19061

THE STATE OF SOUTH CAROLINA

ADMINISTRATIVE LAW COURT

The Honorable Carolyn C Matthews, Administrative Law Judge

Case No 2009-ALJ-30-0103-AP

RECEIVED
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SC Court of Appeals

James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief,

Appellants,

vs

South Carolina Department of Corrections and Palmetto Unified School District No 1,

Respondents

RECORD ON APPEAL

Volume 4 of 8

W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Lake E Summers, Esquire
Malone, Thompson, Summers & Ott LLC
339 Heyward Street, Suite 200
Columbia, South Carolina 29201

THE STATE OF SOUTH CAROLINA

ADMINISTRATIVE LAW COURT

The Honorable Carolyn C Matthews, Administrative Law Judge

Case No 2009-ALJ-30-0103-AP

James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief,

Appellants,

vs

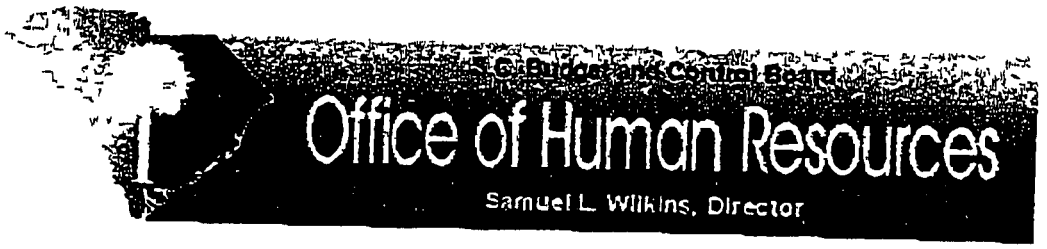
South Carolina Department of Corrections and Palmetto Unified School District No 1,

Respondents

RECORD ON APPEAL
VOLUME 4 OF 7

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Attorney at Law
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Columbia, South Carolina 29202-1866

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Malone, Thompson, Summers & Ott LLC
339 Heyward Street, Suite 200
Columbia, South Carolina 29201



State Employee Grievance Procedure State Appeal Form

TO APPEAL THE DECISION OF THE AGENCY CONCERNING A GRIEVANCE UNDER THE STATE EMPLOYEE GRIEVANCE PROCEDURE ACT TO THE STATE HUMAN RESOURCES DIRECTOR THE EMPLOYEE AND/OR REPRESENTATIVE INITIATING THE APPEAL MUST COMPLETE THIS FORM AND RETURN IT TO THE STATE OFFICE OF HUMAN RESOURCES

EMPLOYEE S NAME Othella Bernard

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S C Department of Corrections

HOME ADDRESS

Street 7028 Greenpond Road City Gray Court

State SC Zip Code 29645

TELEPHONE 864.575.3039 (Home) (Office)

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency's internal grievance procedure?

APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

see attached

State Employee Grievance Procedure Appeal Form

46

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary) See attached

Signature Dora Gruffey **Date** June 20, 2003

Employee or Representative

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Office of Human Resources
1201 Main Street Suite 1000
Columbia South Carolina 29201

Form GC101-Revised 10/01/96

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S.C. Budget and Control Board

Office of Human Resources

Samuel L. Wilkins, Director

State Employee Grievance Procedure State Appeal Form

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EMPLOYEE S NAME Katherina Bowyer

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S C Department of Corrections

HOME ADDRESS P O Box 49553

Street 3523 Ridge Road City Greenwood

State SC Zip Code 29649

TELEPHONE 864. 374 7918
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? R.I.F

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency's internal grievance procedure? _____

APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

See attached

1560

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary)

See attached

Signature Dora Griffey **Date** June 20, 2003

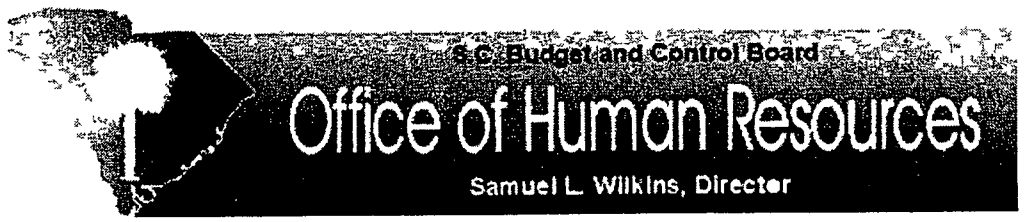
Employee or Representative

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EMPLOYEE S NAME Linda M W Bratton

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S C Department of Corrections

HOME ADDRESS

Street 108 Tollgate Court City Simpsonville

State SC Zip Code 29681

TELEPHONE 864 967. 4860
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

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APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

See attached

1502

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary) See attached

Signature Dora Guffey **Date** June 20, 2003

Employee or Representative

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Office of Human Resources
Samuel L. Wilkins, Director

State Employee Grievance Procedure State Appeal Form

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EMPLOYEE S NAME Ann Bridges

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S C Department of Corrections

HOME ADDRESS

Street 212 Hampton Avenue City Clinton

State SC Zip Code 29325

TELEPHONE 864.833.5875
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency s internal grievance procedure?

APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

See attached

1504

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary)

See attached

Signature Dora Griffey **Date** June 20, 2003

Employee or Representative

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Office of Human Resources
Samuel L. Wilkins, Director

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EMPLOYEE S NAME Rance Cobb

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S C Department of Corrections

HOME ADDRESS

Street 211 Harvest Lane City Greenwood

State SC Zip Code 29649

TELEPHONE 864 223 5772
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

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APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

See attached

1506

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary) See attached

Signature Dora Duffey **Date** June 20, 2003

Employee or Representative

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Samuel L. Wilkins, Director

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EMPLOYEE S NAME Jeanne B Croxton

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S.C Department of Corrections

HOME ADDRESS

Street 3900-B Hanson Avenue City Columbia

State SC Zip Code 29204

TELEPHONE 803 787 0726
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency s internal grievance procedure? _____

APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

see attached

1508

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary) See attached

Signature Dora Griffey **Date** June 20, 2003

Employee or Representative

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EMPLOYEE'S NAME Bernetha L Culbreath

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S.C Department of Corrections

HOME ADDRESS

Street 820 Carter Road City Ninety-Six

State SC Zip Code 29666

TELEPHONE 864 543 5338
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency s internal grievance procedure?

APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

See attached

1510

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary)

See attached

Signature Dora Huffey **Date** June 20, 2003

Employee or Representative

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Columbia South Carolina 29201

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State Employee Grievance Procedure State Appeal Form

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EMPLOYEE S NAME William K Dreyer

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School Distnct/S C. Department of Corrections

HOME ADDRESS

Street 1600 East Laurel Avenue City Greenwood

State SC Zip Code 29649

TELEPHONE 864 223 4308
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency s internal grievance procedure?

APPEAL

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See attached

1512

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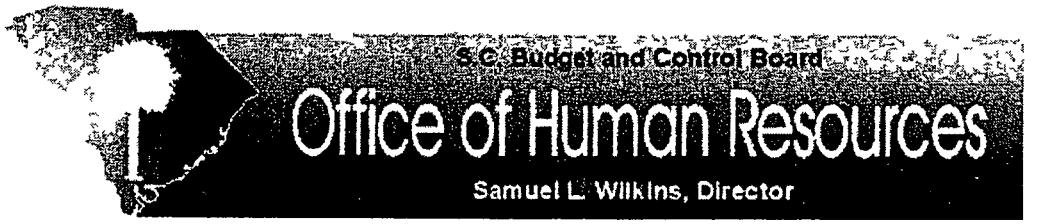
Signature Dona Stuffey **Date** June 20, 2003

Employee or Representative

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EMPLOYEE S NAME Jacqueline D. Farr

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S C Department of Corrections

HOME ADDRESS P.O. Box 2763

Street 151 Lumis Avenue City Spartanburg

State SC Zip Code 29304

TELEPHONE 864 582 8627
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency s internal grievance procedure? _____

APPEAL

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See attached

1514

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary) See attached

Signature Dona Huffey **Date** June 20, 2003

Employee or Representative

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Samuel L. Wilkins, Director

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EMPLOYEE S NAME Ruth Fritts

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/SC Department of Corrections

HOME ADDRESS

Street 118 Hiawatha Drive City Belton

State SC Zip Code 29627

TELEPHONE 864 356 3907
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? RIF

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 18th, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency s internal grievance procedure?

APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

See attached

1516

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary)

See attached

Signature Dona Huffey **Date** June 20, 2003

Employee or Representative

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Columbia South Carolina 29201

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Office of Human Resources
Samuel L. Wilkins, Director

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EMPLOYEE S NAME Nancy Glenn

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District / S C Department of Corrections

HOME ADDRESS

Street 617 Riverwalk Way City Irmo

State SC Zip Code 29063

TELEPHONE 803 749 9124
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency s internal grievance procedure? _____

APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

See attached

1518

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary)

See attached

Signature Dona Griffey **Date** June 26, 2003

Employee or Representative

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1201 Main Street Suite 1000
Columbia South Carolina 29201

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Office of Human Resources
Samuel L. Wilkins, Director

State Employee Grievance Procedure State Appeal Form

TO APPEAL THE DECISION OF THE AGENCY CONCERNING A GRIEVANCE UNDER THE STATE EMPLOYEE GRIEVANCE PROCEDURE ACT TO THE STATE HUMAN RESOURCES DIRECTOR THE EMPLOYEE AND/OR REPRESENTATIVE INITIATING THE APPEAL MUST COMPLETE THIS FORM AND RETURN IT TO THE STATE OFFICE OF HUMAN RESOURCES

EMPLOYEE S NAME Etta Jane Jones

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/SC Department of Corrections

HOME ADDRESS

Street 2313 Ruby Drive City Augusta

State GA Zip Code 30906

TELEPHONE 706.798 8142
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

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APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

See attached

1520

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary) See attached

Signature Dora Griffey **Date** June 20, 2003

Employee or Representative

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Samuel L. Wilkins, Director

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EMPLOYEE S NAME Geneva Martin

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S C Department of Corrections

HOME ADDRESS

Street 2218 Gadsden Street City Columbia

State SC Zip Code 29201

TELEPHONE 803 446 9775
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

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APPEAL

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See attached

1522

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary)

See attached

Signature Dona Huffey **Date** June 20, 2003

Employee or Representative

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Office of Human Resources
Samuel L. Wilkins, Director

State Employee Grievance Procedure State Appeal Form

TO APPEAL THE DECISION OF THE AGENCY CONCERNING A GRIEVANCE UNDER THE STATE EMPLOYEE GRIEVANCE PROCEDURE ACT TO THE STATE HUMAN RESOURCES DIRECTOR THE EMPLOYEE AND/OR REPRESENTATIVE INITIATING THE APPEAL MUST COMPLETE THIS FORM AND RETURN IT TO THE STATE OFFICE OF HUMAN RESOURCES

EMPLOYEE S NAME Mary H McCabe

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S C. Department of Corrections

HOME ADDRESS

Street 105 Marseille Drive City Simpsonville

State SC. Zip Code 29680

TELEPHONE 864 243.9799
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

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APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary) See attached

1524

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary)

See attached

Signature Dora Griffin **Date** June 20, 2003

Employee or Representative

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Columbia South Carolina 29201

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Samuel L. Wilkins, Director

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EMPLOYEE S NAME Beverly Mc Clanahan

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S.C Department of Corrections

HOME ADDRESS

Street 3110 Montcrest Road City Columbia

State SC Zip Code 29210

TELEPHONE 803.772 1834 (Home) (Office)

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

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APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary) See attached

1526

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary) See attached

Signature Dona Griffey **Date** June 20, 2003

Employee or Representative

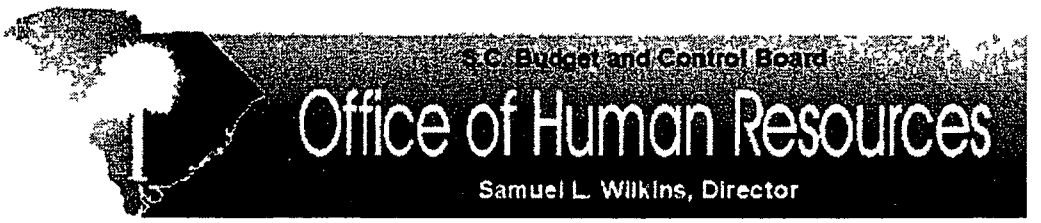
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EMPLOYEE S NAME Max D Randolph

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S C Department of Corrections

HOME ADDRESS

Street 388 Island Creek Road City Cowpens

State SC Zip Code 29330

TELEPHONE 864 461. 2583
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency s internal grievance procedure? _____

APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

See attached

1528

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary) See attached

Signature Dora Stuffle **Date** June 20, 2003

Employee or Representative

White Copy - Return to State Human Resources Director
Yellow Copy - Keep for your file

Office of Human Resources
1201 Main Street Suite 1000
Columbia South Carolina 29201

Form GC101-Revised 10/01/96

1529

-77-

S.C. Budget and Control Board
Office of Human Resources
Samuel L. Wilkins, Director

State Employee Grievance Procedure State Appeal Form

TO APPEAL THE DECISION OF THE AGENCY CONCERNING A GRIEVANCE UNDER THE STATE EMPLOYEE GRIEVANCE PROCEDURE ACT TO THE STATE HUMAN RESOURCES DIRECTOR THE EMPLOYEE AND/OR REPRESENTATIVE INITIATING THE APPEAL MUST COMPLETE THIS FORM AND RETURN IT TO THE STATE OFFICE OF HUMAN RESOURCES

EMPLOYEE S NAME Carolyn McIver Smith

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S.C Department of Corrections

HOME ADDRESS

Street 321 Spring Point Drive City Columbia

State SC Zip Code 29229

TELEPHONE 803.699 9020
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency s internal grievance procedure?

APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary) See attached

1530

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary) See attached

Signature Dona Huffey **Date** June 20, 2003

Employee or Representative

White Copy - Return to State Human Resources Director
Yellow Copy - Keep for your file

Office of Human Resources
1201 Main Street Suite 1000
Columbia South Carolina 29201

Form GC101-Revised 10/01/96

1531

S.C. Budget and Control Board

Office of Human Resources

Samuel L. Wilkins, Director

State Employee Grievance Procedure State Appeal Form

TO APPEAL THE DECISION OF THE AGENCY CONCERNING A GRIEVANCE UNDER THE STATE EMPLOYEE GRIEVANCE PROCEDURE ACT TO THE STATE HUMAN RESOURCES DIRECTOR THE EMPLOYEE AND/OR REPRESENTATIVE INITIATING THE APPEAL MUST COMPLETE THIS FORM AND RETURN IT TO THE STATE OFFICE OF HUMAN RESOURCES

EMPLOYEE S NAME Maggie L Williams

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S C Department of Corrections

HOME ADDRESS

Street 207 Weddell Street, 1-C City Columbia

State SC Zip Code 29223

TELEPHONE 803. ~~703~~ 736 6797
Home Office

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency s internal grievance procedure?

APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

See attached

1532

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary)

See attached

Signature Rose Huffey **Date** June 20, 2003

Employee or Representative

White Copy - Return to State Human Resources Director
Yellow Copy - Keep for your file

Office of Human Resources
1201 Main Street Suite 1000
Columbia South Carolina 29201

Form GC101-Revised 10/01/96

-81-

S.C. Budget and Control Board
Office of Human Resources
Samuel L. Wilkins, Director

State Employee Grievance Procedure State Appeal Form

TO APPEAL THE DECISION OF THE AGENCY CONCERNING A GRIEVANCE UNDER THE STATE EMPLOYEE GRIEVANCE PROCEDURE ACT TO THE STATE HUMAN RESOURCES DIRECTOR THE EMPLOYEE AND/OR REPRESENTATIVE INITIATING THE APPEAL MUST COMPLETE THIS FORM AND RETURN IT TO THE STATE OFFICE OF HUMAN RESOURCES

EMPLOYEE S NAME Paula Woodlief

JOB CLASSIFICATION Educator

AGENCY Palmetto Unified School District/S.C Department of Corrections

HOME ADDRESS

Street 2233 Flint Hill Road City Camden

State SC Zip Code 29020

TELEPHONE 803 425 8332 (Home) (Office)

1 Has the employee completed twelve (12) months of satisfactory service with the state ? yes

2 What disciplinary action taken against the employee is being appealed? Reduction in Force

3 Has the employee received a final decision from the agency? yes

4 What date did the employee receive the final decision? June 17, 2003

5 If the employee has not received a final decision from the agency what date did the employee initiate the grievance within the agency s internal grievance procedure?

APPEAL

Please specify why the employee contends that the agency s decision concerning the grievance is unfair and state relevant facts and issues to support that position (continue on additional pages if necessary)

see attached

1534

Please specify the relief that the employee is seeking by this appeal (continue on additional pages if necessary)

See attached

Signature Dona Griffey **Date** June 20, 2003

Employee or Representative

White Copy - Return to State Human Resources Director
Yellow Copy - Keep for your file

Office of Human Resources
1201 Main Street Suite 1000
Columbia South Carolina 29201

Form GC101-Revised 10/01/96

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 20, 2003



Sam Wilkins, Esquire
Director, State Office of Human Resources
Grievance and Mediation Services
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie L Williams, Paula Woodlief

Dear Sam

Please accept this letter as an appeal of the decision by Robin M Gracien, Chief Employee Relations Branch, Division of Human Resources, South Carolina Department of Corrections In her letter dated June 16, 2003, Ms Gracien denies the grievance issues presented in the Grievance Reports for Palmetto Unified School District educators affected by the June 1, 2003 Reduction in Force Enclosed please find State Employee Grievance Procedure State Appeal Forms for each of the above-referenced grievants

The Palmetto Unified School District is established by statute as a "special statewide unified school district " S C Code Ann § 24-25-10 In fact, the Department has consistently taken the position that the PUSD is "unified" and that its employees must be treated in the same fashion as teachers employed in other school districts This very issue was presented to the South Carolina Court of Appeals in Abraham, et al v Palmetto Unified School District, 343 S C 36, 538 S E 2d 656 (2000) In that case, the Court of Appeals held that instructors employed by the PUSD are entitled to all rights and benefits accorded by Chapter 25 of Title 24 of the South Carolina Code Among the rights established in the controlling statute is the provision that the PUSD shall be "under the control and management" of a board who shall "operate the district" under the supervision of the DOC S C Code Ann § 24-25-40 Among the powers of the School Board are the establishment of goals and objectives for operation of the District, establishment of academic education programs, establishment of a twelve-month school program, teachers' pay schedule and presentation of an education budget S C Code Ann § 24-25-70 In view of its unique status within the Department

of Corrections and its legislatively established "unified" nature, it is clear that any reduction in force plan applicable to the certified staff of the PUSD must include review by its board and must treat all affected employees in a uniform fashion

The response to grievances filed by the above-named employees reveals deviations from established law and factual issues which entitle each employee an opportunity for review under the South Carolina State Employees Grievance Act The issues which require further review include

1 The PUSD Board was not involved in the Reduction in Force as required by law Rather, the District Superintendent was merely "informed" of the action

2 The PUSD was not treated as a single "unified" school district as required by law

3 Submission of a RIF plan to OHR does not authorize the DOC to divide the "unified" PUSD in a manner which eliminates opportunities for affected employees to compete for positions

4 Individuals and/or positions were arbitrarily protected or removed from consideration for separation for reasons unrelated to RIF criteria

5 RIF criteria failed to take into account experience and credentials which are uniformly applied in the field of education These credentials include degrees, certificates, evaluations and positions held

6 The "competitive areas" used by the DOC to divide the unified PUSD are arbitrary, unrelated to employee availability or interests in transfer These "competitive areas" also deprive veteran employees bumping rights due to the arbitrary nature of placing only one or limited numbers of educational institutions in the various "competitive areas" As a result, individuals with less experience and inferior qualifications were retained in favor of more senior employees

7 The designation of educational institutions within "competitive areas" is arbitrary and capricious In the map which accompanies the RIF Plan, a number of institutions appear to fall outside the designated "competitive areas" which are circled on the map Additionally, it appears that a number of the educational institutions are located within commuting distance of one another and yet are designated for different "competitive areas" In fact, the designation of certain single educational institutions within "competitive areas" completely deprive educators of bumping rights

8 Competitive job classifications designated in the RIF Plan include certified teacher (UB02), vocational teacher (UB04), guidance counselor (UB05), special education teacher (UB06) These groupings do not take into account that guidance counselors and special education teachers are also certified teachers These groupings also do not take into account the distinctions in credentials held by certified teachers

9 The list of employees affected by RIF in the RIF Plan submitted to OHR does not include information sufficient to evaluate compliance with the Plan For example, no retention credit information is provided and no explanation is offered as to the reason the employees were separated, subject to bump or subject to possible layoff

10 Employee information provided with the RIF Plan shows that of the 148 employees reportedly affected by RIF, 74 are in the education department Although the education department makes up a relatively small percentage of all employees, one-half of those affected by RIF are educators There is no explanation for this disproportionate impact of the RIF on educators It is the position of the grievants, that the large number of separations in the education department reflect a conscious decision by the DOC administration to "punish" teachers for seeking and obtaining their proper compensation through litigation against the DOC The grievants are informed and believe that the Executive Director has made comments that educators are overpaid in comparison to other employees and were disloyal in bringing a lawsuit against the DOC

For the reasons outlined above, each grievant deserves the relief sought in the initial grievance which is attached for your convenience There are significant legal and factual issues of public importance that were presented in the initial grievance which have not been answered We ask that the State Office of Human Resources review Ms Gracien's denial and address the issues presented in the initial grievance

Sincerely,

Dona L Guffey

DLG/pfb
cc Mike Montgomery, Esquire
Enclosures
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

#3 APPLIES TO GRIEVANTS OTHELLA BERNARD AND JEANNIE B CROXTON ONLY

3 In the alternative, my grievance may be resolved by the Department's purchase of service credit from the South Carolina Retirement System in amounts sufficient to allow full retirement benefits

88-677
COMMITTEE'S EXHIBIT
18

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re James "Cal" Bell v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Mr Bell's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Mr Bell's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
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HUGH K LEATHERMAN SR.
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL, JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737 0900

SAMULL L WILKINS
DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

James "Cal" Bell
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003

CERTIFIED MAIL



Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE James Carl Bell

Dear Ms Clark

In reference to the appeal filed by Dona Gulley Attorney at Law representing James Bell the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Mr Bell s position as a Vocational Teacher (Job Class UB04) was eliminated and he elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In-Force of the decision by the Agency Director to implement a Reduction-In Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 is coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 9 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

PO Box 21787 4444 Broad River Road Columbia, SC 29221-1787 - Telephone (803) 896 8555

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
- (a) ADM 11 02 Employee Grievance and Appeal Procedures
- (b) ADM 11 05 Reduction In Force
- (c) Reduction In Force Plan (with attachments)

Attachment 2 Employee RIF Information
- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law, dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3033

STATE OF SOUTH CAROLINA

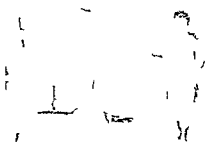
State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL



1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Othella Bernard
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

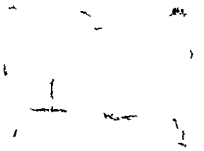
State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
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ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Othella Bernard v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Bernard's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Bernard's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Othella Bernard

Dear Ms Clark

In reference to the appeal filed by Don Guffey Attorney at Law representing Othella Bernard the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Ms Bernard s position as a Certified Teacher (Job Class UB02) was eliminated and she elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction In Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 is coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

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- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3034

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L. PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR.
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Katherina Bowyer
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

1549

STATE OF SOUTH CAROLINA

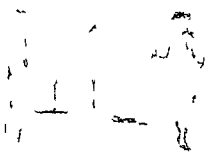
State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR.
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL



1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Katherina Bowyer v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Bowyer's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Bowyer's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Katherina Bowyer

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Katherina Bowyer the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Ms Bowyer s position as a Vocational Teacher (Job Class UB04) was eliminated and she elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction In Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive area in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

PO Box 21787 4444 Broad River Road - Columbia SC 29221 1787 - Telephone (803) 896-8555

In response to item 10 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
- (a) ADM-11 02 Employee Grievance and Appeal Procedures
- (b) ADM-11 05 Reduction In Force
- (c) Reduction In Force Plan (with attachments)

Attachment 2 Employee RIF Information
- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3035

STATE OF SOUTH CAROLINA

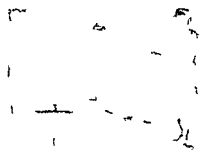
State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL



1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR.
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Linda M W Bratton
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Linda M W Bratton v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Bratton's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Bratton's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0908

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003

CERTIFIED MAIL



Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Linda M Bratton

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Linda Bratton the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction-In-Force (RIF) that was effective June 1 2003 Ms Bratton s position as a Certified Teacher (Job Class UB02) was eliminated and she was able to bump into the same classification at another institution within the competitive area Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction In Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

PO Box 21787 4444 Broad River Road Columbia SC 29221 1787 Telephone (803) 896-8555

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
- (a) ADM 11 02 Employee Grievance and Appeal Procedures
- (b) ADM 11 05 Reduction In Force
- (c) Reduction In Force Plan (with attachments)

Attachment 2 Employee RIF Information
- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3036

