

MEMORANDUM

State of Alaska
Department of Administration
Division of Personnel & Labor Relations

To: Nicki Neal
Director

Date: January 17, 2008

Thru: 
Cindy Gouveia
Class Studies Supervisor

Phone: 465-4075

From: 
Keith Murry
Human Resource Specialist

Phone: 465-4074

Subject: Motor Vehicle Customer Service Study

Preamble:

The Department of Administration's Division of Motor Vehicles (DMV) requested a classification study of the Motor Vehicle Customer Service Representative positions with the goal of changing the salary ranges assigned the job classes. The division's goal, if achieved, would create pay discrepancies between the higher level Representative positions and the positions that supervise the Representatives. Because of this possibility the scope of the study was expanded to include the positions supervising the Representatives.

Study Scope:

This study covers the positions in the Motor Vehicle Customer Service Representative I-III class series, the positions in the Motor Vehicle Office Manager I-III class series, and positions performing similar motor vehicle customer service or supervisory duties, which are currently classified as Administrative Clerk III, Project Assistant, Driver Services Supervisor, and Records and Licensing Supervisor.

Study Method:

Following the study planning meeting, DMV gave classifiers a presentation on the work of the division and submitted updated position descriptions. Desk audits were held in Anchorage, Juneau, and Palmer with telephonic audits of positions in Kodiak, Valdez, and Fairbanks. Based on the information gathered two classification structures were developed and provided to the division. The structures reflected alternate decisions on the assignment of lead level work. The division indicated which option they believed was best suited to future operations and provided comments on class definitions. Class specifications were drafted, provided to the agency for review, and used in a test allocation session with classification analysts. The specifications were refined based on the agency's and analysts' comments and initial allocations determined. Following review of position allocations and resolution of controversial positions, the salary ranges of the job classes were analyzed, and salary ranges recommended.

History of Job Classes:

Driver's License Examiner existed prior to July 24, 1961. The class covered positions responsible for conducting oral, written, visual, and driving examinations of license applicants.

In 1967 a second level was created. Driver's License Examiner I (P1112/09) and Driver's License Examiner II (P1113/11) included positions at the journey and lead levels responsible for conducting road tests of license applicants. The over-the-counter work of issuing licenses, titles, and registrations and collecting fees and taxes was performed by Clerk Typists II and/or Police Aides. On October 1, 1969, the Driver's License Examiner I and II received salary range changes to 10 and 12, respectively.

On January 5, 1973, Motor Vehicle Representative I (P7550/09) and Motor Vehicle Representative II (P7551/11) were established. The classes included journey and working-supervisor level positions performing and supervising the over-the-counter processing of vehicle registrations, titles, and licenses and collection of monies.

On March 5, 1976, Motor Vehicle Office Manager I (P7561/15) and Motor Vehicle Office Manager II (P7562/17) were established. The classes included positions responsible for supervising Motor Vehicle Representatives I/II and Driver's Licensing Examiners I/II and performing the day-to-day management of motor vehicle registration and driver licensing at the larger field offices (in Anchorage, Fairbanks, and Tok).

On February 28, 1978, Motor Vehicle Office Manager III (P7563/20) was established. The single-position class covered responsibility for managing the largest field office in the State (in Anchorage).

In 1980 the Motor Vehicle Representative I/II and Driver's Licensing Examiner I/II were combined into a single series. Motor Vehicle Representative I-V, at salary ranges 8, 9, 10, 11, and 13, covered positions performing motor vehicle licensing, registration, and testing from the trainee to the working-supervisor level.

On November 1, 1984, the minimum qualifications for Motor Vehicle Representatives were revised to remove the traffic offense/indictment restriction. The minimum qualifications were again revised on October 1, 1989, in response to the State discontinuing the use of the Office Skills Test.

A classification study implemented on July 16, 1990, resulted in the salary range of the Motor Vehicle Representative IV being changed from 11 to 12 and the Motor Vehicle Representative V being abolished. The positions in the Motor Vehicle Representative V class were reclassified to Motor Vehicle Office Manager I. The study also established the Driver Services Supervisor class, which included two positions in Juneau that supervised the Financial Responsibility/Mandatory Insurance Unit or the Records of Conviction Unit. The subordinates in these units were Clerk Typists and Document Processors. The study updated the Motor Vehicle Office Manager I-III classes without making significant changes.

On March 1, 1994, the minimum qualifications for Motor Vehicle Representatives were revised to reflect the changes from the clerical study that created the Administrative Clerk series.

In March of 1997 the Division of Motor Vehicles was transferred from the Department of Public Safety to the Department of Administration. On December 16, 1997, a classification study was implemented that abolished the training level class of Motor Vehicle Representative I; retitled the remaining classes Motor Vehicle Customer Service Representative I-III; and changed the salary ranges from 9, 10, and 12 to 10, 12, and 14. The defining characteristics of the levels (i.e., over-the-counter work, road tests, and lead duties) did not change.

On January 16, 2001, a study of the Motor Vehicle Office Manager I-III was implemented. The study had been initiated on implementation of the Motor Vehicle Customer Service Representative series. The study updated the class specifications with no changes to the defining characteristics of the levels or assigned salary ranges. The main change from the study was the movement of five positions in Anchorage from Motor Vehicle Customer Service Representative III to Motor Vehicle Office Manager I.

On March 18, 2003, the minimum qualifications for the Motor Vehicle Customer Service Representative series were modified to reflect the use of typing ability as a desired qualification instead of a required qualification.

