PERSONNEL COMMISSION

STATE OF WISCONSIN

v.

KARLA K. KELEKOVICH,

Appellant, \* DECISION \* AND \* ORDER

Secretary, DEPARTMENT OF EMPLOYMENT RELATIONS,

Respondent.

This matter is before the Commission as an appeal from a reallocation decision. At the prehearing conference the parties agreed to the following issue for hearing:

Was the respondent's decision to reallocate the appellant's position from Research Analyst 5 (PR8-05) to Research Analyst 4 (PR8-05) correct.

#### FINDINGS OF FACT

- 1. At all times relevant to this proceeding, the appellant has been employed by the Department of Industry, Labor and Human Relations, Job Service Division, Bureau of Program Management, Management Information Section.
- 2. Except for a one year hiatus, the appellant has, since January of 1979, been lead worker of the validation unit for Employment Service (ES) programs. ES programs are those programs administered by Job Service designed to assist the public in finding employment by, activities such as counselling, testing and training Job Service applicants.

- 3. In one form or another, every ES program administered by Job Service generates information for the Employment Security Automated Reporting System (ESARS). Information is collected both in the form of direct reports to ESARS by Job Service employes working at the local office level and also as a by-product of an automated reporting system. ESARS is used as a tool by local state and federal agencies for measuring the effectiveness of ES programs, for program management, and for equitable fund allocation.
- 4. "Validation" may be defined as the process used to make sure that the data found in ESARS is accurate and reliable. Validation also includes ensuring the comparability of ESARS data within and between states and is a method for diagnosing and correcting reporting problems in the local Job Service offices.
- 5. Appellant is the lead worker in the unit responsible for validation of ESARS in Wisconsin. Appellant's supervisor is Thomas Meier. The validation unit is comprised of the appellant, two other research analyst positions and a clerical support position.
- 6. Appellant's duties and responsibilities are accurately described in a position description dated August of 1983, a copy of which is attached hereto and incorporated in this finding as if fully set out below.
- 7. There are certain limited requirements established by the federal government (Employment and Training Administration (ETA), Department of Labor) and described in its "Validation Handbook" that are applied to each state's validation programs. Among those requirements that are set by the Department of Labor are: minimum frequency for surveying each state's local (JS) offices, the sample size used in those surveys, reports of each survey conducted as well as annual plans and quarterly summaries of

validations performed. The "Validation Handbook" also provides the state validation unit with numerous specific guidelines and suggestions for carrying out validations. These guidelines are advisory in nature and each state is granted the flexibility to adapt the procedures to its own specific needs.

- §. In preparing to validate a particular local office's ESARS data,
  the appellant will review the (unvalidated) ESARS data for that office
  (which is in the form of a statistical report) and try to identify any
  totals that appear to be out of line based on the reports from other years
  and other offices. If the appellant identifies a possible problem, the
  on-site validation visit to the office will be constructed in such a way as
  to focus on that subject area.
- 9. In all cases, the validation unit must conduct an "outside placement survey" in order to validate an office's placement data. The outside placement survey is conducted by sending letters directly to an employer in order to determine if the employer agrees that a placement was made by the local office as had been reported by the local office.
- 10. When they are actually in a local office to conduct a validation survey, the validators will pull samples of the office's paper files (hard copy data) to compare with the data already in ESARS. Before leaving the local office the appellant conveys the survey's preliminary findings to the office director. Upon returning to Madison, the appellant reviews and tabulates the pulled samples and then issues a fiscal written report. Underlying the written report are calculations of the error rates found in the local office based upon the samples drawn and comparison with the allowable error rates as established by the ETA and by the state. The appellant and the other validators may provide technical assistance to

local offices in how to correctly carry out their reporting responsibilities.

