

STATE OF WISCONSIN

PERSONNEL COMMISSION

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 *
 HAROLD W. JACOBS, *
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 Appellant, *
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 v. *
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 Secretary, DEPARTMENT OF *
 EMPLOYMENT RELATIONS, *
 *
 Respondent. *
 *
 Case No. 83-0123-PC *
 *
 * * * * *

ORDER

NATURE OF THE CASE

This is an appeal pursuant to §230.44(1)(b), Stats., of the reallocation of the appellant's position.

FINDINGS OF FACT

1. At all times relevant to this matter, appellant has been employed in the classified civil service in the Division of Corrections of the Department of Health and Social Services.

2. As a result of a personnel management survey, respondent Department of Employment Relations reallocated appellant's position from Planning Analyst 3 (PR 1-14) to Research Analyst 4 (PR 08-05). Appellant received notice of such reallocation on June 22, 1983. On July 15, 1983, appellant filed a timely appeal of this reallocation of his position and subsequently alleged that his position was most appropriately classified as a Program and Planning Analyst 4 (PR 1-14).

3. The duties and responsibilities of appellant's position are accurately described in the position description signed by appellant in June of 1983, a copy of which is attached hereto and incorporated by

reference as if fully set forth as a part of this finding. The primary responsibility of appellant's position is to develop and maintain an integrated management information system for the Division of Corrections.

4. The Research and Analysis Position Standard (which includes the position standard for the Research Analyst series, among others) provides in pertinent part:

B. Inclusions

- 1) The Research Analyst series encompasses positions which have the primary purpose of conducting research, performing statistical analysis, or developing and maintaining statistical information reporting systems.

F. Definitions Used in This Position Description

Research -- The process of defining a set of measurable variables, establishing their level, and specifying their interrelationships, for the purpose of understanding or explaining a particular phenomenon or predicting future states of affairs.

Statistical Information Reporting System -- The set of processes and procedures necessary to collect, compile, report, and store quantitative data about a particular population on an ongoing basis. Typically these systems utilize electronic data processing methods and equipment to compile and store data, as well as depending on statistical concepts and methods to guide the collection and interpretation of data.

5. The position standard for the Program and Planning Analyst series provides in pertinent part:

B. Inclusions

1. The Program and Planning Analyst series encompasses positions having the primary purpose of performing policy analysis, facilities planning, land use or regional planning, program planning, program evaluation, or a combination of these functions. The position must involve analysis of information, issues, problems, or proposals in order to develop alternatives or compare their impacts, develop plans or policies, and recommend appropriate courses of action based on the results of analysis typically to others with responsibility for carrying them out.

G. Definition of Terms Used in This Position Standard

Facilities Planning -- The planning of physical structures such as buildings, roads and highways, utility plants, airports, campuses, or similar facilities. Positions in this series do not typically develop the detailed design or specifications, but rather coordinate overall policies, program or user needs, and social, economic, and environmental concerns to produce an overall design for the facility that is then further specified by technical experts such as engineers or architects.

Planning/Plan -- The process of developing a specification for a future state and the processes or means necessary to achieve it. Planning involves choosing or prioritizing goals, identifying and developing alternative courses of action as means to achieve these goals, and selecting or recommending the optimum course based on systematic comparison of the efficiency or effectiveness of the alternatives. A plan is the formal specification of the future state and the means chosen to achieve it.

Policy -- A broad guideline or framework within which decisions are made regarding the distribution of program resources or benefits. Policy controls the nature of program outputs by defining what will be done, for whom it will be done, and the priorities to be applied to specific program objectives.

Policy Analysis -- The systematic study of an issue, problem, or decision situation requiring policy action designed to provide decision-makers with the information on the costs, benefits, or consequences of alternative courses of action or decisions needed in order to formulate policy. Typically, policy analysis involves defining the decision-maker's objectives, developing or clarifying alternative means to those objectives, assessing the impacts of alternatives by developing a model that projects their consequences, the establishment of criteria to rank the alternatives in order of desirability or priority, and the recommendation of the appropriate alternative to the policy-maker.