Class Analysis:

The Division of Motor Vehicles carries out the duties of the Alaska Uniform Traffic Laws Act that are the responsibility of the Department of Administration. The primary role of the division is the enforcement of statutes and regulations covering the registration, titling, and transfer of vehicles; licensing of drivers; financial responsibility relating to non-commercial vehicles; registration of motor vehicle, trailer, and semi-trailer dealers; management of motor vehicle and driver license records; and administering a commercial motor vehicle driver's licensing program.

The positions examined in this study perform and manage the production-work of the division. The activities include issuing titles for motor vehicles, mobile homes, and trailers; registering motor vehicles, powered boats, all-terrain vehicles, snow vehicles, and trailers; testing and licensing drivers; issuing State identification cards; collecting motor vehicle registration taxes; maintaining driver records; and carrying out the safety responsibility law and driver improvement program.

The majority of the work is the provision of services to the public. This includes working directly with customers; determining each individual's desired action; ensuring the request meets the requirements in statutes and regulations; verifying the proper supporting documentation is presented; conducting and evaluating the required tests of knowledge, skill, and fitness; calculating and collecting fees and taxes; and issuing legal documents. This "field services" work is performed in offices throughout the State, ranging from the main Anchorage office with more than 30 employees serving a high volume of customers to offices in remote towns staffed by a single employee.

The main Anchorage office and the Juneau office have positions assigned the “back-office” work required by the mandatory insurance laws and driver point system, as well as processing the work from motor vehicle dealers, requests for records, and transactions submitted through the mail. Also in Anchorage is the Contract Services section, which is responsible for guiding, auditing, and administering the licensing and registration work performed by companies under contract with the division.

The State’s classification plan provides for grouping positions into job classes when they are sufficiently similar with respect to duties and responsibilities, degree of supervision exercised and received, and entrance requirements so that: 1) the same title can be used to clearly identify each position; 2) the same minimum qualifications for initial appointment can be established for all positions; 3) the same rate of basic pay can be fairly applied to all positions; and 4) employees in a particular class are considered an appropriate group for purposes of layoff and recall. Job classes are constructed as broadly as is feasible as long as the tests of similarity are met.

The front-line customer service work performed by the majority of employees in the division is the same in all field services offices. The employees use the same knowledge and skills and apply the same policies and procedures to determine the actions to be taken; issue the same types of licenses, titles, and registrations; use the same types of equipment; and maintain information in the same databases. The differences between positions are principally the result of work-load and the availability of other staff. In the larger offices the stress of high-volume customer contact is greater and the frequency of more complicated actions is potentially higher, although there are other employees and supervisors available to assist. In the smaller offices the customer volume is less constant and the complicated actions less frequent, but there are fewer (or no) other employees to assist. In smaller offices the employees also commonly have responsibility for administrative duties that are performed by supervisors in larger offices, such as opening and closing the office; ensuring adequate janitorial service; tracking, ordering and stocking supplies and brochures; calculating and depositing monies collected; and so on.

Differences in work volume are not considered when evaluating the classification of positions. However, the impact work-load has on the difficulty of the job, the frequency of performing unusual or complicated actions, and the variety of duties performed are factors that influence classification decisions. My examination of the work in various offices and the impacts of working in large, high-volume offices versus small, remote offices indicates the differences are not sufficient to require separate titles, qualifications, or rates of basic pay and employees performing this work are an appropriate group for purposes of layoff and recall. Grouping the positions performing front-line public service in field service offices into a single job class is practicable. As the positions in this group make up the majority of the division and regularly perform the full range of front-line work, this is considered the journey level.

The positions in the “back-office” typically perform work that is more routine than the front-line positions. The work does not require the regular face-to-face interactions with customers, but does require phone and mail interactions. The work requires document examination, decision-making, and records maintenance that is similar to the work performed on the front-line, although with less variety. In the main Anchorage office the back-office work is also used as a training ground for new employees, to give them familiarity with the computer systems and the

types of actions to be taken prior to putting them face-to-face with customers. In Juneau the work is not used as a training ground, but the employees in the back-office are expected to work on the front-line when work-loads and staffing limitations require it.

Taken alone the differences in complexity and variety, as well as the impacts of working with customers face-to-face versus by phone or mail, could justify the back-office positions having lower qualifications and rate of basic pay than the journey level described above. However, given the way the division is using the back-office work (i.e., as training and relief-staff for front-line positions), and the substantive similarity in the knowledge and skills applied in performing both sets of duties, using the same title, qualifications, and rate of basic pay for the back-office positions as for the front-line positions is feasible. Grouping the positions into a single set for purposes of layoff and recall would not be likely to cause an employee to be recalled into a position where they could not be reasonably expected to successfully perform. Combining the back-office positions with the front-line positions in the journey level job class is appropriate for personnel administration.

The clerical nature of the work performed by the above class requires consideration of grouping the positions into the general Administrative Clerk class series. The positions under review conduct specialized document examinations and independently make and implement decisions on validity, eligibility, and legality of requested transactions. The decisions require particular knowledge of program requirements and policies, as well as computer systems specific to the division. This type of independent judgment, scope of knowledge, and application of policies, regulations, and statutes is not unique to DMV, but is characteristic of several advanced level clerical classes; including Administrative Clerk III, Medical Records Assistant, Human Resource Assistant, Accounting Clerk II, and others. The DMV positions' work does not require particular knowledge in a professional area that would justify their separation from the general clerical class, as do the Medical Records Assistant and Accounting Clerk II. However, the DMV positions are the first level of a progressive body of work with increasingly distinct specialization. The work constitutes a subject area where encouraging a career service requires progression in the specialization, rather than in a body of knowledge that is transferable to other programs. The role as the primary performer of the division's production work and foundation for higher levels of specialized work supports continuing the separation of the DMV positions from the general clerical series.

