



**STATE OF WASHINGTON
OFFICE OF FINANCIAL MANAGEMENT**

STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM
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April 27, 2015

TO: Franklin Plaistowe,
Rules and Appeals Section Chief

FROM: Meredith Huff, SPHR, MPA
Director's Review Program Investigator

SUBJECT: Anne Springer vs WA Department of Labor and Industries (L&I)
Allocation Review Request ALLO-14-032

Director's Determination

This position review was based on the work performed for the six-month period prior to October 2, 2013, the date which L&I's Human Resources Office received Ms. Anne Springer's Position Review Request. As the Director's Review Investigator, I carefully considered the information gathered during an in-person review conference and the documentation in the file. Based on my review and analysis of assigned duties and responsibilities, I conclude Ms. Springer's position is properly allocated to the Safety & Health Specialist 4 classification.

Background

On October 2, 2013, L&I's Human Resources received Ms. Springer's Position Review Request (PRR). Ms. Springer requested that her position be reallocated to Administrative Regulations Analyst 4 from Safety and Health Specialist 4. (Exhibit B-4)

On April 1, 2014, Ms. Vicki Kamin, Classification & Compensation Coordinator, L&I HR, notified Ms. Springer that her position was properly allocated to the classification of Safety and Health Specialist 4. (Exhibit B-1)

On April 21, 2014, the State HR Director's Review Program received Ms. Springer's request for a Director's review of L&I's allocation determination. (Exhibit A-1)

On March 10, 2015, I conducted a Director's in-person review with the following parties:
Anne Springer, L&I DOSH Discrimination Supervisor, employee;
Perry Gordon, WFSE Council Representative;
Susan Rue, L&I DOSH Investigation Program Manager, Supervisor;
Vicki Kamin, Classification and Compensation Manager, L&I Human Resources.

Rationale for Director's Determination

A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which the 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. See Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

The position description serves the same purpose as the former classification questionnaire. Both the Personnel Appeals Board and the Personnel Resources Board have held that because a current and accurate description of a position's duties and responsibilities is documented in an approved classification questionnaire, the classification questionnaire becomes the basis for allocation of a position. An allocation determination must be based on the overall duties and responsibilities as documented in the classification questionnaire. Lawrence v. Dept. of Social and Health Services, PAB No. ALLO-99-0027 (2000).

Position Review Request (PRR) (Exhibit B-2)

Ms. Springer's PRR was received October 2, 2013 by L&I's Human Resources office. Ms. Springer is a supervisor in the Division of Occupational Safety and Health (DOSH) within the Workplace Safety and Health Program (WSHP) at L&I. She supervises five field investigators who process employees complaints of employers' discrimination filed under the Whistleblower statute (WISHA). Ms. Springer reports to Ms. Susan Rue, Investigation Manager. Ms. Lezlie Perrin is Ms. Springer's second level supervisor.

Position Purpose states, in part:

(1) DOSH administers the ... Workplace Safety and Health Program, serving state citizens by protecting the safety and health of Washington's workforce. This position is the Supervisor for the statewide discrimination regulatory program. The Supervisor is responsible for processing all statewide complaints of discrimination filed under RCW 49.17.160 of . . .WISHA. This position reports to the WMS Investigation Manager. . .

(2) The WISHA Discrimination Supervisor reviews and screens complaints to determine validity and jurisdiction pursuant to the statute. Provides technical assistance to field investigators. Reviews completed investigative reports for technical accuracy, thoroughness of investigation, quality and adherence to policies, procedures, codes and statutes. Prepares written reports documenting case findings and conclusions to the Investigation Program Manager. Serves as the liaison handling all matters relating to WISHA Discrimination issues as they relate to RCW 49.17.160...

(3) The WISHA Discrimination Supervisor is responsible for supervision and oversight of five statewide field investigators this position requires statewide travel.