STATE OF SOUTH CAROLINA

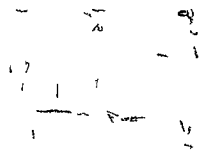
State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL



HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Ann Bridges
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR.
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Ann Bridges v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Bridges' State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Bridges' appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

1558

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 5 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Ann Bridges

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Ann Bridges the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Ms Bridges position as a Guidance Counselor (Job Class UB06) was eliminated and she elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction In-Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive area in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 is coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
- (a) ADM 11 02 Employee Grievance and Appeal Procedures
- (b) ADM 11 05 Reduction In Force
- (c) Reduction In Force Plan (with attachments)

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- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3037

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
COVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER CFNERAL

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUCH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEF

FRANK W FUSCO
EXECUTIVE DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Rance Cobb
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
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ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Rance Cobb v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Mr Cobb's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Mr Cobb's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON E OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Rince Cobb

Dear Ms Clark

In reference to the appeal filed by Dona Gulfey Attorney at Law representing Rince Cobb the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Mr Cobb s position as a Principal (Job Class UB07) was eliminated and he elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In-Force of the decision by the Agency Director to implement a Reduction In-Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive area in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
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- (b) ADM 11 05 Reduction In Force
- (c) Reduction In Force Plan (with attachments)

Attachment 2 Employee RIF Information
- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3038

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Jeannie B Croxton
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

1565

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L. PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Jeannie B Croxton v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Croxton's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Croxton's appeal as quickly as possible

Sincerely,

Deborah Clark

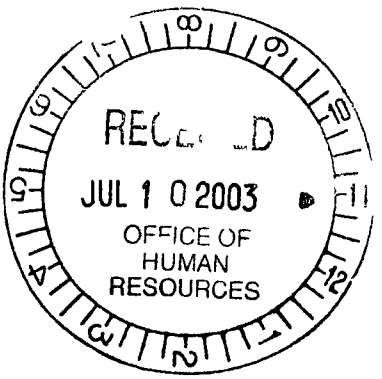
Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON E OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Jeannie Croxton

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Jeannie Croxton the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Ms Croxton s position is a Certified Teacher (Job Class UB02) was eliminated and she elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Geigel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction In-Force

In response to items 6 and 7 SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 9 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
- (a) ADM 11 02 Employee Grievance and Appeal Procedures
- (b) ADM-11 05 Reduction In Force
- (c) Reduction In Force Plan (with attachments)

Attachment 2 Employee RIF Information
- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3039

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Bernetha L Culbreath
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

1569

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Bernetha L Culbreath v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Culbreath's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Culbreath's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

1570

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8, 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Bernetha Culbreath

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Bernetha Culbreath the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Ms Culbreath s position as a Certified Teacher (Job Class UB02) was eliminated and she elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto United School District who is a member of the District Board was informed prior to the effective date of the Reduction-In Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to items 6 and 7 SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive area in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction-In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
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- (c) Reduction In Force Plan (with attachments)

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- (a) Position Bumping Selection/Refusal Form
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- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3040

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

William K Dreyer
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re William K Dreyer v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Mr Dreyer's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Mr Dreyer's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE William Dreyer

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing William Dreyer the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Mr Dreyer s position as a Certified Teacher (Job Class UB02) was eliminated and he elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In-Force of the decision by the Agency Director to implement a Reduction In-Force

In response to items 6 and 7 SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 is coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

PO Box 21787 4444 Broad River Road - Columbia SC 29221 1787 Telephone (803) 896-8555

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

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- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896-1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3041

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
COVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Jacqueline D Farr
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

1577

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

CRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Jacqueline D Farr v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Farr's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Farr's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

1578

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8, 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street, Suite 1000
Columbia South Carolina 29201

RE Jacqueline D Farr

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Jacqueline Farr the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction-In Force (RIF) that was effective June 1 2003 Ms Farr was bumped by another Certified Teacher (Job Class UB02) with a higher RIF service date and she elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction-In Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

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In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

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- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896-1927

Sincerely

Robin M. Gracien

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3042

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Ruth Fritts
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

1581

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Ruth Fritts v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Fritts' State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Fritts' appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

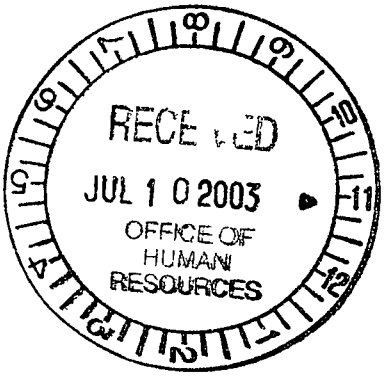
FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003

CERTIFIED MAIL



Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Ruth Fritts

Dear Ms Clark

In reference to the appeal filed by Don Guffey Attorney at Law representing Ruth Fritts the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Ms Fritts position as a Certified Teacher (Job Class UB02) was eliminated and she elected to bump into a Correctional Officer position (Job Class JD30 Pay Band/Level 3E) with a salary reduction Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction In-Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan, employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

PO Box 21787 4444 Broad River Road Columbia SC 29221 1787 - Telephone (803) 896 8555

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
- (a) ADM 11 02 Employee Grievance and Appeal Procedures
- (b) ADM 11 05 Reduction In Force
- (c) Reduction In Force Plan (with attachments)

Attachment 2 Employee RIF Information
- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3043

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR.
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Nancy Glenn
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

1585

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Nancy Glenn v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Glenn's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Glenn's appeal as quickly as possible

Sincerely,

Deborah Clark

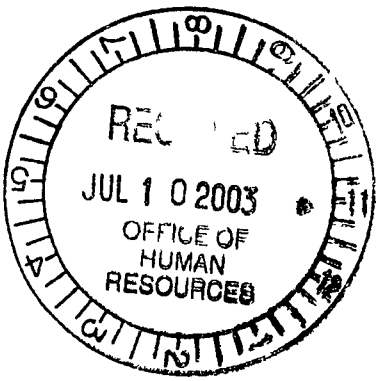
Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Nancy Glenn

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Nancy Glenn the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction-In Force (RIF) that was effective June 1 2003 Ms Glenn s position as a Certified Teacher (Job Class UB02) was eliminated and she elected to bump into a Correctional Officer position (Job Class JD30 Pay Band/Level 3E) with a salary reduction Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction-In Force of the decision by the Agency Director to implement a Reduction In Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive area in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

PO Box 21787 4444 Broad River Road Columbia SC 29221-1787 Telephone (803) 896-8555

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
- (a) ADM-11 02 Employee Grievance and Appeal Procedures
- (b) ADM-11 05 Reduction In Force
- (c) Reduction In Force Plan (with attachments)

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- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3044

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Etta Jane Jones
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

1589

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Etta Jane Jones v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Jones' State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Jones' appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

1530

South Carolina Department of Corrections

MARK SANFORD Governor
JON E OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Etta J mc Jones

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Etta Jones the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Ms Jones position as a Guidance Counselor (Job Class UB06) was eliminated and she elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction In-Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 9 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

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- (c) Reduction In Force Plan (with attachments)

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- (a) Position Bumping Selection/Refusal Form
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- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3045

STATE OF SOUTH CAROLINA

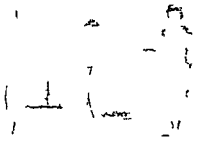
State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL



1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Geneva Martin
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

1593

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L. PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K. LEATHERMAN SR.
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL, JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L. WILKINS
DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Geneva Martin v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Martin's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Martin's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Geneva Martin

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Geneva Martin the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003, Ms Martin s position as a Certified Teacher (Job Class UB02) was eliminated and she elected to bump into a Correctional Officer position (Job Class JD30 Pay Band/Level 3E) with a salary reduction Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction In Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force, states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan, employee bumping may occur only within the designated Competitive Job Classification

In response to item 9 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

PO Box 21787 4444 Broad River Road Columbia, SC 29221 1787 Telephone (803) 896 8555

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

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- (c) Reduction In Force Plan (with attachments)

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- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3046

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Mary H McCabe
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L. PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L. WILKINS
DIRECTOR

HUGH K. LEATHERMAN SR.
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W. HARRELL JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W. FUSCO
EXECUTIVE DIRECTOR

June 24, 2003

Mr. W. Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re: Mary H. McCabe v. S.C. Department of Corrections

Dear Mr. Nickles:

The Office of Human Resources has received Ms. McCabe's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal. Once these documents have been received and reviewed, you will be contacted. Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency.

Every effort is being made to process Ms. McCabe's appeal as quickly as possible.

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003

CERTIFIED MAIL



Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Mary McCabe

Dear Ms Clark

In reference to the appeal filed by Dona Gufley Attorney at Law representing Mary McCabe the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Ms McCabe s position as a Certified Teacher (Job Class UB02) was eliminated and she elected to bump into a Correctional Officer position (Job Class JD30 Pay Band/Level 3E) with a salary reduction Effective June 2 2003 Ms McCabe was recalled into a Certified Teacher position and made whole Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction In-Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 9 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
- (a) ADM 11 02 Employee Grievance and Appeal Procedures
- (b) ADM 11 05 Reduction In Force
- (c) Reduction In Force Plan (with attachments)

Attachment 2 Employee RIF Information
- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3047

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Beverly McClanahan
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

1601

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

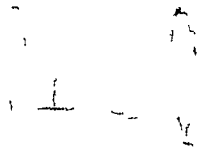
State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL



1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737-0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR.
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL, JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Beverly McClanahan v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms McClanahan's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms McClanahan's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Beverly McClanahan

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Beverly McClanahan the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction-In Force (RIF) that was effective June 1 2003 Ms McClanahan s position as a Vocational Teacher (Job Class UB04) was eliminated and she elected to bump into a Correctional Officer position (Job Class JD30 Pay Band/Level 3E) with a salary reduction Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In-Force of the decision by the Agency Director to implement a Reduction-In Force

In response to items 6 and 7 SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
- (a) ADM 11 02 Employee Grievance and Appeal Procedures
- (b) ADM-11 05 Reduction In Force
- (c) Reduction In Force Plan (with attachments)

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- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3048

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Max D Randolph
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Max D Randolph v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Mr Randolph's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Mr Randolph's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Mary D Randolph

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Mary Randolph the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In-Force (RIF) that was effective June 1 2003 Mr Randolph was bumped by another Vocational Teacher (Job Class UB04) with a higher RIF service date and he elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction-In Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

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- (a) ADM 11 02 Employee Grievance and Appeal Procedures
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- (c) Reduction In Force Plan (with attachments)

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- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3049

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Carolyn McIver Smith
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

1609

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Carolyn McIver Smith v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Smith's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Smith's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

1610

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Carolyn McIver Smith

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Carolyn McIver Smith the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction-In-Force (RIF) that was effective June 1 2003 Ms McIver Smith s position as an Academic Program Manager (Job Class UB07) was eliminated and she elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In Force of the decision by the Agency Director to implement a Reduction-In Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

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- (b) ADM-11 05, Reduction In Force
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- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3050

STATE OF SOUTH CAROLINA

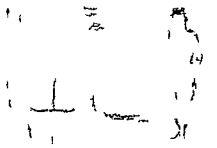
State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL



1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Maggie L Williams
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

1613

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

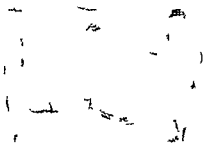
State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL



1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Maggie L Williams v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Williams' State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Williams' appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003

CERTIFIED MAIL



Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Maggie Williams

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Maggie Williams the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction-In Force (RIF) that was effective June 1 2003 Ms Williams was bumped by another Certified Teacher (Job Class UB02) with a higher RIF service date and she elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In-Force of the decision by the Agency Director to implement a Reduction-In Force

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In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 9 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction-In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

Attachment 1 South Carolina Department of Corrections Policies and Procedures
- (a) ADM 11 02 Employee Grievance and Appeal Procedures
- (b) ADM 11 05 Reduction In Force
- (c) Reduction In Force Plan (with attachments)

Attachment 2 Employee RIF Information
- (a) Position Bumping Selection/Refusal Form
- (b) Acknowledgement of Receipt of RIF Plan (if applicable)
- (c) Notification of Recall Rights after Retirement (if applicable)
- (d) Notification of Termination or Reassignment

Attachment 3 South Carolina Department of Corrections Grievance and Appeals Process
- (a) Grievance Report from Mr Nickles Attorney at Law dated June 12 2003
- (b) Letter to Mr Nickles denying the grievance dated June 16 2003

If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M. Gracien

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3051

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
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CRADY L PATTERSON JR
STATE TREASURER

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COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June24, 2003

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Paula Woodlief
Appellant's Name

Educator
Job Classification

Dear Ms Gracien

The appellant has appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copy of the State Employee Grievance Procedure State Appeal Form

