

**STATE OF WASHINGTON**  
**OFFICE OF FINANCIAL MANAGEMENT**  
STATE HUMAN RESOURCES | DIRECTOR'S REVIEW PROGRAM  
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September 2, 2014

TO: Connie Goff, PHR  
Rules and Appeals Section Chief

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

SUBJECT: Dawn Hawes v. Eastern Washington University (EWU)  
Allocation Review Request ALLO-13-087

This position review was based on the work performed for the six-month period prior to August 28, 2013, the date EWU Human Resources (EWU HR) received Ms. Hawes'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. Hawes's assigned duties and responsibilities, I conclude her position is properly allocated to the Program Coordinator classification.

**Background**

On August 28, 2013, EWU Human Resources (EWU HR) received Ms. Hawes's Position Review Request (PRR), requesting that her Program Coordinator position be reallocated to the Program Specialist 2 class (Exhibit B-5).

EWU HR conducted a position review and notified Ms. Hawes on October 25, 2013 that her position was properly allocated to the Program Coordinator class (Exhibit B-4).

On November 13, 2013, State Human Resources, OFM received Ms. Hawes's request for a Director's review of EWU's allocation determination (Exhibit A-1).

On August 7, 2014, I conducted a Director's review conference with Ms. Hawes. Also present for the conference were Ms. Kandys Dygert, Council Representative, WFSE; Mr. Dennis Wilson, Director, Student Financial Services, EWU; and Ms. Kim Wilson, Human Resource Associate, EWU HR.

**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. Hawes works in the Student Financial Services Office at EWU. Her position provides a variety of financial services and customer support activities for the office. Ms. Hawes's position has primary emphasis on supporting the services and resources of the Perkins Loan program. This includes providing guidance and direct support and assistance to program participants. She applies specific policies and procedures to ensure conformance with rules, regulations and program guidelines. She performs a variety of direct fiscal support such as processing payments, record keeping, and other related activities. She also provides direct customer service assistance to the Student and Financial Services and Records & Registration Offices. She answers questions and provides guidance to customers regarding financial accounts and registration, as well as online services including the Borrower Web Access, EagleNET, and the EWU Website.

Ms. Hawes's major job duties are summarized from the PRR (exhibit B-5) as follows:

#### 70% **Duty**

Independently Manage Perkins Loan Program

#### **Tasks**

Manage, assist and council program participants with program benefits. Program Benefits include but are not limited to:

##### 1) Concurrent Deferment/Cancellation

Approve or disapprove after establishing the participant's eligibility for benefit. Determine (1) date(s) when the loan was made and date when benefit regulation started, as eligibility from one participant to another differs (2) the participants employing agency is eligible and that (3) the participant's position is eligible. Research the agency online and/or contact the agency directly.

##### 2) Deferment and Default

Program participant(s) are not entitled to a deferment on a defaulted loan. Work with collections co-worker to decide what course of action to take to approve or disapprove. Council participant's regarding what course(s) of action they need to complete for eligibility for this benefit if disapproved as well as other types of deferment benefits.

##### 3) Maintaining In-school Enrollment Status v. In-school Deferment

To establish participant's eligibility for maintaining in-school enrollment status and/or in-school deferment: determine (1) time lapse between enrollment status (2) the participant's school must be an eligible school and that (3) the participant must be enrolled at least half time. The participant either submits a

verification of enrollment or I contact the National Student Clearinghouse.

4) Forbearance

Program participants are entitled to this benefit upon their request and in some cases providing supporting documentation. Verbal request for this benefit is also allowed. This benefit is for participants who are expecting financial hardship or poor health, or for other acceptable reasons.

5) Discharge Perkins Loans

Review applications for completeness. Assist, counsel, review, and submit applications to the appropriate agency (i.e. The Department of Education, Nelnet).

Provide information and technical assistance to program participants, staff and outside entities regarding program content, policies and activities and recommend different courses of action, promote the program with outside organizations and resources.

Confer regularly with staff and outside entities regarding the interpretation and implementation of program policies, participate in establishing program standards and identifying areas for program development.

Monitor program activities in relation to established program goals; within established program parameters, determine variances from program standards.

Analyze program participant operations and performances to program policies, procedures, practices and conformance with rules and regulations: provide assistance, counseling and/or instruction as needed.

Other Program Activities

Post payments and provide program participant with balance(s) such as; minimum payment amount, pay-off balance, total interest paid, etc.

Promissory Notes

- Review and Indicate Complete in Banner (ROASMRY) when completed. Counsel participant's when incomplete promissory notes are received.

Cancellation Processing (monthly)

- Run report in CLM, Export report to Excel Spreadsheet, filter, then print
- Review program participant's status; loan cancellation history, and loan deferment history. Determine % of cancellation and then apply to student loan account.

