

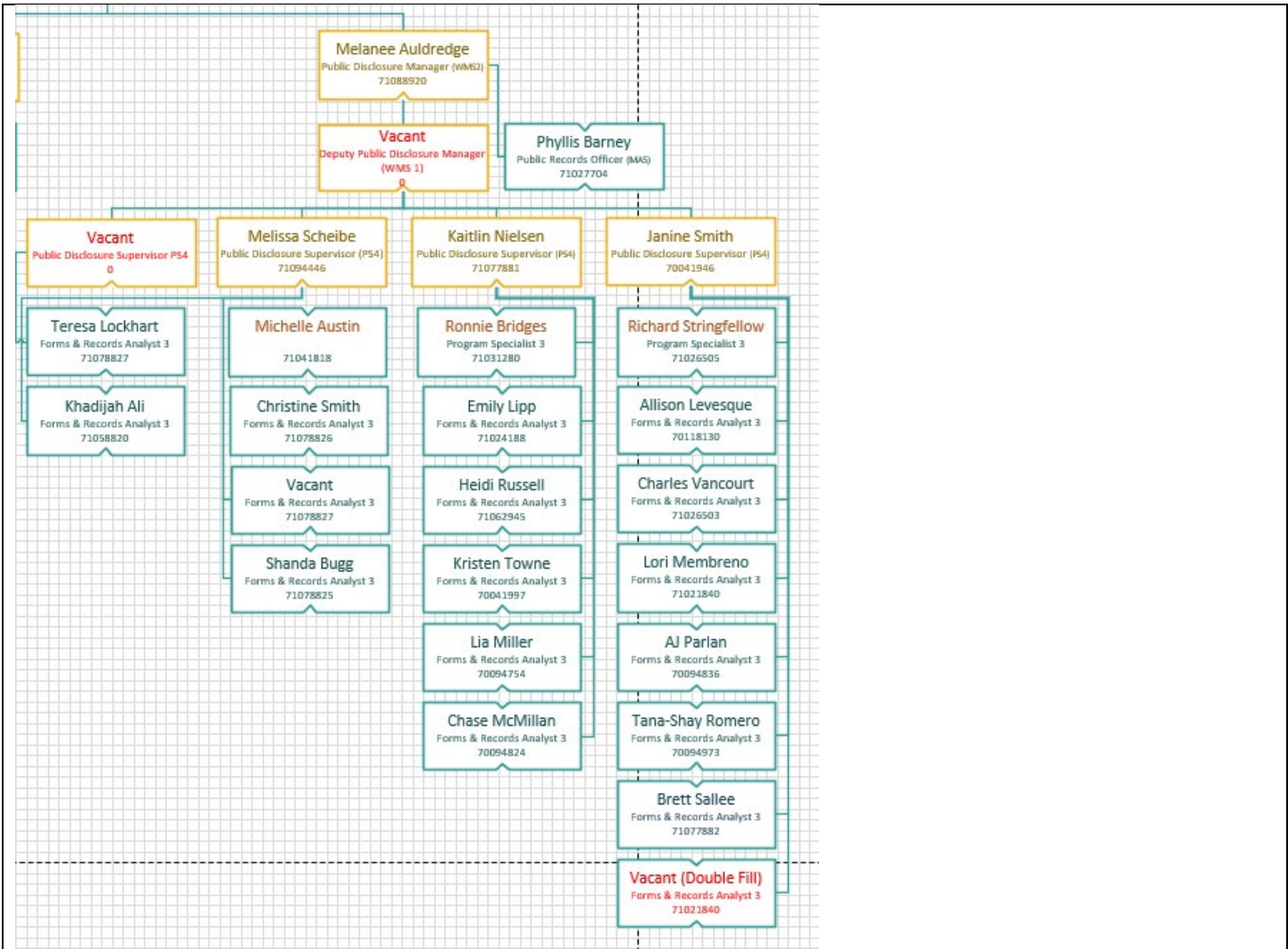
Washington Management Service (WMS) Position Description

For assistance completing this form, contact your WMS Coordinator.