Program -- An ongoing set of coordinated activities carried out by a number of people, aimed at providing a specific service or benefit to a specific group, organization or group of organizations. A program typically has a unique set of policies, regulations, or procedures, a unique set of activities to be performed in providing the service or achieving the program's goals, and a unique set of persons specializing in carrying these out. A program involves a variety of specific projects or functions coordinated to achieve program objectives.

Program Evaluation -- The systematic examination of an existing program or policy for the purpose of determining its effectiveness or efficiency in achieving its goal, by developing and applying quantitative measures of costs and/or benefits, to provide decision-makers with recommendations for the continuation, modification, or discontinuation of the program or underlying policy.

Program Planning -- The process of developing a specification of what a particular program will accomplish in the future and the courses of action that will be pursued to achieve those goals. To be complete in scope, program planning must involve defining program goals, developing and prioritizing specific objectives, developing alternative program designs or courses of action to achieve these objectives, and recommending appropriate priorities and alternatives to program administrators. Program planning which focuses on developing the specific processes, procedures, or operations necessary to implement overall program plans is called implementation planning in this standard. Implementation planning typically takes the overall design of the program as given, covers a shorter period of time, and is concerned with detailing specific parts of the overall design;

Project -- A coordinated set of analytic activities aimed at reaching a conclusion, recommendation or decision on a specific question, problem, or issue. Projects do not continue indefinitely, but are expected to end in the foreseeable future when the conclusion, etc., is reached. A project differs from a program in that it has narrower scope, is situational in focus, and is temporary in duration.

Regional Planning -- The process of developing plans which integrate economic, social, and environmental considerations to guide the physical development of a city, metropolitan area, or region of the state. Regional plans are typically concerned with land use, housing supply and demand, the transportation system, and other elements of the physical infrastructure, to balance factors needed to promote economic development with the protection of social and environmental amenities.

6. The system which appellant's position is responsible for developing and maintaining is a "statistical information reporting system."

7. The primary emphasis of appellant's position is not "research."

8. The duties and responsibilities of appellant's position clearly do not involve "facilities planning," i.e., the planning of physical structures; or "regional planning," i.e., developing plans to guide the physical development of a city, metropolitan area, or region of the state.

9. Appellant's position is not responsible for "policy analysis" but for assuring consistency between Division of Corrections' policy and the Division of Corrections' management information system.

10. The Division of Corrections' management information system is not a "program" of the Division of Corrections but a system which provides support for Division of Corrections programs. The Division of Corrections' management information system does not directly serve a group or organization external to the Division of Corrections, which is a necessary feature of a "program." As a result, appellant's primary responsibilities do not involve "program planning" or "program evaluation."

11. The duties and responsibilities of appellant's position are better described by the specifications of the Research Analyst 4 classification than those of the Program and Planning Analyst 4 classification and appellant's position is more appropriately classified as a Research Analyst 4.

CONCLUSIONS OF LAW

1. This matter is appropriately before the Commission pursuant to §230.44(1)(a), Stats. (1981-82) ^{FN}

2. The appellant has the burden of proving that respondent's decision reallocating appellant's position from Planning Analyst 3 to Research Analyst 4 was incorrect.

3. The appellant has not sustained his burden of proof.

^{FN} The appellant received notice of his reallocation on June 22, 1983, and filed his appeal on July 15, 1983. The Commission's jurisdictional basis for hearing appeals of reallocation decisions was affected by 1983 Wisconsin Act 27, which became effective on July 2, 1983. However, this appeal is more properly treated as an appeal of a decision by the Administrator, Division of Personnel, made prior to the effective date of 1983 Wisconsin Act 27. Technically, this conclusion also means that the case should be captioned Jacobs v. Administrator, Division of Personnel (DP). Such a change is unnecessary because one effect of 1983 Wisconsin Act 27 was that the Secretary of DER assumed responsibility over reallocation decisions now that the Division of Personnel has been abolished.

4. Respondent's decision to reallocate appellant's position to Research Analyst 4 was correct and appellant's position is more appropriately classified as a Research Analyst 4.

OPINION

One of the theories upon which the appellant bases his appeal is that, since, the primary responsibility of his position is not "research," he should not be classified in the Research Analyst series. However, the position standard for the Research Analyst series states that "the Research Analyst series encompasses positions which have the primary purpose of conducting research, performing statistical analysis, or developing and maintaining statistical information reporting systems," and, as a result, the primary responsibility of a position need not be "research" in order for the position to be appropriately classified in the Research Analyst series.

