STATE OF WASHINGTON
OFFICE OF THE STATE HUMAN RESOURCES DIRECTOR
DIRECTOR'S REVIEW PROGRAM
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March 23, 2012

TO: Teresa Parsons
Director's Review Program Supervisor

FROM: Kris Brophy
Director's Review Program Investigator

SUBJECT: Thomas Werda v. Department of Transportation (WSDOT)
Allocation Review Request ALLO-11-025

Director's Determination

This position review was based on the work performed for the six-month period prior to January 6, 2011. As the Director's Review Investigator, I carefully considered all of the documentation in the file, the exhibits, and the verbal comments provided by both parties during the two review conferences. Based on my review and analysis of Mr. Werda's assigned duties and responsibilities, I conclude the Maintenance Mechanic 4 classification is the proper allocation of his position**.**

Background

Mr. Werda and his immediate supervisor, Ms. Annie Morris, Maintenance Specialist 5, completed an updated Position Description Form (PDF) for his position. Mr. Werda signed and submitted the updated PDF to Mr. Andrew Blomberg, Regional Facilities Manager on January 6, 2010, requesting that his position be reallocated from Maintenance Mechanic 3 (MM3) to Maintenance Mechanic 4 (MM4) (Exhibit A-2).

Mr. Werda explained during the course of this review that Mr. Blomberg revised Mr. Werda's description of duties and percentages of time worked and signed the revised PDF on January 27, 2011 (Exhibit A-3). Mr. Werda was notified of the changes and also signed the revised PDF on January 27, 2011. Mr. Blomberg submitted the PDF along with a letter supporting Mr. Werda's request to Mr. David McCormick, Assistant Regional Administrator (Exhibit A-9).

Mr. Blomberg's description of Mr. Werda's work and percentages of time were revised further by Mr. McCormick and others (Exhibit B-2). On March 24, 2011, Mr. McCormick signed and submitted the revised PDF to WSDOT NWR-HR (Exhibit B-2). Mr. McCormick's and Mr. Blomberg's versions of the PDF were date stamped by WSDOT NWR-HR on March 24, 2011.

WSDOT used Mr. McCormick's version to review Mr. Werda's duties and responsibilities (Exhibit B-2). Mr. Werda indicated that he initially protested but eventually agreed to the revised language. He stated WSDOT did not review his submitted PDF in its review.

By memorandum dated May 16, 2011, WSDOT notified Mr. Werda that his position was properly allocated to the Maintenance Mechanic 3 classification (Exhibit B-1).

The Department of Personnel received Mr. Werda's Request for a Director's Review form appealing WSDOT's allocation determination on June 7, 2011(Exhibit A).

A pre-hearing conference was conducted on November 17, 201, to discuss an approach for reviewing the large number of exhibits submitted by Mr. Werda in his appeal.

I conducted an initial Director's review conference with the parties on December 1, 2011. The parties discussed how the PDF submitted by Mr. McCormick and used by WSDOT in its review diverged from the PDF originally signed by Mr. Werda January 6, 2011 (Exhibit A-2). As a result of the discussion, Ms. Pavlicek agreed to review Mr. Werda's submitted PDF and issue a new allocation determination effective January 6, 2011.

The review conference was postponed to allow Mr. Werda an opportunity to provide Ms. Pavlicek with a revised rationale in support of his PDF along with additional supporting documentation. It should be noted that in the supporting rationale submitted to Ms. Pavlicek, Mr. Werda indicated his position should be reallocated to the ITS 4 class. (see exhibit A-22),

Ms. Pavlicek reviewed Mr. Werda's information and on December 16, 2011, issued a second determination letter reconfirming that Mr. Werda's position was properly allocated to the MM3 class (Exhibit B-7).

