



STATE OF WASHINGTON
OFFICE OF FINANCIAL MANAGEMENT

STATE HUMAN RESOURCES DIVISION | DIRECTOR'S REVIEW PROGRAM
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July 9, 2018

TO: Connie Goff
Rules and Appeals Program Section Chief

FROM: Caroline Kirk
Director's Review Specialist

SUBJECT: Jerry Franklin v. Department of Ecology (ECY)
Allocation Review Request ALLO-17-072

Director's Determination

This position review is based on the work performed for the six-month period prior to June 27, 2017, the date that ECY Human Resources (ECY HR) received Jerry Franklin's request for reallocation. As the Director's Review Specialist, I carefully considered all of the exhibits and any closing arguments submitted by the parties. Based on my review and analysis of Mr. Franklin's assigned job duties; I conclude his position should be reallocated to the Cartographer 3 classification.

Background

On June 27, 2017, Mr. Franklin submitted a Position Review Request (PRR) to ECY HR, requesting that his position be reallocated to the Information Technology Specialist (ITS) 4 classification. (Exhibit A-2)

ECY HR notified Mr. Franklin on October 3, 2017, that his position would remain allocated to the ITS3 classification. (Exhibit B-1)

On October 25, 2017, the Office of Financial Management, State Human Resources (OFM-SHR) received Mr. Franklin's Request for Director's Review of ECY HR's allocation determination. (Exhibit A-1)

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 classification that best describes the overall duties and responsibilities of the position. *Liddle-Stamper v. Washington State University*, PAB Case No. 3722-A2 (1994).

Organizational Structure (Exhibit B-5 and B-6)

According to the organizational chart, this position works under the Shorelands and Environmental Assistance Program within ECY. Mr. Franklin reports to Scott McKinney, State Coordinator.

Position Purpose (Exhibit A-2)

As summarized in the PRR, Mr. Franklin described his position purpose is as follows:

This position serves as the agency Risk Mapping, Analysis, and Planning (RiskMAP) Coordinator performing flood hazard mapping and flood risk analysis statewide. This position is a senior-level professional spatial database administrator and IT specialist providing program leadership, training, expertise, and technical assistance to projects, programs, and agency applications. This position independently manages spatial data, performs risk assessments, collects, integrates, and distributes data, develops mapping applications and tools to local governments, state and federal agencies, and other client groups.

Duties and Responsibilities (Exhibit A-2)

As summarized in the PRR, Mr. Franklin describes the duties performed as:

Manage statewide spatial flood hazard data, acquisitions, and updates. Directs large-scale analysis and mapping projects statewide providing advanced technical knowledge of tools and technologies such as GIS, GPS, internet and mobile device applications, and high-resolution digital topographic data (LIDAR). This includes integrating source datasets for agency application (WA Coastal Atlas), database design (Watershed Risk Portfolio, Wetland Buffers, CMS's, ArcGIS CAV Collector Tool), integrating newly acquired data with existing data to meet application standards. Performs quality review of new spatial data developed by projects. Maintains and distributes GIS data and mapping applications for public, private, and government audiences (draft & preliminary regulatory flood hazard data, non-regulatory flood risk geodatabases, ArcGIS.com online mapping applications and services, areas of increased or decreased risk, coastal transect surveys, derived elevation datasets, HAZUS public risk data, channel migration zones, and georeferenced flood aerial imagery).

Risk Mapping, Assessment, and Planning Program Coordinator

Working with local governments and agencies on natural hazard mapping and analysis projects. This includes program and strategic planning, project management, data acquisition and development, community engagement, risk analysis, outreach, and risk communication.

Develops analysis and mapping methodologies for GIS/GPS projects such as Community Assistance Visit field collector tool, wetland buffer and protection analysis (methods for evaluating regulatory buffers on select wetlands using both GIS methods and GPS procedures), channel migration zone analysis (method to extract Relative Water Surface Elevations from LiDAR for use in CMZ and geomorphic analysis), and high water mark surveys. Coordinates, develops and maintains a data dictionaries for collecting HWM's and other flood related features for evaluating localized flooding, trends, and correlations with the FEMA 1% annual change event).