Another theory advanced by appellant is that, since planning is a necessary element of his responsibilities, he should be classified in the Program and Planning Analyst series. However, the planning that appellant describes as a necessary element of his responsibilities is the type of planning which is a necessary element of most jobs: review of a fact situation, determination if the fact situation presents a problem which should be addressed by the work unit, exploration of alternative solutions to the problem, recommending or deciding upon the appropriate solution. The position standard for the Program and Planning Analyst series very clearly defines the nature of the planning, analysis, and evaluation responsibilities required for classification of a position in the Program and Planning Analyst series and, as presented in the Findings above, appellant's responsibilities do not satisfy any of these definitions, i.e.,

appellant's position is not primarily responsible for policy analysis, facilities planning, land use or regional planning, program planning, or program evaluation as required for classification in the Program and Planning Analyst series.

The primary responsibility of appellant's position is the development and maintenance of a statistical information reporting system. This responsibility is specifically described in the Research Analyst Position Standard. In view of this fact, and the fact that the responsibilities of appellant's position do not satisfy the requirements for classification in the Program and Planning Analyst series, appellant's position is more appropriately classified as a Research Analyst 4 than as a Program and Planning Analyst 4.

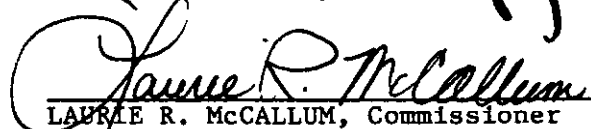
ORDER

The respondent's decision is affirmed and this appeal is dismissed.

Dated: April 23, 1985 STATE PERSONNEL COMMISSION


DENNIS P. MCGILLIGAN, Chairperson


DONALD R. MURPHY, Commissioner


LAURIE R. McCALLUM, Commissioner

LRM:jmf
ID7/2

Parties

Harold W. Jacobs
5 Frederick Circle
Madison, WI 53711

Howard Fuller
Secretary, DER
P. O. Box 7855
Madison, WI 53707

POSITION DESCRIPTION

ER-PERS-10 (Rev. 1-78)
 State of Wisconsin
 Department of Employment Relations
 DIVISION OF PERSONNEL

1. Position No. 008928	2. Cert/Reclass Request No. UPDATE	3. Agency No. 435
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4. NAME OF EMPLOYEE
Harold Jacobs

5. DEPARTMENT, UNIT, WORK ADDRESS
**Department of Health and Social Services
 Office of Information Management & Operations
 Division of Corrections
 1 W. Wilson Street
 Madison, Wisconsin 53707**

3. CLASSIFICATION TITLE OF POSITION *vacated 6-12-83*
Research
Planning Analyst #4 8-05

7. CLASS TITLE OPTION (To be Filled Out By Personnel Office)

8. NAME AND CLASS OF FORMER INCUMBENT
William Curley, PA3

9. AGENCY WORKING TITLE OF POSITION
Planning Analyst

10. NAME AND CLASS OF EMPLOYEES PERFORMING SIMILAR DUTIES

11. NAME AND CLASS OF FIRST-LINE SUPERVISOR
**Carl Sam
 Chief, Systems Operations**

12. FROM APPROXIMATELY WHAT DATE HAS THE EMPLOYEE PERFORMED THE WORK DESCRIBED BELOW?
October 1, 1980

13. DOES THIS POSITION SUPERVISE SUBORDINATE EMPLOYEES IN PERMANENT POSITIONS? Yes No IF YES, COMPLETE AND ATTACH A SUPERVISORY POSITION ANALYSIS FORM (DER-PERS-84).

14. POSITION SUMMARY - PLEASE DESCRIBE BELOW THE MAJOR GOALS OF THIS POSITION
See attached

15. DESCRIBE THE GOALS AND WORKER ACTIVITIES OF THIS POSITION (Please see sample format and instructions on back of last page.)

- GOALS: Describe the major achievements, outputs, or results. List them in descending order of importance.
- WORKER ACTIVITIES: Under each goal, list the worker activities performed to meet that goal.
- TIME %: Include for goals and major worker activities.