Some positions in the field services offices are assigned responsibility for conducting skill tests of license applicants. The tests examine the applicants knowledge and ability to operate a motorcycle, non-commercial vehicle, or commercial vehicle. (Some offices do not offer testing or only conduct specific types of tests.) The testing consists of guiding an applicant through a preset series of actions over an established course; observing the performance of assigned actions, compliance with traffic laws, and awareness of traffic situations; grading the performance of specific actions on an established scale; and passing or failing the applicant based on the total score. The motorcycle tests differ by being observed from beside the testing area instead of as a passenger. The non-commercial and commercial tests differ in the type of vehicle used during the test, the pre-test vehicle examination, and a few tested actions. However, the types of decisions made in giving the tests, the criteria applied, and the level of independence is substantially similar.

Conducting skill tests requires a level of independent judgment, discretion, and responsibility that is greater than required of the journey level work. Positions assigned this duty in larger offices typically perform it in rotation with a limited number of other positions, performing the office's front-line work when not giving tests. In small offices staffed by a single position the employee commonly performs both testing and front-line duties. In two- or three-position offices a single position commonly performs the testing and serves as a senior position over the others in the office.

The greater complexity, independent judgment, and discretion applied in the skill testing, along with the differences in working conditions encountered and their effect on the work, indicate the positions should be given different minimum qualifications, and a different rate of basic pay than the journey level. Employees in positions at the journey level who have not been given special training particular to the testing duties would not be an appropriate pool for purposes of layoff and recall to a testing position. Therefore, positions performing skill tests are properly placed in a separate job class. The similarity in subject matter, knowledge and skills, and non-testing duties indicates the two classes are properly considered different levels in a class series. The characteristics of the skill testing support considering the class the advanced level of the series.

Two positions in the Fairbanks field services office are assigned lead responsibilities over teams of journey and advanced level positions. The duties include assigning, prioritizing, and auditing work; modifying assignments to deal with work-load or changes in priorities; identifying training needs and conducting training; resolving the unusual or complex issues that arise; and assisting the supervisor with other tasks as directed. The positions are not assigned the level of authority for hiring, discipline, or grievance-response that would support their placement in the Supervisory Bargaining Unit. The responsibility for guiding the work of journey and advanced level employees while performing substantially the same work indicates the positions are appropriately given different qualifications and a different rate of basic pay than the employees led. Therefore, the positions are properly grouped together in a lead-level job class. The similar nature of duties and knowledge and skills, along with the differences in levels of difficulty and responsibility, supports placing the class as a third level in the class series.

There are four positions in the Contract Services section that guide, oversee, and audit the work of contractors performing licensing and registration activities. The duties of these positions include conducting training, guiding and resolving unusual and complex issues, and auditing the performance of contracted services. The positions do not oversee the work of employees, but the oversight of contractors and decisions made are similar to the lead activities of the positions in Fairbanks, with the added difficulty of geographic separation from the individuals led. The similarities support applying the same title, qualifications, and rate of basic pay as given the lead-level positions above. The similarity in knowledge and skills required of both groups and the authority and responsibility exercised indicates grouping the positions together for purposes of layoff and recall is feasible. Therefore, the positions performing the Contract Services work of overseeing contractors are properly grouped into the lead-level job class.

The final group of positions examined are those responsible for supervising employees and managing the production work of the division. The positions assign and prioritize work; review

work products; set employees' performance goals; evaluate and provide feedback on performance; provide coaching, training, guidance, and career development opportunities; identify problems in employee behavior and take appropriate action; and solve problems and handle conflicts between employees or with customers. The positions also perform the strategic management of the division, working together in strategic planning to develop objectives and priorities; and monitoring, evaluating, and adjusting activities in the unit(s) managed to achieve organizational goals. The differences between positions result from the scale of the organizational segment managed, the subordinate hierarchy, the role and responsibility in interactions with other managers, the level of responsibility for specific programs or projects affecting the division's operations, and the control exercised by higher level managers and the division's executive.

One group of positions are first-level supervisors responsible for managing a medium-size office or a specific unit of journey and advanced level employees in a large urban office. (A medium-size office is one that has enough employees to require an on-site supervisor for efficient operations, but does not require a multi-tier hierarchy of supervision.) The positions in this group are closely involved in the day-to-day operations of their office/unit. Incumbents in these positions spend a significant portion of time working directly with customers and employees to resolve problems and conflicts. The work includes responsibility for the administrative functions that are part and parcel of management, such as monitoring and controlling finances, controlling resources, efficient use of office space, and ensuring security of materials and staff. The responsibility for division-impacting work at this level is normally limited to recommending changes in policies or practices to higher level managers, reviewing proposed policies or procedures and recommending changes, communicating policies and procedures to subordinates, and determining the most effective methods for implementing policies in the office or unit managed.

The differences between positions in this group are primarily the result of the working environment, overseeing a unit in a large office which has peer-level managers as well as higher level managers on-site or overseeing a stand-alone office with no other management on-site. The large office setting enables greater division of labor that reduces some of the administrative functions, but requires more coordination with other managers to ensure efficient operations and reduce unnecessary redundancy. The separate office setting includes a greater responsibility for the administrative functions necessary to keep the office operating, but allows greater control over the overall operation to ensure efficiency. My examination of these first-level managers found the differences are mainly in the weight a particular focus is given, not a substantive difference in the types of work performed or the knowledge and skills required. The similarities in the duties and responsibilities indicate using the same title to identify the level of responsibility, the same qualifications, and the same rate of basic pay is practicable. The similarity in knowledge and skills required of employees in both settings support treating them as a single pool for purposes of layoff and recall.