Please send us the documents concerning this appeal, including a brief summary of your position, a brief list of the appellant's employment record, copies of performance appraisals if applicable, and a copy of your findings and determination at each step of your grievance procedure Any supporting documents that might serve to clarify the specific issues in the appeal should be included You should also specifically state which policy or policies were used as a basis for the action, and include a copy of those policies These might be either internal policies and/or State policies If a policy was not violated, state on what criteria the action was based

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
c Mr Jon Ozmint, without enclosure

FAX (803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

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CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

June 24, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re Paula Woodlief v S C Department of Corrections

Dear Mr Nickles

The Office of Human Resources has received Ms Woodlief's State Employee Grievance Procedure State Appeal Form and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed, you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Ms Woodlief's appeal as quickly as possible

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

FAX (803) 737 0968

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

July 8 2003



CERTIFIED MAIL

Ms Debbie Clark
Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE Paula Woodlief

Dear Ms Clark

In reference to the appeal filed by Dona Guffey Attorney at Law representing Paula Woodlief the information and documents attached are submitted for your consideration

As a result of the Agency s Reduction In Force (RIF) that was effective June 1 2003 Ms Woodlief's position as a Certified Teacher (Job Class UB02) was eliminated and she elected lay off Twenty Education employees that were affected by the RIF and represented by the law firm of Gergel Nickles & Solomon appealed the action The issues presented were reviewed and it was determined that the RIF Plan and Policy were consistently and properly applied Therefore the grievance was denied

To address the ten (10) items listed in the appeal to the Office of Human Resources I will state the Agency s position on each In response to items 1 2 3 and 4 Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the Agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction In-Force of the decision by the Agency Director to implement a Reduction In-Force

In response to items 6 and 7 SCDC Policy ADM 11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights

In response to item 8 as coordinated and approved through the Office of Human Resources Competitive Job Classifications were established individually and not as a series for Certified Teacher (UB02) Vocational Teacher (UB04) Guidance Teacher (UB05) and Special Education Teacher (UB06) As provided in the RIF Policy and Plan employee bumping may occur only within the designated Competitive Job Classification

In response to item 5 and 9 the RIF Plan was submitted to the Office of Human Resources and approved prior to the implementation of the plan It did provide the required information that listed the competitive areas competitive classes the RIF Service Date which was used to determine the bumping rights as well as the indicators that projected the employees who may be affected by the RIF

In response to item 10 the basis for the Reduction-In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

For additional information requested please refer to the attachments listed below

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If I can be of further assistance please contact me at 896 1927

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Grievance File # 3052

South Carolina Department of Corrections

SCDC POLICY/PROCEDURE

NUMBER ADM-11 02

TITLE EMPLOYEE GRIEVANCE AND APPEALS PROCEDURES

ISSUE DATE DECEMBER 1, 2000

RESPONSIBLE AUTHORITY DIVISION OF HUMAN RESOURCES

OPERATIONS MANUAL ADMINISTRATION

SUPERSEDES ADM-11 02, ADM-11 02(OP) (December 15, 1998)

RELEVANT SCDC FORMS/SUPPLIES 16-33

ACA/CAC STANDARDS 3-ACRS-1C-02, 3-4048

STATE/FEDERAL STATUTES State Employee Grievance Procedure Act, § 8-17-110 et seq

THE LANGUAGE USED IN THIS POLICY/ PROCEDURE DOES NOT CREATE AN EMPLOYMENT CONTRACT BETWEEN THE EMPLOYEE AND THE AGENCY THE AGENCY RESERVES THE RIGHT TO REVISE THE CONTENTS OF THIS POLICY/PROCEDURE, IN WHOLE OR IN PART

PURPOSE To outline the establishment and administration of a formal grievance and appeals system whereby covered state employees may file a complaint when they feel they have been subjected to unfair treatment

POLICY STATEMENT **In order to uphold the professional integrity of the Department, the Agency will establish an employee grievance and appeals system whereby covered state employees may file a written complaint. Under no circumstances will any employee be subjected to reprisal, prejudice, corrective action, or retaliation as a result of exercising his/her grievance and appeals rights under this policy/procedure (3-ACRS-1C-02, 3-4048)**

TABLE OF CONTENTS

1 DEVELOPMENT AND RESPONSIBILITY

2 GRIEVABLE AND APPEALABLE ACTIONS

3 NON-GRIEVABLE ACTIONS

4 GRIEVANCE AND APPEAL PROCESS

5 TIME PERIODS

6 LEAVE

7 CORRESPONDENCE

8 REPRESENTATION BY COUNSEL

9 DEFINITION(S)

SPECIFIC PROCEDURES

1 DEVELOPMENT AND RESPONSIBILITY The Director, Division of Human Resources, will be responsible for the development, implementation, management, and administration of an Employee Grievance and Appeals System (EGAS) applicable to all covered employees of the South Carolina Department of Corrections (SCDC) The system must be reviewed and approved for procedural correctness by the South Carolina Office of Human Resources prior to system-wide implementation (3-ACRS-1C-02, 3-4048)

2 GRIEVABLE AND APPEALABLE ACTIONS The following actions are considered grievable and/or appealable under the Agency's EGAS

- Terminations, demotions, and suspensions *(disciplinary and administrative)*,
- Salary decreases based on performance evaluations, and,
- Reclassifications are considered grievable if the Department, or appealable if the State Human Resources Director, determines there is a material issue of fact that the action is a punitive reclassification,
- Reductions-in-force are considered grievable if the Department, or, appealable if the State Human Resources Director, determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency's reduction-in-force plan or policy, (See SCDC Policy/Procedure ADM-11 05, "Reduction-in-Force," for information)
- Involuntary reassignments of an employee greater than 30 miles from his/her current work location to another work location
- Promotions are not adverse employment actions which may be considered grievable or appealable except in instances where the Agency or, in the case of appeals, the State Human Resources Director, determines that there is a material issue of fact as to whether or not the Agency has considered a qualified covered employee for a position for which the employee formally applied or would have applied if the employee had known of the promotional opportunity (However, when the Agency promotes an employee one organizational level above the promoted employee's former level, that action is not grievable or appealable for any other qualified covered employee Failure to be selected for a promotion is not considered an adverse employment action which can be considered for a grievance or an appeal)

3 NON-GRIEVABLE ACTIONS *The following actions are not grievable and/or appealable under*

the Agency's EGAS -170-

- Reclassifications, reassignments, and transfers within the same pay band, and
- Demotions when an employee is demoted prior to serving six (6) months of satisfactory service in the higher class (band) with a higher state salary range, and provided the demotion is not to a lower class (band) with a lower state salary range than the class from which the employee was promoted, and

- Voluntary reassignments or resignations [**NOTE** An employee's failure to report to duty for three (3) consecutive days without contacting the Agency is considered job abandonment and voluntary resignation]

If it is determined that the matter is not grievable, the covered employee will be so advised in writing by the ***Director, Division of Human Resources*** or a designee, normally within five (5) calendar days of receipt of the grievance Such determination will be a final decision within the Agency which may then be appealed to the State Human Resources Director

4 **GRIEVANCE AND APPEAL PROCESS** The following procedures will be followed for all covered employee grievances and appeals An employee may not proceed to another level without first exhausting his/her agency remedies in the order presented below An employee may appeal to the State Human Resources Director when all administrative remedies to secure relief within the Agency have been exhausted

4 1 Any covered employee of the SCDC may file a grievance concerning a legitimate grievable action SCDC Form 16-33, "Grievance Report," must be fully completed by the employee and returned (or, if mailed, postmarked) to the Director, Division of Human Resources, Employee Relations Branch, within 14 calendar days of the effective date of the action to be considered Upon receipt of the form, the Director, Division of Human Resources, or an approved designee will

- ***Confer with the responsible Deputy/Office Director or designee to determine if the grievance can be resolved informally by overturning or reducing the severity of the corrective action taken.***
- ***If the grievance cannot be resolved informally by the responsible Deputy/Office Director or designee, forward the form to the Office of General Counsel within five (5) calendar days***

4 2 **General Counsel Review** Upon receipt, an attorney from the Office of General Counsel will be assigned the grievance and will be responsible for conducting an investigative review of all pertinent documentation and related SCDC policies and procedures A summary report of facts will be prepared and a recommendation will be forwarded to the appropriate Deputy or Office Director within 25 calendar days If necessary, a non-adversarial fact-finding conference may be scheduled by the Office of the General Counsel and may include the grievant, relevant witnesses, the reprimanding authority, and any other individuals deemed necessary by the attorney assigned the grievance The following guidelines may apply to such hearing

- each individual may be called to testify separately and alone,
- testimony may not be made under oath and will not be recorded,
- cross-examination may not be allowed,
- a grievant may be represented by counsel, (However, such representation will be at the grievant's own expense)
- the grievant may ask Agency employees to submit statements, present personal testimony, or

otherwise participate in the grievance process However, unless the employee is issued an official directive and/or subpoena, the employee has the right to refuse to participate In addition, the Deputy or Office Director, Division Director, or Warden has the right to limit the number of employee and Agency witnesses asked to testify if participation in the grievance process poses a staffing and/or security problem or other hardship on the division or facility, provided that the specified number of witnesses are equal for both the Agency and the employee

Upon conclusion of the conference, a summary report of facts will be made and forwarded as described in Paragraph 4 2, above

4 3 Deputy/Office Director Review The appropriate Deputy or Office Director receiving the summary report will be responsible for reviewing the facts and for making a determination to uphold, reverse, or modify the grievance action The Deputy or Office Director's response will be made in writing to the grievant within five (5) calendar days The grievant may grieve the Deputy or Office Director's decision to the Agency Director within five (5) calendar days of his/her receipt of the response from the Deputy ***or Office*** Director

4 4 Agency Director Review The Agency Director will respond in writing to the grievant indicating a final decision within five (5) calendar days from receipt of the grievance The Agency Director's response represents the Agency's final ruling concerning the grievance

4 5 External Appeal The grievant may appeal the Agency's final ruling to the State Budget and Control Board, Office of Human Resources, State Human Resources Director, within ten (10) calendar days of his/her receipt of the Agency Director's response or within 55 calendar days from the initial date the grievance was filed within the Agency, whichever is later

5 TIME PERIODS The Agency must complete its internal grievance process including the Director's final decision on any grievances within 45 calendar days from receipt of Form 16-33, "Grievance Report," to the Division of Human Resources, Employee Relations Branch Failure to act within 45 days will be considered a decision against the grievant from which s/he may appeal to the State Human Resources Director, State Budget and Control Board, Office of Human Resources The 45 day calendar period for internal departmental action may only be waived by a signed mutual agreement Internal time periods for the Agency's internal grievance process (Paragraph 4 , above) are guidelines for the convenience of the Agency and are not binding upon the Agency In the event that an internal time period lapses, the grievant should proceed to the next level of the grievance process

6 LEAVE Any time away from normal job duties during the grievance or appeal process will be charged to the employee as time worked if the employee is involved in official grievance or appeal business such as, but not limited to, scheduled meetings with the Division of Human Resources, Employee Relations Branch, Office of General Counsel, or Office of Human Resources Any time used to handle official grievance or appeal business during scheduled work hours must be approved by the employee's supervisor and is subject to verification by the Director, Division of Human Resources or designee Furthermore, any time away from normal job duties during scheduled work hours for the purpose of general follow-up, or unscheduled meetings to inquire as to the status of a grievance or appeal, will be charged to the employee as annual leave All annual leave must be approved in accordance with SCDC Policy/Procedure ADM-11 08, "Employee Leave "

7 CORRESPONDENCE All original grievance correspondence, transfer of records, and relative memoranda addressed to interdepartment individuals/offices will be "hand carried" from one office/individual to another Grievance correspondence to individuals/offices outside the Agency (to

include correspondence to the grievant) will be sent U S Mail, Certified, Return Receipt Requested (All copies of the receipt information will be maintained on file by the sender) A copy of the correspondence will be forwarded to the Division of Human Resources, Employee Relations Branch

8. ~~REPRESENTATION BY COUNSEL~~ ~~A grievant may be represented by counsel; however, such~~ counsel will be at the grievant's expense Upon notification that a grievant is represented by counsel, the Director, Division of Human Resources or designee will inform the South Carolina Department of Corrections' General Counsel and all interested parties within the Agency so as to ensure that all material and information pertinent to the case are forwarded to counsel for the grievant collaterally as it is presented to the grievant Such correspondence will be sent to the employee's attorney by U S Mail, Certified, Return Receipt Requested (All copies of the receipt information will be maintained on file by the sender) A copy of all such correspondence will be forwarded to the Division of Human Resources, Employee Relations Branch

9 DEFINITION(S)

EMPLOYEE OR GRIEVANT as used throughout this policy, refers to a covered state employee who has successfully completed a probationary period in a full-time equivalent position with the South Carolina Department of Corrections or another South Carolina state agency A covered employee does not include the Agency Director or Deputy Directors