- 11. The appellant assists or acts as a "consultant" for the production of various reports as described in goal C of her position description. For example, the appellant assists in creating the report format, layout and the gathering of data for use in certain reports used in the planning and budgeting for ES programs. However, the appellant does not produce the programming language used to generate such a report and appellant's supervisor is responsible for producing the report.
- 12. The position standard for the Research Analyst (RA) series is based upon a "Factor Evaluation System," or FES. Each position falling within the RA series is analyzed in terms of five factors: scope and impact of work, complexity of work, knowledge and skills required, personal contacts and their purpose, and discretion and accountability. Each factor is broken down into four or five levels which are described at some length in the position standard. Point values are assigned to each level. A decision is made that one level best describes the position in question with respect to each of the five factors. Once a decision is reached regarding each factor, the points are totalled and compared with the point ranges assigned to the various RA classification levels.
- 13. The Research Analyst 4 classification includes positions with point totals between 245 and 315. The Research Analyst 5 classification inclused positions totaling 320 to 405 points.
- 14. The "scope and impact of work" factor is divided into two subfactors: "scope" and "impact". For purposes of this factor, the ultimate work product or program being focused upon is the validation of ESARS data and in the course of that validation the recommendation of changes in local

offices in order to insure accurate data in the future. Each office validation may be considered as a separate project. The relevant portion of the position standard reads as follows:

Subfactor: Scope

S-1

The work involves applying a limited range of standard or established procedures, methods or approaches typically to complete aspects or phases of a research or statistical analysis project or to operate/maintain an established statistical reporting system. Results depend on the selection and adaptation of standard methods or approaches, or incremental extention of existing results or interpretations.

S-2

The work involves applying a wide range of research, statistical analysis, or data processing/systems analysis techniques, to complete major segments of large projects where the analyst serves as the 'specialist' or 'expert' for that particular segment or phase (i.e., design of surveys and analysis of survey data, development of measures) or to complete entire projects which do not require all the steps or aspects of a full-scope project (i.e., definition of the problem to be addressed, identification of hypotheses/objectives, design or choice of methodology, collection of original data, data analysis, liaison with users or information sources, interpretation of results, and development of conclusions or recommendations\*) or where some steps are pre-determined or do not require substantial effort. Results depend on substantial adaptation or extension of standard methods and results to meet new situations.

S-3

The purpose of the work is to formulate and conduct entire research projects, or to develop and operate statistical information reporting systems which require substantive effort in <u>all</u> the aspects of a comprehensive research project, or in statistical information reporting system design, operation, and maintenance, described at Level S-2. Results depend on the analyst's development of new approaches or methods and the establishment of many of the criteria or presuppositions upon which project conclusions/recommendations depend.

- For positions responsible for statistical information reporting systems, consider information needs analysis, development of detailed system specifications, design of system elements (e.g., files, edits, coding instructions), collection and analysis of data, liaison with users, data sources, and data processing unit, testing and debugging of changes, and interpretation of data reported.
- 15. The scope of appellant's work is best described in S-2.
- 16. The relevant portion of the RA position standard relating to the impact subfactor reads as follows:

Subfactor: Impact

NOTE: A position may be credited with a level of impact based on work individually performed or performed by positions under its direct control.

**I-1** 

The work contributes to the accuracy, reliability, validity or timeliness of research conclusions or of data reported by statistical information reporting systems. Positions typically provide information, analyses or similar assistance to others responsible for the project or system.

I-2

The work product affects such things as: the design of statistical information reporting systems; the planning, budgeting, or evaluation of governmental programs (or similar decisions of private organizations) through providing estimates, projections, or other measures of key variables and their interrelationships; the design of formulas used to allocate resources; the design and completion of a variety of analytic projects through the provision of expert technical advice; or the development/confirmation of new theories by refining and testing research hypotheses.

1 - 3

The work product or service: provides key information used for the planning, budgeting, and evaluation of a wide range of different programs or facilities; controls the allocation of millions of dollars through the design of allocation formulas or providing the data necessary to administer such formulas; provides information essential to key business decisions of a large number of private firms. The work product may also affect the way in which a wide variety of others conduct studies or provide services by developing new theories, concepts or methodologies.