The supervisory authority assigned and exercised for hiring, discipline, and other actions affecting the status of subordinates, along with the responsibility for managerial functions, supports the positions being grouped separately from the lead level class. Current policy and practice in classification is to restrict a class series to a single type of work. Since management is

a different type of work requiring different knowledge, skills, and abilities than the work of the classes previously described, this group of positions is properly considered the first level in a separate class series.

The second management group consists of positions whose responsibilities have a higher level of difficulty and authority than the first level described above, which are caused by the differences in scope of organizational control and additional responsibility for work impacting over-all division operations. The positions' organizational control elements include supervising a segment whose scope requires subordinate managers at the first level or multiple lead level positions for efficient operations, or supervising a segment that includes multiple geographically-dispersed offices that do not have on-site supervision. These positions have substantial responsibility for coordinating the work of field service offices and back-office programs and frequently conduct significant projects that directly impact the division's goals, procedures, and organization.

These positions have greater variety in the specific characteristics that make up their role in the organization, but have similar factors of complexity such as the hierarchy and size of the organizational segment managed, the interactions with individuals and groups outside the supervisory chain, and the need for coordination and negotiation with other levels of division management. The similar knowledge and skills required to perform the complex management activities, as well as the similarity in responsibility for projects and management actions that impact the entire division, indicates using the same qualifications and rate of basic pay is feasible and the employees in the positions are an appropriate group for purposes of layoff and recall. The greater scope of authority and responsibility indicates these positions should be placed in a separate job class than the first managerial level positions. The similarity in the nature of work and difference in difficulty and responsibility support the group being a second level in the managerial class series.

A single position makes up the final group. The position is responsible for managing the State's largest field services office, which also provides central administrative support to all division offices. The hierarchy and size of the organization required to effectively provide the services, the increased difficulty in managing the scope of the organizational segment, and an increased responsibility and authority for management activities affecting the division's operations support assigning different qualifications and rate of basic pay than is established for the second managerial level. Establishing a third level in the managerial class series is feasible.

While the characteristics of the work performed by the position in this third managerial level are not currently found in any other position in the division, there are no elements of the work that would require the class be restricted to a single position. A job class is restricted to a single position when the nature of the work is such that assigning it to more than one position substantially changes the authority, responsibility, or complexity of the class-defining work. In this instance the work is limited to a single position only because the division does not have other offices of comparable size, complexity, and responsibility. If the work in another part of the State changes to require growing an office of similar size and complexity, a second position performing substantially the same duties and responsibilities could be established in the class without changing the work of the existing position to such an extent that it no longer met the

defining characteristics of the job class. To allow for potential changes in the division, which would not affect the characteristics of the work, the class will not be restricted to a single position.

In evaluating the work of the classes I gave careful consideration to the changes that have occurred in the last decade as well as current and pending changes in policies, statutes, and regulations. A major influence on the work over the last several years has been changes in information technology that has led to increased use of computer systems, the internet, and information from other agencies.

Although the positions use computers to perform work processes, knowledge of the division's rules, processes, and procedures remains the paramount requirement to perform the work. The computer tools involved and the skill required to use them have replaced or supplemented work methods and techniques previously done manually or through machine-enhanced processes. Incumbents use computers to facilitate work but the use of computer systems has not changed the primary purpose of the work; the relevant knowledge and skills required to perform the duties; or the level of difficulty, independence of action, decision making, and authority of the positions.

Another area of consideration was the addition of duties outside of motor vehicle laws and regulations, such as voter registration and the organ donor program. Examination of the additional duties, level of difficulty, and level of authority exercised indicates the work is not such that its addition substantively changes the work of the positions. The tasks involved in these areas are more routine and less complicated than the motor vehicle licensing and registration tasks that define the work.

The final areas of consideration were the division's recent emphasis on fraud prevention and detection and the impact of the federal REAL ID Act's requirements. The emphasis on fraud prevention and detection is part of the requirements to comply with the REAL ID Act, which mandates each state's driver licensing employees receive a minimum of 12 hours training in recognizing fraudulent documents. The other impacts from the Act include mandating: the specific information to be included in driver's licenses; what constitutes acceptable documentation for proof of identity and residence; the retention of copies of all supporting documents used to acquire a license; security features to be included in driver's licenses; security screening of employees issuing driver's licenses; and security of un-issued license documents and facilities.

The majority of the changes mandated by the REAL ID Act will result in minor changes to the work of the division's employees, such as scanning documents for electronic retention and limiting which documents are acceptable for license applications. This will require using new tools and applying new policies. Such changes will not substantially impact the nature of the work being performed. The responsibility for recognizing fraudulent documents is not a new element. Employees have previously been expected to alert their supervisors to potentially fraudulent documents. The new emphasis and training may result in more effectively recognizing fraudulent documents, but does not significantly change the authority or responsibility of the employees. The additional tools and steps will result in fewer transactions completed per hour, and the requirement for face-to-face transactions instead of mail or internet will create longer

lines, with a potential for increased customer frustration and anger. The impact these changes will have on the work of employees should be short-term (primarily the first couple of years). This addition of simple clerical tasks to the licensing process will not change the level of knowledge or skills required to perform the class defining work of the employees, unless such tasks become a major part of the duties and justify lower qualifications or a lower rate of basic pay.

The REAL ID Act's requirement for security clearances for employees issuing driver's licenses remains a concern. When such a requirement is applied to all positions in a job class a special note is included in the class specification to alert potential applicants. I have been unable to locate any U. S. Department of Homeland Security (USDHS) guidelines on the level of security clearance required or the standards for acquiring such clearance. Absent specific information from USDHS on what is required for the clearance and what would prevent an employee from receiving clearance, I am unable to assess the requirement's impact on required qualifications. Given the limitations on eligibility that result from the State's requirements for employees given access to the Department of Public Safety's APSIN database, I do not expect the security clearance requirement to have a significant impact on the eligibility of current employees to retain their positions, or the qualification requirements for new employees. When we are notified by DMV or USDHS what the requirement is and when it is effective we can add any necessary note to the class specifications and determine if we need to add any restrictions to the minimum qualifications.

