BEFORE THE PERSONNEL RESOURCES BOARD

STATE OF WASHINGTON

RACHEL GEISA, RICHARD PARKER, WILMA HENDERSON, DENISE KELLEY & SANDRA TOLMAN, Appellants, vs. DEPARTMENT OF SOCIAL AND HEALTH SERVICES, Respondent.	CASE NOS. R-ALLO-11-004, R-ALLO-11-005, R-ALLO-11-006, R-ALLO-11-007 & R-ALLO-11-008 ORDER OF THE BOARD FOLLOWING HEARING ON EXCEPTIONS TO THE DETERMINATIONS OF THE DIRECTOR

Hearing on Exceptions. This appeal came before the Personnel Resources Board, DJ MARK, Chair; JOSEPH PINZONE, Vice Chair; and LAURA ANDERSON, Member, for a consolidated hearing on Appellants' exceptions to the director's determination dated April 28, 2011. The hearing was held in Olympia, Washington, on September 14, 2011.

Appearances. Appellants Rachel Geisa, Richard Parker, Wilma Henderson, and Denise Kelley were present and were represented by Debbie Brookman, Labor Advocate with the Washington Federation of State Employees. Respondent Department of Social and Health Services (DSHS) was represented by Robert Swanson, Classification and Compensation Specialist.

Background. Appellants are employed by DSHS at Western State Hospital (WSH). Appellants work in the Medical Billing Coordination Unit as Medical Billing Coordinators. Appellants' supervisor submitted Position Description Forms to WSH's Human Resources Office asking that the positions be reallocated to the Forms and Records Analyst 3 classification. On June 16, 2010, Respondent determined that Appellants' positions were properly allocated to the Forms and Records Analyst 2 level.

Appellants filed requests for director's reviews of DSHS's allocation determinations. By letter dated April 28, 2011, the director's designee determined that Appellants' positions were properly allocated. On May 23, 2011, Appellants filed exceptions to the director's determination. Appellants' exceptions are the subject of this proceeding,

Appellants are certified Medical Records Technicians. They review and analyze patient medical records and physician notes to determine the services to be recorded on patient encounter forms and coded into the medical billing system. They use their knowledge of medical diagnostic codes, federal and state regulatory billing guidelines, and various reference documents to determine what codes to use. After Appellants have entered the information into the billing system, the billing process is completed by the Office of Financial Recovery (OFR). When questions arise about a bill, Appellants research and clarify information and make corrections so that WSH is properly reimbursed for services provided to patients.

Summary of Appellants' Arguments. In summary Appellants argue that they are specialists in two system areas, medical records and financial records. Appellants assert that they create, modify, and use medical and financial records to assure all billable service are captured; that they follow up on questions related to invoices, resolve billing issues, and clarify information; and that when they identify system issues, they request system modifications to improve efficiencies. Appellants argue that they utilize their extensive knowledge and skills in medical and financial records to fulfill the duties and responsibilities of their positions. Appellants explain that they are the gatekeepers for financial records and that they work with physicians, outside insurance providers, including but not limited to Medicare administrators, various state offices, OFR, and others. They research and resolve billing issues assigned to them by their supervisor. Appellants agree that their positions are described, in part, at the Forms and Records Analyst 2 level but argue that their positions best fit in the 3 level because they are specialists for both the health records and the billing and financial

records. Appellants argue that health records and billing/financial records are two separate system areas as described in the definition of the Forms and Records Analyst 3 classification.

Summary of Respondent's Arguments. Respondent explains that while Appellants are specialists in medical records, they are not specialists in the financial record system. Rather, Respondent contends that Appellants contribute to the billing portion of the financial record system. Respondent recognizes that as certified Medical Records Technicians, Appellants are specialists for medical coding that goes into the financial records system. However, Respondent asserts that Appellants are not responsible for the system. Respondent explains that Appellants extract information; gather information; code information according the manuals, standards and reference materials they utilize; put information on the patient encounter form; enter information into the internal hospital system; and provide clarification when requested. Respondent further explains that while Appellants deal with financial data, they are not functioning as specialists responsible for the financial records system. Respondent argues that Appellants' positions best fit the Forms and Records Analyst 2 classification.

Primary Issue. Whether the director's determination that Appellants' positions are properly allocated to the Forms and Records Analyst 2 classification should be affirmed.

Relevant Classifications. Forms and Records Analyst 2, class code 112J; Forms and Records Analyst 3, class code 112K.

Decision of the Board. 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. See Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

During the hearing before the Board, Appellants argued that positions performing similar duties at Eastern State Hospital are allocated to the Forms and Records Analyst 3 level. In Byrnes v. Dept's of Personnel and Corrections, PRB No. R-ALLO-06-005 (2006), the Personnel Resources 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). Therefore, the allocation or misallocation of other positions is not a determining factor in the appropriate allocation of Appellants' positions.

In relevant part, at the Forms and Records Analyst 3 level, incumbents are specialists in two or more system areas such as financial records and health records. As certified Medical Records Technicians, Appellants are health records specialists.

The Department of Personnel Glossary of classification terms provides that a "specialist" performs duties that "involve intensive application of knowledge and skills in a specific segment of an occupational area." As health records specialists, Appellants provide information that contributes to and supports the billing portion of medical financial records. They do not utilize intensive application of knowledge and skills specific to a financial records system. Rather, they apply intensive application of knowledge and skills in medical records to input data into the medical financial system. Although they identify needed revisions to the system itself based on their knowledge and research of certain billing issues, system specialists in the information

technology department take those suggestions and make the necessary system changes. System specialists are specifically assigned and authorized to modify the financial software system. The data entered by Appellants is then utilized by others to complete the billing process. Further, the DSHS Records Officer/Compliance Coordinator manages the Health Information Management Services department at WSH. The Records Officer is responsible for setting the processes, policies and procedures that govern the documentation, security and maintenance of the legal health records. Appellants' are not specialists in the financial records system. Therefore, their positions do not rise to the level of the Forms and Records Analyst 3 classification.

At the Forms and Records Analyst 2 level, incumbents provide consultation to managers and perform journey-level forms and/or records work. Incumbents also 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. Appellants' positions fit within this description.

In addition, the following typical work statement found in the 2 level describes the duties and responsibilities of Appellants' positions:

> In a healthcare facility, hospital, or institution performs records management duties such as, reviewing resident and/or patient records for completeness and accuracy, assigning diagnoses and operative procedures codes, abstracting pertinent data from treatment and/or medical records, and acting as information resource for authorized personnel requesting information from resident and/or patient records. May monitor patient's length of stay, severity of illness, and intensity of services to assure appropriate utilization of resources or explain the justification for admission, treatment, and length of stay and relay pertinent diagnostic information to authorized third party agents.

In a hearing on exceptions, the appellant has the burden of proof. WAC 357-52-110. Appellants have failed to meet their burden of proof.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED that the appeals on exceptions by Rachel Geisa, Richard Parker, Wilma Henderson, Denise Kelley and Sandra Tolman are denied and the director's determination dated April 28, 2011, is affirmed.

DATED this _____ day of _____, 2011.

WASHINGTON P ERSONNEL RESOURCES BOARD

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DJ MARK, Chair

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JOSEPH PINZONE, Vice Chair

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LAURA ANDERSON, Member