A second review conference was conducted on January 31, 2012. Present for the meeting were Thomas Werda; Phyllis Naiad, Council Representative, Andy Tole, Council Representative, WFSE (King County); Sherri Clarke, Classification Specialist, WFSE; Annie Morris, Region Wide Facilities Manager, WSDOT; and Niki Pavlicek, OHR Classification, Compensation, Operations & Benefits Manager, WSDOT.

Ms. Pavlicek stated shortly into the meeting that based upon the initial conversation that morning, she believed Mr. Werda's duties and responsibilities constituted expert-level work and that she was going to reallocate Mr. Werda's position to the MM4 class. Mr. Werda chose to continue the appeal, contending that his position's duties fit the ITS 4 level class.

By memo dated February 14, 2011, WSDOT reallocated Mr. Werda's position to the MM 4 class, effective January 6, 2011 (i.e. the date agreed to by the parties (Exhibit B-8). Thus, the scope of this review is to determine whether Mr. Werda's position is properly allocated to the MM 4 class, effective January 6, 2011.

Rationale for Director's Determination

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).

Duties and Responsibilities

Mr. Werda's position is assigned to the WSDOT Northwest Region Maintenance Office Facilities Organization. The NW Region reaches from Canada to Seattle, and includes Island County. The NW Region is divided into six areas, with the regional headquarters located in Shoreline. The NW Region Maintenance Office – facilities branch provides facilities maintenance for approximately 270 buildings and 60 sites. Mr. Werda is assigned to the NW area and his position is physically located in Mt. Vernon.

Mr. Werda performs a variety of preventive, corrective, and project level work on a variety of equipment and systems including mechanical, plumbing, water, sewer, and physical plant machinery and equipment including air compressor, roof systems, exterior/overhead doors, waste oil furnaces and associated building and environmental controls.

Because of his specialized technical knowledge, his position provides Region wide remote technical support to other maintenance mechanics in the diagnosis, operation and repair of various Heating, Ventilation and Air Conditioning (HVAC), Air Balance, Computer Data Center Environmental controls, Building Automation Systems (BAS) and other microprocessor-based systems including automated gates/valves, overhead doors, and fire alarm panels.

Mr. Werda describes his duties and responsibilities in the Position Description Form (Exhibit A-2) as follows:

45% Resolves the region's most complex problems/issues and/or may supervise all other positions. Instructs and trains members in various skilled trades' tasks. Performs expert level region wide work in facility design, installation, repair and maintenance. Handles NW Region Facilities most sensitive and critical issues, or those with a potential for broad impact, and initiates proactive intervention as necessary. Performs remote support (give directions) to region wide team members and management in the diagnostics and operation of critical systems.

Manages the region wide energy management control systems, and all supporting sub-systems. Designs, plans, estimates and procures materials, supplies and equipment for facility HVAC and lighting upgrades and remodels. Supervises work and leads crew members (and other division personnel) in the region wide execution of facility upgrades, remodels, and energy conservation projects. Designs, plans, installs and/or supervises energy conservation projects with local utilities and provides after the project follow through for the rebate incentive programs.

35% Performs above senior-level (technical expert) in facility maintenance and repair. Submits specifications to contractors to solicit bids, reviews submitted bids and designs, oversees contractor work, and performs as the commissioning agent. Works with management, engineering firms and contractors in the design process of projects.

Performs expert level work in troubleshooting and maintenance on HVAC, T.A.B., DDC, pneumatics, electronics, UPS systems, plumbing, water, sewer, and physical

plant machinery and equipment. Develops plan options and budget cost estimates for region wide HVAC/DDC FWR's [Facility Work Requests].

15% Site and Grounds maintenance of radio tower sites. Performs expert level repair relating to landscaping, and irrigation. Performs maintenance of hard surface areas, paved and unpaved. Operates a variety of equipment, power tools, vehicles, rental equipment, backhoes, tractors, ladder systems, fall restraint systems, and other motorized equipment.