Ms. Springer's work time allocation for Job Duties is shown on the PRR, in part:

45%

- ensure compliance with the RCW's and WACS as they pertain to the 11c Whistleblower program.
- Build and maintain a working relationship with external customers . . . , including employers and their attorneys, the Office of the Attorney General (AGO) and others.
- Build and maintain a working relationship with internal customers . . .
- . . . review and screen incoming complaints to determine validity and jurisdiction . . . determine if complainants were engaged in a WISHA-protected activity
- Demonstrate and maintain thorough knowledge of WISHA discrimination program requirements including all policies and procedures. . . knowledge of Federal 11c Whistleblower statues and make recommendations for referrals as needed.
- Provide assistance to field investigators regarding all aspects of the WISHA discrimination program.review completed investigative reports for technical accuracy, thoroughness of investigation, sufficient documentation to support merit or non-merit determinations, and to ensure quality and adherence to policies, procedures, codes and statutes.
- Provide written conclusions of investigative findings to the Investigations Program Manager.
- . . . consult with the Office of Attorney General to obtain oral or written legal opinions. . .
- Ensure program goals and objectives are met, including timeliness and quality of investigations.
- Ensure uniformity and adherence to agency policy, rules and laws during the discrimination investigation process.
- Develops and recommends solutions to situations in which the lack of written policy poses a potential threat to the agency.

45%

- Plan, coordinate and supervise the activities of Discrimination Investigators.
- Assign work activities and monitor workloads.
- Educate staff on the law and policy and provide ongoing training to develop skill.
- Provide assistance to staff working on settlement agreements . . .
- Establish standards, document practices and establish performance measures. . .
- Challenge staff to excel at their work, . . .hold staff accountable for behavior and performance.
- Conduct review of work to ensure the quality and statewide consistency is maintained.
- Review and update the current WISHA Discrimination Program manual . . . to ensure compliance with the Statewide Regulatory Program statues.
- Review and implement OSHA requirements and recommendations as required and needed by statue.

5%

- . . . assists the Discriminations Program . . . regarding the applicability and appropriateness of . . . rules and procedures as they relate to DOSH 11C Whistleblower complaints and investigations.
- Confers with and obtains legal advice from the AAG as needed.

5%

- Other duties as assigned.

Ms. Springer provided the following examples of decisions she makes without consulting her supervisor, in part:

(5) Decision Making Authority:

- Decisions ...of all cases that are received and screened and whether or not they are assigned to the field or screened out and closed based on the criteria of the statute.
- I make decisions on leave requests from my direct reports.
- ...on training requests from my direct reports
- ... on approval of settlements that are negotiated by my staff with employers.
- ...final decisions on the outcome of the cases that are investigated by my staff.
- ...on when to seek legal counsel and/or guidance in regards to cases...
- ...establish and maintain policies and procedures that are followed in this program.
- ... on whom the cases are assigned to in the field for investigation.
- I develop and organize the training for my staff and ensure that they are all up to date with required training.
- ...decisions on grievance issues and negotiated settlements with staff.
- ...schedule outreach presentations with unions, employers, other units within the agency and others in relation to our program.
- I have signing authority on final action letters when my supervisor is not available.

Ms. Springer indicates that she supervises five Safety and Health Specialist 2 positions.

Summary of Employee's Perspective

During the review conference held on March 10, 2015, Ms. Springer described the employees' appeal process under WISHA in Washington State. She stated employees have a right to report safety concerns to an employer. If retaliation or an adverse action occurs after that report, the employee may file a discrimination complaint with L&I's WISHA appeal program. Ms. Springer indicated that she screens all such filings to ensure they are valid, have merit and adhere to the regulations. When the complaints have merit, she makes an assignment by written letter to an investigator for further review, investigation and a written report. Ms. Springer maintains a log of assigned cases and will telephone the investigator for updates and a brief synopsis. Occasionally, she travels to see the investigators in person. The investigators are located in Tukwila, Kelso, Kennewick, Spokane and Bellevue.

After completing the investigation, the investigator may negotiate a settlement with the employer, the claim may be withdrawn, or an agreement may be facilitated. Based on the investigator's report, Ms. Springer composes a letter which includes the appeal rights and any settlement agreement. She forwards the letter to Ms. Rue for review and signature. She noted that in Ms. Rue's absence, she has been authorized to sign the letters. When a case has issues that she cannot address, such as an unusual settlement or possible referral of legal issues to the AAG's office, Ms. Springer discusses the case with Ms. Rue.

