



**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

December 9, 2014

TO: Connie Goff, PHR
Director's Review Program Manager

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

SUBJECT: Catherine Howell v. Department of Labor and Industries (LNI)
Allocation Review Request ALLO-13-114

Director's Determination

This position review was based on the work performed for the six-month period prior to July 24, 2013, the date the LNI Human Resources Office (LNI HR) received Catherine Howell's request for a position review. As the Director's designee, I carefully considered all of the documentation in the file, the exhibits presented during the Director's review conference, and the verbal comments provided by both parties. Based on my review and analysis of Ms. Howell's assigned duties and responsibilities, I conclude her position should be reallocated to the Information Technology Specialist 5 (ITS 5) classification.

Background

On July 24, 2013, LNI HR received a Position Review Request (PRR) from Ms. Howell requesting reallocation of her position to the Information Technology Specialist 5 (ITS 5) classification.

On December 2, 2013, LNI issued its allocation decision, concluding the Medical Program Specialist 3 class best described the duties and responsibilities assigned to Ms. Howell's position (Exhibit B-1).

On October 21, 2013, I conducted a Director's review conference with Catherine Howell, Manager, HSA Technical Operations; John Hanson, Applications & Data Management Program Manager, Information Services Division (ISD), LNI; Vicki Kamin, Classification/Compensation

Coordinator, LNI. Also present to observe were Sarah Nelson, Human Resource Consultant, LNI, and Ms. Cheri Willhide, HR Development Coordinator, State HR, OFM.

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. Howell is the Manager for the Healthcare Technical Operations (HTO) unit located within the Health Services Analysis (HSA) program of the Insurance Services Division of LNI. Ms. Howell supervises five professional ITS 4 and three ITS 3 positions. During the review period Ms. Howell reported to Janet Peterson, HSA Program Manager.

As stated in the Position Description Form (PDF) on file for her position (exhibit B-3), the primary role of the HTO unit is to:

...define business system requirements for systems and technology changes that help Health Services Analysis control medical costs, operate effective and accurate payment systems, enhance customer service, ensure effective oversight of health services, and reduce administrative burdens. HTO staff also assist with service request implementation and system maintenance through testing, documentation, troubleshooting, business continuity planning, and customer support for Electronic Billing. The unit has a lead role within Insurance Services for issues related to the statewide medical information payment system (MIPS), the pharmacy point-of-sale system (IMPOS), and Provider Express Billing (PEB). These also include components to manage and support the list of providers who are authorized to treat injured workers and crime victims...MIPS enhancements play a critical part in LNI strategic initiatives related to improving injured workers' access to quality care and overall efficiency in managing workers compensation claims.

Ms. Howell describes her major job duties in the Position Review Request Form for her position as follows: (Exhibit B-2)

- 65% Project leader for complex, mission critical and highly visible MIPS/MPOS technical projects, responsible for developing, maintaining and monitoring project plans and schedules, assigning project tasks, leading project staff, scheduling and facilitating project meetings, developing implementation scripts, coordinating design and testing.

Coordinates implementation of service requests/projects, system enhancements and maintenance to MIPS/MPOS/VISTAR, PEB/Electronic Billing and numerous interfaces (LINIIS, IVR, ARC and Data Warehouse) with senior information Technology management, management and senior level ITS 4's and ITS 3's,

Insurance Services IT, and across business areas - technical Insurance programmers/contractors, Insurance Services Technical Support (ISTS), Provider Credentialing & Compliance, Audit, Self-Insurance, Crime Victims, Legal Services, Claims, Office of the Medical Director, Department of Enterprise Services (DES), Internal Revenue Service, Consolidated Mail Services (CMS) along with private companies (VISTAR).

Provide Information Technology Specialist project management leadership, technical expertise and understanding knowledge of project management practices, principles, and skills.

Plans, directs and organizes, monitors and coordinates the enhancement, maintenance, development and implementation of MIPS/MPOS/VISTAR/PEB/VISTAR/FAD/Electronic Billing and interface system LINNIS.

Research, analyze, troubleshoot system problems/issues and make recommendations to a resolution or enhancement to MIPS/MPOS/VISTAR/PEB/VISTAR/FAD/Electronic Billing and interface system LINNIS,IVR,ARC and Data Warehouse).