Participates in safety meetings, training, (BOC classes), and utilize all safety equipment and provides crew training during the work shift. Maintain and purchase parts, supplies, and inventory for PM's. Utilize WSDOT computer systems and network to complete paperwork, and for operating region wide networked control systems, maintaining backup databases, and for completing project design/plan work.

5% Performs other duties and tasks as assigned.

Mr. Werda's immediate supervisor, Ms. Morris, and the Facilities Manager, Mr. Blomberg, fully support Mr. Werda in his request to a higher level class. Mr. Blomberg states in his reallocation justification memo to Mr. McCormick (Exhibit A-9) that the original focus of Mr. Werda's position was to provide HVAC maintenance with a secondary emphasis on performing general facility maintenance work. Mr. Blomberg further stated:

> … controls for these [HVAC] systems, especially the larger ones, have integrated more technology and computerization to manage the most efficient use of energy and control the environment for the facility occupants. As late as 4 years ago, we were relying heavily on consultants and contractors to specify, program, modify and maintain these systems… Because of Tom Werda's previous work experience, and his talent with computer programming and incorporating technology, he has become the expert at complex HVAC/Technology issues. Many of these larger complex systems rely on WSDOT IT Network which requires coordination with the IT department on communication and software issues…
>
> … In the last 3 years, we lost [employees] who had …experience with computerized control systems. We had to rely on Tom Werda to remotely diagnose and troubleshoot issues, give consultation to other employees over the phone and in person, and to supervise contractors in the repair and renovation of these complicated controls. We see Tom's position currently and in the future as one that manages a half dozen or so complex systems over the network and/or remotely as well as trains lower level employees in the use of this technology. Because of the size of our current Facilities crew, we … can't justify a supervisory position but this qualifies as an expert in knowledge and activities…
>
> …Tom leads various crew members on a project-by-project basis or on a given task. Our crew is small and we can't afford to assign him a full time dedicated crew. However, the necessary knowledge and skills in computers, controls technology and building environmental controls make this position an expert in our case…

Mr. Blomberg states that with the converging of information technology with Building Automation Systems, the overall complexity of Mr. Werda's work will continue to increase, thereby warranting reallocation to a higher level class.

Summary of Mr. Werda's Perspective

Mr. Werda asserts that his work on BAS computers and other microprocessor-based control systems within the NW Region meet the requirements of the Information Technology Specialist 4 class.

Mr. Werda contends he oversees and manages the specialized BAS computer systems, work stations, servers, PC's, laptops, Palm PC's within the NW Region. Mr. Werda asserts his position requires knowledge of the WSDOT IT network structure and how that affects BAS computers, web servers, and their operating systems. Mr. Werda asserts his position requires senior-level knowledge of multiple vendor proprietary and non-proprietary computers, web servers, and operating systems. Mr. Werda asserts he resolves complex issues, performs advanced level troubleshooting, and works on large scale projects such as creating a multi-level, multi-function region wide command workstation that allows access and control of all systems from that location.

Mr. Werda asserts he performs many ITS 4 level tasks including conducting capacity planning, planning and directing large-scale projects, representing the agency as a senior level technical expert, representing institution-wide standards in reviewing agency systems and systems in review by outside contracted engineering firms.

Summary of WSDOT's reasoning

WSDOT contends the majority of Mr. Werda's time is spent performing expert-level Maintenance Mechanic 4 work. WSDOT asserts his position meets the definition of this class of performing a broad scope of work involving the maintenance, repair and modification of plant machinery and mechanical equipment involved with building, special apparatus, and utilities and facilities.

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.