Ms. Springer indicated that she develops and presents training to staff including RCW and WAC regulations, the discrimination manual and reviews of prior cases to compare situations and

elements of cases. In addition, Ms. Springer makes presentations at various meetings/trainings such as the Governor's Industrial Safety & Health Conference, and the Governor's ISH Advisory Board, WISHA Discrimination training, and DOSH Technical Safety & Health Symposium.

Summary of Supervisor Perspective

On the PRR, Ms. Susan Rue, Ms. Springer's direct supervisor, indicates that she provides a "spot-check" supervision for Ms. Springer's position. Ms. Rue indicates Ms. Springer's decisions include "work assignments to her staff" and "reviews and screens complaints." Ms. Rue attached clarifying information to Ms. Springer's PPR, in part:

Item 4.

- Paragraph 2 "...Ms. Springer provides recommendation of investigative findings to me:"
- Paragraph 4, last sentence: " It is not one of Ms. Springer's duties to review and update the Discrimination manual on a continual basis. ...If there is a change it has to be approved by the Sr. Program Managers, Assistant Director and Deputy Assistant Director.the ARA4 in the DOSH Standards & Tech Services unit updates all of DOSH's manuals and works closely with OSHA."

Item 5

- Paragraph 5: "Ms. Springer does not have final decision on outcome of cases. She makes recommendations on a final decision; however, the final authority to approve or deny the decision lies with Lezlie Perrin, Sr. Program Manager or me in Ms. Perrin's absence."
- Paragraph 6: "Ms. Springer.....is directed by either me or the Sr. Program Manager to contact the AGO..."
- Paragraph 7: "Ms. Springer makes suggestions to policy and procedure changes...but the ultimate decision in most cases lies with the Sr. Program Manager..."
- Paragraph 12:..."I asked Ms. Springer on one occasion to sign (decision letters) in my absence...When she signed on another occasion I reminded her that I needed to sign the letters. The Discrimination Manual states that the investigation program manager must send the final action letter to the complainant..."

During the review conference, Ms. Rue explained that when she was away from the office for a few days, she delegated Ms. Springer authorization to sign determination letters during that absence. Due to a misunderstanding, Ms. Springer continued to sign the letters after Ms. Rue's return. When the misunderstanding was resolved, Ms. Rue resumed signing the determination letters. Ms. Rue clarified that Ms. Springer ensures compliance with the RCW's and WAC's as they pertain to the WISHA Discrimination program. She further indicated that Ms. Springer makes recommendations rather than conclusions of investigative findings. Ms. Rue also explained that when Ms. Springer approves staff training requests that cost more than \$250, additional approval must be obtained from management. Ms. Rue acknowledged that Ms. Springer has an in-depth knowledge of the WISHA requirements and she provides leadership in that unit.

Summary of Second Level Supervisor's Comments

Ms. Lezlie Perrin, Appeals, Audit & Discrimination Administrator, Ms. Springer's second-level supervisor, provided comments about the PRR to the Human Resources Office by memo dated February 21, 2014, in part...

"Section 4 and 5: I think Anne does make recommendations based on her review and analysis of the discrimination case files. She does make conclusions and provides a recommendation to the manager for final approval. In Susan's [Rue] absence Anne has been delegated the authority to sign certain letters."

"Anne keeps track of policy and procedures for the discrimination program. If something is not working well, or changes are needed, she is the one who will make a note of it and make recommendations for changes to her management for approval....she does have a significant contribution to maintain a current and applicable discrimination manual."
(Exhibit A-2, pg 13)

Summary of Human Resources Findings

By letter dated April 1, 2014, Ms. Vicki Kamin, Classification & Compensation Coordinator for L&I, informed Ms. Springer that the Safety and Health Specialist 4 was the best match for Ms. Springer's assigned responsibilities. (Exhibit B-3)

Ms. Kamin indicated: "It is undisputed that Ms. Springer supervises a program guided by rigorous Federal and State laws and makes complex decision when applying those laws to determine the merits of discrimination cases. However, the reason her position exists is not to analyze and develop policy, but to lead a team in applying that policy." (Exhibit B-18)

During the review conference, Ms. Kamin commented that under the former L&I HR Manager, the WISHA investigators were reallocated to Safety and Health Specialist because of the nature of the work under WISHA regulations. Some incumbent investigators appealed to the Personnel Resources Board for reallocation back to the Investigator classes. However, those appeals were denied as the Safety and Health Specialist classifications were more specific to their work than the Investigator classes.