SIGNATURE ON FILE

s/ William D Catoe, Director

ORIGINAL SIGNED COPY MAINTAINED IN THE DIVISION OF POLICY DEVELOPMENT

South Carolina Department of Corrections

MARK SANFORD Governor
JON E OZMINT, Director

March 28, 2003

Samuel L Wilkins, Director
Office of Human Resources
1201 Main St Suite 1000
Columbia, South Carolina 29201

SUBJECT Reduction-In-Force Plan

Dear Mr Wilkins,

As Director of the South Carolina Department of Corrections (SCDC), I am formally submitting a Reduction-In-Force (RIF) Plan for the elimination of several positions within our agency

I Overview

The Department of Corrections' budget has been reduced by over $80 million during the past 30 months These cuts come at a time when incarceration rates have increased the inmate population by several thousand During this same period, efforts to cut spending have included staff reductions of nearly 1,300 employees, closing prisons, elimination of numerous programs, and drastic cuts in expenditures Conversely, efforts have also been made to increase revenue from sources such as prison industries, institutional canteens, inmate work programs, and increasing grant funding Unfortunately, the financial health of this agency remains critical and more drastic measures are necessary

II Reason for the Reduction-In-Force

As agency Director, I have the responsibility to focus on our primary mission, which is to protect the public I must continuously assess the needs of the agency, no matter how difficult, and recommend necessary changes in order to meet that mission

Sufficient operating funds are not expected to be restored in FY2003-2004, and an additional deficit of over $10 million is projected As a result, priorities have been established to ensure the continued efficient operation of the agency The need to maintain certain programs and administrative positions must now be identified as secondary to achieving our primary mission, and have been targeted for reduction or elimination

I have made the decision to eliminate 148 non-security positions through a Reduction-In-Force in three primary functions within the agency

Headquarters management and administrative support staff
Non-essential inmate support programs
Certified education and support staff

The implementation of this Reduction-In-Force Plan is projected to save approximately $8 million (including fringe benefits), assuming the employees occupying the positions to be eliminated will be laid off Of course, actual saving will be less, based upon employees bumping into filled positions occupied by lower-paid employees, or employees reassigned or demoted into vacant positions for which the agency is actively recruiting

Long term, I feel the overall operation of the agency could be adversely impacted by the elimination of these positions without additional plans to maximize the valuable programs these positions represent Therefore, I have developed an organizational plan that should provide the necessary staff oversight and allow continued educational opportunity for the alternate instruction of inmates

The decision to layoff staff is not one that I take lightly Employees occupying these positions signify the reason why the Department of Corrections has been so successful with such a difficult mission In a very short time, I have come to know these employees personally and their level of professionalism is overwhelming Unfortunately, I must look beyond individuals to prepare this agency for the future

Included in this Reduction-In-Force Plan are the state requirements for the elimination of positions More importantly, I have identified a number of resources to assist these valuable employees after leaving the Department of Corrections

III Competitive Areas and Competitive Job Classification Series

The positions to be eliminated in this Reduction-In-Force Plan are located across the state of South Carolina Competitive areas have been designated to include entire groups of institutions and divisions within a reasonable geographic area to accommodate the realistic opportunity for staff relocation, and hopefully, recall and reinstatement In addition, by expanding the number of locations, adverse impact may be minimized on specific groups of employees

Competitive Areas – (Attached)

Competitive Job Classifications and Classification Series – (Attached)

Positions Being Eliminated and Employees Eligible for Bumping in Each Competitive Area– (Attached)

IV Name, Age, Race, Sex, Classification, and RIF Service Date of Affected Employees

(See attached) In order to submit the Reduction-In-Force Plan to the Office of Human Resources for review and approval for procedural correctness prior to the effective date of June 1, 2003, each employee's age was based upon their age as of April 1, 2003 The RIF Service Date was calculated based upon EPMS performance evaluations with review dates through March 2, 2003

V Reduction-In-Force Projected Outcome

Following the review and approval of this Reduction-In-Force Plan for procedural correctness by the Office of Human Resources, each of the affected employees will meet with Mr John A Near, Division Director – Human Resources, or designee, who will advise them of their Reduction-In-Force rights with regard to layoff, bumping, reassignment, demotion, recall, and reinstatement

After the meeting with a representative from the Human Resources Division, within two (2) working days, the employee must elect layoff, or to exercise their bumping rights based upon their RIF Service Date Meetings with employees who exercise their bumping rights will be conducted as follows

(First) If the Job Classification is in one of the designated Competitive Job Classification Series identified above, the employee may be eligible to bump into the position occupied by the employee with the lowest RIF Service Date in the same Job Classification and pay band with the same or lower pay level (provided they meet the state and SCDC minimum training & experience requirements) The bumped employee may then bump into the position occupied by the employee with the lowest RIF Service Date in the next lowest Job Classification in the designated series (provided they meet the state and agency minimum training & experience requirements)

(Second) If the position is not in one of the Competitive Series designated above, the employee may first bump the employee in the competitive area with the lowest RIF Service Date in the same Job Classification and pay band, with the same or lower pay level (provided s/he meets the state and SCDC minimum training & experience requirements)

(Third) The employee (or the bumped employee with the lowest RIF Service Date) may next be reassigned or demoted into a vacant position in the competitive area of the same pay band, pay level or lower, provided the agency is actively recruiting to fill the vacancy, and s/he meets the state and SCDC minimum training & experience requirements

In some cases, in accordance with Section 6 9 of the Department's approved RIF Policy, employees with a higher RIF Service Date were retained over other employees with a lower RIF Service Date in the same generic state job classification or job classification series due to the necessary qualifications of the position, or their higher pay level within the pay band (code "R" on listing of employees to be laid off) The specific reasons in each of these cases are as follows

R1 (Area 01) – AH45 Program Manager I in the substance abuse area did not qualify to bump employees whose job duties included engineering/construction experience, or a position requiring knowledge of OSHA, EPA/environmental, or emergency preparedness

R2 (Area 01) – EC10 Medical Assistant Technician I (dental assistant) did not qualify to bump employees with a higher RIF Service Date whose positions are a certified nursing assistant (CNA)

R3 (Area 01) – UE07 Academic Program Managers (2) with a lower RIF Service Date did not possess a principal's or superintendent's certification required for either of the two central office Academic Program Managers who had a higher RIF Service Date In addition, the (UB07) Principal in the same competitive area, was not eligible to upward bump his supervisor who is an Academic Program Manager

R4 (Areas 01, 02, 06, 11) – UB02, UB04 - Certified Teacher, Vocational Teacher – In four competitive areas of the state, several certified teachers and vocational teachers did not possess the specific educational credentials or skills necessary to qualify for bumping into positions occupied by employees with a lower RIF Service Date

R5 (Area 11) - AH35 Program Coordinator I did not qualify to bump employees in the same job classification within the competitive area because the job duties and responsibility levels of all other employees were greater, and the other employees occupied a higher pay level, as indicated in the RIF policy

The Positions Being Eliminated and Employees Eligible for Bumping in each Competitive Area (attached) has been developed to identify employees in each competitive area occupying the same job classification, or classification series, of positions that are being eliminated

Disclaimer: This plan indicates the rights of each employee under the Reduction-In-Force A specific employee subject to demotion or separation may not be affected due to the decision of the other employees to exercise, or not exercise, their bumping rights

VI Efforts Made to Assist the Affected Employees

1 Affected employees will receive at least a two week written notice prior to separation

2 The Office of Human Resources State Career Center will be notified of this Reduction-In-Force and their assistance will be requested to help the affected employees in their search for other state employment In addition, the employee will be entered into the automated State Employee RIF Applicant Pool, which will allow the employee to provide updated information and eligibility for other state agency's vacancies

3 A Department of Corrections application form will be provided to the affected employee to maintain updated education, work history, and job skills

4 The Department of Corrections will contact the State Department of Education's unit responsible for teacher recruitment to advise them of the availability of certified teachers and administrators If directed by the State Department of Education, the Department of Corrections will contact local school districts in the competitive area to make them aware of available applicants for vacant positions

5 Temporary positions, particularly in the area of educational instruction to inmates, may be developed and made available to affected employees by the Reduction-In-Force

6 Outplacement services will be solicited from local vendors to provide cost-free services to affected employees

7 The S C Employment Security Commission will be contacted in order to supply information required for application for unemployment compensation, to be completed on-site at the Department of Corrections, if possible In addition, information will be obtained necessary for registration for application into their statewide database of available job openings

8 Local employers may be contacted in competitive areas which have advertised for openings of qualified employees

9 The Employee Assistance Program (EAP) for the Department of Corrections will be contacted and counseling services made available for affected employees for a period of 90 days which is equal to current employees

10 Affected employees will be advised of all recall and reinstatement rights and privileges and will be asked to maintain a current address with the Department of Corrections' Division of Human Resources

11 Affected employees will be informed about the state group benefits for which the employee is eligible, and the effect of their employment separation upon state benefits such as health & dental insurance, retirement, etc

12 Affected employees will be informed of their right, upon request, to review the Reduction-In-Force plan, with the exception of the RIF service date of other affected employees The employees will be entitled to view their own RIF service date and the order of other employees in RIF Service Date order

13 The affected employees will be informed of their right to grieve the Reduction-In-Force through the agency grievance process and appeal through the state grievance process only if the grievance or appeal is based upon an improper or inconsistent application of the Reduction-In-Force policy/procedure, or plan

VII Summary

Mr Wilkins, a Reduction-In-Force is one of the most unpleasant tasks that I must undertake as Director However, I am committed to the primary mission of Department of Corrections and to the legal responsibilities to operate within the funds allocated by the Legislature

The timeframe necessary to implement a Reduction-In-Force of this size across the state mandates our agency move as quickly to implement the procedures of the plan Therefore, I ask that you give priority to the review and approval of this Reduction-In-Force plan and contact Mr Near at 896-1645 if you have any questions

I truly appreciate any assistance you can provide

Sincerely,

Jon E Ozmint

Attachments

1 SCDC Approved Reduction-In-Force Policy
2 Listing of Competitive Areas, Areas Map, and Competitive Job Classifications & Classification Series
3 Listing of Positions being eliminated and Employees eligible for Bumping in Each Competitive Area
4 Sample Letter - Notification of Reduction-In-Force

Cc file

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L. PATTERSON JR.
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CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737-0900

SAMUEL L. WILKINS
DIRECTOR

March 14, 2003

Mr John Near
Human Resources Director
S C Department of Corrections
4444 Broad River Road
Post Office Box 21787
Columbia, South Carolina 29221-1787

Dear Mr Near

The revised Reduction-In-Force policy submitted to our office has been approved and is enclosed for your files This revised policy becomes effective only after covered employees receive actual notice of the revisions, including a date for implementation

Should you determine that further revisions are necessary, please submit them to our office for review and approval as required by statute

Please let us know if we may be of further assistance to you

Sincerely,

Chris Byrd
Assistant Director

South Carolina Department of Corrections

SCDC POLICY/PROCEDURE

NUMBER ADM-11.05

TITLE REDUCTION IN FORCE

ISSUE DATE MARCH 14, 2003

RESPONSIBLE AUTHORITY DIVISION OF HUMAN RESOURCES

OPERATIONS MANUAL ADMINISTRATION

SUPERSEDES ADM-11 05 (July 1, 2000)

RELEVANT SCDC FORMS/SUPPLIES 16-5, 16-7

ACA/CAC STANDARDS None

STATE/FEDERAL STATUTES Sub-regulations *19-703, 19-704, 19-705, 19-706, 19-715, 19-718, and 19-719*, State Office of Human Resources Regulations Manual

THE LANGUAGE USED IN THIS POLICY/PROCEDURE DOES NOT CREATE AN EMPLOYMENT CONTRACT BETWEEN THE EMPLOYEE AND THE AGENCY THE AGENCY RESERVES THE RIGHT TO REVISE THIS CONTENTS OF THIS POLICY/PROCEDURE

PURPOSE To establish guidelines for a reduction-in-force (RIF) in the event of reduced Agency funding, change in workload, or reorganization

POLICY STATEMENT In order for the SCDC to continue effectively meeting its financial and/or operational objectives, the Agency Director may authorize a reduction-in-force (RIF) due to the reorganization of the SCDC, reduced funding, and/or change in workload Any RIF will be planned and conducted in compliance with all applicable State of South Carolina Office of Human Resources regulations and policies/procedures

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1 AUTHORIZATION FOR A REDUCTION-IN-FORCE (RIF)

1 1 The Agency Director *or designee* is authorized to approve any position(s) to be abolished and to approve the competitive areas within which employees subject to a lay off will be able to exercise their rights under this policy/procedure (NOTE The competitive area may be *agency wide, a* department, or a more restricted *geographical* area where the staff is separately organized and clearly distinguishable from the staff in other areas) The Agency Director will be the final authority for approving a reduction-in-force whereby

- *employees may only bump into vacant positions, which are actively recruiting to be filled,*
- filled positions are abolished with the subsequent removal of some or all employees from the payroll and/or the reassignment, and/or possible transfer *or demotion* of others