(Continue on attached sheets)

TIME % GOALS AND WORKER ACTIVITIES

See attached

16. SUPERVISORY SECTION - TO BE COMPLETED BY THE FIRST LINE SUPERVISOR OF THIS POSITION (See Instructions on Back of last page)

- a. The supervision, direction, and review given to the work of this position is [] close [] limited [x] general.
- b. The statements and time estimates above and on attachments accurately describe the work assigned to the position. (Please initial and date attachments.)

Signature of first-line supervisor _____ Date _____

17. EMPLOYEE SECTION - TO BE COMPLETED BY THE INCUMBENT OF THIS POSITION

I have read and understand that the statements and time estimates above and on attachments are a description of the functions assigned my position. (Please initial and date attachments.)

Signature of employee *[Signature]* Date *11/16/1982*

18. Signature of Personnel Manager _____ Date _____

POSITION DESCRIPTION

Planning Analyst 3 - Harold Jacobs

Position Summary

Under the general supervision of the Chief of the Systems Operation Section, this position is responsible for developing plans for the Division of Corrections (DOC) statistical information publications system; initiating and maintaining the Policy and Procedures Manual for the Office of Information Management and Operations (OIMO); establishing and maintaining standards for report writing by OIMO staff; analyzing data and conducting informational needs assessment; interpreting findings and writing reports; formulating and drafting flow diagrams; lead analyst for Reports and Data Retrieval Unit; acting as Chief of Systems Operation Section in absence of Section Chief.

Time % Goals and Worker Activities

50%

- A. Development and implementation of immediate and long range plans for DOC's statistical information publication system to meet statutory requirements of s.46.16(4), augmented by s.53.17, and policy and informational needs. (The information is used by Operations and Management staff of DOC's Central Office, institutions, and regional offices; managers of the Department of Health and Social Services, public officials and staff, the media, and other individuals and groups.)
 - A1. Study and review current and past statistical publications information objectives, and related procedures of OIMO.
 - A2. Consult with DOC management and other user groups to make an informational needs assessment.
 - A3. Review existing literature to make maximum use of publications and formats used in other states.
 - A4. Develop written objectives and specify requirements for the statistical reporting system, including time and performance constraints. Review with other DOC staff to assure congruence with informational needs assessment.
 - A5. Provide verbal synopses, as appropriate, of written reports to DOC management staff and others to assure maximum utilization of report findings.
 - A6. Establish procedures for and supervise resource center acquisitions and holdings.
 - A7. Make verbal and written progress reports to Systems Operation Section Chief.

POSITION DESCRIPTION

Planning Analyst 3 - Harold Jacobs

Time % Goals and Worker Activities

- | | |
|-----|--|
| | <p>A8. Direct and control activities of the Reports and Data Retrieval activities to assure appropriate interactions with other DOC activities and with the Department's centralized data processing services.</p> <p>A9. Establish priorities and schedule work to be performed.</p> <p>A10. Review and evaluate draft and final versions of work assignment documents, instruments, etc.</p> <p>A11. Analyze data, interpret charts and graphs for managers, supervisors, evaluators, planners, administration, etc.</p> |
| 15% | <p>B. Retrieval of data from computer. (The data retrieved is required by DOC, the Department and federal or national agencies. The data is used for program planning, policy information, and program evaluation needs.)</p> <p>B1. Analyze requests for information and determine the most feasible method of providing the information requested.</p> <p>B2. Write computer programs or prepare computer programs by modifying existing programs to provide the desired data.</p> <p>B3. Utilize SPSS, Mark IV, or other computer languages and software packages to write programs and retrieve data.</p> <p>B4. Develop procedures within approved methods and guidelines of responding to special request.</p> <p>B5. Production and distribution of data and reports.</p> |
| 10% | <p>C. Planning and implementation of specialized short and long-term studies to evaluate informational needs and usage. (The results of the studies enable DOC management and other staff to keep abreast of informational trends and aid in program decision-making.)</p> <p>C1. Review specific study objectives with DOC management and other staff to assure meeting of DOC needs and expectations.</p> <p>C2. Plan, coordinate, and implement activities necessary to complete special studies.</p> <p>C3. Provide verbal and written progress reports to OIMO Director.</p> <p>C4. Analyze data, write reports, and interpret findings as appropriate.</p> <p>C5. Train and supervise staff as appropriate.</p> |