Ms. Kamin also discussed other classifications she reviewed for a possible match to Ms. Springer's position. She found the Administrative Regulations Analyst 4 class was not a good fit as Ms. Springer does not have primary responsibility to analyze rules and statutes for compliance with legal standards and to recommend rules and agency manual changes. Additionally, she found the Investigator 3 class was a not good match as Ms. Springer does not conduct civil or criminal investigations of fraud or collusion allegations as required at the 3 level. Further she found that Ms. Springer does not direct a statewide investigation program for an agency as expected at the Investigator 4 level.

Ms. Kamin stated she found the Safety and Health Specialist 4 was closely aligned with and descriptive of assigned duties of Ms. Springer's position. On a best fit basis, she felt Ms. Springer's position is appropriately allocated to Safety and Health Specialist 4

Comparison of Duties to 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. 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 with in a classification.

Comparison of Duties to Investigator

Class Series Concept for all Investigator classes is on the Investigator 1 (427P)

Positions in this series conduct civil and/or criminal investigations in a variety of areas including allegations of fraud or collusion among recipients of public assistance or industrial insurance, allegations of fraudulent and/or unfair business and insurance practices, misconduct, and allegations of civil rights violations.

Positions gather facts and develop evidence with responsibility for developing the complete case from the original claim or allegation through preparation for presentation in court or administrative hearing....

This includes researching records and case files; gathering and preserving documentary evidence; obtaining statements of fact, depositions, or confessions; obtaining and serving subpoenas to compel the attendance of witnesses or the production of records; conducting field surveillance; obtaining and coordinating the service of search warrants; writing investigative reports, establishing proof of facts and evidence; reviewing the case with private attorneys, assistant attorneys general, or prosecuting attorneys; and testifying in court or other proceedings as necessary.

Positions allocated to the Investigator class series conduct civil and/or criminal investigations in a variety of areas such as:

- allegations of fraud or collusion among recipients of public assistance or industrial insurance,
- allegations of fraudulent and/or unfair business and insurance practices, misconduct, and
- allegations of civil rights violations.

Incumbents in these positions gather facts and develop evidence with responsibility for developing the complete case from the original claim or allegation through preparation for presentation in court or administrative hearing.

Ms. Springer does not conduct civil and/or criminal investigations such as fraud or collusion among recipients of public assistance or industrial insurance, allegations of fraudulent unfair business and insurance practices, or allegations of civil rights violations. Rather Ms. Springer supervises employees who investigate discrimination complaints filed under WISHA regulations. Overall, the focus of her position does not match the nature or extent of criminal investigations anticipated in this class series. Allocation of Ms. Springer's position to the Investigator series is not appropriate.

Comparison of Duties to Administrative Regulations Analyst 4 (108G)

There is not a Class Series Concept for the Administrative Regulations Analyst series.

Definition

In Headquarters of the Department of Social and Health Services, analyzes proposed and existing departmental Washington Administrative Code (WAC), program and administrative policies, procedures, numbered memoranda, terminal alerts, client notices, forms, and other issuances for compliance with departmental and legal standards. Provides expert consultation and written opinion, develops departmental standards for issuances, provides consultative and technical services to agency and division heads, develops and maintains agency-wide administrative systems and manuals, and interprets and develops issuances requiring independent judgment.

Distinguishing Characteristics

Positions at this senior level lead staff as assigned on major projects having agency/statewide scope. They perform the most difficult issuance tasks, consult with agency executive management on theories and principles of translating multiple concepts into plain and understandable language, and conduct issuance training and writing classes for the department.

The stated purpose and focus of Ms. Springer's position is to determine if an employee's claims of discrimination, as a result of whistleblowing, have merit and, if so, she oversees the investigation of those claims. She is responsible for ensuring compliance with the RCW 49.17.160 and L&I WACs as they pertain to the Federal 11c Whistleblower program investigations. She maintains a procedures manual and when appropriate provides input for agency policy and procedures development or changes.