Perform GIS spatial analysis for State & Federal agencies, communities, internal and external clients. This includes terrain analysis for natural hazard mapping such as scenario-based depth of flooding, erosion and avulsion potential, and areas subject to sea level rise, assessing populations at risk, hazard scenarios for emergency preparedness, and integrating natural hazard inventories. This position also responds to program agency, and cross-agency needs. This includes large-scale complex requests such as the 2015 HUD Natural Disaster Resilience Competition.

This requires working knowledge of ArcGIS software, GIS database fundamentals, and spatial data concepts of accuracy, coordinate systems, and cartographic principles.

Summary of Mr. Franklin's Perspective (Exhibit A-1)

In his filing for a Director's Review, Mr. Franklin explains the ECY HR interview process was limiting and it did not allow him to fully convey the depth of his IT duties. Mr. Franklin states he is the "...Washington State's Risk Mapping, Assessment, and Planning Coordinator (RiskMAP). This Program is operated by the Federal Emergency Management Agency (FEMA) from their Risk and Analysis Branch. A prime objective of RiskMAP is to deliver quality data that increases awareness and leads to action that reduces risk to life and property." The data is multifaceted geographic information or GIS spatial data.

The IT analysis Mr. Franklin provides is to develop methods and procedures that drive or guide project sequencing, data development, and applications. He does this through several methods including the spatial analysis of geographic data such as population trends, densities and distributions of risk factors, and interpolating terrain data under changing conditions.

These are not the full statements provided in the Director's Review request; however, all statements that have been submitted have been taken into consideration.

Summary of ECY HR's Perspective (Exhibit B-1)

In the determination letter, Barb Vane, Human Resource Consultant, summarized her meeting with Mr. Franklin. She listed the duties Mr. Franklin described as:

- Utilizing IT expertise test and evaluate software and applications that meet agency business needs. Responsible to manage spatial data, perform risk analysis and assessment based upon information from the various sources described in the PRR and position description.
- As the RiskMap Coordinator your position is responsible to perform statewide flood hazard mapping and flood risk analysis. You integrate datasets and use tools from other sources to meet application standards and agency business needs by formulating a process for gathering information and storing it in tabular form (i.e. Excel Spreadsheets). You determine what data needs to be collected by staff in the field and train them on collection tools.
- Serving as the team lead for quality assurance and quality control (QAQC) for your program, Shorelands and Environmental Assistance (SEA). The team was created five years ago and consists of other from outside the agency such as DOT, DNR and Department of Emergency Management. FEMA creates significant data you use to make final decisions regarding how to use data received from the various sources used by Ecology and for review by the team.

- GIS data is housed on the agency server with ArcGIS the agency platform for agency-side work including by the ITSO GIS Team and reflected on the GIS Website page we discussed during our meeting (Attachment D).
- When asked if your duties include building, designing, developing or programming of complex multi-functional databases or database systems, you said you manage data from various sources and are responsible for inputting data and for quality assurance/quality control. Work is completed with software you must be trained in (i.e. HAZUS). No one in the agency does GIS design and ArcGIS is the agency wide platform for agency work, however others might design pieces of a program or script. You said you don't design software and are a user of IT. You described your duties of database design as formulating a process of gathering information and storing it in tabular (i.e. EXCEL Spreadsheets) form.
- Responsible for producing data by receiving data from other sources (i.e. FEMA), and then producing other data information by creating maps and reports for analysis by the team you lead. You develop data standards for use on projects and by other staff. When new information is created the team conducts an analysis and develops risk scenarios.
- Determining what data needs to be collected by staff for example Wetlands staff and train them on how to use tools and equipment (GPS) while out in the field. This includes creating maps designing a tool for staff to use from cellular phones or other available equipment. You said this wasn't necessarily a system, rather a tools, all part of the GIS system.