- 17. The impact of the appellant's position is best described at level I-2.
- 18. The combination of a rating of S-2 and I-2 is worth 85 points in assessing the proper classification of a position in the RA series.
- 19. The parties stipulated that in terms of the nature of appellant's work, the difficulty of deciding what needed to be done and the difficulty in performing the work, the appellant's position was at a complexity level of C-2 which is described as follows:

#### C-2 70 Points

Assignments consist of a variety of analytic and coordinative, and/or supervisory, tasks involving problems with many diverse, poorly-defined, novel, or conflicting factors, utilizing the more complex

standard analytical approaches or techniques and planning, coordinating and conducting surveys, studies or projects. Deciding what needs to be done requires relating the assigned problem to broad factors such as theoretical, public, or policy issues, the information needs of multiple users, or the operation of a variety of other systems or programs as well as testing different technical approaches and assumptions to determine the most appropriate methodology. Doing the work is complicated by the need to make numerous, subjective judgements on the reliability and validity of data, measures, and results, to develop original data or adapt data developed for other purposes, and to develop new measures or definitions of variables, and/or to plan, coordinate, and review the work of subordinate staff.

20. The relevant position of the RA position standard that relates to the "knowledge and skill" factor reads:

#### FACTOR 3 - KNOWLEDGE AND SKILL REQUIRED

Since positions covered by this standard are found in a wide variety of specializations, the factor level definitions cannot specifically mention all types or combinations of knowledge/skills that may be required for any one position. Rather, the factor level definitions are based on differences in the breadth and depth of the following broad types of knowledge/skills:

- Technical knowledge including knowledge of specific methods and techniques, professional standards and principles, the formal theory that governs the application of specific techniques or methods (e.g., psychometrics, sampling theory), and the skill required to apply them. Typical disciplines from which technical knowledge is required include statistics, mathematics, psychometrics, demography, econometrics, sociometry, and/or computer systems analysis and programming.
- Knowledge relating to the subject matter being studied, such as prior research results, how programs under study work, the history of governmental programs in the area, relevant laws, policies or regulations and related public policy issues, professionally accepted constructs, concepts, and theories explaining phenomena under study.
- Administrative knowledge and skills, including those required to plan, organize and control the work of others, the operation and principles of relevant administrative systems (e.g., budgeting, personnel, purchasing) and techniques of contract administration, public relations or similar functions.

NOTE: To be used as a basis for selecting a level under this factor, knowledge or skill must be required and applied on a continuing basis.

#### KS-1 15 Points

This level encompasses the basic knowledge and skills needed to perform professional assignments in statistical analysis, statistical information reporting and/or research. Positions at this level require knowledge of the specific work methods, procedures and guidelines used in the work unit,

and the basic concepts and techniques of quantitative analysis, information system operation and design, data processing, and/or package computer programs, of a particular discipline like history or political science relevant to the questions to be researched.

In addition, positions at this level typically require either:

a. Working knowledge of statistics, psychometrics, demography, econometrics, or a comparable discipline, or of computer systems analysis and programming. This includes knowledge of the theory or formal principles behind the application of specific tools and techniques, and allows the analyst to locate, select, and apply a range of analytical techniques, and explain or interpret the rationale for these applications in terms of theory or professionally accepted principles.

OR

b. A broad knowledge of the subject matter field or area of specialization, typically in the form of working to considerable knowledge of several related elements such as the operation and goals of private and/or governmental systems in the area, characteristics of the population under study, current public or professional issues, current theories or concepts applying to the area, or trends and results reported in the literature or by other investigators. This knowledge is used by the analyst to relate the results of the analyses to public or theoretical issues, interpret phenomena identified in terms of broader social or programmatic processes, design information collection systems and make substantive contributions to the design of studies or research projects.

#### Illustrations:

- (a) Applies working knowledge of statistics and sampling theory, and some knowledge of the concepts of clinical psychology to develop cross tabulations, calculate correlation coefficients, and apply tests of statistical significance to compare the effectiveness of two treatment programs on different types of patients.
- (b) Applies considerable knowledge of Job Service Work Incentive Program statistical reporting system design and operation, extensive knowledge of procedural manuals, and basic concepts of systems analysis to identify incorrect application of procedures by local office staff and recommend changes in local office procedures or system design to ensure accurate reporting of information.

## KS-2 50 Points Positions evaluated at this level require both:

a. working knowledge of statistics, psychometrics, demography, econometrics, or a comparable discipline, or of computer systems analysis and programming as described at Level KS-1.

b. a broad knowledge of the subject matter field or area of specialization, as described at Level KS-1.

Knowledge of and skill in applying a variety of principles, practices and procedures necessary to supervise staff and direct an organizational unit, including such elements as purchasing/procurement guidelines, budget development procedures, personnel rules and practices, methods and techniques for organizing, motivating, and controlling the work of others or training techniques may be substituted for either (a) or (b) at this level.