Position Information		
Position Title: Deputy Public Disclosure Manager	Position Number/Object Abbreviation: 71103884	
Incumbent's Name (If filled position): Vacant	Agency/Division/Unit: DOH/CFRA/OERM	
Address Where Position Is Located: Town Center 1, 101 Israel Road SE, Tumwater, WA	Work Schedule: Part Time <input type="checkbox"/> Full Time <input checked="" type="checkbox"/>	Overtime Eligible: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Supervisor's Name and Title: Melanee Auldredge, Public Disclosure Manager	Supervisor's Phone: (360) 819-6768	

Organizational Structure
<p>Summarize the functions of the position's division/unit and how this position fits into the agency structure (attach an organizational chart).</p> <p>The mission of the Department of Health (DOH) is to protect and improve the health of people in Washington State.</p> <p>The Center for Facilities, Risk and Adjudication (CFRA) provides leadership and support to the agency in the areas of adjudicative services, enterprise risk management, and facilities. CFRAs mission is to provide services to agency internal and external partners and the public by proactively identifying and mitigating risk, ensuring due process and consistent application of the law in adjudicative proceedings, and providing facilities that allow employees to do their best work in a safe environment.</p> <p>The Office of Enterprise Risk Management (OERM), where this position is located, is one of three offices within the Center for Facilities, Risk and Adjudication. OERM is comprised of 6 sections: Public Disclosure Office, Information Governance, Privacy Office, External Audit/Internal Controls, Civil Rights/Title VI & ADA, and Enterprise Risk Management. These sections are responsible for identifying risks and managing any events or outcomes that could prevent the agency from meeting its strategic goals.</p> <p>The Deputy Public Disclosure Manager reports to the Public Disclosure Manager (WMS 2) and is a member of the PDO leadership team. The Deputy Public Disclosure Manager provides leadership over PDO supervisors, with a focus on operational activities, interpretation and implementation of policies, rules and regulations, process improvement, and quality assurance of public disclosure requests. The Deputy Director has full delegated authority to act on behalf of the Public Disclosure Manager in their absence. The Public Disclosure Office currently includes 24+ FTEs.</p>





Position Objective

Describe the position’s main purpose, include what the position is required to accomplish, and major outcomes produced. Summarize the scope of impact, responsibilities, and how the position supports/contributes to the mission of the organization.

Under the administrative direction of the agency Public Disclosure Manager, this position provides leadership, operational and process improvement expertise. Specifically, this position provides leadership direction to the Public Disclosure supervisors. The Deputy Public Disclosure Manager has latitude and discretion for making decisions, applying judgement for policy interpretations, and is guided by their familiarity creating internal policies and applying published guidelines and regulations such as those in the areas of public disclosure, records management, health care professional licensing and credentialing, Environmental Public Health, the goals of our agency Executive Offices,

The Deputy Public Disclosure Manager functions as one of the subject matter experts on all issues related to public disclosure and judges and analyzes all public disclosure processes and activities for the Public Disclosure Office, which impact the entire agency. This includes conducting operational analyses of state and federal statutes related to public records requests, establishing or amending delegated policies and procedures, conducting and recommending process improvements, and managing the supervisors who supervise staff that fulfill public records requests.

This position facilitates long-range project planning and implementation for the Public Disclosure Office. This includes collaborating with the PDO leadership team to organize year-to-year program development strategies, build staff



training plans, and construct workflows of processes, procedures, and policies. This position also coordinates with other agency offices to identify process efficiencies and enable new standards (e.g. uniform agency deidentification).

The Deputy Public Disclosure Manager is directly accountable for actions and results of the Public Disclosure Office by supervising the work of the Public Disclosure Office supervisors. The position is crucial in improving the pace and work distribution of the centralized public disclosure team and ensuring that all public records requests received by the agency are processed and fulfilled in a legally defensible and timely manner.