Few of the functions this position performs on a regular basis:

- System development, analysis, testing, system parameters/edits;
- System requirements, system functionality;
- Research/analyze Senate & House Bill legislative affects to MIPS, MPOS and Electronic Billing;
- System/bill analysis, consultations (internal & external customers), support training, and documentation;
- Liaison between/across business areas;
- System interactions/compatibility/ability and it's affects/effects;
- Timelines/deadlines of system needs/modifications;
- Issues, problems, concerns between systems
- System modification/implementation implications/benefits.

Analyze and assess agency/industry direction and analyze new capabilities that may be applied to the agency. Evaluates new products, document product capabilities, and makes recommendation such as VISTAR;

Support, maintain, and enhance existing applications. Analyze and resolve very complex problems such as multiple product (VISTAR/Finalist)/system problems, analysis, or major conflicts caused by a new software version or modifications to current software;

Analyze system recovery scenarios and develops on-site backup requirements (disaster recover). Define and implement on-site backup and recovery procedures

and schedules;

Review project data for compliance with internal and external agency/government rules/policies. Develop training plans and train staff in modifications/enhancements; consult with information technology staff/programmers regarding business rules, data integrity, location and use of data;

Direct system testing and other testing depending on complexity, risk and impact of enhancements/modifications/implementation of new;

Direct quality assurance efforts. Develop and issue standards and processes including reporting, testing, and evaluation;

Direct policy implementation. Implement technical policies;

Assist in project charters, requests for proposals, and evaluates re[s]po[n]ses for major systems (MIPS/MPOS/VISTAR/PEB/VISTAR/FAD/Electronic Billing).

Assist in feasibility studies, acquisition plans, and decision packages for high visibility/impact initiatives;

Assist in developing/writing service-level agreements with clients and vendors. Develops measures and monitoring methods. Prepares reports;

Modify and supports pre-production environments such as test, demo, and production runs for MIPS/MPOS/VISTAR/PEB/VISTAR/FAD/Electronic Billing;

Lead problem solving teams in large operation area/projects. Evaluates problem-solving methodologies and facilitates adoption of a methodology.

35% Develop and analyze test scripts, test plans, test conditions and perform testing of major to minor system software modifications/enhancements;

Evaluate and write Performance Planning and Appraisal form for ITS 3's and ITS 4's;

Provide mentoring, coaching and guidance toward future expectations and goals of the team and team members;

Develop Position Descriptions for HTO ITS staff;

Approve leave and training requests;

Develop reports for operational purposes as needed;

Conduct one on one status meetings with ITS 3's and ITS 4's;

Lead or participate on interview panels for filling vacancies in HTO and other business areas;

In the Supervisor Review section of the PRR, Ms. Peterson indicates that Ms. Howell's description of her assigned duties and responsibilities is accurate and complete. In her comments, Ms. Peterson states that Ms. Howell has decision making authority for scheduling service requests for system enhancements, developing testing plans and approving releases into production.

Summary of Ms. Howell's Perspective

Ms. Howell asserts her position reaches the ITS 5 level class by serving as the Manager for the HTO within the Health Services Analysis program. She asserts that in this role she serves as the project leader for complex, mission critical and highly visible MIPS/MPOS technical projects for her division. She asserts that she coordinates the implementation of service requests, system enhancements and maintenance activities with IS management, senior level IT specialists and business owners across the division and ISD. Ms. Howell asserts that MIPS is a mission-critical system for the agency. She contends it is a high-risk/high impact, large-scale application with agency-wide impact.

Ms. Howell asserts her position requires extensive knowledge of the MIPS, MIPOS, PEB, Find-a-DOC website, VISTAR, and Electronic Billing systems. She contends this knowledge is crucial as her position tests/analyzes, resolves issues, analyzes impacts to other systems, consults and guides staff and other business areas regarding system functions and its interactions with agency-wide, mission-critical systems such as LINIIS, IVR, ARC and Data Warehouse.

Ms. Howell asserts the level of her decision-making authority, level of responsibility for serving as the HTO expert for system upgrades, enhancements and other projects, representing the Unit on her supervisor's behalf at various meetings, and providing and reporting information to her supervisor is consistent with the level of reporting required at the ITS 5 level.

Summary of LNI's Reasoning

LNI asserts the overall level and scope of duties and responsibilities assigned to Ms. Howell's position does not reach the ITS 5 level of responsibility.