The focus of Ms. Springer's responsibilities for overseeing and supervising the investigations of discrimination complaints covered by Whistleblower regulations does not meet the broad scope of responsibility for development of agency-wide laws, regulations and policies as anticipated by the Administrative Regulations Analyst 4 classification. The Administrative Regulations Analyst 4 is not an appropriate match for allocation of Ms. Springer's position.

Comparison of Duties to Safety & Health Specialist

Class Series Concept for all Safety & Health Specialists is on the 1 level, (392E):

This series works in the Department of Labor & Industries.

The Safety and Health Specialist is required to successfully maintain the federally approved state occupational safety and health program and meet the authorizing statute, Chapter 49.17 RCW, the Washington Industrial Safety and Health Act (WISHA).

The approved State program at the Department of Labor and Industries must be maintained as-effective-as the national Federal OSHA program including enforcement, consultation, rules, regulations, policies and procedures.

The series represent the predominant professional classifications necessary to maintain Federal approval. The work is aimed at assisting and ensuring employers comply with safety

and health standards, general duty clauses and employee safety laws, rules and regulations.

Within L&I, Ms. Springer is responsible for supervising and overseeing the investigations of employee's complaints of employer discrimination filed under RCW 49.17.160, WISHA.

The focus and nature of Ms. Springer's work is directly related to the Class Series Concept of the Safety and Health Specialist. Her position should be allocated within this series.

Comparison of Duties to Safety and Health Specialist 4 (392H)

Definition (in part)

In the Department of Labor and Industries, this is the supervisory or expert level of the series.

Supervises Safety and Health Specialists. May also supervise other professional staff. . .

There are no **Distinguishing Characteristics**.

Ms. Springer position is responsible for supervising five Safety and Health Specialists 2 employees who complete investigations of employee's claims of employer's discrimination as a result of whistleblowing under WISHA regulations.

Ms. Springer is recognized as an expert on the topic of WISHA and is often requested to provide information at various Safety and Health conferences and trainings.

The Safety and Health Specialist 4 classification is a match for the scope and nature of the responsibilities assigned to Ms. Springer's position.

Although **Typical Work** statements are not allocation criteria, they do provide guidance on the level of responsibility. The following Typical Work statements, in part, are descriptive of Ms. Springer's assigned work.

- Supervises . . . assigns and reviews work, and ensures consistency with required formats
- Organizes, writes and edits... technical materials and reports, and reviews . . .
- Provides specialized technical expertise to management, and others interested in . . . safety and health;
- Makes assignments and ensures quality control over all compliance activity; reviews and cosigns written work for accuracy and completeness;
- Coordinates activities and/or assignments of staff with other . . .division/department staff;
- Develops and conducts ... safety and health training programs for internal and external customers in the area of expertise, . . .
- Maintains high level awareness of current information and trends in assigned specialty. . .

The Personnel Resources Board has found the following in relationship to allocation of positions:

When there is a definition that specifically includes a particular assignment and there is a general classification that has a definition which could also apply to the position, the position will be allocated to the class with the definition that includes the position. Mikitik v Depts. of Wildlife and Personnel, PAB No. A88-021 (1989).

Ms. Springer's assigned responsibilities, including supervisory duties, are aligned with the Class Series Concept and Definition and supported by the Typical Work statements of the Safety & Health Specialist 4 class. The Definition of this class includes the focus and nature of Ms. Springer's position.

It is clear that Ms. Springer is a highly skilled and dedicated member of the L&I staff. A position's allocation is not a reflection of performance or an individual's ability to perform higher-level work. A position's allocation is based on the majority of work assigned to a position and how that work best aligns with the available classifications. As a whole, the level, scope and diversity of the overall duties and responsibilities assigned to Ms. Springer's position are aligned with and a best fit to the Safety and Health Specialist 4. Her position is correctly allocated.

Appeal Rights

RCW 41.06.170 governs the right to appeal. RCW 41.06.10(4) provides, in relevant part, the following:

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

The mailing address for the Personnel Resources Board (PRB) is P.O. Box 40911, Olympia, Washington 98504-0911. The PRB Office is located on the 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.