This position is critical in mitigating agency-level risk when it comes to matters of public records especially when considering the high volume of records requests that come into the agency and the high volume of records that are released to the public in this process, is authorized to interpret and implement policy and procedure decisions about public disclosure and public records as it relates to the Public Records Act ([RCW 42.56](#)).

Assigned Work Activities (Duties and Tasks)

Describe the duties and tasks, and underline the essential functions. Functions listed in this section are primary duties and are fundamental to why the position exists. For more guidance, see [Essential Functions Guide](#).

The duties and tasks for the Deputy Public Disclosure Manager are to:

Provide leadership and subject matter expertise to PDO policies and standards:

- Significant authority to interpret public disclosure policies, statues and rules and assist programs across the agency with implementation of public disclosure requirements.
- Build and maintain collaborative working relationships with PDO supervisors and leadership team and all partners to identify priorities and work collaboratively on public disclosure standards affecting agency public records coordinators and staff.
- Monitor and analyze changes to public records laws and regulations, either through legislation or case law and assists the PD Manager with policy and procedure updates to ensure agency compliance.
- Consult and collaborate on public disclosure exemptions and redactions with Public Records Officer.
- Validate and document decisions and approaches to program-specific exemptions.
- Develop and implement policies and procedures for cross-team compliance and consistency with state statutes and federal regulations.
- Develop and implement policy decisions about redacting health care information and health-related data.
- Makes decisions in partnership with the Public Disclosure Manager about program, including strategic and tactical decisions
- Responsible for understanding and mitigating negative impacts from policy implementation to internal DOH programs and the public.
- Facilitate clear processes for staff to request exemption deliberations and recommendations. Work with the PDO Leadership team on requests and situations that need to be escalated or shared for action.

Conduct process improvement analysis for processes relating to public disclosure and document processes:

- Uses and supports quality assurance and improvement methodologies to improve public disclosure processes.
- Working with the PD Manager, strategizes projects and process improvement efforts to improve consistency of practice, interpretation, compliance, risk minimization and adherence to applicable and new legal requirements and to minimize litigation exposure in complex and evolving field of law.
- Leads supervisors and Public Records Officer in performing ongoing quality control and compliance auditing of public records requests and responses.

Manage the PDO supervisors:

- Provide leadership and direction to supervisors and staff.
- Set goals and directions for supervisors.
- Provide clarification on the agency centralized public disclosure unit roles and goals
- Determine program metrics and goals and resources needed to accomplish.



- Recruit and retain qualified staff.
- Develop succession and contingency plans.
- Monitor content and quality of work as needed providing timely feedback. Provide an inclusive environment focused on staff development.
- Recognize staff contributions.
- Provide supervision and support for performance and personnel issues with timely and responsible decisions.
- Continually apprise the Public Disclosure Manager and OERM leadership of partner interactions, concerns, and salient issues
- Participate in the development of and lead implementation of tactical and strategic plans: track progress and assess performance. Work with internal and external stakeholders to identify priority and emerging issues and develop strategic plans and performance measures. Work with staff to develop annual work plans identifying priority activities and performance measures. Monitor work and strategic plans and measures on an ongoing basis. Continually evaluate outcomes to enhance program effectiveness and performance.
- Change Management: Invest in developing and implementing change management skills.
- Continuous learning: Invest in developing leadership and management skills as well as technical skills.
- Promote development of greater technical skills for staff, especially in the area of redaction software and eDiscovery tools.
- Participate in the measuring, reporting and continuous improvement of organizational performance.
- Support agency equity and social justice initiatives not only internal activities such as hiring, training opportunities, and facilitated discussions on equity and inclusion, but also in external activities by evaluating where and how agency resources are targeted to address health inequities.

Accountability – Scope of Control and Influence

Provide examples of the resources and/or policies that are controlled and influenced.

Resources:

- This position will supervise and direct the work of 4 PS4s, who respectively supervise teams of FRA3s (totaling 22).
- This position will collaborate and work closely with the agency's Public Records Officer to accomplish program goals and objectives.
- Provide leadership for implementing operational plans.
- Provide leadership for implementing process improvement methodologies.