Class Title:

A class title should be the best descriptive title for the work. It is intended to concisely and accurately convey the kind and level of work performed and should be brief, easily recognized, gender neutral, and understood by potential applicants.

The classes in this study have previously been titled Motor Vehicle Customer Service Representative and Motor Vehicle Office Manager. These titles are descriptive of the duties and responsibilities and are retained for the revised classes.

Minimum Qualifications:

The minimum qualifications established for a job class must relate to the knowledge, skills, and abilities needed to perform the work and must not create an artificial barrier to employment of individuals in protected classes. Required training should be limited to the basic formal training that customarily prepares individuals for work in the field. Experience requirements are intended to ensure new employees can successfully perform the work after a period of orientation or familiarization. Required experience should be directly related to the actual duties of positions in the class and should not be equivalent to the work to be performed.

The qualifications previously established for the classes examined were heavily weighted towards advancement in the organization by requiring experience at a lower level to qualify for a higher level. In developing minimum qualifications for the revised classes we attempted to balance the desire to encourage a career service with the need for open consideration of candidates under the merit principles. The work requires knowledge of the division's programs and knowledge and skills in customer service, clerical data maintenance, and cash handling. The

program-specific knowledge can only be gained in the division and its use as a required qualification would unnecessarily limit the ability to consider applicants with experience in other areas. The customer service knowledge and skills may be gained in a wide variety of business settings and applicants with that experience could be reasonably expected to learn the required program-specific information within the probationary period. The minimum qualifications we established for these series use this broader experience to qualify, requiring higher levels of experience at the higher levels of each series.

The exception to this broader qualification is the lead level Motor Vehicle Customer Service Representative III. The requirement for leading, training, and examining the work of others is such that requiring program specific knowledge and skills as a minimum is warranted.

Class Code:

A Class Code is assigned based on the placement of the job class in the classification schematic of Occupational Groups and Job Families. Occupational Groups are made up of related Job Families and encompass relatively broad occupations, professions, or activities. Job Families are groups of job classes and class series that are related as to the nature of the work performed and typically have similar initial preparation for employment and career progression.

The job classes have previously been placed in the Legal Document Processing job family (PI05) in the Legal, Judicial, and Related group. This family includes classes that supervise or perform examination and processing of legal documents. Initial preparation for employment is typically through on-the-job training with subsequent career progression based on progressively responsible experience.

The focus of the work, the nature of the document examinations conducted, the types of decisions made and implemented, and the typical training and experience required to enter and advance in the work support keeping the revised classes in the Legal Document Processing job family. The Motor Vehicle Customer Service Representative I-III continue to be assigned Class Codes PI0531-3 and the Motor Vehicle Office Manager I-III continue to be assigned codes PI0541-3.

AKPAY Code:

AKPAY Codes are assigned to job classes for use in legacy computer systems that cannot use the six-digit Class Codes in the current Classification Outline. The job classes revised in this study will retain their previously assigned AKPAY Codes.

Fair Labor Standards Act

Employees in positions in this study are covered by the minimum wage and maximum hour provisions of the Fair Labor Standards Act of 1938, as Amended (FLSA). While exemption from the provisions of the Act are determined based on the specific circumstances of an individual employee on a work-week basis, there are general aspects of the classes and their influence on the exemptions for employees in bona fide executive, professional, or administrative positions that can be addressed in general.

To meet the criteria for exemption as administrative employees, the primary duty must be the performance of office or non-manual work directly related to the management or general business operations of the employer or the employer's customers and must include the exercise of discretion and independent judgment with respect to matters of significance. The work of employees in these job classes are a regulatory activity of the State that is focused on the general public, not a function that supports or serves other State operations; therefore, the primary duty is not directly related to the management or general business operations of the employer. This precludes employees in these job classes from being exempted from overtime as administrative employees.

To meet the criteria for exemption as professional employees, the primary duty must be the performance of work that requires knowledge of an advanced type in a field of science or learning that is customarily acquired by a prolonged course of specialized intellectual instruction, or that requires invention, imagination, originality or talent in a recognized field of artistic or creative endeavor. The motor vehicle regulatory activities performed by employees in these classes are not in a field of science or learning whose customary preparation is a college degree in the field. Nor is the work in a recognized artistic or creative area. This precludes employees in these classes from being exempted from overtime as professional employees.

To meet the criteria for exemption as executive employees, the primary duty must be the management of a customarily recognized subdivision of the enterprise in which the employee is employed, must include the customary and regular direction of the work of two or more other employees, and must include the authority to hire or fire other employees or make suggestions and recommendations that are given particular weight in the hiring, firing, advancement, promotion or any other change of status of other employees. The primary duty of employees in the Motor Vehicle Customer Service Representative series is the performance of the regulatory activities of the division. Lead level employees are responsible for overseeing and coordinating the work of other employees, evaluating performance, and providing training; however, they are not assigned authority to take or effectively recommend actions that change the status of other employees. Nor is the primary duty of lead level employees management as defined in the regulations. Therefore, employees in Motor Vehicle Customer Service Representative series are precluded from being exempted from overtime as executive employees.

The primary duty of employees in the Motor Vehicle Office Manager series is the management of a customarily recognized subdivision of the Division of Motor Vehicles. Employees in this series are assigned authority for determining or effectively recommending hiring, completion or failure to complete probation, granting or denial of a merit increase, reassignment with significantly different responsibilities, and other changes of status affecting their subordinates. When an employee in this series has two or more full-time subordinates, or the equivalent, and is compensated on a salary basis at a rate that meets or exceeds \$455 per week, the employee meets the criteria for exemption from overtime as an executive employee.