POSITION DESCRIPTION

Planning Analyst 3 - Harold Jacobs

Time % Goals and Worker Activities

10%

- D. Formulatiⁿ and drafting flow diagrams which delineate decision points for processes, operations, paperwork, or the movement of an individual through the correctional system. (The flow diagram is used in decision-making and pictorially simplifies complicated procedures. It has DOC distribution and state-wide distribution as appropriate.)
- D1. Review, with DOC management or staff, the objectives to be attained.
 - D2. Research existing literature (statutes, rules, names, etc.), discuss specific points with operational personnel, and compile pertinent information.
 - D3. Analyze information and determine factors to be encompassed in flow diagram.
 - D4. Conceptualize and evaluate steps and information to be included in flow diagram.
 - D5. Formulate and draft flow diagram.

7%

- E. Initiation and continued updating of OIMO Policy and Procedure Manual (The Manual is used internally within OIMO and DOC so goals (Policies) and ways of accomplishment (Procedures) are delineated and known by all affected personnel.)
- E1. Consult with Office Director and Section Chiefs about policies and procedures to be included in the Manual and establish priorities for an implementation Schedule.
 - E2. Consult with DOC management staff to ascertain impact of OIMO policies and procedures on operational programs and include such consideration in overall implementation.
 - E3. Interview OIMO and other appropriate DOC staff to review existing or to-be-developed procedures with respect to each policy and procedure to be written.
 - E4. Write, Maintain, and distribute OIMO Policy and Procedures Manual.
 - E5. Make verbal and written progress reports to Section Chief and OIMO Director.

8%

- F. Act as Chief of Systems Operation Section, with authority to make decisions, during incumbent's absence. (This work is necessary for Section to function properly.)