Comparison of Duties to Information Technology Series

The Class Series Concept for the Information Technology Specialist series states:

> Positions in this category perform professional information technology systems and/or applications support for client applications, databases, computer hardware and software products, network infrastructure equipment, or telecommunications software or hardware.
>
> This category broadly describes positions in one or more information technology disciplines such as: Application Development And Maintenance, Application Testing, Capacity Planning, Business Analysis and/or Process Re-Engineering, Data Base

> Design And Maintenance, Data Communications, Disaster Recovery/Data Security, Distributed Systems/LAN/WAN/PC, Hardware Management And Support, Network Operations, Production Control, Quality Assurance, IT Project Management, Systems Software, Web Development, or Voice Communications.
>
> Positions which perform information technology-related work to accomplish tasks but are non-technical in nature would not be included in this occupational category. [Emphasis added]

The overall focus of Mr. Werda's position does not meet the intent of the Information Technology (IT) class series.

Incumbents in this series provide professional information technology systems, programming, installation, maintenance and/or systems support in one or more of the IT disciplines identified in the class series concept. The purpose of Mr. Werda's position is not to perform professional IT support within a specific IT discipline, but rather to apply his knowledge and use of information technology to support and maintain building environmental control and other energy management control systems and all supporting sub-systems across the NW Region.

Mr. Werda's position focuses on performing Region wide facility design, installation, repair and maintenance. He works on a variety of specialized HVAC/R, T.A.B., DDC, pneumatic, electronic, plumbing, water, sewer, and physical plant machinery, equipment and control systems. He also develops plan options and budget cost estimates for Region wide HVAC/DDC facility work requests. He provides remote support to other maintenance staff to assist them in diagnosing and repairing complex building environmental control systems. He designs, plans, and installs energy conservation lighting projects with local utilities and coordinates the rebate incentive program associated with those projects. He also leads crew members and other division personnel in Region wide facility upgrades, remodel, and energy conservation projects.

Although a portion of Mr. Werda's work involves performing information technology-related work to accomplish his tasks, the focus of his position, and the majority of his duties as a whole, are non-technical in nature and would therefore not be included in this series. The primary focus of Mr. Werda's position is to perform specialized facility maintenance and repair work.

Comparison of Duties to Information Technology Specialist 4 (ITS4)

The Definition for this class states:

> Performs analysis, system design, acquisition, installation, maintenance, programming, project management, quality assurance, troubleshooting, problem resolution, and/or consulting tasks for complex computing system, application, data access/retrieval, multi-functional databases or database management systems, telecommunication, project or operational problems.
>
> As a senior-level specialist in an assigned area of responsibility and/or as a team or project leader, applies advanced technical knowledge and considerable discretion to evaluate and resolve complex tasks such as planning and directing large-scale projects; conducting capacity planning; designing multiple-server systems; directing or facilitating the installation of complex systems, hardware, software, application interfaces, or applications; developing and implementing quality assurance testing and performance monitoring; planning, administering, and coordinating

> organization-wide information technology training; acting as a liaison on the development of applications; representing institution-wide computing and/or telecommunication standards and philosophy at meetings; or developing security policies and standards.
>
> Incumbents understand the customer's business from the perspective of a senior business person and are conversant in the customer's business language. Projects assigned to this level impact geographical groupings of offices/facilities, and/or regional, divisional or multiple business units with multiple functions. The majority of tasks performed have wide-area impact, integrate new technology, and/or affect how the mission is accomplished.

Mr. Werda's position does not perform senior-level analysis, system design, acquisition, installation, maintenance, programming, project management, quality assurance, troubleshooting, problem resolution, and/or consulting tasks for complex WSDOT IT computing systems, applications, data access/retrieval, multi-functional databases or database management or telecommunication systems as required for allocation to this class.

Comparison of Duties to Information Technology Specialist 3 (ITS3)

The Definition for this class states:

> In support of information systems and users in an assigned area of responsibility, independently performs consulting, designing, programming, installation, maintenance, quality assurance, troubleshooting and/or technical support for applications, hardware and software products, databases, database management systems, support products, network infrastructure equipment, or telecommunications infrastructure, software or hardware.
>
> The majority of assignments and projects are moderate in size and impact an agency division or large workgroup or single business function; or internal or satellite operations, multiple users, or more than one group. Consults with higher-level technical staff to resolve complex problems.