Policies:

- Participate in the rulemaking for WAC 246-08-390 Public Disclosure
- Participate in the updates to Policy 17.003 Public Disclosure Policy
- Participate in the updates to Procedure 17.003 Public Disclosure Procedure
- Participate in the agency-wide effort to create an acceptable deidentification method for healthcare information and health-related data.

This position makes decisions about interpretation and applying RCWs and WACs and creates implementation plans to meet business needs and bring legislatively mandated changes with relevant recommendations to the Public Disclosure Manager and Public Records Officer for additional training purposes.

This position develops standard processes and business practices and recommends changes to office and program specific policies and procedures; assesses workload and policy impacts of legislative and regulatory changes based on the introduction of new technologies and changes in workflow and processes.

As Deputy Public Disclosure Manager, this position has full responsibility for management of the Public Disclosure Office in the Manager's absence.



Describe the scope of accountability.

This position has responsibility for the management of the public disclosure supervisors and staff. The incumbent is directly accountable for ensuring that public records requests are fulfilled according to the law and implementing defensible, workable processes and procedure to enhance business operations and minimize legal risk.

This position's scope of work is far-reaching, given that the work influenced and supervised by the position may impact not only the OERM but the entire Department of Health. This position is a member of the PDO leadership team and is accountable for the day-to-day supervision of the Public Disclosure Office supervisors and teams.

Accountability may be demonstrated through the following activities:

- Oversight and day to day management of legislative mandates and statutory interpretations.
- General to specific interpretation and implementation issues related to WAC rulemaking.
- Recommendations to OERM leadership on complex and inter-departmental issues, trends, and developments for projects and policies.

This position requires the ability to balance competing demands and priorities with defined resources and with a constant eye toward risk management and reducing potential negative exposure for the agency. This position has primary responsibility for providing accurate advice on the Public Records Act, and associated state and federal health statutes to the Public Disclosure Manager, supervisors, and staff. This expertise is heavily relied on for decision-making.

This position requires long-term strategic and creative thinking, application of management principles and skill, comprehensive process development skills and a high proficiency regarding the statutes that impact responses to public disclosure requests. This position works with DOH staff, customers, contractors, sub-recipients along with the public.

Describe the potential impact of error or consequence of error (impacts unit, division, agency, state).

There is significant risk to the agency legally, financially, and to its reputation if errors occur with public records requests and disclosure. Failure to fulfill expected results and to mitigate risk may result in negative financial or reputational impacts for the agency, legal repercussions, and unfavorable media attention. Sensitive personnel issues not properly addressed could result in grievances or civil suits filed against the department and may negatively impact the credibility of the agency. Failure to ensure that public disclosure requests are handled properly could negatively impact the agency's reputation and could result in a loss of public trust. Interruption of daily workflow may prevent or greatly reduce the ability of the agency to meet its business purpose and mission.

The position works on, leads, and supervises disclosure responses by the Public Disclosure Office. The position is expected to set deadlines and consistent standards to ensure accuracy and timeliness. Missed deadlines and errors can cost the agency money and integrity. Ensuring the office supervisors and staff are meeting appropriate statutory obligations clearly and within timelines are key components of this position. The impact of error could range from an agency division to all state agencies, depending on the subject and scope of the issue in question.

Ineffective planning, delays, and lack of attention to requests could result in:

- Inappropriate use or loss of state resources.
- A risk to public health due to the inefficient use of resources.
- Loss of public confidence.
- Unfavorable media attention.
- Negative repercussions and reports to OFM and the legislature.

Poorly planned or executed process implementation could result in:



- An inefficient use of state resources.
- Information security breaches.
- Unfavorable media attention.
- Legal liability for failure to follow statutes or federal regulations.

Financial Dimensions

Describe the type and annual amount of all monies that the position directly controls. Identify other revenue sources managed by the position and what type of influence/impact it has over those sources.

Operating budget controlled.