Internal Alignment:

The salary range of a job class is determined based on internal consistency within the State's pay plans, in accordance with merit principles, with the goals of providing fair and reasonable compensation for services rendered and maintaining the principle of like pay for like work. In

evaluating internal consistency, the difficulty, responsibility, knowledge, skills, and other characteristics of a job are compared with job classes of a similar nature, kind, and level in the same occupational group and job family or related job families.

To determine salary ranges consistent with the merit principles and goals of the pay plan I compared the duties, responsibilities, and required knowledge and skills with classes in the Legal Document Processing job family. To ensure full consideration was given the characteristics of the work performed by motor vehicles positions I made additional comparisons with classes performing similar activities in the General Administration job family, the Business Regulation and Compliance job family, and the Public Programs job family.

The Legal Document Processing job family includes the motor vehicle classes in this study and the classes of positions performing and supervising the recording of real property and Uniform Commercial Code transactions. These include Recorder I-IV (Rgs 10, 11, 13, and 15), Recorder Manager (Rg 17), State Recorder (Rg 22), Recorder Technician (Rg 12), and Recorder Technician Supervisor (Rg 15). The motor vehicle classes in the family that are not part of this study are Motor Vehicle Registrar (Rg 21) and Driver Licensing Manager (Rg 21).

Comparison of the nature of document examination duties, level of control by guidelines and supervision, independence in implementing decisions, and the nature of the difficulties in dealing with customers indicates the Motor Vehicle Customer Service Representative (MVCSR) I has similarities with both the Recorder I and Recorder II. The level of similarity with both classes would normally support alignment between them. As the classes are a single range apart such an alignment is not possible. In this instance the weighting of similarities provides greater support to aligning the MVCSR I alongside the Recorder II at range 11.

The MVCSR II's primary duty of technical level work with a significant responsibility for lower level clerical work is substantially similar to the technical/clerical mix that defines the Recorder Technician, although the nature of the technical work differs. The similarities with the Recorder Technician, and lack of similarity to the working supervisor responsibilities that define the Recorder III, supports aligning the MVCSR II alongside the Recorder Technician's range 12 and below the Recorder III's range 13.

The lead duties that define the MVCSR III include a significant authority over the work of other employees, which is similar to the working supervisor characteristics of the Recorder III. The MVCSR III lacks full supervisory authority and the Recorder III lacks responsibility for leading technical level staff. The similarities in supervisory functions, difference in levels of authority, and difference in levels of knowledge and skills required to lead technical level employees supports aligning the MVCSR III above the Recorder III's range 13. The lack of similarity with the duties of managing and supervising an office, which distinguishes the Recorder IV and Recorder Technician Supervisor, supports aligning the MVCSR III below their range 15.

Comparing the Motor Vehicle Office Manager (MVOM) I's management and supervisory duties with the office management characteristics of the Recorder IV and Recorder Technician Supervisor shows substantial similarity. The similarities in organizational scope of control, nature of work supervised, and management activities supports aligning the MVOM I alongside

the Recorder IV and Recorder Technician Supervisor at range 15. The differences in organizational scope of control and program management responsibilities between the MVOM I and the Recorder Manager's responsibility for managing a region with multiple recording offices supports aligning the MVOM I below the Recorder Manager's range 17.

Comparing the MVOM II's responsibility for managing a segment of the organization with greater complexity and scope of control to the Recorder Manager's primary duty of managing a region with multiple recording offices and districts shows substantial similarity. The similarities in managerial functions, scope of control and subordinate hierarchy, and nature of work managed supports aligning the MVOM II alongside the Recorder Manager at range 17.

Comparing the MVOM III's responsibility for managing a large urban office, scope of control and subordinate hierarchy, and responsibility for division-level administrative activities supports aligning the class above the Recorder Manager's range 17. The MVOM III's lack of overall program administration responsibilities supports alignment below the Driver Licensing Manager and Motor Vehicle Registrar at range 21 and the State Recorder at range 22.

The General Administration job family includes classes that perform or supervise general clerical, technical, and administrative functions. The classes with sufficient similarities to provide reliable comparisons include Administrative Clerk I-III (Rgs 7, 8, and 10), Administrative Assistant I-II (Rgs 12 and 14), Administrative Officer I-II (Rgs 17 and 19), and Administrative Operations Manager I-III (Rgs 22, 23, and 24). I also examined similarities with the Administrative Manager I-IV classes (Rgs 15, 17, 19, and 21), although the comparison to this series was given less weight since the series has been superseded by the other classes considered and will be abolished by May 7, 2008.

Comparing the nature of the work performed; independence in making and implementing decisions; control by guidelines and supervision; authority to deviate from established procedures; and difficulties encountered in providing customer service reveals substantial similarity between the MVCSR I and the Administrative Clerk II and III. The variety of procedures, type and level of knowledge and skills required, and independence in making and implementing decisions supports aligning the MVCSR I with the Administrative Clerk III, while the lack of authority to deviate from established procedures or to control the workflow, priorities, or methods supports aligning with the Administrative Clerk II. Weighing the similarities with each level and considering the elements of complexity in providing customer services supports aligning the MVCSR I alongside the advanced level Administrative Clerk III at range 10.

Comparing the mix of technical and clerical duties and responsibilities; the type and level of discretion and independent judgment in decision-making; the nature of control by guidelines and supervision; and the authority exercised in determining workflow, methods, and priorities reveals substantial similarities between the MVCSR II and the Administrative Assistant I. The similarities support aligning the MVCSR II alongside the Administrative Assistant I at range 12. The lack of similarity to the responsibility for a variety of technical duties that require knowledge and skills in multiple areas, which characterizes the Administrative Assistant II, supports aligning the MVCSR II below the Administrative Assistant II's range 14.