Print and Mail

- Invoice – Bills (monthly)
- Benefit Mail (monthly)
- Invoice – Due Diligence (monthly)

Run Batch Satisfactions (monthly)

- Run report in CLM, Print report, Print letters, fold, stuff and mail.
- Pull file(s) and Original Promissory Notes – file them in PIF

Process name changes via reports received from both the Payroll Office and the Records & Registration Office. Also, via receipt of notice from program participants.

Exit Interview Reports (weekly +)

- Pull report and Remove hold in CLM

Note receipt of Truth in Lending Disclosure and Checklist  
Set-up ACH Payments in CLM

Borrower Web Access – Assist and Advise with navigation and other inquiries. Also Perkins Payments through EagleNET and other information of SFS/EWU Website.

10% **Duty**

Customer Services, Student Financial Services (This function is shared equally with three co-workers)

**Tasks**

Process Payments

- Student Accounts; current, perspective & alumni, EWU Employees & Departments and Community Members

Post payments in Banner:

- Student Accounts (TSASPAY)
- Department Accounts (TFAMISC)
- Housing Department Deposit account (TSAMASS)

Short Term Loans

- Review Applications, Approve or Deny and Assist & Counsel Student

Create ID numbers (GOAMTCH & GUIALTI):

- New Students
- Community members
- Running Start Teachers – Solely responsible for creating ID numbers

Assist & Counsel customers with:

- 1098T Tax Forms (TSATAXN)
- Late Payment & Short Term Loan Fee Waiver Request Forms
- Refund Request Forms
- Affidavit for Lost or Stolen Checks Forms

Rockwood Clinic

- Verify Comprehensive Health Fee Charges

Holds

- Clear Financial Holds
  - Memo (TSADETL)
  - Transcript (SOAHOLD)
  - Registration (SOAHOLD)

Student Attribute (SGASADD)

- Enter and/or remove student attribute
  - Off-Campus Students (TOFF)
  - EWU Employees (TETW)

EagleNET & EWU Website

- Assist and Counsel with navigation and other inquiries from customers.

Assist and Counsel from the list above as well as other miscellaneous inquiries. Problem solve, audit accounts, correct mistakes, explain, etc.

10% **Duty**

Customer Service, Records & Registration (This function is share equally with three co-workers)

**Tasks**

Process Registration Request for Students and EWU Employees – Register, Add, Drop, Withdrawal, Credit Over-ride (19-credits +)

Review, Collect & Enter; Release of Information Forms, Review Form and Note on account (SPACMNT)

Review and Collect; Undergraduate Graduation Application, Course Repeat Forms, Name Change/Student Update Forms

Review Transcript Request Form, check student account for transcript hold and then process payment or advise student of hold

Review, Advise, Explain, Problem solve registration inquiries using: SFASTCA – Student Course Registration Audit, SSADETL – Schedule Detail, SFARHST – Student History and Extension, SFASRPO – Student Registration Permit-Override, SHACRSE – Course Summary, SFAFAUD – Registration Fee Assessment Audit History, SHATCKN - Course Maintenance, SHAINST – Short Term Course Maintenance, SHATERM – Term Sequence Course History, etc.

Assist and Counsel from the list above as well as other miscellaneous inquiries. Problem solve, audit, correct mistakes, explain, etc.

Supervisor's Comments

Mr. Stewart Maxson, Associate Director, Student Financial Services completed the Supervisor's Portion of the PRR (Exhibit B-6). Mr. Maxson disagrees that Ms. Hawes's description of her assigned duties and responsibilities is fully accurate and complete.

Mr. Maxson states that Ms. Hawes is not solely responsible for providing consultation to Perkins Loan Program participants as he and another staff member also provide assistance. He states

that Ms. Hawes uses independent judgment in recurring situations within her program and is not responsible for auditing but rather reviewing accounts for errors and explaining transactions to students and others. He also disagrees that Ms. Hawes spends approximately 70% of her time performing tasks for the Perkins Program. He believes that Ms. Hawes may spend up to 50% of her time performing this work during cyclical peak periods, but the duration is relatively short.

Mr. Maxson states that the decisions Ms. Hawes makes about the Perkins Loan program are done following the guidelines outlined in the FSA Handbook, and she must consult with her supervisor for situations that are new or unclear.

He also states that Ms. Hawes does not have authorization for expenditures but does receipt funds from students and has responsibility for her change fund. He indicates that she can approve short-term loans when the student-borrower meets all approval criteria. She also processes Perkins Loan cancellations in accordance with the FSA Handbook's guidelines and regulations.