- Public Disclosure Office is relatively new with a budget dictated by charge backs to other agency programs; however, the budget is in the process of being clarified by OFS and CFRA.

Other financial influences/impacts.

- Strong and proactive records management and public disclosure programs reduces agency risk exposure to civil penalties and fines.

Supervisory Responsibilities

Supervisory Position: Yes No

If **yes**, list total full-time equivalents (FTE's) managed and highest position title.

This position is responsible for directly managing 4 staff, PS4s. Those PS4s supervise in total 22 people. The highest positions supervised are the Program Specialist 4 (PS4) positions.

Decision Making and Policy Impact

Explain the position's policy impact (applying, developing, or determining how the agency will implement).

This position will interpret and apply the current federal and state laws and regulations surrounding public disclosure, regulating healthcare licensees, agreements made with various federal entities, and contribute to the updating and monitoring of compliance for DOH's public records policy and procedures.

The position will develop and provide consistent decisions on program exemptions and has the ability to make recommendations with little guidance or no precedents available to provide direction. The position has significant policy interpretation authority for the agency.

The Deputy Public Disclosure Manager makes key policy decisions that have significant impacts on the long-term sustainability and functionality of the Public Disclosure Office and agency operations. This position is responsible for making decisions affecting long-term strategic direction and determining how operational policies and protocols developed by the PDO will be implemented across the agency, for example redacting health care information and health-related data. This position is responsible for understanding and mitigating negative impacts from policy implementation to internal DOH programs and the public.

This position requires independent judgement in framing office policy recommendations for implementation by supervisors and staff. The ability to set goals, establish direction and be accountable for performance measures is key. Decisions and authority around the Public Records Act have long term impacts on the agency's mission and operational effectiveness.

Significant risk can be involved in public disclosure decisions and requires analysis in both unknown and unexplored areas having widespread effect on DOH employees and the public.

This position applies and implements existing departmental policies through the management and participation of various agency and division-wide workgroups and the Attorney General's Office. The scope of this position also



includes the interpretation and application of existing policy, but more importantly, assisting with the formulation, application and implementation of new policies as warranted. These policies include:

- 17.002 Records Management
- 17.003 Public Disclosure
- 17.005 Responsibilities for Confidential Information
- 17.006 Release of Confidential Data/Information

This position makes decisions about applying RCWs and WACs and creates implementation plans to meet business needs and brings about legislatively mandated changes to recommend to the Public Disclosure Manager for additional training purposes. This position also develops standard processes and business practices and recommends changes to office and program specific policies and procedures; assesses workload and policy impacts of legislative and regulatory changes based on the introduction of new technologies and changes in workflow and processes. The position also advises OERM leadership, and other divisions/offices within DOH on matters related to the Public Records Act.

Is the position responsible for making significant recommendations due to expertise or knowledge? If yes, provide examples of the types of recommendations made and to whom.

This position is responsible for making significant recommendations due to their expertise and knowledge of operational knowledge and process improvement. Some examples of recommendations (and to whom) include recommendations of changes in internal processes and recommendations on how to create more legally defensible timelines.

Yes. This position works independently to determine appropriate and accurate decision-making and actions. This position is relied on for its expertise and consultation with public disclosure statutes and rules and the overall legislative process, often involving complex issues impacting all areas of the office, division, and agency. Responsible for making significant interpretation decisions on agency policy about Public Records Act compliance issues. Examples include recommending changes to programmatic or division policies and practices (state and federal), recommending changes to a division position on proposed legislation.

This position brings forward high-level recommendations to the Public Disclosure Manager, PDO leadership team, OERM leadership team, divisional leadership, and other program leadership. In particular, there will be close coordination around recommendations between this position and AGO staff. This position needs a broad background and knowledge around the intersection of public disclosure statutes and requirements with general operational support functions. This position also requires a strong working knowledge of office, center, and agency policies and procedures related to personnel, budgeting, IT, and other administrative service functions.

