March 20, 2007

RE: Kathleen Webb v. Washington State University
Allocation Review Request HEU No. 4632

Dear Ms. Webb:

On October 20, 2006, I conducted a Director's review meeting by telephone conference call regarding the allocation of the following Fiscal Technician III positions in the Accounts Payable Department of the Business Services Division at Washington State University:

Susan Chamberlin-----Position number 40636
Joey Comstock-------- Position number 41599
Deborah Howerton--- Position number 51668
Ami Libey----------Position number 41712
Jennifer McDonald--- Position number 42283
Patricia Perkins--------Position number 39706
Kathleen Webb--------Position number 41661

All of the employees were present during the conference call except Jennifer McDonald. Kendra Wilkins-Fontenot, Human Resource Consultant representing Washington State University (WSU), also participated in the conference call.

Background

On January 12, 2006, each employee submitted a Position Questionnaire to Human Resource Services at WSU, requesting that each Fiscal Technician III position be reallocated to the Fiscal Specialist 1 classification. By memorandum dated March 10, 2006, Steve DeSoer, Director of Human Resource Services and Theresa Elliot-Cheslek, Associate Director notified Barry Johnston, Executive Director of Business Services/Controller that the employees' positions were appropriately allocated to the Fiscal Technician III classification. Human Resource Services determined the duties the employees performed primarily related to providing technical support to departments and vendors while processing accounts payable documents. Further, Human Resource

Services did not believe the employees provided administrative support in a fiscal and/or business management area to an administrator, as required by the Fiscal Specialist 1 classification.

On April 5, 2006, you requested a Director's review of WSU's determination. Your request was consolidated with the employees previously mentioned.

The following summarizes the employees' perspective as well as WSU's:

Summary of Employees' Perspective

The employees describe the fiscal support they provide to the various, university-wide departments, including all research extensions of WSU, as administrative support rather than technical. The employees contend the duties they perform in accounts payable have significantly changed over the past ten years and, as a result, they believe they provide an important administrative support system to all departments at WSU and act as a collective "watchdog" for purchases and expenses. As such, the employees assert they each have the role and responsibility of safeguarding the University's assets. In order to monitor University spending, the employees assert they have contributed to the implementation of the purchasing card system, which began six years ago and added a new dynamic to the work they perform.

The employees describe the purchasing card system as a key and worthwhile procedure they helped create and implement, which they train other departments how to use successfully. The employees contend they each had a hand in developing the new system and made contributions such as the fields to include in the new system. They further contend they helped decide which policies needed to be put in place for the program to work. The employees believe the University departments and extensions have come to rely on their knowledge and expertise and frequently contact them with questions, for example, which correct funding to use for a specific expense or how to use the PAPR-Web function. The employees assert the numerous letters of recommendation from program administrators support their reallocation and demonstrate the administrative functions they perform.

The employees describe the work related to the purchasing card system as complex and state they now work closely with administrators to provide internal controls. As an example, the employees contend they physically go to the various departments and extensions and sort through invoices and expenditures to reconcile financial data, not only to provide internal control but also to perform a "pre-audit" prior to the state audit. The employees state the goal is to visit a department monthly to audit a three-month period, and they state they perform this auditing function on a rotating basis with two employees working together.

The employees assert they deal with program administrators, finance and budget managers, and fiscal specialists every day to advise them on expenditure issues like explaining which budget to use to correctly allocate an expense. Additionally, the

employees assert they use independent judgment and interpret and apply the rules correctly to problem-solve issues with departments and vendors, as well as initiate cost saving measures based on their individual expertise.

Besides the verbal comments provided during the conference call, several employees provided additional written responses, which they emailed to Ms. Wilkins-Fontenot in WSU's HR Office and to me. Wade Davis, the Associate Director of Business Services also sent an email supporting the employees' reallocations (Exhibit E-7). In the emails, the employees and Mr. Davis further contend the employees provide assistance with allocating purchases to the correct account/budget; train and problem-solve regarding payment processing of vendor bills to ensure compliance; maintain necessary spreadsheets to enable correct reporting for year-end IRS and 1042 tax reporting; develop, train, and provide outreach to departmental finance personnel; work directly with the Purchasing Card Administrator regarding purchasing card audits; and provide first line administrative support for departmental administrators and finance officers.

In summary, the employees believe the services they provide to vendors and administrators go beyond a technical level and contend their managers in Accounts Payable and Business Services support their reallocation to the Fiscal Specialist 1 classification.