1 2 A RIF plan based on the directives of the Agency Director will be developed by the Division Director of Human Resources

1 3 A copy of the RIF plan will be submitted to the State Office of Human Resources (OHR) for approval of procedural correctness prior to the effective date of the RIF At a minimum, the plan will contain the reasons for the RIF, a proposed list of affected employees in the order of their RIF Service Dates (see Section 5, below), the competitive area(s) and classification(s) affected, and the age, race, and sex of the affected employees, *organizational chart of affected areas, and a sample letter to employees* In addition, efforts will be made to assist laid-off employees to find other employment through the State Career Center of the OHR The Recruiting and Employment Services Branch of the SCDC Division of Human Resources will be provided with updated employment applications of all employees affected by the RIF

1.4 Upon approval of the RIF plan by the OHR, the Division Director of Human Resources will be responsible for implementing the actions called for in the plan No action will be taken nor will information be provided to any employee without the written approval of the Division Director of Human Resources No action will be considered official without the written approval of the Division Director of Human Resources

2 GENERAL PROVISIONS GOVERNING RIFs

2 1 The Division Director of Human Resources will maintain a roster of employees who have been bumped or who have been laid-off It will be the responsibility of all Agency managers to furnish the Division Director of Human Resources with any and all information related to the filling of positions upon request

2 2 It is the responsibility of all employees to ensure that the Division of Human Resources has current information on their home addresses and telephone numbers at all times

2 3 Whenever a RIF is in effect, no additional new hires, internal promotions, or reassignments into vacant positions *in the competitive area* will be allowed in any position without first determining through the Division Director of Human Resources or designee those employees with recall rights These employees have recall rights as a result of being bumped or laid off and must be notified of such vacancies to determine their eligibility

3 EXCEPTIONS IN SPECIAL OR UNIQUE CASES

3 1 In exceptional cases, the Agency Director reserves the right to approve actions outside the provisions of this policy/procedure if, in his/her opinion, circumstances warrant such approval If any provisions of this policy/procedure are affected by a proposed exception, justification and specific instructions to be followed will be recommended in writing to the Agency Director by the *appropriate member of the Director's staff*

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w th the concurrence of the General Counsel and the Division Director of Human Resources

3 2 Reasons or justification for such actions above may include, but are not limited to the following

3.2 1 Sufficient evidence exists that the movement by an employee into a position may aggravate a pre-existing health related condition Such evidence would require medical documentation and diagnosis of inability to perform the essential functions of the position

3 2 2 A particular employee may be retained over another employee within the Agency regardless of RIF Service Date and bumping rights of other employees because s/he possesses supervisory skills, knowledge, experience, or abilities that cannot be learned within a reasonable training period In such cases, a statement of facts must be made in the reduction-in-force plan and approved in advance by the Agency Director The SCDC will retain documentation to support any exceptions made on this basis

3 3 3 The move would violate State and/or Agency nepotism policies/procedures

3 3 4 Sufficient evidence exists to show that it would not be in the best interest of the SCDC or the employee to allow a move

4 EMPLOYEE NOTIFICATION

4 1 After a RIF plan is approved and reviewed for procedural correctness by OHR and before it becomes effective, employees to be affected by an approved RIF will be notified in writing by the Division Director of Human Resources Notification will be made by either

- A personally delivered letter to the affected employee requiring the signed acknowledgment of receipt by the employee, or
- Certified mail (return receipt requested)

4 2 An employee affected by a RIF may make a written request to the Division Director of Human Resources to receive a copy of the RIF plan affecting the employee The RIF Service Dates of affected employees (see Section 5, below) will not be disclosed in the copy of the plan provided to such employees

4 3 Employees notified that their position is to be abolished (and those employees subsequently bumped under these procedures) will be scheduled to meet with a designated representative of the Division of Human Resources to review their rights under these procedures After reviewing their rights, affected employees must indicate in writing whether they will exercise or waive their bumping rights (see Section 6, below) Written notification of each employee's decision must be filed with the Division of Human Resources representative designated to meet with the employee no later than two (2) working days following the meeting, or else that employee's bumping rights will be automatically waived

4 4 Generally, employee meetings and ***employees exercising their*** bumping ***rights*** will be made in decreasing order based on each affected employee's RIF Service Date Exceptions may be made by the Division Director of Human Resources when

- A change in the order of meetings and transactions does not affect other employees with a lower RIF Service Date, or
- To delay a meeting or transaction would jeopardize efficient operations of the RIF, or
- An employee either fails to keep or fails to notify the Division of Human Resources of his/her inability to keep a required appointment date and therefore, ***the appointment will be rescheduled after other employees with a lower RIF Service Date have been contacted***

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4 5 After the final list of employees to be laid off is determined, these employees will be notified — — — — by the Division Director of Human Resources or an approved designee no later than 14 calendar days before the actual date the lay off is to become effective Notification will, at a minimum, include the following information

- Reason for the lay off,
- Competitive classification ***and/or competitive*** series (job class, pay band, pay level) and competitive area,
- Benefits to which the affected employee is entitled,
- Where to obtain benefit information,
- Recall ***and reinstatement rights***,
- Services available for seeking other employment,
- Efforts taken (or to be taken) to place the affected employee, and
- ***Employee grievance rights***

4 6 Notification will be made to such employees by either a hand-delivered letter to the employee requiring the employee's written acknowledgment of the same, or by certified mail (return receipt requested)

4 7 The Division of Human Resources will be responsible for ensuring that SCDC Form 16-5, "Personnel Advice Form," and SCDC Form 16-7, "Employee Termination Clearance," are completed for all employees being removed from the SCDC payroll

5 ESTABLISHMENT OF RIF SERVICE DATES A RIF Service Date will be established for any employee affected by a RIF and will be used as the basis for bumping, laying-off, recalling, or reinstating an affected employee All approved RIFs will be conducted in such a manner which provides employees the optimum security for past performance and length of service, while minimizing disruption to the Agency's operations The RIF Service Date will be established by combining the continuous state service date of each affected employee with credit for his/her job/merit performance, as follows

5 1 Continuous State Service The continuous state service date of each affected employee will be determined by the employee's most recent date of hire with the state Section ***19-719*** of the State Office of Human Resources Regulations Manual outlines conditions affecting the employee's length of continuous state service

5 2 Job Performance Credit All employees will be awarded additional service credit based on the total of their last two (2) scheduled performance appraisals (special appraisals are excluded) which precede the date of designation of positions to be eliminated by the Agency Director The additional service credit will be allocated as follows

- - Below Performance Requirements = 0 months credit
- - Meets Performance Requirements = 6 months credit
- - Exceeds Performance Requirements = 12 months credit
- - Substantially Exceeds Performance Requirements = 18 months credit

5 3 The calculated additional service credit will be added to the employee's continuous state service date to determine the RIF Service Date for all RIF purposes

5 4 Where two (2) employees have equal RIF Service Dates, deadlocks will be broken by using each employee's Agency hire date If the deadlock continues, other impartial means (e g , drawing lots, etc) may be used to break the deadlock

5 5 Probationary employees will not have any rights under these RIF procedures and may be terminated at

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any time during their initial 12 month probationary period

6 BUMPING RIGHTS OF EMPLOYEES

6 1 Applicability Only those employees considered covered state employees are authorized to have bumping rights Temporary ("pink-slip"), contract, full/part-time temporary grant employees, and probationary employees have no bumping or RIF rights

6 2 Covered Employees Covered employees have bumping rights only when

6 2 1 The position the employee occupies is being abolished or the employee is bumped by another employee and the bumped employee has a greater RIF Service Date than remaining employees in the classification *and/or job classification* series, or

6 2 2 The employee elects to exercise his/her bumping rights in writing no later than two (2) working days following the review meeting with the designated representative of the Division of Human Resources (see Section 4 3, above)

6 3 If an employee elects to exercise his/her bumping rights, the employee must utilize the option below which provides him/her the highest resulting pay band or s/he may elect to be laid-off with recall or reinstatement rights as provided by the provisions within these procedures (**NOTE** Under no circumstances may an employee gain from a RIF Bumping rights are only provided laterally or downward)

6 4 *The following procedures must be followed only in cases where the position eliminated is one of a designated competitive series (e g Administrative Specialist I, AA25, Band 2, and Administrative Specialist II, AA50, Band 3)*

- *If the employee whose position is eliminated has a higher RIF Service Date than other employees in the designated competitive series in the competitive area, s/he will bump into the position occupied by the employee with the lowest RIF Service Date in the same job classification and pay band with the same or lower pay level The bumped employee may then bump into the position occupied by the employee with the lowest RIF Service Date in the next lowest job classification in the designated competitive series Once the employee with the lowest RIF Service Date in the series is determined, s/he must then follow the procedures outlined in Section 6 6, below*
- *In all cases, the employee bumping into a position must meet the State and SCDC minimum training and experience requirements as outlined in 6 10, below*

6.5 *If a position eliminated is not one of a designated series and the employee elects to exercise his/her bumping rights, the employee must first bump the employee in the competitive area with the lowest RIF Service Date in the same job classification and pay band, and same or lower pay level, provided s/he meets the State and SCDC minimum training and experience requirements*

6 6 *The employee must next be reassigned or demoted into a vacant position in the competitive area of the same pay band, and pay level or lower, provided the agency is actively recruiting to fill the vacancy, and provided s/he meets the State and SCDC minimum training and experience requirements*

6 7 For those employees bumped or bumping into a position with a lower pay band, the employee's pay rate and review date will be determined in accordance with the Office of Human Resources Regulations Manual

6 8 If a position is offered to an employee under RIF bumping procedures, and the employee *refuses the position, s/he* has the right to elect to be laid-off with recall/reinstatement rights

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6 9 An employee is considered as meeting the minimum training and experience requirements provided the

- S/he meets minimum state training and experience with regard to education and experience, and
- The experience required is considered acceptable to perform the specific essential functions of the position (i e , a vocational teacher of a specific trade such as electrical, automotive, plumbing, etc) as defined in the position's SCDC Additional Requirements

6 10 Any employee exercising his/her bumping rights will be notified in writing by the Division of Human Resources of the position (job title, ***pay*** band, ***pay level,*** location, and salary) and effective date of the position change Notification of the position change will also be made to the Recruiting and Employment Services Branch The Recruiting and Employment Services Branch will be responsible for keying the selection and notifying the Payroll Branch so that the change can be made effective

6 11 An employee bumped out of his/her position during a RIF (regardless of source of funds) may then exercise his/her rights according to these procedural guidelines

6 12 A second wave of bumping rights for ***covered*** employees who have been displaced will not be implemented until first wave RIF bumping procedures have been completed

6 13 An employee subject to lay off may waive his/her bumping rights in writing Once waived, s/he forfeits bumping rights for the remainder of the RIF An employee who waives bumping rights does not waive any recall rights under these procedures

7 RECALL *AND REINSTATEMENT* RIGHTS OF EMPLOYEES

7 1 Covered employees who have been laid-off or bumped to a position with a lower pay band and pay level will have recall and reinstatement rights for a period of one (1) year from the effective date of their lay off, bumping, or reassignment to another ***position*** Employees will be reinstated in inverse order of lay off

7 2 ***Recall Rights*** When a vacancy occurs in an employee's competitive area which is (1) in the ***same job class,*** pay band, pay level ***or lower***, and ***functionally similiar*** as the position held prior to the lay off, downward bumping, or reassignment and (2) within a reasonable geographic distance (30 mile radius) of the work location of the employee, then the eligible employee will be offered the vacancy provided s/he meets the minimum training and experience qualifications The position must be accepted in writing by the employee within two (2) working days of the offer or s/he waives any future recall rights

7 3 Upon refusal of the position by an eligible employee, the offer will be extended in decreasing RIF Service Date order to other eligible employees on the recall list If all eligible employees on the recall list refuse the position, the vacancy will be filled pursuant to normal Agency hiring policy/procedure

7 4 ***Reinstatement Rights*** ***An employee affected by a Reduction-In-Force may apply for any SCDC or State job for which s/he meets the minimum training and experience requirements If the employee accepts a position with a lower pay band than the one from which s/he was separated, s/he still retains recall rights to a position in the same job classification in the competitive area***

7 5 Probationary, temporary ***(pink slip)***, or temporary grant employees will not have recall ***or reinstatement*** rights They may, however, apply for rehire through regular Agency employment policy/procedure

7 6 If an employee on the recall list relocates to another geographic area, s/he will be eligible for recall in the new competitive area After relocation it will be the employee's responsibility to notify the Division Director of Human Resources in writing of the relocation in order to be eligible for recall within that competitive area

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7 7 Upon appointment to an established position (either as a result of bumping or recall), an employee shall be given one of the following types of status in accordance with State regulations and Agency policies/procedures