#### . Illustrations:

- Applies working knowledge of statistics and econometrics, as well as working knowledge of demographic and employment characteristics of Wisconsin population and the history and economics of state business and employment cycles, to estimate the proportion of population subgroups in the labor force, develop and interpret employment trends, and develop an index of economic indicators to predict future unemployment, utilizes correlation, regression, and trend analysis techniques.
- Applies working knowledge of highway design principles and methods, federal highway statistical reporting requirements, information needs of department planners, characteristics of Wisconsin's State trunk highway system, principles of computer systems analysis, data management and capabilities of data processing to design a system for collecting data on mileage, physical characteristics, and jurisdictional location of state trunk highways.

# KS-3 80 Points This is the first advanced level of knowledge, requiring, in addition to that described at Level KS-2, either:

a. Deeper technical knowledge, typically in the form of considerable knowledge of statistics, psychometrics, demography, econometrics, or a comparable discipline, or of computer systems analysis and programming. This knowledge is sufficient to allow the analyst to independently select, adapt and apply a wide range of analytic techniques or methods, explain the rationale for methods selected or adaptations made, act as a technical resource to other staff, and produce results consistent with accepted professional standards of the discipline in response to a wide variety of technical problems;

#### OR

b. Knowledge of the subject matter field is extensive, enabling the analyst to provide authoritative consultation and interpretation as a recognized expert, develop new research hypotheses, develop and direct new research or statistical information reporting programs, or design and coordinate studies which add to the knowledge base about the program, population or issue under study. Typically, the analyst is considered the 'expert' in a particular subject matter area.

Positions evaluated at this level may also require supervisory knowledge/skill as described at Level KS-2.

#### Illustrations:

- (a) Applies a considerable knowledge of statistical theory and operations research techniques such as Markov chain and queuing models to adopt a mathematical model of physician supply to Wisconsin conditions in order to predict need for medical education resources.
- (b) Applies extensive knowledge of Job Service Employment Program operations and policies, of federal reporting requirements and agency management information needs, and of the structure and content of existing statistical information reporting systems, as well as working knowledge of systems analysis principles and considerable knowledge of BASIC programming techniques, to direct the design of new statistical information reporting systems for the Work Incentive Program.
- 21. The RA position standard defines several of the important terms used in describing the knowledge and skill factor:

Knowledge, Depth of -- (1) Some Knowledge - implies familiarity only with the elementary principles and terminology of the subject or subjects indicated to effectively communicate with subject matter specialists. (2) Working Knowledge - implies sufficient knowledge of the subject to enable the employe to work effectively in a limited range of work situations. (3) Considerable knowledge - implies enough knowledge of the subject to enable the employe to work effectively in a wide range of work situations and with little direct supervision. (4) Extensive Knowledge - implies an advanced knowledge of the subject matter so as to permit solution of unusually difficult work problems or issues, advising on technical questions and planning methods for resolving these problems or issues. (5) Thorough Knowledge - implies an unusually specialized in-depth knowledge and means that work calls for an almost complete mastery of the subject. It is used rarely and only for especially advanced positions.

Package Programs -- Also referred to as analytical programs, are computer programs developed (usually by someone other than the user) to carry out a specific type of mathematical or statistical analysis. These packages typically provide for different combinations or variations of analyses and a variety of display and data storage formats and methods, but do not have the flexibility of full programming languages.

<u>Programming Language</u> -- A system of codes and terms which computers are able to interpret as instructions for processing. The major languages used in this occupational area are COBOL, FORTRAN, PL/1, BASIC, and APL.

Statistics -- The body of theory and methods used in the collection, classification, and evaluation of quantitative facts as a basis for inference. Basic to statistical theory are the theories of probability and sampling.

Systems Analysis -- The process of developing detailed system specifications for a computerized information collection, manipulation, storage, and reporting system. Such specifications specify the logic of the computer programs and the flow of data to and from the computer, and guide the acquisition/utilization of equipment and the coding of the program in the programming language. A full-scope systems analysis involves defining and evaluating user needs, identifying the operations needed, analyzing the elements or operations into programmable steps, developing an overall system design, projecting costs and benefits from systematization, and presenting the overall design to users or management.