Must be able to read, write, and interpret RCWs and WACs. This position is responsible for analyzing new legal requirements, new legislation, existing systems and procedures and recommending new processes, WACs, and bill language.

Explain the major decision-making responsibilities this position has full authority to make.

This position is responsible for the day-to-day management of the agency's public disclosure program which have impact on long term program planning. This includes tactical decisions about program processes and decisions made by the Deputy Public Disclosure Manager are often made in the absence of clear statutory guidance, policy, or precedent. This position is expected to gather information and input from multiple sources (legal, fiscal, operational), weigh the risks and benefits, consider the impacts to customers and stakeholders, and apply independent judgment to make sound decisions that may have to withstand public scrutiny and legal challenge.

This position has full authority to make decisions necessary for the effective operations of the Public Disclosure Office with delegated authority from the Public Disclosure Manager. Operations include:

- Process changes needed to implement new legislation and court cases and changes in RCWs and WACs.
- Developing procedures and policies required for the office and agency operations.
- Interpretation and Implementation of legislation and oversight of rules content necessary to implement statutes.



This position works independently to determine appropriate and accurate decision-making and actions. This position is responsible for making significant recommendations to the Public Disclosure Manager, including formulating recommendations for the office resource allocation, managing risk, and identifying potential threats or difficulties to the business.

Describe whether decisions are of a tactical or strategic nature and how decisions are made. For example, is there a known precedent, is it somewhat unfamiliar, or unknown and unexplored?

Decisions made are both tactical and strategic. The position makes daily tactical decisions to establish priorities and determine assignments. Tactical decisions consider previous experiences, knowledge of the programs, and the general environment of the agency.

There is also a need for assistance with strategic decisions due to the nature of public disclosure because public disclosure is inherently risky. While there are rules, laws, and court opinions applying to the daily decisions, issues may arise that are new, complex, and unique, and which require risk analysis and assessment to determine how to proceed. So, this position also requires the capability of providing innovative and highly effective solutions for the Public Disclosure Office that may indirectly impact agency leaders in technically complex situations and in sensitive legal and/or political circumstances.

Technical knowledge in the following areas is needed for appropriate decision making:

- Washington State statutes, rules and policies and court precedents related to legal rights, confidential data, HIPAA, personnel management, IT management, contracting, regulation of health care professions/facilities, and administrative rules development.
- Agency administrative policies and procedures
- Union collective bargaining agreement
- State and federal public health agenda and priorities
- Federal regulations

What are the risks or consequences of the recommendations or decisions?

The Public Disclosure Office provides services to every program in the department. Without effective management of these centralized services, the department's mission is at risk of inefficient use of resources, staff time, and disruptions to program delivery.

Failure to adequately manage Public Disclosure could increase the agency's legal, reputational, and financial exposure. Errors in the application of laws, regulations and policies could impact DOH's ability to carry out its mission effectively and impair public perception of the agency's ability to execute its statutory mandates. Poor recommendations or advice not predicated on state and federal rules and regulations could negatively impact agency employees and create reputational risk as well as financial liability for DOH.

The decisions and recommendations made by this position affect the outcomes of the Public Disclosure Office and programs/divisions in the department. The consequences of faulty direction, recommendations or advice could negatively impact the DOH's bottom line. As such, errors or omissions could negatively impact the credibility of the agency.

Qualifications – Knowledge, Skills, and Abilities

List the education, experience, licenses, certifications, and competencies.

Required Education, Experience, and Competencies.

- **Option 1:** A Bachelor's degree or higher in legal studies, business administration, political science, health care administration, criminal justice studies, psychology or other related programs AND five (5) or more years of



experience in public disclosure or related field (privacy or records management) or experience and expertise in analyzing, interpreting, and applying laws, rules, and case law and three (3) or more years of supervising staff OR six (6) years of experience leading teams, projects, workgroups.