- Trial, or
- *Covered*

7 8 Any changes in salary, job date, or performance appraisal review dates will be in accordance with established State regulations and Agency policies/procedures

7 9 Employees who are recalled ***or reinstated*** within one (1) year of the effective date of the RIF will be eligible for all benefits including sick leave restored in accordance with state regulations, and will have the option of buying back all, some, or none of the annual leave ~~lost~~ paid as a result of the RIF

8 GRIEVANCES A ***covered*** employee who is affected by a reduction-in-force has the right to appeal through the Agency's employee grievance procedures and to the State Employee Grievance Process only if the appeal is based upon inconsistent or improper application of any portion of the Agency's reduction-in-force policy/procedure or plan ***The grievance must be filed within 14 calendar days of the effective date of the RIF as outlined in SCDC Policy/Procedure ADM-11 02***

9 REORGANIZATION. Reorganization of the SCDC after a RIF will be implemented in compliance with all existing departmental policies Those employees remaining after reorganization will not be eligible for moving expenses or travel to and from their home to their work stations if they are transferred to meet the mission of the Agency

10 REHIRES An employee affected by a RIF who waives his/her bumping or recall rights or who is not eligible for such rights may apply for rehire with the Agency through normal hiring and employment policies/procedures

11 DEFINITIONS

Bumping refers to the action taken when an employee subject to lay off is placed in a vacant position or displaces ("bumps") another employee in the same or another job classification and/or location

Class Series refers to a group of classes which are sufficiently similar in the kind of work performed to warrant similar state class titles, but sufficiently different in level of responsibilities to warrant different state salary ranges

Competitive Area refers to a common geographic or organizational area in which employees will be considered for reduction-in-force procedures including transfers, reassignments, and/or bumping which is determined and approved by the Agency Director

Competitive Class refers to classifications (job class, pay band, pay level) designated to compete in a reduction in force

Continuous State Service refers to service with the state determined by the most recent date of hire with the State of South Carolina without a break in service

Employee Subject to Lay Off refers to an employee who is subject to termination because s/he has a lower RIF Service Date than another employee

Lay Off refers to the actual termination of employment from the Agency because of reduced funding

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change in workload, or reorganization

State Minimum Qualifications refers to those qualifications specified by the state job specifications and specific job functions as required for an employee to enter a job classification

Probationary Employee refers to an employee in a covered position who has less than 12 months of continuous state service

Recall refers to the reinstatement of an employee who is in lay-off status within one (1) year of the effective date of the lay off

Reduction-in-Force (RIF) refers to the reduction or abolishing of positions because of reduced funding, change in workload, or reorganization

Reduction-in-Force (RIF) Service Date refers to date upon which all RIF procedures are based RIF Service Date is determined by continuous state service date with additional service credits awarded for job performance rating

Temporary Employee refers to a full-time or part-time employee who does not occupy an FTE position, whose employment is not to exceed one year, and who is not a covered employee ***(S C Code Ann §8-17-320)***

Trial Period/Status refers to a six (6) month working trial period/status of a covered employee following a promotion, demotion, or reclassification transfer or reassignment to any class in which the employee has not held permanent status

s/ Jon E Ozmint, Director

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DEPARTMENT OF CORRECTIONS

REDUCTION-IN-FORCE - COMPETITIVE AREAS

Competitive Area	Location(s)
1	All Broad River Road Complex Institutions and Divisions Watkins Pre-Release Center Manning Correctional Institution
2	Wateree River Correctional Institution Lee Correctional Institution Palmer Pre-Release Center Turbeville Correctional Institution
3	Catawba Pre Release Center
4	Evans Correctional Institution
5	Kershaw Correctional Institution
6	Coastal Office Coastal Pre-Release Center Lieber Correctional Institution MacDougall Correctional Institution
7	Allendale Correctional Institution
8	Ridgeland Correctional Institution
9	Lower Savannah Pre-Release Center Trenton Correctional Institution
10	Leath Correctional Institution McCormick Correctional Institution
11	Appalachian Office Northside Correctional Institution Livesay Pre-Release Center Tyger River Correctional Institution Perry Correctional Institution

Locations of Existing Institutions and Cen

***23 Greenville County**
1 Perry Correctional Institution

***42 Spartanburg County**
2 Livesay Pre-Release Center
Northside Correctional Institution
3 Tyger River Correctional Institution

***46 York County**
4 Catawba Pre-Release Center

***29 Lancaster County**
5 Kershaw Correctional Institution

***24 Greenwood County**
6 Leath Correctional Institution

***33 McCormick County**
7 McCormick Correctional Institution

***19 Edgefield County**
8 Trenton Correctional Institution

***02 Aiken County**
9 Lower Savannah Pre-Release Center

***40 Richland County**
10 Broad River Correctional Institution
Campbell Correctional Institution
Goodman Correctional Institution
Kirkland Reception & Evaluation Center
Stevenson Correctional Institution
Walden Correctional Institution
Watkins Pre Release Center
Women's Correctional Institution
11 Manning Correctional Institution

***43 Sumter County**
12 Wateree River Correctional Institution

***31 Lee County**
13 Lee Correctional Institution

***35 Marlboro County**
14 Evans Correctional Institution

***21 Florence County**
15 Palmer Pre Release Center

***14 Clarendon County**
16 Turbeville Correctional Institution

***08 Berkeley County**
17 MacDougall Correctional Institution

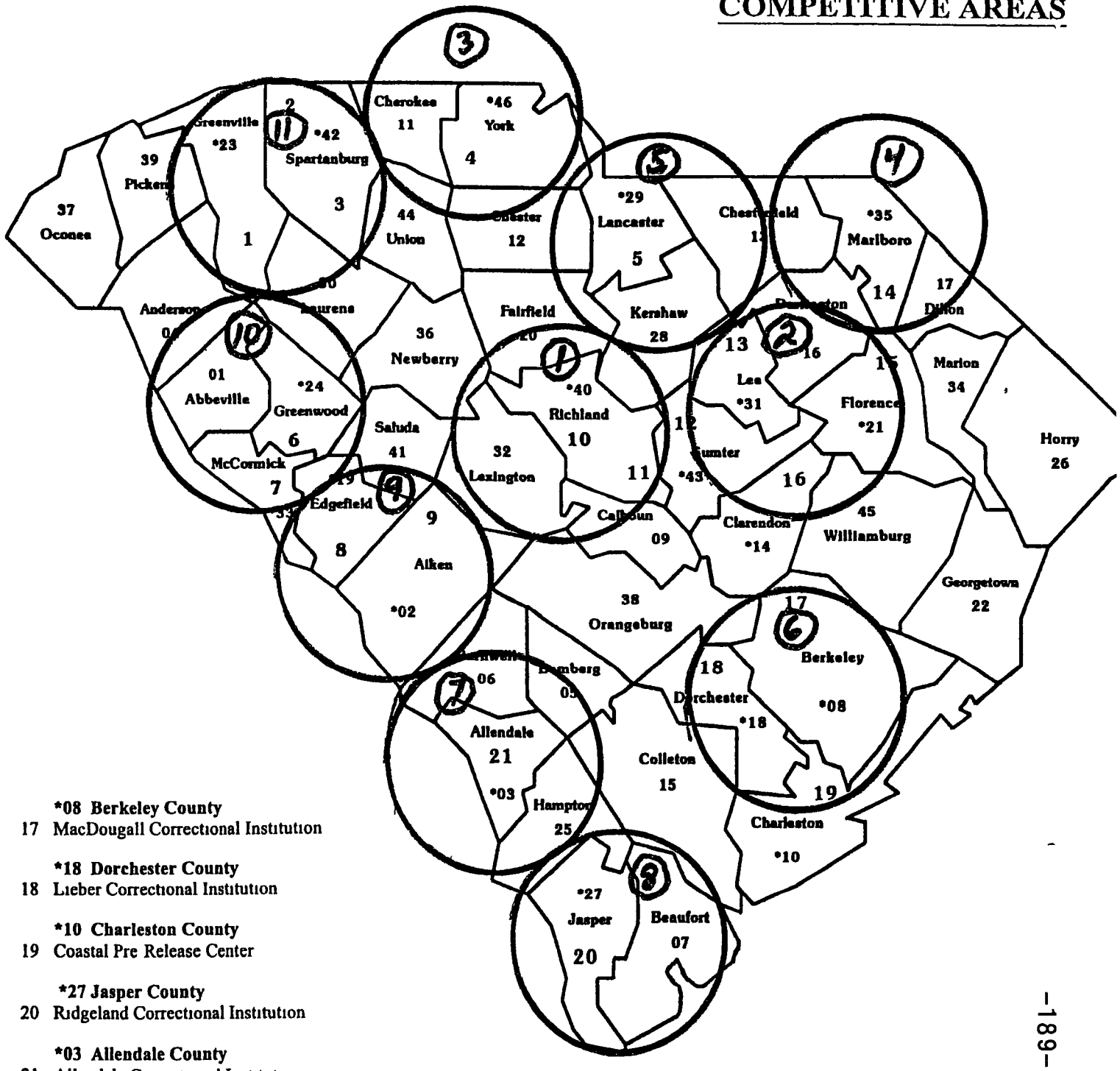
***18 Dorchester County**
18 Lieber Correctional Institution

***10 Charleston County**
19 Coastal Pre Release Center

***27 Jasper County**
20 Ridgeland Correctional Institution

***03 Allendale County**
21 Allendale Correctional Institution

COMPETITIVE AREAS



DEPARTMENT OF CORRECTIONS

COMPETITIVE JOB CLASSIFICATIONS & SERIES

Competitive Job Classifications and Competitive Job Classification Series within each competitive area for employee bumping are identified as

Competitive Job Classifications

AA75 – (Pay Band 4) - Administrative Assistant
AH20 – (Pay Band 7) - Administrative Manager I
AH45 – (Pay Band 7) – Program Manager I
AJ40 – (Pay Band 6) – Computer Operator II
AJ45 – (Pay Band 6) – Information Resource Consultant II
BC30 – (Pay Band 6) – Public Information Director I
BC50 – (Pay Band 8) – Director of Information Services
CD20 – (Pay Band 4) – Library Specialist
EB52 – (Pay Band 9) – Dentist
EC10 – (Pay Band 2) - Medical Assistant Technician I
EC25 – (Pay Band 5) - Technical Medical Associate II
GA40 – (Pay Band 4) - Human Services Specialist II
JA80 – (Pay Band 4) – Inspector II
UB02 – Certified Teacher
UB04 – Vocational Teacher
UB05 – Guidance Counselor
UB06 – Special Education Teacher

Competitive Job Classification Series

AA25, AA50 – (Pay Bands 2-3) - Administrative Specialist I & II
AD01, AD03 – (Pay Bands 3-4) - Fiscal Technician I & II
AD05, AD08, AD10, AD12 – (Pay Bands 3-4-5-6) - Auditor I, II, III, IV
AD15, AD18 – (Pay Bands 7-8) – Audits Manager I & II
AH10, AH15 – (Pay Bands 5-6) - Administrative Coordinator I & II
AH35, AH40 – (Pay Bands 5-6) - Program Coordinator I & II
CB30, CB35 – (Pay Bands 2-3) - Teacher Assistant, Teacher/Center Director
GA50, GA60 – (Pay Bands 5-6) - Human Services Coordinator I & II
UB09, UE07, UB07– Superintendent, Academic Program Manager, Principal