- 22. The knowledge and skill utilized by the appellant in carrying out her validation and related duties are adequately described at the KS-1 level and are better described at that level than at the KS-2 level. The appellant does not utilize a working knowledge of statistics nor of computer systems analysis and programming as required at the KS-2 level.
- 23. The parties stipulated that the appellant's position is entitled to 45 points as to the factor of personal contacts and their purpose.
- 24. The final FES factor relates to discretion and accountability.

  The position standard describes the relevant factor levels as follows:

FACTOR 5 - DISCRETION AND ACCOUNTABILITY

Subfactor: Discretion

In evaluating positions on this subfactor, objectives, priorities and guidelines set or provided by other authorities outside the chain of command should be considered, as well as those provided by direct supervisors.

\* \* \*

Level D-2 50 Points

Objectives and priorities of most work assignments are established for the incumbent in general terms, defining the type of result to be obtained, the relative importance of various assignments, and the general approach to be taken. Incumbent and supervisor cooperatively plan monthly-to-yearly activities and deadlines to carry out objectives and priorities. Guidelines cover most aspects of assignments, but require considerable adaptation/interpretation due to conflicts, gaps, generality of presentation, or novelty of the assignment. Incumbent independently chooses and adapts methods, makes significant deviations from standard methods in accordance with policies, previous training, or accepted practices of the occupation, and determines the general form the results will take. Conclusions are reviewed for appropriateness of assumptions, consistency with previous

results, or compliance with unit standards as well as for conformity with agency policy and responsiveness to established objectives and priorities.

Level D-3 80 Points
Objectives and priorities of the work assignments are defined for the incumbent only in terms of unit functions, program or project objectives, and resources available. Broad timeframes are developed jointly with the supervisor or user of the work product. Incumbent is independently responsible for developing specific objectives and priorities to meet them. Guidelines governing work methods are advisory in effect, leaving incumbent free to choose methods or develop approaches. Laws or regulations that apply are general and are susceptible to a wide variety of interpretations. Incumbent exercises discretion by independently establishing new methods or approaches, setting unit objectives,

- 25. The appellant's position is best categorized at level D-3. The appellant works with her supervisor in setting the annual plan that indicates which offices are to be validated in a given year. However, it is within the appellant's discretion to decide how best to complete the agreed upon plan in a manner that also fulfills the relatively few federal requirements in the area. While there are extensive federal guidelines on the subject of validation but the appellant has the flexibility to which of those guidelines she will follow and the procedures she will use. Her work is reviewed by her supervisor only in term of whether the validation unit has met the annual plan.
- 26. The total of the points assigned to the appellants position using the FES method is 295 which places her position at the RA 4 level.

#### CONCLUSIONS OF LAW

- 1. The Commission has jurisdiction over this appeal pursuant to \$230.44(1)(b), Stats.
- 2. The appellant has the burden of establishing that respondent's decision to reallocate the appellants position to the Research Analyst 4 level was incorrect.
  - 3. The appellant has failed to meet the burden of proof.

4. The respondent's decision to reallocate the appellant's position to the RA 4 level instead of the RA 5 level was correct.

#### OPINION

The three FES factors applicable to the appellant's positions and in dispute in the proceeding are discussed individually below.

#### Scope,

The bulk of the appellant's validation work involves the collection and analysis of reporting data. As noted in finding 8, the appellant prepares for each on-site validation by reviewing the unvalidated ESAR's data and identifying unreasonable totals. The appellant then uses the on-site review to focus on the previously identified problem areas. This procedure is somewhat more than the "selection and adaption of standard methods" described in S-1, but is less than the scope identified in S-3 where the "[r]esults depend on the analyst's development of new approaches or methods and the establishment of many of the criteria or presumptions upon which project conclusion/recommendations depend." Appellant does more than simply "operate/maintain an established statistical reporting system."

While the Commission concludes that the appellants position is appropriately at the S-2 level, it is not a particularly strong S-2 position. The asterisk found in the position standard (finding #14) describes a position responsible for an entire statistical information reporting system. Such a position is broader in scope than the appellant's position which is responsible only for validating information within large and complicated statistical information reporting system.