- **Option 2:** Eight (8) years of professional-level experience in public disclosure or related field (privacy or records management) or experience and expertise in analyzing, interpreting, and applying laws, rules, and case law and three (3) years of supervisory and/or management experience OR seven (7) years of experience leading teams, projects, workgroups.
- Excellent organizational, written, verbal and presentation skills.
- Expertise in building and maintaining positive relationships with partners, the public, attorneys, etc.
- Working level experience of databases and data analysis. Experience using data to manage and make data driven decisions.
- A strong understanding of performance measurement, including data collection, manipulation and interpretation.
- Experience with drafting & sending constituent correspondence.
- Strong writing and editing skills; the ability to quickly produce written materials that are clear, concise, easy to read and effective in communicating the desired message.
- Ability to communicate effectively and professionally with diverse groups of people.
- Demonstrate effective management of interpersonal relations to build rapport inside and outside of the office and agency.

At the fully functional level, the position requires, at a minimum, full competence in knowledge and skills to supervise first-level supervisors. The position provides work assignment and direction; job performance evaluation and needed correction of work performance; and training of subordinate personnel.

Preferred/Desired Education, Experience, and Competencies.

WAPRO Certification

Extensive knowledge of the Washington Public Records Act, RCW 42.56, and the Public Records Act Model Rules in WAC 44-14

Detailed knowledge of DOH programs, services, records, confidentiality requirements and public records exemptions

Competencies:

- **Leadership:** Understands and embraces an Outward Mindset in approach to mentoring staff and knows how to coach, inspire and motivate staff and others to accomplish assigned tasks. Understands importance of promoting a cooperative and collaborative environment. Understands empowering others to act. Sets clear and reasonable expectations. Ensures timely follow through with a quality product/service. Expects excellence from self and others. Consistently models trustworthiness, sensitivity to others and respect.
- **Teamwork:** Works cooperatively with others, promotes a cooperative work environment and appropriately influences others. Involves others in a process of decisions to seek their support. Listens and responds honestly and constructively to their team member's ideas. Looks for win-win solutions. Recognizes team members for their contributions. Aids others when they need it. Demonstrates a positive attitude and enthusiasm toward the agency, customers and work in general.
- **Communication:** Effectively interacts with others, individuals or groups, internal and external to DOH. Actively listens, effectively give and receive information both orally and in writing with diverse audiences. Adapts appropriately to the various styles and needs of the individuals or groups with whom we are communicating. Is willing and able to have crucial conversations, when needed, and communicates sensitive information in a direct and respectful manner. The incumbent understands the impact of change on others; uses negotiation skills to resolve problems.

Special Requirements/Conditions of Employment



List special requirements or conditions of employment beyond the qualifications above.	
Working Conditions	
Work Setting, including hazards:	Work will be almost exclusively indoors and operate remotely. May need to come into the office in Tumwater and work in a cubicle office environment on occasion. Work in a tobacco-free campus when onsite. This position is eligible to telework and is typically not required to report on-site.
Schedule (i.e., hours and days):	Due to the operational and supervisory nature of the position, the schedule will be Monday through Friday. A minimum of 40 hours per week is required to fulfill the responsibilities of this position. May need to work more than 40 hours per week to meet critical deadlines or address workload peaks such as during legislative session. A flexible work schedule will be considered at the incumbent's request, subject to supervisory approval.
Travel Requirements:	Occasional travel may be required in-state and out of state, but not frequently
Tools and Equipment:	Requires the use of standard office furniture and equipment (desk, file cabinets, desktop/laptop computer, phone, copy machine, etc.).
Customer Relations:	Most contact will be with co-workers, but occasional contact with vendors, other agency staff, or external customers may be required.
Other:	

Acknowledgement of Position Description	
The signatures below indicate that the job duties as defined above are an accurate reflection of the work performed by this position.	
Date: 3/12/24	Supervisor's Signature (required): /s/Melanee Auldredge
Date: 03/13/2024	Appointing Authority's Name and Title: Signature (required): /s/Robin Bucknell, Chief
As the incumbent in this position, I have received a copy of this position description.	
Date:	Employee's Signature:

Position details and related actions taken by Human Resources will be reflected on the Position Evaluation Summary form.