Ms. Vane summarized her meeting with Mr. McKinney, Mr. Franklin's supervisor. She listed Mr. McKinney's statements as:

- Increased IT skills are required by FEMA with GIS technology rapidly evolving from routine digital cartography serving specific projects and functions to delivering complex applications across multiple platforms to various user communities. This technology requires constant continuing education to keep current with the GIS tools as well as the knowledge of emerging platforms such as online and smart phone applications.
- The Shorelands and Environmental Assistance (SEA) Program needs have evolved along with technology including several core statewide program functions.

Ms. Vane summarized her meeting with an ITS subject matter expert (SME). The ITS SME reviewed Mr. Franklin's PRR and provided the following:

- Your position is not a developer and performs database or data management. ITSO GIS positions utilize advanced knowledge to design for implementation, agency-wide IT systems.
- You utilize tools to develop data scripts to extract data from other sources, systems or tools. You use data to make configuration changes to meet program needs and for developing charts or reports for data collection and data analysis. Database tools to manage data for other IT user positions include MS Access, Excel or other standard database tool to manage data.

Ms. Vane concluded Mr. Franklin's duties did not involve serving as a senior-level IT specialist applying advanced technical knowledge and discretion to evaluate and resolve complex IT

related tasks. Mr. Franklin's position for the majority of time is not responsible for IT analysis, IT system design, acquisition, installation, maintenance, programming, project management, quality assurance, troubleshooting, problem resolution and tasks for complex IT computing systems, applications, multi-functional databases or database management systems. Therefore, Ms. Vane found Mr. Franklin was properly allocated to the ITS3 classification.

Comparison of Duties to Class Specifications

As stated in the Personnel Resources Board (PRB) case *Norton-Nader v. Western Washington University*, PRB Case No. R-ALLO-08-020 (2008), the hierarchy of primary considerations in allocating positions is as follows:

- a) Category concept (if one exists);
- b) Definition or basic function of the class;
- c) Distinguishing characteristics of a class; and
- d) Class series concept, definition/basic function, and distinguishing characteristics of other classes in the series in question.

IT Specialist

Class Series Concept

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 be not be included in this occupational category.

Pursuant to *Norton-Nader v. Western Washington University*, PRB Case No. R-ALLO-08-020 (2008), there is a category concept (class series concept) for the ITS class series. The class series concept states "Positions which perform information technology-related work to accomplish tasks but are non-technical in nature would not be included in this occupational category." Mr. Franklin's position serves as ECY's Risk Mapping Analyst. The majority of duties performed are for flood hazard mapping and flood risk analysis. He directs large-scale analysis and mapping projects statewide providing knowledge of tools and technologies such as GIS, GPS, internet and mobile device applications and high-resolution digital topographic data. These duties are not consistent with the intent of the IT series. Mr. Franklin is not developing and testing applications. He does not provide data base design or hardware management and support. Rather Mr. Franklin uses data within multiple databases and integrates the datasets to meet the Shorelands and Environmental Assistance Program objectives. Additionally, in her

determination letter (Exhibit B-1), Ms. Vane points out GIS data is housed on the agency server and managed by the ITS GIS team. In Mr. Franklin's Director Review request, he states "A prime objective of Risk Map is to deliver quality data that increases awareness and leads to actions that reduce risk to life and property." Mr. Franklin is not building the applications or databases, rather he is utilizing those databases/applications and providing mapping data analysis for the Washington State RiskMAP Program.