#### Impact

The appellant's work product ultimately affects the planning, budgeting and evaluation of ES programs by validating the accuracy of ESARS data.
The appellant's work does more than "contribute" (level I-1) to the

accuracy of ESARS data; it establishes or confirms that accuracy. Not all of the raw ESARS data is validated, however. Ultimately it is the ESARS data and not the validation information that is the "key information used for the planning, budgeting and evaluation" of ES programs (I-3). Appellants work product is best described at the I-2 level.

#### Knowledge and Skill

The appellant's position is well described in one of the illustrations provided in the position standard for the KS-1 level.

- (b) Applies considerable knowledge of Job Service Work Incentive Program statistical reporting system design and operation, extensive knowledge of procedural manuals, and basic concepts of systems analysis to identify incorrect application of procedures by local office staff and recommend changes in local office procedures or system design to ensure accurate reporting of information.

Testimony at the hearing showed that the appellant used basic mathematical calculations in determining rates of error. There was no indications that appellant utilized basic statistical theories of probability and sampling, nor any of the statistical techniques identified in the KS-2 illustrations as representative of a working knowledge of statistics: correlation, regression, and trend analysis.

Appellant did establish that she utilized certain computer programs in preparing ESARs reports. Specifically she uses Table Producing Language, program and SAS. Respondent's personnel specialist described TPL and SAS as package programs rather than full programming languages (See finding #21). A witness (Mr. Gleason) testifying on behalf of the appellant specifically identified SAS as a full programming language. Given Mr. Gleason's own experience as an analyst, his testimony as to the nature of SAS must outweight the testimony of respondents analyst (Mr. Milanowski) on this point.

Even with the determination that appellant had a working knowledge of computer programming, her position is not at the KS 2 level unless it requires a working knowledge of computer systems analysis and programming. The RA position standard's definition of the term "systems analysis" is found in finding #21. Nothing in the record of this case indicates that the appellant develops system specifications for ESARS or any other computerized information system. The only evidence offered by the appellant on the subject of system analysis suggests that she accesses particular information once it has already been input and then may decide to arrange the information in a particular way to make it more useful for reporting purposes. This activity is more properly defined as programming rather than as a system analysis function. Therefore, the appellant's position cannot meet the requirements of the KS-2 level and must be placed at the KS-1 level.

#### Discretion and Accountability

There was some discrepancy between the testimony of the appellant and of respondent's personnel specialist, Mr. Milanowski, as to the role played by appellant's supervisor in monitoring and controlling the work of the validation unit. Appellant's supervisor, Mr. Meier, did not testify at the hearing. Ms. Milanowski's testimony was based upon statements made to him by Mr. Meier and another supervisor many months before the hearing. Given the absence of Mr. Meier, the Commission will resolve any conflicts in testimony on the discretion factor in favor of the appellant who provided non-hearsay testimony as to the role of her supervisor (Finding 25).

The appellant's testimony justifies the D-3 level.

#### Summary

The parties stipulated that the appellant's position was entitled to 70 points for level 2 of complexity and 45 points in terms of the personal contacts factor. The Commission has found that the appellant is also entitled to 85 points for the scope and impact factor, 15 points for the knowledge and skill factor, and 80 points for the discretion factor. The total of 295 places the appellant's position within the point range of 245 to 315 that is assigned to the Research Analyst 4 classification.

Therefore, the respondent's reallocation decision must be affirmed.

#### ORDER

The respondent's decision reallocating the appellant's position to the Research Analyst 4 classification is affirmed and this appeal is dismissed.

Dated:

Donald R. MURPHY, Chairperson

LAURIE R. McCallum, Commissioner

KMS:jab
ORDER

ORDER

#### **Parties**

Paula Kelekovich 970 Starr School Road Stoughton, WI 53589 Howard Fuller Secretary, DER P. O. Box 7855 Madison, WI 53707

### IMPORTANT: PLEASE READ INSTRUCTIONS ON BACK OF LAST PAGE

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			201 . Washington Avenue			
Research Analyst			Madison, Wisconsin 53702			
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#### Position Summary

This is a leadworker position for which major goals are: Coordination of the Job Scrvice Validation Program to meet frideral policy; Improvement of ESARS data for use as a tool in measuring performance and effectiveness of ETA programs; Validation of ESARS and notification to federal, state, and local administrators of findings and any corrective action required, taken or planned; Development and production of program information for use in various ES administered programs for planning and appraisal purposes; Development of staff knowledge and capabilities necessary to perform unit function. (These services provide comprehensive information affecting the key source used in planning, funding, and evaluation of ES administered programs. Effects range from changing procedures to be used in future reporting, to eliminating ESARS data determined to be invalid. The work product is essential to ensure the reliability of information used to measure office performance and ES program effectiveness. Affects local office method of operation for A various employment programs.

