BEFORE THE PERSONNEL APPEALS BOARD

STATE OF WASHINGTON

ROGER JOHNSON, Appellant, v. DEPARTMENT OF ECOLOGY, Respondent.	Case No. ALLO-01-0012 ORDER OF THE BOARD FOLLOWING HEARING ON EXCEPTIONS TO THE DETERMINATIONS OF THE DIRECTOR

Hearing on Exceptions. Pursuant to RCW 41.64.060 and WAC 358-01-040, this appeal came on for hearing before the Personnel Appeals Board, GERALD L. MORGEN, Vice Chair. The hearing was held on November 1, 2001, at Yakima Valley Community College In Yakima, Washington. LEANA D. LAMB, Member, reviewed the record and participated in the decision in this matter. WALTER T. HUBBARD, Chair, did not participate in the hearing or in the decision in this matter.

Appearances. Appellant Roger Johnson was present and represented himself, *pro se*. Jan Bacon, Human Resource Consultant, represented Respondent Department of Ecology (ECO).

Background. Appellant submitted a Classification Questionnaire (CQ) requesting that his Forms and Records Analyst (FRA) 1 position be reallocated to the FRA 2 classification. Jan Bacon, Human Resource Consultant, reviewed the request and determined that Appellant's position was properly allocated.

By letter dated October 9, 2000, Appellant appealed ECO's decision to the Department of Personnel (DOP). On February 27, 2001, the Director’s designee, Paul Peterson, conducted an allocation review of Appellant's position. By letter dated March 21, 2001, Mr. Peterson determined that Appellant's position was properly allocated to the FRA 1 classification. On April 18, 2001,

Appellant filed exceptions to the Director's determination with the Personnel Appeals Board. Appellant's exceptions are the subject of this proceeding.

Appellant is responsible for records management within ECO's Central Region. He responds to public disclosure requests; organizes files; maintains records and the database, which he designed; and prepares files for archives. Appellant does not participate in designing forms, forms control or procurement.

Summary of Appellant's Argument. Appellant contends that he maintains, designs, updates and implements the records management/data base system for over 10,000 regional records. Appellant argues that he is responsible for records protection and records inventory for the region. He asserts that the most important component of his work includes coordinating all public disclosure requests for the region which involves contact with requestors, ECO staff, and the Assistant Attorney General's office, researching all the regional files, gathering the relevant documents, reproducing documents, and scanning documents for confidentiality. Appellant argues that he is the records coordinator for a large region that encompasses seven counties, seven programs and approximately 100 employees and that the volume of his work fits the FRA 2 classification. Appellant further argues that his work has evolved, that he has assumed higher-level duties, and that he is doing work equivalent to the work performed by other positions allocated to the FRA 2 classification.

Summary of Respondent's Argument. Respondent argues that the FRA 1 classification is used for regional records coordinators while the FRA 2 class is used in the headquarters office for positions with statewide records responsibility. Respondent contends that Appellant independently performs complex clerical tasks and consults with headquarters' staff when he has questions about records management. Respondent agrees that Appellant coordinates public disclosure requests and certifies that the records disclosed are accurate copies, however, he is not responsible for the content of the documents or of the files. Respondent asserts that Appellant does not do forms work

and is not performing work equal to the FRA 2 positions located in the headquarters office. Respondent contends that Appellant's position best fits the FRA 1 classification.

Primary Issue. Whether the Director's determination that Appellant's position was properly allocated to the Forms and Records Analyst 1 classification should be affirmed.

Relevant Classifications. Forms and Records Analyst 1, class code 11530, and Forms and Records Analyst 2, class code 11540.

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. Also, a position review is not a comparison of work performed by employees in similar positions. 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 which best describes the overall duties and responsibilities of the position. Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

While 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. Flahaut v. Dept's of Personnel and Labor and Industries, PAB No. ALLO 96-0009 (1996).

Both the FRA 1 and 2 classifications encompass positions that analyze record problems; present proposed solutions to management using flow charts, layouts, and narrative write-ups; and

implement and manage an agency records management system to ensure compliance with State records management statutes. Neither the FRA 1 nor 2 classifications encompass Appellant's responsibility for coordinating public disclosure requests.

While typical work statements are not considered allocating criteria, they do provide guidance on the scope and level of work intended to be encompassed by a classification. The typical work statements for the FRA 2 classification indicate, in relevant part, that the class is intended to encompass positions that have agency-wide responsibility; consult with managers in solving records management problems; assign work to subordinates; perform records surveys; exercise control over the acquisition of filing equipment; manage the inventory of all public records of the agency in accordance with procedures established by the State Records Committee; approve all records inventory and destruction requests which are submitted to the State Records Committee; review established agency records retention schedules at least annually and manage agency records retention, disposition, transfer and microfilming systems and programs; and coordinate and manage agency essential records protection program.

Appellant does not have agency-wide records management responsibility. The scope of his position does not meet the intent of the FRS 2 classification.

In relevant part, the FRA 1 classification encompasses positions that provide advice on established files and records management procedures; review and approve requests for records disposition; coordinate transmittal and disposition of agency records; and assist in the establishment of file systems. The FRA 1 classification best describes the scope of Appellant's records management responsibilities.

Conclusion. Appellant's appeal on exceptions should be denied and the determination of the Director, dated March 21, 2001, should be affirmed.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED that the appeal on exceptions by Appellant is denied and the Director's determination, dated March 21, 2001, is affirmed and adopted. A copy is attached.

DATED this _____ day of _____, 2001.

WASHINGTON STATE PERSONNEL APPEALS BOARD

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Gerald L. Morgen, Vice, Chair

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Leana D. Lamb, Member

Personnel Appeals Board
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Olympia, Washington 98504