Summary of Washington State University's (WSU's) Reasoning

WSU asserts the employees provide technical fiscal support rather than administrative support. To illustrate the University's point, WSU refers to the Washington State Classification and Pay Guide's definition of administrative work, which reads as follows:

> Duties performed involve determining and/or actively participating in making policy, formulating long-range objectives and programs, and reviewing the implementation of programs for conformance to policies and objectives.

WSU contends the employees do not support the administrative functions above such as assisting with policy development. Rather, WSU asserts the duties the employees provide relate to preparing, auditing, verifying, and processing accounts payable documents like invoices, vouchers, and purchase requests, and reconciling financial reports related to the University's purchasing card system. WSU acknowledges the employees provide support and training on the use of the purchase card and that they receive calls from other departments on a daily basis with regard to the purchase card. WSU, however, characterizes the employees' involvement as assisting with the process of how to complete necessary paperwork and walking individuals through the different procedures. WSU contends the employees provide technical support within pre-established polices. WSU further contends the employees' assigned duties do not support the administrative support functions like budget maintenance, payroll expenditure control, or the level of fiscal analysis required at the Fiscal Specialist 1 level.

WSU also acknowledges the employees work with specialized fiscal functions and work with all departments and extensions and train those departments on using the process and internal controls. However, WSU states the employees resolve issues like pointing out correct account codes to fiscal employees in the various departments. WSU maintains the duties performed by the employees are technical because they relate to purchasing, expenditure control, payroll processing, creating spreadsheets to track information, and record keeping. Therefore, WSU believes the employees are appropriately allocated to the Fiscal Technician III classification.

Director's Determination

This position review was based on the work performed for the six-month period prior to January 12, 2006, the date your Position Questionnaires were submitted to WSU's Human Resource Services.

As the Director's designee, I carefully considered all of the documentation in each file, including each employee's letter of appeal with attachments, the exhibits forwarded from WSU, and the verbal comments provided by all parties during the telephone conference and in writing via email. Based on my review and analysis of the employees' assigned duties and responsibilities, I conclude the positions are properly allocated to the Fiscal Technician III classification.

Rationale for Determination

First, I acknowledge the employees are invaluable assets to the University, as evidenced by the numerous letters of support and the department's exemplary audit history. Further, this decision is not a reflection of work performance or the employees' abilities to perform higher-level fiscal work. It is a determination based on the assignment of work to the positions and how the majority of work best fits the available job classifications.

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).

In conducting my analysis, I first considered the Position Questionnaire (PQ) (Exhibit E-2) submitted by the employees. The position purpose notes the following:

> To provide daily education/training of A.I.S PAPR and Balances applications, Business Policies & Procedures and sales tax regulations to the Finance Administration University wide. Maintain & Process

> departmental expense records; insure compliance with State & Institutional regulations/procedures; allocate departmental expenses to appropriate budgets. Provide daily support on Purchasing policies & procedures to all State wide Financial Administrators. Communication & coordination of purchasing rules & regulations with outside vendors world wide to facilitate prompt payments.

On page two of the PQ, the employees describe the work they consider to be outside the Fiscal Technician III class as follows:

- Without supervision, enforce the rules & regulations of State, Federal & Discretionary funds to ensure University compliance;
- Provide fiscal support to University area Finance Administrators on budget maintenance and expenditure control using AIS applications;
- Perform pre-audits on purchasing card transactions to ensure compliance, internal card safeguards, budget authority, log sheet compliance that supports itemized documentation and proper card usage.

On page three, the PQ breaks down the work activities as follows:

- 50% - involve preparing, auditing, and ensuring compliance of expense records and process using the AIS & PAPR-Web systems. The duties also include the final approval of all expense records for payment and a review for incomplete or incorrect expenses.

- 35% - daily work related to support, education and training on purchasing/purchase card procedures and polices.

- Other fiscal related duties at 5% or less include working with vendors and auditing statements; performing wire transfers and manual checks; and spreadsheets/record keeping.

The above duties and responsibilities meet the Fiscal Technician III's basic function, which states:

> Provide fiscal support using independent judgment in the interpretation and application of a variety of rules and procedures in specialized fiscal functions, such as internal control, revolving fund maintenance control, and providing resource data for reports.

The distinguishing characteristics for the Fiscal Technician III note that positions at that level "[p]erform detailed fiscal work where independent judgment is exercised to make fiscal determinations and to solve problems that arise within work assignments."

In performing the duties described, the employees provide fiscal support to all departments and extensions at WSU, using independent judgment, applying and

interpreting rules and procedures, and solving problems that arise while performing each of their specialized fiscal functions. While the employees played an integral role in shaping the purchasing card system, the duties they perform now that the system is in place are similar to the basic functions of providing internal control or revolving fund maintenance control.