### **Summary of Ms. Hawes's Perspective**

Ms. Hawes asserts her position serves as the administrator for the Perkins Loan Program. She states in her comments that the Perkins financial aid program is a discrete program with specialized functions and activities which separate it from the main body of the University. She asserts she has independent responsibility for planning, organizing, directing and coordinating operations and performing other duties consistent with the Program Specialist 2 class. This includes having sole responsibility for providing consultation to program participants, serving as the program's liaison, exercising independent judgment in interpreting and applying program specific policies and procedures and resolving problems.

Ms. Hawes asserts she performs similar level duties to a co-worker who works the Collections Program who is allocated to the Program Specialist 2 class.

Ms. Hawes asserts her position should be reallocated to the Program Specialist 2 class.

In Byrnes v. Dept's of Personnel and Corrections, PRB No. R-ALLO-06-005 (2006), the Board held that "[w]hile a comparison of one position to another similar position may be useful in gaining a better understanding of the duties performed by and the level of responsibility assigned to an incumbent, allocation of a position must be based on the overall duties and responsibilities assigned to an individual position compared to the existing classifications. The allocation or misallocation of a similar position is not a determining factor in the appropriate allocation of a position." Citing to Flahaut v. Dept's of Personnel and Labor and Industries, PAB No. ALLO 96-0009 (1996).

### **Summary of EWU's reasoning**

EWU asserts Ms. Hawes' position does not perform the essential functions of the Program Specialist 2 class.

EWU contends the Perkins Loan Program does not constitute a discrete program with separate specialized functions and activities that separate it from main body of the University as a whole. EWU asserts the Perkins Loan Program functions within the Student Financial Services Office. EWU asserts the level of the program's functions, services and activities are similar to that of the other student financial services and activities provided by the office. In addition, EWU asserts the scope of Ms. Hawes's position duties do not reach the overall scope of responsibility

for planning, organizing, directing and coordinating the program at a level anticipated by the PS 2 class.

EWU asserts Ms. Hawes's position meets the Definition and Distinguishing Characteristics of the Program Coordinator classification by working under general direction and coordinating activities in support of the Perkins Loan Program as well as the other customer service and related financial services support she provides to the department. She exercises independent judgment in interpreting and applying rules, policies and procedures related to coordinating administrative processes and procedures for the duties she performs.

For these reasons, EWU asserts Ms. Hawes's position is properly allocated to the Program Coordinator 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 Program Specialist 2

The Class Series Concept for the Program Specialist 2 states:

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 Definition for Program Specialist 2 states:

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. Unusual problems, probable outcomes and solutions are presented to higher levels for resolution. Incumbents may be

delegated limited authority to approve budget expenditures and may assist higher-level staff with developing and coordinating statewide program activities.

First, the Perkins Loan Program does not reach the organizational size and scope of program operations anticipated by this class. The Student Financial Services Office provides a variety of student financial and customer service related activities. Perkins Loan processing is one of several program functions supported by the office. As such, the Perkins loan processing function does not fully constitute a separate program with specialized functions and discrete activities which separate it from main body of the University as required.

In addition, positions at this level have independent responsibility for planning, organizing, directing and coordinating program operations. Ms. Hawes does not have this level of responsibility. Incumbents coordinate services and resources, assess program needs, and develop courses of action to carry out program functions and activities. The duties Ms. Hawes performs do not include responsibility for planning, organizing, directing the operations of the program as a whole.

For example, the duties Ms. Hawes performs are technical and supportive in nature to the Perkins Loan program services. Ms. Hawes's position does not have full, independent responsibility for reviewing and applying program specific policies, procedures and regulations, assessing program needs and developing courses of action or resolving problems in order to carry out program activities. Mr. Maxson indicated he has ultimate responsibility for addressing and resolving programmatic issues and problems that arise. Mr. Maxson stated in his comments that Ms. Hawes supports the Perkins program but is not solely responsible for providing consultation to Perkins Loan Program participants as he and another staff member also provide assistance. Ms. Hawes exercises independent judgment to address generally recurring situations and reviews accounts for errors and explaining transactions to students and others. The decisions Ms. Hawes makes about the Perkins Loan program are done following the guidelines outlined in the FSA Handbook and she must consult with her supervisor for situations that are new or unclear.

Ms. Hawes does not have authorization for expenditures but does receipt funds from students and has responsibility for her change fund. She can approve short-term loans when the student-borrower meets all approval criteria. She also processes Perkins Loan cancellations in accordance with the FSA Handbook's guidelines and regulations.