Cc: Ms. Anne Springer, Employee
Mr. Perry Gordon, WFSE Representative
Ms. Susan Rue, Investigations Program Manager, L&I
Ms. Vicki Kamin, Classification & Compensation Coordinator, L&I

Enclosure: List of Exhibits

ANNE SPRINGER v LNI
ALLO-14-036

A. Anne Springer Exhibits

1. Request for Director's Review dated 4/21/2014 - pgs. 1-3
2. Position Review Request dated 10/2/2013 (this includes the original request submitted to HR, Supervisor Susan Rue's response, & Program Manager Lezlie Perrin's response rebuffing Susan's comments) - pgs. 4-14
3. HR's Response dated 4/1/2014 - pgs. 15-25
4. Current position description dated 12/08/2011 - pgs. 26-33
5. Proposed position description dated 4/21/2014 pgs. 34-41
6. State specifications for Safety & Health Specialist 4 - pgs. 42-45
7. State specifications for proposed position - Administrative Regulations Analyst 4 - pgs. 46-48
8. Copies of Letters I signed for Susan Rue from February 26, 2013 - February 13, 2014 pgs. 49-59
9. List of Discrimination new employees that I have trained from March 2010 thru March 2013 - pg. 60.
10. DOSH New Hire Presentations that I give from March 2012 - present day - pg.61
11. Request to me to give training on DOSH Discrimination on August 20, 2013 - pg. 62
12. Program of events for Governor's Safety Conference identifying myself as a speaker - pgs. 63-79 (pg. 3 of 14 reflects the 1st day presentation that I was scheduled to present & pg. 10 of 14 reflects the 2nd day presentation that I was scheduled to present)
13. Email from Kathy Sorter to me confirming myself as speaker for events named in "L" - pg. 80-81
14. Agenda from DOSH Safety & Health Symposium May 14-16, 2013 reflecting myself as speaker - pgs. 82-92 (pg. 87 reflects the information regarding myself as presenter)
15. Email dated 3/19/2014 from Carol Stevenson to myself explaining the reason for the change to the DOSH Discrimination Investigation Manual, who made the change and update to the manual which reflects signing of final action letters -- pgs. 93-95
16. Letter response to OSHA from DOSH dated 7/25/2013 reflecting the change in the DOSH Discrimination Investigations Manual - pgs. 96-97. (#4 on pg. 97 -reflects the change which states that the Discrimination Supervisor reviews the case and issues the final action letter)
17. Updated DOSH Discrimination Investigations Manual dated 7/25/2013 pgs. 98-134 (pg.8 of 37 Section F. 4e - reflects the change in the manual that reads "the date upon which the Discrimination Supervisor reviews the case and issues the final action letter."

B. LNI Exhibits

1. Allocation Determination Letter, 4-1-2014
2. Position Review Request, 10-2-2013
3. Recommendation from HRC Kowalski 3-3-2014
4. Position Description Form #2119, unsigned, submitted with PRR on 10-2-2013
5. Position Description Form #2119, signed 2-28-2012
6. Organizational Chart
7. Notes from Supervisor Rue and Manager Perrin
8. Position Description Form #W1756, DOSH Investigations Program Manager
9. Position Description Form #2552, Admin Regulations Analyst 4, Skinner
10. Position Description Form #4010, Admin Regulations Analyst 4, Baptiste
11. Position Description Form #4567, Admin Regulations Analyst 4, Ruth
12. Position Description Form #2296, Safety & Health Specialist 3, Navarre (Springer's direct report)
13. Classification Specs for Safety & Health Specialist 2 and 4
14. Classification Specs for Administrative Regulations Analyst 4
15. Classification Specs for Investigator 1, 3 and 4
16. DOP decision, 2-20-2009, K. Navarre, allocation appeals.
17. PRB decision, 9-29-2009, P. Brown & K. Navarre, allocation appeals
18. LNI final response to Director's review

C. Class Specifications

1. Safety & Health Specialist 2
2. Safety & Health Specialist 3
3. Safety & Health Specialist 4
4. Administrative Regulations Analyst 4
5. Investigator 1
6. Investigator 3
7. Investigator 4