Exhibit A-3, Mr. Franklin's supervisor, Ms. McKinney states the following:

GIS technology **has rapidly evolved from routine digital cartography** serving specific projects and functions to delivering complex mapping applications across multiple platforms to various user communities. This technology requires constant continuing education to keep current with the GIS tools as well as knowledge of emerging platforms such as online and smart phone applications. **Jerry has advanced the floodplain mapping program beyond modernizing paper maps** using solely GIS skills to broad-based application of digital mapping products and tools designed to meet the needs of the home owner and the more sophisticated IT community.... [emphasis added]

The Personnel Resources Board (PRB) has ruled as technology advances and many tasks that were once performed by technicians become computerized, many functions and disciplines utilize computers to perform tasks that were once performed using less computerized processes. However, this does not change the purpose or nature of the work being performed. Rather, only the tools being used and the processes necessary to employ those tools have changed. *Granum v. Department of Corrections*, PRB Case No. R-ALLO-15-004 (2015). The statements made by Mr. McKinney raise question whether the IT series is the appropriate class for the duties and responsibilities being performed by Mr. Franklin as the evolution of technology does not justify a reallocation to a higher class.

The PRB has ruled when there is a class that specifically includes a particular assignment and there is a general class 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). I conclude the IT series is not the correct class series for the majority of duties and responsibilities being performed as there is a class which has a definition that could also apply to the position, as described below.

Cartographer 3

Definition

Performs professional cartography projects and/or activities providing geographic products, services and/or information using conventional and/or computerized methods.

There is not a class series concept for the Cartographer series. Pursuant to *Norton-Nader v. Western Washington University*, PRB Case No. R-ALLO-08-020 (2008), I then looked to the definition, which states "**Performs professional cartography projects and/or activities providing geographic products, services and/or information using conventional and/or computerized methods.**" [emphasis added] It is clear the majority of duties being performed by Mr. Franklin are for risk mapping. The position purpose in the PRR states "...performing flood hazard mapping and flood risk analysis statewide." Mr. Franklin provides risk mapping by using technical tools and technologies such as GIS, GPS, internet and mobile device applications and high-resolution digital topographic data.

Additionally, the PRR states Mr. Franklin "...maintains and distributes GIS data and mapping applications for public, private, and government audiences...areas of increased or decreased risk, coastal transect surveys, derived elevation datasets, HAZUS public risk data, channel migration zones, and georeferenced flood aerial imagery." These duties closely align with the definition of the Cartographer 3 class. Mr. Franklin provides geographic services and information using conventional computerized methods.

Furthermore, while examples of typical work identified in a class specification do not form the basis for an allocation, they lend support to the work envisioned within a classification. The typical work statements that most closely align with Mr. Franklin's duties and responsibilities include:

Conducts research, designs, compiles, and produces maps from various source material such as road inventory logs, aerial photography and revised maps;

Designs, compiles and produces...through computerized equipment new county, city, administrative and township maps utilizing field reports, engineer's plans and plats, aerial photographs, W.S.G.S. quadrangles, Coast and Geodetic charts and other reliable sources;

Does fine drafting...through computerized equipment and color separation work on special maps and charts, including most of the preliminary design;

Develops computer instructions to meet requirements of specific mapping project;

Edits mapping data for input;

Plans map layouts and techniques for mapping projects; develops standards for special maps;

Conducts research into new cartographic technology;

The primary function of Mr. Franklin's position and the majority of his duties in their entirety fall within the scope and level of responsibility in the stated Definition for the Cartographer 3 class. Therefore, his overall level and scope of assigned duties and responsibilities are consistent with the Cartographer 3 level work.

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 PO Box 40911, Olympia, Washington, 98504-0911. The PRB Office is located on the 3rd floor of the Raad Building, 128 10th Avenue SW, Olympia, Washington. The main telephone number is (360) 407-4101 and the fax number is (360) 586-4694.

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

cc: Jerry Franklin, Appellant
Barb Vane, ECY HR

Enclosure: List of Exhibits

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LIST OF EXHIBITS

A. Jerry Franklin Exhibits

1. Director's Review request received October 25, 2017 with IT Pyramid
2. Position Review Request/Supervisor Review Section
3. Memo of support from Scott McKinney

B. ECY Exhibits

1. Employer's allocation determination
2. Position Review Request/Supervisor Review Section
3. Position Description at time of request
4. Other documents considered
5. Organizational Chart
6. List of class specifications considered

C. Class Specifications

1. IT Specialist 3
2. IT Specialist 4
3. Cartographer 3