Comparing the responsibility for leading and performing technical and clerical level work; the nature and level of authority over workflow, methods, and priorities; the nature of control by guidelines and supervision; the type and level of supervisory functions assigned; and the type and level of knowledge and skills required reveals substantial similarities between the MVCSR III and the Administrative Assistant II. The similarities support aligning the MVCSR III alongside the Administrative Assistant II at range 14. Comparing the MVCSR III with the variety of duties and responsibilities, organizational scope of control and impact, and broad range of knowledge and skills that distinguish the Administrative Manager I supports aligning the class below the Administrative Manager I's range 15.

Comparing the type and level of supervisory and managerial duties; scope of organizational control; nature of work managed; responsibility for administrative activities; and control by guidelines and supervision received indicates the MVOM I has the greatest similarity with the Administrative Manager I. The similarities are sufficient to support aligning the MVOM I alongside the Administrative Manager I at range 15. The differences between the MVOM I and the Administrative Officer I in variety of responsibilities, authority for distinct operations, requirement for department-wide coordination and integration of activities, and type and level of knowledge and skills required supports aligning the MVOM I below the Administrative Officer I's range 17.

Comparing the type and level of management duties and responsibilities; type and level of knowledge and skills required; scope of organizational control exercised and subordinate hierarchy; responsibility for projects affecting division operations; and responsibility for policies and procedures indicates the MVOM II has the greatest similarity with the Administrative Manager II and Administrative Officer I. The similarities are sufficient to support aligning the MVOM II alongside the Administrative Manager II and Administrative Officer I at range 17. The differences between the MVOM II and the Administrative Officer II and Administrative Manager III in variety of responsibilities, requirements for coordination and integration, and authority to revise and implement policies and procedures supports aligning the MVOM II below the Administrative Officer II's and Administrative Manager III's range 19.

Comparing the type and level of management duties and responsibilities; type and level of knowledge and skills required; scope of organizational control exercised and subordinate hierarchy; responsibility for projects affecting division operations; and responsibility for policies and procedures indicates the MVOM III has similarities with the Administrative Officer II, Administrative Manager III, and the Administrative Manager IV. Weighing the similarities, and giving greater influence to the new class over the superseded classes, supports aligning the MVOM III alongside the Administrative Officer II at range 19. The differences between the MVOM III and the Administrative Manager IV and Administrative Operations Manager I in scope of organizational control, type and level of work managed, and requirements for coordination and integration with outside agencies supports aligning the MVOM III below the Administrative Manager IV's range 21 and the Administrative Operations Manager I's range 22.

The Business Regulation and Compliance job family includes classes that administer, supervise, and perform work related to the regulation of business and occupational licensing. The classes with sufficient similarity in duties, responsibilities, and entrance requirements to provide reliable

comparisons include Business Registration Examiner (Rg 13), Occupational License Examiner (Rg 13), Insurance Licensing Examiner I-II (Rgs 12 and 14), Records and Licensing Supervisor (Rg 16), and Chief of Occupational Licensing (Rg 21). The other classes in the family require a level of specialized education and perform investigations and compliance actions that do not provide sufficient similarity with the motor vehicles classes to support pay decisions.

Comparing the nature of technical and clerical examinations conducted; the nature of guidelines and supervisory controls; the independent judgment and discretion exercised; the authority to deviate from or modify established policies and procedures; the type and level of knowledge and skills required; and the responsibility for providing guidance and interpretation to applicants in areas that are not clearly defined in statutes, regulations, or policies and procedures supports aligning both the MVCSR I and MVCSR II below the Insurance Licensing Examiner I's range 12 and the Business Registration Examiner's and Occupational License Examiner's range 13.

Comparing the nature and complexity of the technical duties performed; the nature of guidelines and supervisory controls; the level of independent judgment and discretion; the responsibility for providing guidance and interpretation to applicants in areas that are not clearly defined in statutes, regulations, or policies and procedures; and the responsibility for controlling the work of other employees supports aligning the MVCSR III alongside the Business Registration Examiner and Occupational License Examiner at range 13 and the Insurance Licensing Examiner II at range 14.

Comparing the type and level of management duties and responsibilities; type and level of knowledge and skills required; scope of organizational control exercised and subordinate hierarchy; responsibility for projects affecting division operations; and responsibility for policies and procedures supports aligning the MVOM I below the Records and Licensing Supervisor's range 16. The substantial similarities between the Records and Licensing Supervisor and the MVOM II supports aligning the MVOM II alongside the Records and Licensing Supervisor at range 16.

Comparing the type and level of management duties and responsibilities; type and level of knowledge and skills required; scope of organizational control exercised and subordinate hierarchy; responsibility for projects affecting division operations; and responsibility for policies and procedures supports aligning the MVOM III above the Records and Licensing Supervisor's range 16. The differences in scope of organizational control, type and level of work managed, and requirements for coordination and integration with outside agencies supports aligning the MVOM III below the Chief of Occupational Licensing's range 21.

The Public Programs job family includes classes that administer, supervise, and perform services in social, government benefit, or public assistance programs. The classes with sufficient similarity in duties, responsibilities, and entrance requirements to provide reliable comparisons include PFD Technician I-IV (Rgs 10, 12, 14, and 15), PFD Specialist I-II (Rgs 16 and 18), PFD Manager (Rg 22), and Eligibility Technician I-IV (Rgs 13, 14, 15, and 16). The other classes in the family require a level of specialized education and perform a professional level of work that does not provide sufficient similarity with the motor vehicles classes to support pay decisions.