A portion of Mr. Werda's work involves performing information technology technical support as stated in the definition of this class. Mr. Werda independently provides technical support on several computer-integrated energy management control systems, HVAC systems, and BAS computers and other microprocessor-based control systems.

Mr. Werda independently provides troubleshooting and technical hardware and operating system software support on BAS and other integrated energy management control system computers, work stations, servers, PC's, laptops, and Palm PC's within the NW Region. Mr. Werda stated during the review conference that he coordinates with the IT department on software and other WSDOT IT Network issues that interface or integrate with BAS computers, web servers, and their associated operating systems. Mr. Werda's position requires knowledge of vendor proprietary and non-proprietary computers, web servers, and operating systems. During the review conference Mr. Werda stated that his work included creating a computer-integrated command workstation at the Dayton Headquarters building that allows remote access and control of all energy management control systems from one centralized location.

However, while this portion of work is addressed in the definition of this class, the information technology series, and the ITS 3 class specifically, does not address the primary focus of his position, and the majority of his duties as a whole, which is to perform specialized maintenance and repair activities in support of WSDOT NW Region facilities. Mr. Werda's information technology work is secondary to his primary focus of working within the facilities maintenance trade field. There is another class series which addresses the unique functions he performs involving the maintenance, repair and modification of facilities.

Comparison of Duties to the Maintenance Mechanic series

The Class Series Concept for Maintenance Mechanic positions includes performance of the following:

> . . . general maintenance, repair, remodeling and construction duties utilizing working knowledge of several related skill fields such as electrical, plumbing, carpentry, welding, painting and machinist work. Incumbents inspect, repair, install and maintain physical facilities, locks and maintain and repair machinery and equipment. . . .

Mr. Werda performs a variety of specialized and highly technical expert level facility maintenance and repair activities requiring a working knowledge of a variety of skilled trades including HVAC, electronic control systems, electrical and other trades skills and should therefore be allocated to a class within the Maintenance Mechanic series.

Comparison of Duties to Maintenance Mechanic 4 (MM 4)

The Definition for this class states:

> This is the supervisory or expert level of the series. Positions at this level are responsible for shop administration and supervising maintenance personnel, equipment mechanics or others performing skilled maintenance, repair and modification of plant machinery and mechanical equipment involved with buildings, special apparatus, utilities and facilities. This level also includes positions which erect construction or communication towers around 300 feet high. [Emphasis added]

The Office of State Human Resource Director (OSHRD) Glossary of Classification Terms defines expert as:

> Within the context of the class series, has the highest level of responsibility and extensive knowledge based on research and experience in a specific area. Resolves the most complex, critical, or precedent-setting issues that arise. Positions act as a resource and provide guidance on specialized technical issues. Although an employee may be considered by their peers as an expert or "go-to" person at any level, for purposes of allocation, the term is typically applied to an employee in a higher class level who has gained expertise through progression in the series.

The Maintenance Mechanic 4 class accurately describes the overall scope and level of responsibility assigned to Mr. Werda's position.

Mr. Werda confirmed during the review conference process that his position does not supervise other employees. However, the thrust of his position is to perform expert-level facilities maintenance design, installation, repair and maintenance work for the WSDOT NW Region buildings, utilities, and facilities. He works on a variety of specialized HVAC/R, T.A.B., DDC, pneumatic, electronic, plumbing, water, sewer, and physical plant machinery, equipment and control systems. He develops plan options and budget cost estimates for Region wide HVAC/DDC facility work requests. He provides remote support to other maintenance staff to assist them in diagnosing and repairing complex building environmental control systems.

His position meets the definition of expert within the context of this class series as having the highest level of independent responsibility resolve the NW Region's most complex or critical facilities maintenance issues that arise. Mr. Werda acts as a resource and provides guidance on specialized technical issues to other maintenance mechanics in the region.

