4 through A-9.

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.

Although I considered the **Health Services Consultant 1 (HSC 1)** classification, which is the beginning level of the professional HSC series, I concluded the Forms & Records Analyst class series provided a better overall fit since Mr. Edwards' duties primarily involve work in support of credentialing records.

The **Forms & Records Analyst 2 (F&RA 2)** definition states, in part, the following:

Positions at this level provide consultation to managers and perform journey-level forms and/or records work such as analyzing manual, electronic and/or automated forms and/or records management problems, developing and implementing plans for rectifying system deficiencies, designing forms and coordinating forms production. Incumbents assist with and coordinate records retention, migration, transfer and disposition, utilize manual, electronic and/or automated systems, and provide consultation on forms and/or records management programs and system requirements. Incumbents conduct record inventories, assist with reviewing and updating record retention schedules and coordinate, retrieve information for and respond to public record requests.

I recognize the employees in the scanning unit perform their duties independently and process a large volume of documents, which includes verifying the documents contain all proper signatures and original information needed for certification. It is also clear the employees recognize important information to highlight to credentialing and other staff members as needed. However, F&RA 2 level work also encompasses duties such as consultation to management on

records-related issues. When considering the overall body of work, the majority of credentialing records fall within established guidelines and practices that are largely routine in nature. Therefore, when looking at the employees' duties and responsibilities as a whole, the majority of work best aligns with the F&RA 1 classification.

The **Forms & Records Analyst 1 (F&RA 1)** definition reads as follows:

Positions at this level provide assistance in all phases of manual, electronic and/or automated forms control, records management and/or public records disclosure. Incumbents work under the supervision of higher-level records and/or forms management staff. Incumbents follow established guidelines and perform tasks that are routine in nature and require the use of standard filing and indexing systems and related equipment and supplies. Decision-making authority is limited to choice of established methods or procedures and guidance is provided for new or unusual situations.

The majority of Mr. Edwards' assigned duties fit within the F&RA 1 definition. Mr. Edwards' assists the Credentialing Section in processing licensing applications, renewals and other related documentation by scanning records into DOH's Licensing & Regulatory System (ILRS). He organizes, sorts, reviews, and scans documents, creating electronic records that are then accessed by credentialing staff. In performing his duties, Mr. Edwards follows established guidelines, and his position's decision-making authority is limited to established methods and procedures.

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 F&RA 1 typical work examples that best align with Mr. Edwards' duties and level of responsibility include the following:

- Assists in the analysis of manual, electronic and/or automated filing systems and in the design of alternative systems . . . ;
- Assists in the development of agency/institution-wide uniform filing system;
- Participates in designing and revising . . . forms . . . processes forms orders . . . ;
- Assists in the transmittal, migration, reformatting . . . of records;
- Provides clerical and technical support to higher level records management staff;
- May identify potential applications of electronic, automated, micrographics and/or imaging technology and assist in performing analysis to determine the feasibility and/or benefits of converting information to alternative formats.

It is clear Mr. Edwards has gained knowledge about the credentialing and licensing of qualified health care professionals and facilities from reviewing, verifying, and processing numerous documents. DOH also commented on the importance of the work performed by the positions in the scanning unit. 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. Overall, the scope of duties and responsibilities assigned to Mr. Edwards' position best fit the Forms & Records Analyst 1 (F&RA 1) job 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 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: Joshua Edwards
Traci Black, DOH
Lisa Skriletz, SHR

Enclosure: List of Exhibits

JOSHUA EDWARDS v DOH
ALLO-13-059

A. Joshua Edwards Exhibits

1. Request for Director's Review
2. Position Reallocation Request and Appointment Status Decision from Agency
3. Org. Chart
4. Lincoln County
5. School Transcripts
6. School Completion Form
7. Example-Court Documents
8. Letter of Recommendation
9. Social Security Number Notification

B. DOH Exhibits

1. Allocation determination letter July 9, 2013
2. Position Description for Mr. Edwards's position received by HR June 13, 2013 with original reallocation request
3. Office of Customer Service Organizational Chart August 31, 2013
4. Classification Specification considered:
 - o Forms and Records Analyst 1
 - o Forms and Records Analyst 2
 - o Health Services Consultant 1

C. Class Specifications

1. Forms and Records Analyst 1
2. Forms and Records Analyst 2
3. Health Services Consultant 1