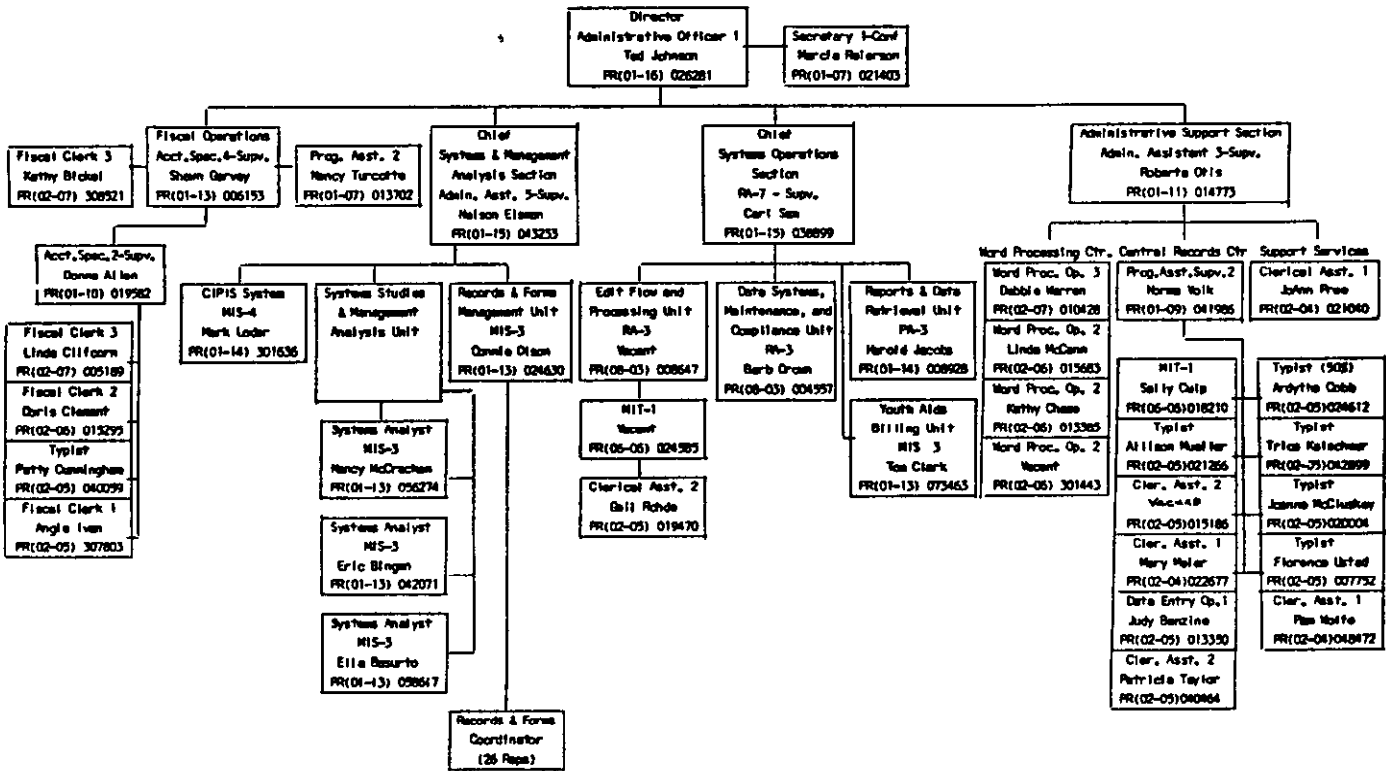
POSITION DESCRIPTION

Planning Analyst 3 - Harold Jacobs

Time % Goals and Worker Activities

- F1. Lead worker of the Edit Flow, Data Systems, and Reports and Data Retrieval Section.
- F2. Participate in Section policy and procedure determination.
- F3. Plan, coordinate, and lead activities of professional personnel, including training specialists and other professionals.
- F4. Assist in preparing biennial budget request of OIMO.
- F5. Provide consultation and handle special requests.
- F6. Answer inquiries from administrative staff of DOC and the Department.
- F7. Assign, direct the work of staff.
- F8. Provide information and/or technical assistance as needed and arrange or recommend to Section Chief further training to meet needs.
- F9. Participate in selecting appropriate new employees from certification lists after completing all prior initiating processes, including Affirmative Action, and obtaining administrative concurrences.
- F10. Engage in personnel staff development activities.
- F11. Establish and maintain standards for writing of reports by OIMO staff. (Standards are for internal use of OIMO staff and are to enhance the quality and uniformity of reports.)
- F12. Establish and communicate OIMO standards for written reports to OIMO staff.
- F13. Review and edit reports written by OIMO staff.

Office of Information Management and Operations



June, 1983

9-22-3/F18

The Office of Information Management and Operations in the Division of Corrections, Department of Health and Social Services, is the basic organization for correctional information. Its responsibilities include: (1) correctional systems and management studies; (2) conceptualization, direction, and planning for a comprehensive and responsive adult and juvenile decision support system for correctional program planning, management, research, evaluation, and operations; (3) correctional data systems operations; (4) staff support for correctional records/forms management; (5) technical consultation services; (6) restitutory accountability; (7) purchasing; (8) word processing and (9) document maintenance. The Office of Information Management and Operations is composed of four sections: Systems Operations Section, Systems and Management Analysis Section, Fiscal Operations Section, and Administrative Support Section.

The Systems Operation Section is responsible for establishing, in conjunction with management, correctional information requirements; issuing original or revised reporting instructions; and procedures, confirming compliance to reporting procedures; writing original or revised computer programs for information retrieval; receiving, editing, and verifying reports; entering and verifying data; maintaining daily logs of population at adult and juvenile correctional institutions; writing and issuing statistical information publications and reports, verifying and approving Minnesota Correctional Institution bills of charges; and providing consultative, computer programming, and specialized services to researchers, educators, and other special requesters. The correctional information, which is provided, is used by the Division, Department, Governor's staff, Legislature, Attorney General's staff, universities, special interest groups, and the general public. Computer tapes are provided annually to the U.S. Department of Commerce National Prisoner Statistics Unit, and to the National Council on Crime and Delinquency.

POSITION DESCRIPTION - PART B

The information contained in this part of the PD relates to the following FES Factors: Knowledge Required, Personal Contacts and Their Purpose, Discretion and Accountability, Physical Demands, and Work Environment.

I. KNOWLEDGE AND SKILLS REQUIRED BY THE POSITION

Describe the breadth and depth of knowledge and skills used to perform the work. Reference each knowledge/skill statement to specific goals or worker activities in Part A by placing the index number(s) in parentheses after the statement.

See attached.