Therefore, while Ms. Hawes has responsibility for performing a variety of specialized technical and clerical support activities for the Perkins Loan program, the overall scope of the activities and functions she performs are generally recurring and more routine in nature. This includes posting payments, reviewing promissory notes, processing loan cancellations and payment deferments, providing enrollment verifications, invoicing bills, assisting and counseling students, and performing other related duties.

In total, her overall scope and level of responsibility for directing the activities of the Perkins Loan processing function do not reach the Program Specialist 2 level responsibility.

For each of these reasons her position should not be allocated to the Program Specialist 2 class.

Comparison of Duties to Program Coordinator

The Definition for the Program Coordinator classification states: “[c]oordinate the operation of a specialized or technical program.”

The Distinguishing Characteristics for the Program Coordinator classification state:

Under general direction, perform work using knowledge and experience specific to the program. Exercise independent judgment in interpreting and applying rules and regulations. Independently advise students, staff, program participants and/or the public regarding program content, policies, procedures and activities; select/ recommend alternative courses of action and either:

(1) Project, monitor, maintain, initiate and/or approve expenditures on program budgets

OR

(2) Have extensive involvement with students, staff, the public and/or agencies in carrying out program activities, and coordinate, schedule and monitor program activities to determine consistency with program goals.

Ms. Hawes's position meets the Definition and Distinguishing Characteristics of the Program Coordinator classification.

Ms. Hawes works under general direction and has primary responsibility within her unit to coordinate and provide direct technical support to the department's Perkins Loan servicing and resource activities. She uses her specialized knowledge to independently coordinate and carry out daily fiscal processing and office support activities for the program. She exercises independent judgment in interpreting and applying rules, policies and procedures related to administrative processes and procedures.

Ms. Hawes has extensive contact with on-campus students and staff in carrying out program activities. She independently advises students, staff, program participants and/or the public regarding the Perkins Loan Program policies, processes and procedures.

Additionally Ms. Hawes performs a variety of specialized technical and clerical tasks in support of the program. This includes such activities as assisting and counseling program participants regarding program benefits and determining and approving eligibility. She also processes a variety of actions such as deferments and defaults, maintaining in-school enrollment status, discharging loans, and performing related activities such as processing cancellations, posting payments and providing participants with balances and other information.

Ms. Hawes's principal responsibility is to provide specialized administrative fiscal and clerical support to the Perkins Loan Program. Ms. Hawes acts as a resource to assist in coordinating and processing daily work flow activities needed to carry out the program's fiscal and related clerical support activities for loan participants. This overall level of responsibility and decision making authority, as well as responsibility for coordinating the technical processes for the Perkins Loan fit most appropriately within the Program Coordinator classification.

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 this case, the majority of the duties assigned to Ms. Hawes's position and her level of responsibility and delegated authority are best described by the Program Coordinator classification. Her position should remain allocated to the Program Coordinator Class.

### **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:     Kandys Dygert, WFSE  
       Dawn Hawes  
       Kim Davis, EWU HR  
       Lisa Skriletz, OFM

Enclosure: List of Exhibits

**DAWN HAWES v EWU**  
**ALLO-13-087**

List of Exhibits

A. Dawn Hawes Exhibits

1. Director's Review Form received November 13, 2013 (2 pages)
  - PRR Employee Portion
  - October 25, 2013 EWU allocation determination memo
2. Perkins Loan information
3. Examples of Perkins Loan emails Processing such as promissory notes
4. Examples of Veterans' disability discharge and discharging of loan
5. Examples of more Veterans' loan issues
6. Documentation of increasing number of accounts/loans
7. Examples of financial services office emails

B. EWU Exhibits

1. Allocation determination letter to employee dated October 25, 2013.
2. Job description relevant to the audit period.
3. Current organizational chart.
4. Allocation determination letter to Vice President for Business and Finance dated October 25, 2013.
5. Position Review Request- Employee Portion with attached documents received in Human Resource Services on 8/28/13.
6. Position Review Request- Supervisor Portion filled out by supervisor, Stewart Maxson, Associate Director for Student Financial Services, received 9/13/13.
7. Notes taken by Kim Davis from interview with Dawn Hawes on 9/24/13.
8. Email from Dawn Hawes with additional information received on 10/9/13.
9. Notes taken from interview with supervisor, Stewart Maxson, on 10/10/13.
10. State of Washington Class Specifications for Program Coordinator and Program Specialist 2.
11. Allocation determination letter to Dawn Hawes dated 3/27/13 [referenced in the body of the 10/25/13 allocation determination letter.]
12. Position Review Request- Employee Portion with attached documents received in Human Resource Services on 1/29/13. [referenced in the body of the 10/25/13 allocation determination letter.]

C. Class Specifications

1. State HR class specification for Program Coordinator, 107N
2. State HR class specification for Program Specialist 2, 107I