Comparing the nature of technical and clerical examinations conducted; the nature of guidelines and supervisory controls; the independent judgment and discretion exercised; the authority to deviate from or modify established policies and procedures; the type and level of knowledge and skills required; the responsibility for providing guidance and interpretation to applicants; and the complicating elements of typical customer interactions support aligning the MVCSR I alongside the PFD Technician I at range 10. The similarities support aligning the MVCSR II alongside the PFD Technician II at range 12. The differences between the MVCSR I and II and the Eligibility Technician I in variety of program requirements, independent judgment and discretion exercised, and complicating elements of typical customer interactions supports aligning the MVCSR I and II below the Eligibility Technician I's range 13.

Comparing the responsibility for leading technical level work; the nature of guidelines and supervisory controls; the level of independent judgment and discretion; the type and level of knowledge and skills required; and the complicating elements of typical customer interactions support aligning the MVCSR III alongside the PFD Technician III at range 14. The difference between MVCSR III and the Eligibility Technician II in variety and complexity of technical level work, level of independent judgment and discretion, type and level of knowledge and skills required, and the complicating elements of typical customer interactions supports aligning the MVCSR III below the Eligibility Technician II's range 14.

Comparing the type and level of management duties and responsibilities; type and level of knowledge and skills required; scope of organizational control exercised and subordinate hierarchy; responsibility for projects affecting division operations; and responsibility for policies and procedures shows substantial similarity between the MVOM I and the first level supervisor and office management role of the PFD Technician IV and Eligibility Technician IV. The similarities support aligning the MVOM I alongside the PFD Technician IV at range 15 and the Eligibility Technician IV at range 16. The differences in the nature of work managed, type and level of knowledge and skills required, and complicating elements of typical customer interactions indicates greater weight is properly given the similarities with the PFD Technician that support aligning the MVOM I at range 15.

Comparing the type and level of management duties and responsibilities; type and level of knowledge and skills required; scope of organizational control exercised and subordinate hierarchy; responsibility for projects affecting division operations; and responsibility for policies and procedures shows substantial similarity between the MVOM II and the unit manager and program expert role of the PFD Specialist I. The similarities support aligning the MVOM II alongside the PFD Specialist I at range 16. The lack of similar responsibility for performing and managing professional level work supports aligning the MVOM II below the PFD Specialist II's range 18.

Comparing the type and level of management duties and responsibilities; type and level of knowledge and skills required; scope of organizational control exercised and subordinate hierarchy; responsibility for projects affecting division operations; and responsibility for policies and procedures shows substantial similarity between the MVOM III and the subject matter expert and program management role of the PFD Specialist II. The differences in managing technical and professional level work are not such that aligning the MVOM III alongside the PFD

Specialist II at range 18 would be inappropriate. The differences between the management responsibilities of the MVOM III and the PFD Manager's role as deputy director of a division support aligning the MVOM III below the PFD Manager's range 22.

My analysis of internal alignment outlined above found minimal support for moving the MVCSR I up one range; no support for changing the ranges of the MVCSR II, MVCSR III, and MVOM I; minimal support for moving the MVOM II down one range; and moderate support for moving the MVOM III down one range. If these changes were made they would result in a compressed salary structure for the division. The negative consequences of such a structure on employee acquisition, retention, and advancement would counteract the goal of encouraging a career service. Prudence and a reasonable desire for substantive support to justify changing the salary range of a job class, especially when the change would lower the assigned range, argues against making these changes.

After discussion of the salary analysis and initial results, DMV management requested we re-examine the comparisons of the MVCSR series with the Business Registration Examiner, Occupational License Examiner, Unemployment Insurance Specialist IB, and Eligibility Technician I-IV job classes. To ensure the work was sufficiently examined the comparisons were evaluated separately by two analysts. Both analysts concluded the similarities and differences in analysis, decision making, and authority with the MVCSR classes do not provide support for changing the initial conclusions.

Based on the analysis of the duties and responsibilities typical of the classes, the preponderance of comparisons with other job classes, the goals of the pay plan, and the need to provide sufficient range separation between classes to recognize and reward differences in skill, difficulty, and responsibility, I recommend the Motor Vehicle Customer Service Representative I-III remain at salary ranges 10, 12, and 14, and the Motor Vehicle Office Manager I-III remain at salary ranges 15, 17, and 20.

A study of the Administrative Clerk series is scheduled for next fiscal year. The study has the potential to change the defining characteristics and related salary ranges for our largest group of general clerical positions. I recommend we re-examine the comparisons of the Motor Vehicle Customer Service Representative series as an integral part of the final stage of the Administrative Clerk study and adjust the MVCSR ranges as necessary to maintain their proper relationship with the general clerical classes.

Conclusions:

The Division of Motor Vehicles requested this study to change the salary ranges assigned the division's job classes. The job analysis and review of internal alignment found insufficient justification to change the salary ranges assigned the classes. The class specifications covering the positions in the study have been revised to better reflect the work that characterizes each class and to broaden the pool of candidates when filling vacancies.

The position allocation analyses for study positions are being transmitted through the OPD System. Concurrent with the reallocation of PCN 125221, the Driver Services Supervisor class is abolished.

The revised class specifications and position reclassifications are effective February 1, 2008.

Attachments:

Final class specifications

Position Allocation Spreadsheet

cc: Whitney Brewster, Director
Division of Motor Vehicles

Stephen Elliot, Motor Vehicle Office Manager III
Division of Motor Vehicles

Eric Swanson, Director
Division of Administrative Services

Sharon Dick, Human Resource Manager
Division of Personnel & Labor Relations