Mr. Werda leads crews in Region wide facility upgrade projects including remodels and energy conservation projects. During the review conference Mr. Werda discussed two energy conservation lighting projects he completed which included designing, planning, and working with local utilities to install new facility lighting. Mr. Werda also coordinated the rebate incentive program associated with those projects. He also leads crew members and other division personnel in Region wide facility upgrades, remodel, and other facility energy conservation lighting projects.

Mr. Werda also supports the Facilities Maintenance Construction Project Coordinator in the design, bid, cost, and management of complex HVAC/R and DDC facility work requests.

Mr. Werda has responsibility for the Region's largest and most complex irrigation systems which includes designing and redesigning water delivery systems.

Mr. Werda's overall level of responsibility fits the highest level of the series as an MM 4. Mr. Werda's position also overlaps to a certain degree with the Facilities Engineer, HVAC and Control Technician series. However, Mr. Werda's position does not require performing professional engineering tasks as required by the Facilities Engineer series. Further, his position encompasses a wider variety and broader scope of facilities maintenance responsibility than described by the HVAC and Control Technician classes. In addition, while a portion of Mr. Werda's work falls within the ITS 3 class, the overall majority of work assigned to his position is more accurately and fully described by the Maintenance Mechanic 4 classification. Further, Mr. Werda's knowledge and use of information technology is secondary to his primary duties requiring application of building environmental control systems knowledge related to his facilities maintenance function. Mr. Werda's use of information technology is to support region wide computer-integrated facility HVAC/R BAS and other control systems.

Additionally, 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. Dudley v. Dept. of Labor and Industries, PRB Case No. R-ALLO-07-007 (2007).

Further, the PRB has previously determined that while one class appeared to cover the scope of a position, there was another classification that not only encompasses the scope of the position, but specifically encompassed the unique functions performed. Alvarez v. Olympic College, PRB

No. R-ALLO-08-013 (2008). Further, the Board has consistently held that "[w]hen 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).

Additionally, positions are to be allocated to the class which best describes the majority of the work assignment. Ramos v DOP, PAB Case No. A85-18 (1985).

Finally, in determining which class provided the best fit, it is also noted that Mr. Werda's position fits within the WSDOT organizational structure by reporting to the WSDOT NW Region Facilities Manager under the supervision of a Maintenance Specialist 5 position (Exhibit B-2(c)).

A position's allocation is not a reflection of performance or an individual's ability to perform higher-level work. Rather, it is based on the majority of work assigned to a position and how that work best aligns with the available job classifications. Based on the level and scope of the overall duties and responsibilities assigned to Mr. Werda's position, the Maintenance Mechanic 4 classification is the best fit.

Appeal Rights

RCW 41.06.170 governs the right to appeal. RCW 41.06.170(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.

You may file in person at 521 Capitol Way South, Olympia, Washington. Fax number (360) 586-4694. For questions, please call (360) 664-0388.

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

c: Thomas Werda, WSDOT
Phyllis Naiad, WFSE
Katy Taylor, WSDOT HR Director
Kenneth D. Irons, SPHR, WSDOT
Lisa Skriletz, OSHRD

Enclosure: List of Exhibits

THOMAS WERDA v WSDOT ALLO-11-025
List of Exhibits

A. Thomas Werda Exhibits

Thomas Werda Director's Review Request form received by DOP on June 7, 2011 with attached Allocation Determination letter from Niki Pavlicek dated May 16, 2011 (5 pages)

Exhibits submitted September 30, 2011

1. DOP Class Specification for Facilities Engineer 2, (528B) (2 pages)
2. Classified Position Description Form (PDF) submitted by Thomas Werda, dated January 6, 2011 (3 pages)
3. PDF for Thomas Werda's position submitted by Andrew Blomberg with March 24, 2011 NR Region HR Date Stamp (4 pages)
4. Series of email strings discussing the PDF and review notification (4 pages)

