BEFORE THE PERSONNEL RESOURCES BOARD

STATE OF WASHINGTON

PAMELA IVERSON, Appellant, vs. DEPARTMENT OF CORRECTIONS, Respondent.	CASE NO. R-ALLO-13-009 ORDER OF THE BOARD FOLLOWING HEARING ON EXCEPTIONS TO THE DETERMINATION OF THE DIRECTOR

Hearing on Exceptions. This appeal came before the Personnel Resources Board, JOSEPH PINZONE, Chair, and NANCY HOLLAND YOUNG, Member, for a hearing on Appellant's exceptions to the director's determination dated April 5, 2013. The hearing was held on August 7, 2013.

Appearances. Appellant Pamela Iverson was present and represented herself. Nicole Baker, Human Resource Consultant, represented Respondent Department of Corrections (DOC).

Background. Appellant is employed at the Stafford Creek Corrections Center (SCCC) where her position is allocated to the Correctional Records Supervisor classification. On October 5, 2011, SCCC's Human Resources (HR) Office received Appellant's request to reallocate her position to the Records Management Supervisor classification. By letter dated March 7, 2012, DOC's HR staff determined that Appellant's position was properly allocated to the Correctional Records Supervisor classification.

On March 30, 2012, the Office of the State Human Resources Director received Appellant's request for a director's review of DOC's allocation determination. By letter dated April 5, 2013, the director's designee determined that Appellant's position was properly allocated to the Correctional Records Supervisor classification.

On May 3, 2013, Appellant filed exceptions to the Board. Appellant's exceptions are the subject of this proceeding.

In summary, Appellant's position:

- Serves as custodian of offender records at SCCC and manages a correctional records office.
- Supervises nine staff in the records office.
- Enters, audits, and interprets legal documents included in offender files and ensures compliance with the appropriate laws and agency polices.
- Contributes to the agency's mission to improve public safety.

The majority of duties and responsibilities described in Appellant's position review request form include:

- Enter, audit, and interpret the legal documents that hold an offender in the facility and/or other jurisdictions for supervision and ensure compliance with state and federal laws, Superior Court sanctions and agency policies.
- Review and verify the accuracy of legal documents related to convictions and sentencing.
- Provide legal interpretation of case data per Attorney General opinions.
- Develop and implement identification procedures for staff, offenders, contractors, volunteers [at SCCC].
- Control and release confidential, personal, and statistical criminal history data, including escapes, paroles, work release placements, and Victim/Witness Notification.
- Prepare files for Indeterminate Sentence Review Board hearings.
- Serve as Superintendent's designee for computation of time and time adjustments on all offenders at SCCC, including liability with high impact.

Summary of Appellant's Arguments. Appellant argues that DOC reallocated several other Correctional Records Specialist positions to the Records Management Supervisor classification and asserts that these positions perform the same duties and have the same level of responsibility and liability as her position. Appellant explains that all DOC records offices are governed by the same processes and rules and that the records processed at SCCC are equal in complexity to the records processed at other institutions regardless of where those records are stored at the institutions. Appellant acknowledges that most male offenders are initially processed through a primary receiving center where their files are created before transfer to the institution. However, Appellant explains that sometimes an offender is sent directly to the institution and intake, including creation of the offender's file, is performed at the institution. Appellant further explains that when an

offender is transferred to SCCC, she becomes responsible for accuracy of the information contained in the file and for assuring that all information regarding the offender is entered into the system correctly. Appellant contends that her position fits the definition of the Records Management Supervisor classification as well as a majority of the typical work statements for the class.

Summary of Respondent's Arguments. Respondent asserts that the duties and responsibilities of the positions that were reallocated to the Records Management Supervisor classification are more complex than the duties and responsibilities of Appellant's position. Respondent explains that one position has statewide responsibility and other positions are responsible for more than one institution, each with a separate records office, located within a single correctional complex. Respondent asserts that Appellant is responsible for a single institution and that all offender records at SCCC are located in a single records office. Respondent acknowledges that some of Appellant's duties may fit within the Records Management Supervisor class but argues that the majority of her duties and responsibilities are fully described by the Correctional Records Supervisor classification.

Primary Issue. Whether the director's determination that Appellant's position is properly allocated to the Correctional Records Supervisor classification should be affirmed.

Relevant Classifications. Correctional Records Supervisor, class code 112G, and Records Management Supervisor, class code 112M.

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).

The primary thrust of Appellant's argument revolves around the reallocation of other Correctional Records Supervisor positions to the Records Management Supervisor classification. However, 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 Records Management Supervisor positions at DOC is not a determining factor in the appropriate allocation of Appellant's position.

Most positions within the civil service system occasionally perform duties that appear in more than one classification. However, 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. See Dudley v. Dept. of Labor and Industries, PRB Case No. R-ALLO-07-007 (2007).

The definition for the Records Management Supervisor states:

> Develops, implements, and administers a totally integrated records management program in a large agency.

The typical work statements for this class provide clarification of the duties performed by this class. When read in its entirety, this class encompasses positions that perform a broad scope of duties involving not only the administration/processing of records but the integration, design, development and analysis of records and forms for a records management program. The primary thrust of Appellant's duties and responsibilities is to oversee the processing, maintenance and disposition of offender records at SCCC. Appellant is not responsible for an integrated records management

program. Rather, she is responsible for a correctional records office. The Records Management Supervisor is not the best fit for the primary thrust and overall duties and responsibilities of Appellant's position.

When there is a class 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 should be allocated to the class that specifically includes the position. Mikitik v. Dept's. of Wildlife and Personnel, PAB No. A88-021 (1989)

The definition for the Correctional Records Supervisor class states:

> Manages a correctional records office and supervises at least one Correctional Records Technician 1 or 2.

Appellant's position fits within the Correctional Records Supervisor definition. In addition, her duties and responsibilities are fully encompassed in the typical work statements for this class. We concur with the director's designee's determination. Appellant's position is properly allocated.

In a hearing on exceptions, the Appellant has the burden of proof. WAC 357-52-110. Appellant has failed to meet her burden of proof.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED that the appeal on exceptions is denied and the director's determination dated April 5, 2013, is affirmed.

DATED this _____ day of _____, 2013.

WASHINGTON PERSONNEL RESOURCES BOARD

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JOSEPH PINZONE, Chair

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NANCY HOLLAND YOUNG, Member