Although allocation decisions are made by comparing the duties of the position to the basic function and distinguishing characteristics, the examples of typical work can lend support to the decision. In reviewing the typical work identified for the Fiscal Technician III class, the work identified by the employees relates to the following examples:

- Maintain accounts, authorize and enter fiscal transactions, compile and prepare fiscal statements;
- Prepare audit, verify and process final documents such as vouchers, purchase requests, invoices, receipts, payroll forms and bank deposit verifications;
- Interpret fiscal policies and procedures, assist in the monitoring and review of records and provide suggestions for development and maintenance of budget development systems;
- Review and verify fiscal reports for accuracy; investigate and correct errors to ensure compliance with established procedures and polices;
- Recommend improved procedures.

I also considered the attachment to the PQ, which included authorization of vendor payments, decisions related to purchasing card reviews/audits, and advice to departments regarding budget statement questions and how to allocate expenses. Again, these duties fall within the Fiscal Technician III class specification of applying specialized fiscal knowledge and rule interpretation and making decisions using independent judgment. These examples are also similar to the typical work examples at this level.

After submitting an appeal to DOP, each employee submitted an additional document outlining further justification for the appeal. The document, dated April 12, 2006, was signed by the employees' immediate and second-level supervisors and elaborated on the duties as justification for allocation to the Fiscal Specialist 1 class. This document did not exist when WSU made its determination; however, WSU had a chance to review the document prior to the Director's review meeting, and both parties made comments about the document during the conference call. For that reason, I included the document as a demonstrative exhibit (Exhibit E-5) and considered it part of the employees' argument.

Although the additional document (Exhibit E-5) characterizes the work as complex and administrative support, many of the functions listed support the basic function, distinguishing characteristics, and work examples of the Fiscal Technician III class. For example, the employees apply financial management principals, use independent judgment and interpret and apply rules for appropriate expenditures, maintain fiscal activity and data in AIS, approve records for payment, review expense records for complete and correct expenses, work with departments and vendors to resolve problems,

develop and maintain spreadsheets as tools for fiscal management, and provide internal control and tracking for the purchase card audit program. Further, performing functions like reconciling invoices and financial data, explaining the correct account or coding for expenses, or answering procedural questions related to the computer system are technical aspects of fiscal work.

The class series concept for the Fiscal Specialist 1 class states, "[p]rovide administrative support to administrator or manager in the area of fiscal and/or business management." These positions also apply principles of financial management to perform functions related to record keeping, auditing, analysis, budgeting, payroll, travel, purchasing and other types of fiscal operations. The distinguishing characteristics note that incumbents perform one or more fiscal administrative support functions for a department, research center or other organizational unit, such as maintaining a comprehensive system for recording fiscal activity, coordinating purchasing functions and expenditure control.

While the employees certainly provide technical support in all aspects of accounts payable and the purchasing card system to all WSU departments, the organizational chart for the Business Services/Controller (Accounts Payable) section indicates the employees report to a Fiscal Technician Supervisor, who then reports to a Fiscal Analyst up through the chain of command (Exhibit E-4). The finance administrators located in the departments the employees serve receive administrative support from staff in their departments, and the employees have indicated they work with Fiscal Specialist positions to train them on certain procedures like the purchasing card system. The technical expertise, while very important, does not reach the level of fiscal analysis, planning, and interpreting encompassed in the Fiscal Specialist series. Additionally, an employee's expertise and knowledge are not considered allocating criteria because allocation is based on the assigned duties to a position.

Therefore, based on the overall duties and responsibilities assigned, the Fiscal Technician III classification best describes the employees' positions, which include the following positions #s: 40636; 41599; 51668; 41712; 42283; 39706; 41661.

Appeal Rights

WAC 357-49-018 provides that either party may appeal the results of the Director's review to the Personnel Resources Board (board) by filing written exceptions to the Director's determination in accordance with Chapter 357-52 WAC.

WAC 357-52-015 states that an appeal must be received in writing at the office of the board within thirty (30) calendar days after service of the Director's determination. The address for the Personnel Resources Board is 2828 Capitol Blvd., P.O. Box 40911, Olympia, Washington, 98504-0911.

If no further action is taken, the Director's determination becomes final.

Sincerely,

Teresa Parsons
Director's Review Supervisor
Legal Affairs Division

c: Kendra Wilkins-Fontenot, WSU

Enclosure: List of Exhibits