Cover page for following exhibits – (Note: Mislabeled – Disregard) (1 page)

5. Recommendation letter from James E. Shaw dated January 7, 2011 (1 page)
6. Supplemental rationale for Exhibit B-2 PDF completed by Thomas Werda (4 pages)
7. Supplemental notes from Tom regarding his Performance Review (PMP) (2 pages)
8. Email from Annie Morris to Thomas Werda dated December 10, 2010 with attached Employee Performance Review for Tom Werda for period 3/26/10 through 11/30/2010. (7 pages)
9. Reallocation justification memorandum from Andrew Blomberg to Dave McCormick dated February 4, 2011. (4 pages) (Note: see exhibit A-3)
10. Extra Mile Award Nomination from Dave McCormick to Thomas Werda dated May 9, 2011 (3 pages)
11. Email string from Andy Blomberg dated 12/29/10 regarding, "rebilled accounts re: meter multiplier issue", acknowledging Tom Werda for his work (3 pages)
12. Memorandum from J.E. Shaw to Dave McCormick regarding, "Facilities Trades and Supervisor Positions" dated June 1, 2003 (3 pages)
13. Document titled, "Definitions of class levels" (2 pages)
14. List of Licenses, Certifications, Training Certificates and requirements for Thomas Werda (4 pages)
15. Copy of Robert Faull vs. DOT Allocation Review Response 06AL0063. (7 pages)
16. Documentation regarding "Dayton" Building Project (109 pages)
17. Documentation regarding, "Justification Emails Andy Blomberg and Ken submitted for Reallocation in March 2011" (91 pages)
18. Documentation regarding Skykomish Facility Lighting Project (50 pages)
19. Documentation regarding Newhalem Facility Lighting Project (38 pages)

20. Documentation regarding work assignments with Thomas Werda notation: "Emails that verify duties performed as described in this section (Please note that a project may begin at a certain time outside of the 10/24/10-3/24/11 time period but would be worked on during the time period)"
    a. Automated systems (82 pages)
    b. Projects (60 pages)
    c. Expert level work (167 pages)
21. Additional Emails - Other (11 pages)

Exhibits submitted after first review conference

22. Supporting document from Thomas Werda titled, "Justification for Reallocation to ITS 4 Position" (6 pages)
23. Copy of PDF (see A-2) submitted by Thomas Werda, dated January 6, 2011 with attached supporting rationale and other documentation (17 pages)
24. Documentation regarding, "BAS/DDC Computers ITS (20A)" (19 pages)
25. Documentation regarding, "Projects (20B)" (29 pages)
26. Documentation regarding, "Justification for Expert (20C)" (51 pages)
27. Duplicate copy of exhibit A-21 (21 pages)

Exhibits submitted during second review conference

28. Documentation regarding, "Trends for IGA<Investment Grade Audit (27 pages)
29. Document titled, "WSDOT Facilities Trades Disparities and Positions" (28 pages)

B. WSDOT Exhibits

1. Allocation determination letter from Niki Pavlicek to Thomas Werda dated May 16, 2011 (3 pages)
2. PDF for Thomas Werda's position March 24, 2011 which differs from the PDF completed by Thomas Werda, with attachments: (6 pages total)
    a) Work Period Designation Form
    b) Risk Classification Identification
    c) NW Region Maintenance Office Facilities Branch Organizational Chart
3. DOP Classification for Maintenance Mechanic 1, (626J) (1 page)
4. DOP Classification for Maintenance Mechanic 4 (626M) (1 page)
5. DOP Classification for Maintenance Mechanic 3 (626L)
6. PDF for Thomas Werda's position dated June 28, 2010 (2 pages)
7. Revised Reallocation Allocation determination letter from Niki Pavlicek to Thomas Werda dated December 16, 2011 (3 pages)
8. Reallocation appointment letter to Thomas Werda dated February 14, 2012. (1 page)