LNI asserts ITS 5 positions within LNI are generally located within the ISD and serve as experts who focus on the agency's most complex, highly-technical IT functions.

LNI contends Ms. Howell's position has primary responsibility for providing technical support to division-level business processes for the HSA. LNI asserts Ms. Howell's position is responsible for identifying and implementing business change processes for the HSA which includes identifying and developing project plans and business requirements, troubleshooting issues, conducting final acceptance testing, and validating the acceptance of changes for the MIPS and related application systems. In contrast, LNI asserts there is an ITS 5 employee located within the ISD that has primary responsibility for performing the technical application development work related to the change process such as designing, coding, and performing other advanced application development tasks for the MIPS application system as a whole. This position also has responsibility for the overall functionality of the MIPS which includes serving as project leader for MIPS technical projects.

Therefore, LNI asserts Ms. Howell's position serves as a senior-level IT specialist, responsible for developing, enhancing and maintaining the MIPS application primarily through service requests. Therefore, the scope of her work and the majority of her assignments are moderate in size and impact the business functions within the HSA which is generally consistent with ITS 4 level responsibility.

However, LNI asserts Ms. Howell's position is best described by the Medical Program Specialist 3 class. LNI states that Ms. Howell's position serves as the interface between the functional

area of Health Services analysis and the technical staff in IS/Applications and Data Management EAS/MIPS. LNI asserts the MPS 3 class is the proper allocation because her position requires the knowledge and understanding of the HSA Health Care cost containment programs as well as the MIPS application system and how it interacts with the agency's technology systems in order to provide adequate support to the HSA program.

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 Medical Program Specialist 3

The Definition for this class states:

Directs and supervises a unit comprised of three or more professional staff engaged in the review, analysis, monitoring, and/or operation of health care cost containment programs; or, manages and directs the development of statewide health care initiatives and long-term purchasing improvement projects to ensure injured workers' access to quality care.

All positions in this classification are responsible for providing consultative expertise regarding health care cost containment programs to top-level managers.

Ms. Howell's position does not supervise professional staff engaged in performing work involving health care cost containment programs. Ms. Howell supervises a unit of professional Information Technology specialists who provide professional information technology support for the HSA. The focus of Ms. Howell's work consists of defining business requirements for system and technology changes to the agency's medical information payment system. Ms. Howell does not manage and direct the development of statewide health care initiatives or long-term purchasing improvement projects, nor does she provide consultative expertise regarding health care cost containment programs to management staff.

Ms. Howell's position does not meet any of the primary allocating criteria of this class and her position should not be allocated to the Medical Program Specialist 3 class.

Comparison of Duties to Information Technology series

The Class Series Concept for the Information Technology series states in relevant part:

Positions in this category perform professional information technology systems and/or applications support for client applications, databases, computer hardware and software products, network infrastructure equipment, or telecommunications software or hardware.

This category broadly describes positions in one or more information technology disciplines such as: Application Development and Maintenance, Application Testing, Capacity Planning, Business Analysis and/or Process Re-Engineering...IT Project Management, Systems Software, Web Development, or Voice Communications.

Ms. Howell's position supervises staff in addition to performing professional technology business analysis and process reengineering tasks and application testing support functions for the HTO within the HSA. Her position closely aligns with the Information Technology series and should be allocated to a class within that series.

Comparison of Duties to Information Technology Specialist 4.

The Definition for this class states:

Performs analysis, system design, acquisition, installation, maintenance, programming, project management, quality assurance, troubleshooting, problem resolution, and/or consulting tasks for complex computing system, application, data access/retrieval, multi-functional databases or database management systems, telecommunication, project or operational problems.

As a senior-level specialist in an assigned area of responsibility and/or as a team or project leader, applies advanced technical knowledge and considerable discretion to evaluate and resolve complex tasks such as planning and directing large-scale projects; conducting capacity planning; designing multiple-server systems; directing or facilitating the installation of complex systems, hardware, software, application interfaces, or applications; developing and implementing quality assurance testing and performance monitoring; planning, administering, and coordinating organization-wide information technology training; acting as a liaison on the development of applications; representing institution-wide computing and/or telecommunication standards and philosophy at meetings; or developing security policies and standards.

Incumbents understand the customer's business from the perspective of a senior business person and are conversant in the customer's business language. Projects assigned to this level impact geographical groupings of offices/facilities, and/or regional, divisional, or multiple business units with multiple functions. The majority of tasks performed have wide-area impact, integrate new technology, and/or affect how the mission is accomplished.