#### Time % Goals and Worker Activities

- 35% A. Coordination of the validation program to meet federal policy and requirements.
  - Al. Develop and transmit annual work plans outlining time-frames and naming offices selected to undergo on-site and/or mail only validation surveys in accordance with federal frequency criteria.
  - A2. Prepare periodic progress reports to the ETA on validation activities during the quarter which includes narrative reports, noted deficiencies or deviations from federal requirements, plans for corrective action, descriptions of progress toward implementation of corrective action plans and results of outside verification surveys.
  - A3. Conduct and report findings of the state procedural review through an annual assessment of the agency's capability to report data comparable with that reported by other states accurately through ESARS.
  - A4. Determine local office size for use in the sample selection for the outside verification of placement's process. This is determined from accessing cost accounting reports and extracting ES Grants positions worked for each office.
  - A5. Review developed procedures used in the outside placement survey to ensure both the adherence to federal mailing time-frames and that consistent decisions from interpretations are made.
  - A6. Modify and formulate validation procedures to adapt to changes in state needs and differing local office practices keeping the federal policy and objective of validation intact.
  - A7. Review and approve instructions prepared by staff for inclusion in the Wisconsin Information Data Systems Handbook to ensure definitions are consistent with federal directives.
- 35% B. Improvement of ESARS data through the validation process.
  - Bl. Determine which office to validate based on meeting the annual work plantequests from program managers or reporting problems discerned or suspected from the analysis of reported information.

12. A.y. 12.3

- B2. Select a random sample of placements to undergo the outside verification process. Sample size and selection interval are determined from computations using a two month universe and the local office size determined in A4.
- B3. Conduct, evaluate and compile results of the outside placement survey.

  Determine the accuracy of placement data reported to ESARS, compute error rates and identify reporting problems.
- B4. Visit the local office and conduct the on-site examination of reporting documents, practices and procedures.
- B5. Analyze preliminary findings of the validation in order to evaluate and identify local procedural weakness and reporting problems. Formulate potential corrective procedures and views to use in closeout.
- B6. Conduct closeout interview with district director to review preliminary findings, express appraisal of reporting practices, supply technical assistance and recommend or require corrective action to eliminate detected reporting deficiencies.
- B7. Calculate final error rates related to each of the reviewed reporting areas and determine if the rates are acceptable, questionable or unacceptable, and if they warrant further action.
- B8. Judge and determine if errors were caused by inadvertent human errors, unexcused carelessness or deliberate falsification.
- B9. Prepare a narrative report covering all aspects of the validation findings and transmit to local directors and state administrators.
- BlO. Follow-up and review information from the office validated to determine if corrective action has been implemented and reporting problems have been corrected. Determine if any further action is warranted and take necessary action.
- 20% C. Development and production of Management Information reports for use in ES management of various programs (ES, WIN, Food Stamp, Vets, etc.).
  - C1. Meet with state administrators and local office staff to determine management information needs.
  - C2. Determine feasibility of producing requested information and suggest alternatives which could improve information format, clarity or use of system.
  - C3. Access computer files with TPL, analyse accuracy of information, produce reports.
  - C4. Train state administrators and local office staff on the use of the produced report and current performance reports, i.e., interpretation of the Veterans Indicators of Compliance.

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- D. Development of staff knowledges and capabilities necessary to perform unit function.
  - Dl. Determine validation priorities within the unit.
  - D2. Train staff in validation operations.
  - D3. Assign duties in order to achieve goals.
  - D4. Guide staff to produce reports reflecting policies of the division.
  - D5. Review reports to ensure accurate results were determined, appropriate decisions were made, and necessary action was taken.

8/18/8, burkir