II. PERSONAL CONTACTS AND THEIR PURPOSE

Describe the nature, purpose, and frequency of required contacts with others for acceptable performance of the work.

See attached.

IV. PHYSICAL DEMANDS

Describe the nature, frequency, and intensity of any unusual physical demands placed on an incumbent of the position.

None

V. WORK ENVIRONMENT

Describe any unique or unusual physical surroundings in which an incumbent of the position works and any special safety regulations or precautions which must be observed.

Security, Privacy, Confidentiality and Protection of information.

I. Knowledge and Skills required by the Position

- A. Considerable knowledge of Division of Corrections programs, policies, practices, philosophies, regulations, and objectives. (A1, A4, D2, D4, D5, E4)
- B. Working knowledge of State laws and rules pertaining to DOC. (D2, D4, D5)
- C. Considerable knowledge of data presentation methods. (A1, A3, A5)
- D. Considerable knowledge of systems analysis, work flow, methods of data capture, forms design, control procedures, productivity measurement techniques, and work simplification. (A4, C1, C2, D2, D4, D5)
- E. Considerable knowledge of planning principles and practices. (A2, A4, C1, C2, C4)
- F. Working knowledge of statistical techniques. (A1, A3, A5, B1, B2)
- G. Considerable knowledge of selected computer programming methods, e.g., SPSS. (B2, B3)
- H. Working knowledge of supervisory principles and practices including Affirmative Action statutes and regulations. (G1, G2, G3, G6, G7, H3)
- I. Skill in oral and written communications. (A2, A4, A5, A6, C3, E1, E2, E3, E4, E5, F1, F2)
- J. Skill in correlating and analyzing facts; drawing conclusions therefrom; devising solutions to assigned problems; and making recommendations. (B1, C4, D3, D4, D5, E4)

II. Personal Contacts and Their Purpose

- A. Contacts with the Section Chief and coworkers of the Systems Operation Section occur on a daily basis and may consist of a simple question and answer or a more lengthy discussion of a problem or of general administration.
- B. Contacts with the Director and other staff members of OIMO and other members of DOC occur at irregular intervals and are dependent upon the particular assignment or project which is being worked upon. The purpose of the contacts is to seek information, clarify positions, resolve issues and seek decisions. During the period of problem solving and clarification the contacts occur anywhere from a daily to weekly basis.
- C. Contacts with the Department, other agencies, the universities, other organizations, and the general public are ad hoc and are for informational purposes or clarifying a particular set of data.

III. Discretion and Accountability

- A. The long-range objectives and goals are set by the Section Chief, Office Director or Assistant Administrator. Priorities for work assignments vary by point of origin and often are in conflict. The incumbent has considerable latitude establishing work completion estimates and in managing day-to-day workload.
- B. Special assignments are set forth in terms of objectives. Continuing assignments are controlled by outside parameters such as availability of data, etc. The incumbent has responsibility for daily decision-making and confers with the Section Chief to suggest modifications or to provide information in non-routine assignments.
- C. The incumbent is responsible for the finished work and any review is for informational purposes, except in sensitive matters.
- D. The incumbent is accountable for the work output. However, when data is considered, the aspect of data reliability requires that all data handlers have a shared accountability for the data.

III. DISCRETION AND ACCOUNTABILITY

- A. Describe the extent to which the objectives and priorities of the work assignments are prescribed or defined for the position and the extent to which they may be modified by an incumbent of the position.**

See attached.

- B. Considering all available guidelines, specific instructions, and assistance; describe the extent to which they define or control the work methods, operational sequences, and decision-making authority of the position and the extent to which these controls may be modified by an incumbent of the position..**

Guidelines such as Administrative Rules, state statutes. Incumbent is responsible for making interpretation of rules and statutes. Instructions are generally given in terms of results to be achieved.

- C. Describe the nature and extent of the work review.**

Work is reviewed through monthly reports, conferences, work plan, progress reports, observation, the performance planning and development process, and through feedback from users of services. Work is reviewed for policy compliance and goals and priorities set for the incumbent by the supervisor from alternatives developed by the incumbent.

- D. Describe the extent to which accountability for the work is shared with other positions or entities outside of the formal supervisory chain of command.**

Administrative Rules and legislative proposals are developed with the procedural assistance of the Division's rules coordinator and Division legislative liaison.