The overall level of Ms. Howell's supervisory responsibility, decision-making authority, and her level of responsibility for serving as the HTO expert for system upgrades, enhancements and other projects reaches beyond the requirements of this class. Her duties extend beyond division-level responsibility to also include working with staff throughout other divisions including Insurance Services and Administrative Services to coordinate information and business process requirements which pass information from MIPS to other LNI systems. She also participates on initiatives that affect multiple systems areas, and provides expert consultation on system impacts of policy changes.

Further, Ms. Howell performs expert-level IT work supervising senior-level and other professional information technology staff who provide support to the MIPS application system.

Ms. Howell is responsible for ensuring all aspects of usability testing and integration and production environments run appropriately, and to troubleshoot and resolve issues and coordinate with other agency resources and groups as necessary to resolve issues. The overall scope of her work and the majority of her assignments impact business functions extend beyond the division level which exceeds ITS 4 level responsibility.

Based on the level, scope and diversity of the overall duties and responsibilities assigned to Ms. Howell's position, her position should not be reallocated to the ITS 4 classification.

Comparison of Duties to Information Technology Specialist 5

The Definition for this class states:

This is the supervisory or expert level. Provides expert consultation and specialized analysis, design, development, acquisition, installation, maintenance, programming, testing, quality assurance, troubleshooting, and/or problem resolution tasks for major organization-wide, high risk/high impact, or mission-critical applications computing and/or telecommunication systems, projects, databases or database management systems; support products, or operational problems.

Performs highly-complex tasks such as conducting capacity planning to determine organization-wide needs and make recommendations; designing complex agency- or institution-wide enterprise systems crossing multiple networks, platforms or telecommunication environments; overseeing the daily operations of large-scale or enterprise systems; identifying and resolving operational problems for major high risk systems with centralized, organization-wide functions; testing multi-dimensional applications, providing quality assurance; developing standards or enhancing existing, high risk and impact, mission critical applications; integrating business solutions, or writing feasibility studies and decision packages for high visibility/impact initiatives.

Provides leadership and expert consultation for large-scale projects or enterprise systems that often integrate new technology and/or carry out organization-wide information technology functions, or impact other institutions or agencies. Provides project management leadership, technical expertise and demonstrates knowledge of project management practices, principles, and skills.

May supervise information technology specialists or function as a recognized expert who is sought out by others in resolving or assessing controversial or precedent-setting issues.

[Emphasis added]

The State HR, *Glossary of Classification Terms* defines "Expert" as follows:

Expert - Within the context of the class series, has the highest level of responsibility and extensive knowledge based on research and experience in a specific area. Resolves the most complex, critical, or precedent-setting issues that arise. Positions act as a resource and provide guidance on specialized technical issues. Although an employee may be considered by their peers as an expert or "go-to" person at any level, for purposes of allocation, the term is

typically applied to an employee in a higher class level who has gained expertise through progression in the series.

On a best fit basis, the focus of Ms. Howell's position and the majority of her duties as a whole are more accurately described by the Definition of this class.

Supervisory Capacity

Ms. Howell's position meets the supervisory requirement of this class. Ms. Howell supervises a unit of eight professional senior- and journey-level IT specialists who provide service request implementation and system maintenance, documentation, testing, troubleshooting, and customer support. As part of her supervisory function, Ms. Howell coordinates and schedules the implementation of MIPS service requests, system enhancements and maintenance activities with management, senior-level IT specialists and business owners across the division and also with ISD.

In addition to supervising eight HTO staff, the position gives direction to IT units on service request priorities and timelines. Ms. Howell also interacts with ISD IT managers and contract programmers. She also works closely with staff throughout Insurance Services and Administrative Services to coordinate information that is passed from MIPS to other LNI systems, participates on initiatives that affect multiple systems areas, and provides expert consultation on system impacts of policy changes.

Expert Consultation

Ms. Howell's supervises and directs eight professional IT staff working on technical projects for the complex, mission-critical and highly visible MIPS/MPOS systems. She also provides consultative expertise to agency management on complex technical issues, including participation on project teams for initiatives that affect multiple LNI systems. This also includes providing expert consultation to executive management on longer-term projects with program-wide impact which includes setting the strategic framework for technology projects to support HSA business needs.

Therefore, the overall level of her supervisory responsibility and decision-making authority and her level of responsibility for serving as the HTO expert for system upgrades, enhancements and other projects is consistent with ITS 5 level supervisory responsibility.

Highly-complex Tasks

Incumbents at the ITS 5 level spend a majority of their time performing highly-complex tasks requiring highly-specialized technical knowledge and understanding of complex computing environment(s) and their client's needs. Incumbents perform highly-complex tasks such as testing multi-dimensional applications, providing quality assurance, developing standards or enhancing existing, high risk and impact, mission critical applications. Positions also integrate business solutions or writing feasibility studies and decision packages for high visibility/impact initiatives.

Ms. Howell's duties are consistent with these statements. She supervises high-visibility technical business improvement projects for initiatives that affect MIPS operational processes. The MIPS is used to process all medical bills filed within LNI. The system is used by, or

provides information to multiple agency program areas and external customers including claimants, employers and providers. Ms. Howell position requires extensive knowledge of the MIPS, MIPOS, PEB, Find-a-DOC website, VISTAR, and Electronic Billing systems. She tests/analyzes, resolves issues, analyzes impacts to other systems, and consults and guides staff and other business areas regarding system functions and its interactions with agency-wide, mission-critical systems such as LINIIS, IVR, ARC and Data Warehouse. During the review telephone conference Mr. Hammond acknowledged that MIPS is a large, mission-critical complex application system for the agency.

While Ms. Howell provides expert technical consultation and supervision to staff working on system enhancements within her division, she does not have responsibility for developing feasibility studies or making technical recommendations to executive administration on system initiatives or decision packages for the MIPS system as a whole. The scope of this work is performed by staff within the ISD.

However, when reviewing the overall depth and breadth of her duties, Ms. Howell supervises professional information technology staff at a level consistent with this class. She also provides expert consultation and performs highly-complex tasks. This includes providing technical expertise in identifying and determining the appropriate tasks for HTO work projects and assignments which can impact other divisions. She is responsible for supervising senior-level staff to ensure work projects are done appropriately including developing project charters, task statements, risk management plans, business and functional requirements, communication, test and release plans. She works extensively with ISD IT and executive management staff to coordinate projects which can extend beyond the division level.

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 level, scope and diversity of the overall duties and responsibilities assigned to Ms. Howell's position, her position should be reallocated to the ITS 5 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: Catherine Howell, LNI
Vicki Kamin, LNI
Lisa Skriletz, SHR

Enclosure: List of Exhibits

CATHERINE HOWELL v LNI
ALLO-13-114

A. Catherine Howell Exhibits

1. Request for Director's Review, 12-30-2013
2. Allocation Determination Letter, 12-3-2013
3. Email to Vicki Kamin, 12-17-13
4. Position Description Form #0466, 5-6-2011 (removed from WMS allocated to Medical Program Specialist 3)
5. Position Description, #0466, 4-6-2011
6. Updated Position Description, #0466, 2-3-2014
7. Organization Functions

B. LNI Exhibits

1. Allocation Determination Letter, 12-3-2013
2. Position Review Request, 7-24-2013
3. Position Description Form #0466, 5-6-2011 (removed from WMS allocated to Medical Program Specialist 3)
4. Position Description Form #W0466, 2-23-2001
5. Organizational Charts
6. Information Technology Series Class Specifications
7. Medical Program Specialist Series Class Specifications
8. Summary of position history from HRCs Gallegos and Nelson, 10-17-2013
9. Direct Report Position Description, #3800, ITS 4 (Battin)
10. Direct Report Position Description #4159, ITS 4 (Christensen)
11. Direct Report Position Description #3675, ITS 4 (Wood)
12. Direct Report Position Description #3690, ITS 3 (Del Bosque)
13. Direct Report Position Description #3703, ITS 4 (Darin)
14. Information Services Position Description #1275, ITS 5 (Malamphy)
15. Personnel Resources Board Appeal Determinations ALLO-07-017 and ALLO-07-018
16. List of all ITS 5 positions within LNI as of 11-27-2013 and 3-5-2-2014 showing organizational assignment within agency
17. March 6, 2014 LNI final response

C. Class Specifications

1. State HR Class Specification for IT Specialist 1
2. State HR Class Specification for IT Specialist 4
3. State HR Class Specification for IT Specialist 5
4. State HR Class Specification for Medical Program Specialist 3