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L A S S	B A N D	L E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		RAJU VISVESWARAN	O	M	65	AA50	03	A	ADMIN SPECIALIST II	2/20/78	01	DIV OF CLASSIFICATION & INMATE RECORD
		DICOSTANZA NINA M	W	F	53	AA50	03	D	ADMIN SPECIALIST II	2/13/81	01	DIVISION OF INMATE SERVICES
		YENNY PATRICIA J	W	F	60	AA50	03	C	ADMIN SPECIALIST II	12/2/81	01	BROAD RIVER CORRECTIONAL INSTITUTION
		AUTON-MCCORMICK KATHY S	W	F	44	AA50	03	E	ADMIN SPECIALIST II	3/15/84	01	TRAINING ADMINISTRATION
1		FLOYD CLAUDETTE L	B	F	53	AA50	03	C	ADMIN SPECIALIST II	5/5/84	01	SUBSTANCE ABUSE SVCS DIV
		HARMON PEARLENE	B	F	43	AA50	03	D	ADMIN SPECIALIST II	7/1/84	01	BROAD RIVER CORRECTIONAL INSTITUTION
		BLUME NANCY G	W	F	45	AA50	03	C	ADMIN SPECIALIST II	7/7/84	01	KIRKLAND CORRECTIONAL INSTITUTION
		ENTZMINGER RONALD G	B	M	39	AA50	03	C	ADMIN SPECIALIST II	8/18/84	01	KIRKLAND CORRECTIONAL INSTITUTION
		HILLER ADELL G	B	F	51	AA50	03	A	ADMIN SPECIALIST II	10/19/85	01	KIRKLAND CORRECTIONAL INSTITUTION
		ROBINSON GLENDA D	B	F	39	AA50	03	A	ADMIN SPECIALIST II	5/9/86	01	BROAD RIVER CORRECTIONAL INSTITUTION
		CURRY DONNA C	W	F	54	AA50	03	C	ADMIN SPECIALIST II	6/12/86	01	DIV OF MEDICAL & PROF HEALTH SVCS
		BARNES NATHANIEL E	B	M	38	AA50	03	C	ADMIN SPECIALIST II	10/9/88	01	FINANCIAL ACCOUNTING
		SHEALY GLORIA E	W	F	59	AA50	03	D	ADMIN SPECIALIST II	11/9/91	01	RECRUITING & EMPLOYMENT SERVICES
		SCHROER PATRICIA A	W	F	61	AA50	03	D	ADMIN SPECIALIST II	3/11/93	01	FOOD SER WHSE INVENTORY/DISTRIBUTION
		BENNETT BARRY F	B	M	37	AA50	03	C	ADMIN SPECIALIST II	5/8/94	01	BROAD RIVER CORRECTIONAL INSTITUTION
		ABSTON MORRIS JEANNIE S	W	F	43	AA50	03	D	ADMIN SPECIALIST II	10/27/94	01	MAINTENANCE ADMINISTRATION
		CARRINGTON YVONNE	B	F	36	AA50	03	A	ADMIN SPECIALIST II	11/5/94	01	BROAD RIVER CORRECTIONAL INSTITUTION
		SCHEPP SHERYL K	W	F	50	AA50	03	C	ADMIN SPECIALIST II	4/27/95	01	KIRKLAND CORRECTIONAL INSTITUTION
		BOUKNIGHT SHANNA R	W	F	27	AA50	03	D	ADMIN SPECIALIST II	5/26/95	01	RECRUITING & EMPLOYMENT SERVICES
		NELSON JERLEAN JOHNSON	B	F	48	AA50	03	A	ADMIN SPECIALIST II	6/22/95	01	DIV OF MEDICAL & PROF HEALTH SVCS
		CLARK DIANE M	W	F	55	AA50	03	A	ADMIN SPECIALIST II	7/20/95	01	BROAD RIVER CORRECTIONAL INSTITUTION
		GROFF YONCE PATRICIA	A	F	43	AA50	03	C	ADMIN SPECIALIST II	7/22/95	01	TRAINING ADMINISTRATION
		BRACEY APRIL C P	B	F	36	AA50	03	D	ADMIN SPECIALIST II	12/8/95	01	DIV OF MEDICAL & PROF HEALTH SVCS
		HICKSON ANN	B	F	51	AA50	03	C	ADMIN SPECIALIST II	3/9/96	01	TRAINING ADMINISTRATION
		PEACE JOY A	W	F	60	AA50	03	A	ADMIN SPECIALIST II	3/30/96	01	BEHAVIORAL MEDICINE DIVISION
		MOSES MARTHA	B	F	45	AA50	03	A	ADMIN SPECIALIST II	5/23/96	01	MANNING CORRECTIONAL INSTITUTION
		TORRUELLA TERESA A	B	F	54	AA50	03	C	ADMIN SPECIALIST II	8/31/96	01	MANNING CORRECTIONAL INSTITUTION
		STRONG JR PRESS	B	M	46	AA50	03	A	ADMIN SPECIALIST II	9/28/96	01	CAMILLE GRAHAM CORRECTIONAL INST
		SPURLOCK SHERRY F	W	F	50	AA50	03	D	ADMIN SPECIALIST II	2/17/97	01	DIVISION OF HUMAN RESOURCES
		GASKINS BRENDA K	B	F	48	AA50	03	A	ADMIN SPECIALIST II	2/22/97	01	KIRKLAND CORRECTIONAL INSTITUTION
		MARSALKO KATHLEEN A	W	F	44	AA50	03	D	ADMIN SPECIALIST II	3/14/97	01	MAINTENANCE ADMINISTRATION
		STOWE PEGGY L	W	F	60	AA50	03	A	ADMIN SPECIALIST II	10/17/97	01	KIRKLAND CORRECTIONAL INSTITUTION
		WARD FAYON R	B	F	34	AA50	03	C	ADMIN SPECIALIST II	10/25/97	01	GOODMAN CORRECTIONAL INSTITUTION
		BURTON PAMELA M	B	F	43	AA50	03	D	ADMIN SPECIALIST II	2/7/98	01	DIVISION OF HUMAN RESOURCES
		LIVINGSTON JACQUELINE	B	F	28	AA50	03	A	ADMIN SPECIALIST II	2/22/98	01	CAMILLE GRAHAM CORRECTIONAL INST
		GREEN KELLEY	B	F	33	AA50	03	A	ADMIN SPECIALIST II	3/8/98	01	GOODMAN CORRECTIONAL INSTITUTION
		SIMS SANDRA D	B	F	40	AA50	03	C	ADMIN SPECIALIST II	6/17/98	01	DIV OF CLASSIFICATION & INMATE RECORD
		SMITH DONNA C	W	F	47	AA50	03	A	ADMIN SPECIALIST II	7/2/98	01	WALDEN CORRECTIONAL INSTITUTION
		MADISON LINDA C	B	F	47	AA50	03	C	ADMIN SPECIALIST II	8/7/98	01	KIRKLAND CORRECTIONAL INSTITUTION
		CHABICA MARINA M	O	F	50	AA50	03	C	ADMIN SPECIALIST II	10/2/98	01	KIRKLAND CORRECTIONAL INSTITUTION

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L A S S	B A N D	L E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		BROWN CLAUDIA B	W	F	50	AA50	03	A	ADMIN SPECIALIST II	11/1/98	01	KIRKLAND CORRECTIONAL INSTITUTION
		INGRAM GLENDA C	W	F	47	AA50	03	C	ADMIN SPECIALIST II	12/4/98	01	MANNING CORRECTIONAL INSTITUTION
		MILLER LISA A	W	F	29	AA50	03	C	ADMIN SPECIALIST II	6/17/99	01	DIV OF CLASSIFICATION & INMATE RECORD
		MORGAN CORIE L	B	F	26	AA50	03	C	ADMIN SPECIALIST II	4/16/00	01	KIRKLAND CORRECTIONAL INSTITUTION
3	P	HODGE LORETTA D	B	F	45	AA50	03	C	ADMIN SPECIALIST II	9/17/02	01	KIRKLAND CORRECTIONAL INSTITUTION
		WILSON BEATRICE YOUNG	B	F	65	AA25	02	C	ADMIN SPECIALIST I	9/10/77	01	GOODMAN CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
		CLAYTOR LYDIA C	W	F	62	AA75	04	B	ADMINISTRATIVE ASSISTANT	7/14/69	01	CAMPBELL PRE RELEASE CENTER
		DEAS VALVITA M	B	F	58	AA75	04	D	ADMINISTRATIVE ASSISTANT	10/24/72	01	STEVENSON CORRECTIONAL INSTITUTION
		HINSON DENISE G	W	F	43	AA75	04	D	ADMINISTRATIVE ASSISTANT	12/9/74	01	BROAD RIVER CORRECTIONAL INSTITUTION
		DOZIER MARILYN	W	F	46	AA75	04	A	ADMINISTRATIVE ASSISTANT	8/7/75	01	EDUCATIONAL SERVICES
		MONTGOMERY JANICE L	B	F	48	AA75	04	D	ADMINISTRATIVE ASSISTANT	4/2/77	01	BROAD RIVER CORRECTIONAL INSTITUTION
		MODZELEWSKI KATHLEEN M	W	F	60	AA75	04	D	ADMINISTRATIVE ASSISTANT	5/12/79	01	OFFICE OF GENERAL COUNSEL
1		ALEXANDER EDNA N	B	F	47	AA75	04	D	ADMINISTRATIVE ASSISTANT	12/21/79	01	DIV OF INSP & OPER REV
		RAWL LYNDA R	W	F	61	AA75	04	D	ADMINISTRATIVE ASSISTANT	5/1/81	01	DIVISION OF POLICY DEVELOPMENT
		LONG REBECCA A	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT	3/17/83	01	CONSTRUCTION ADMINISTRATION
		FOLEY JENNIFER A	W	F	39	AA75	04	A	ADMINISTRATIVE ASSISTANT	4/15/83	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		HINGLE DIANE	W	F	51	AA75	04	D	ADMINISTRATIVE ASSISTANT	9/17/83	01	DIV OF CLASSIFICATION & INMATE RECORD
		ROBERTSON ALICE J	B	F	48	AA75	04	A	ADMINISTRATIVE ASSISTANT	7/29/84	01	DIRECTOR'S OFFICE ADMINISTRATION
		BEIDLER SANDRA J	W	F	41	AA75	04	D	ADMINISTRATIVE ASSISTANT	10/27/84	01	KIRKLAND CORRECTIONAL INSTITUTION
		MELTON LINDA G	W	F	52	AA75	04	B	ADMINISTRATIVE ASSISTANT	4/18/85	01	MANNING CORRECTIONAL INSTITUTION
		WIGGINS BARBARA A	B	F	52	AA75	04	A	ADMINISTRATIVE ASSISTANT	7/27/85	01	BROAD RIVER CORRECTIONAL INSTITUTION
		TOOLE LOUISE W	W	F	59	AA75	04	A	ADMINISTRATIVE ASSISTANT	12/21/85	01	VEHICLE COMMUNICATION MANAGEMENT
		DRISKELL DONALD L	W	M	38	AA75	04	D	ADMINISTRATIVE ASSISTANT	2/6/86	01	BROAD RIVER CORRECTIONAL INSTITUTION
		HORNSBY JUDY H	W	F	49	AA76	04	A	ADMINISTRATIVE ASSISTANT	3/6/86	01	STEVENSON CORRECTIONAL INSTITUTION
		STACKHOUSE ZIGMOND A	B	M	45	AA75	04	C	ADMINISTRATIVE ASSISTANT	3/12/86	01	MAIL ROOM
		BRADLEY JUDY K	B	F	49	AA75	04	E	ADMINISTRATIVE ASSISTANT	9/11/86	01	WALDEN CORRECTIONAL INSTITUTION
		KELLY LATONYA Y	B	F	38	AA75	04	D	ADMINISTRATIVE ASSISTANT	1/30/87	01	MANNING CORRECTIONAL INSTITUTION
		BANKS SHIRLEY J	W	F	51	AA75	04	A	ADMINISTRATIVE ASSISTANT	2/5/87	01	CIV LABOR POOL 9511
		PAGE SONYA M	B	F	36	AA75	04	D	ADMINISTRATIVE ASSISTANT	3/27/87	01	DIVISION III INSTITUTIONS
		MCMANUS MINDY L	W	F	35	AA75	04	D	ADMINISTRATIVE ASSISTANT	7/16/87	01	RECRUITING & EMPLOYMENT SERVICES
		EMERSON NELDA J	W	F	55	AA75	04	A	ADMINISTRATIVE ASSISTANT	12/4/87	01	KIRKLAND CORRECTIONAL INSTITUTION
		MULLER GAIL J	W	F	55	AA75	04	B	ADMINISTRATIVE ASSISTANT	9/24/88	01	GOODMAN CORRECTIONAL INSTITUTION
		GOUDELOCK DELORES J	W	F	55	AA75	04	D	ADMINISTRATIVE ASSISTANT	12/6/90	01	PURCHASING BRANCH
		SANSBURY RAMONA Z	W	F	57	AA75	04	D	ADMINISTRATIVE ASSISTANT	2/8/91	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		BRAZELL NORA S	W	F	57	AA75	04	D	ADMINISTRATIVE ASSISTANT	6/6/91	01	MAINTENANCE ADMINISTRATION
		SKIDMORE MIRIAM M	W	F	60	AA75	04	B	ADMINISTRATIVE ASSISTANT	6/20/91	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
		FULLER DEBRA F	W	F	45	AA75	04	C	ADMINISTRATIVE ASSISTANT	6/28/91	01	CAMILLE GRAHAM CORRECTIONAL INST
		CHRETIAN FLORENCE J	B	F	45	AA75	04	D	ADMINISTRATIVE ASSISTANT	8/9/91	01	MANNING CORRECTIONAL INSTITUTION
1		CRIDER REBEKAH S	W	F	34	AA75	04	D	ADMINISTRATIVE ASSISTANT	8/9/91	01	YOUNG OFFENDER DIV

SEE DISCLAIMER IN SECTION V OF RIF PLAN

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L J A O S B S	B A N D	L E V L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		MYERS MARILYN	B	F	42	AA75	04	B	ADMINISTRATIVE ASSISTANT	9/13/91	01	STEVENSON CORRECTIONAL INSTITUTION
		CANNARELLA DENISE M	W	F	44	AA75	04	D	ADMINISTRATIVE ASSISTANT	9/20/91	01	OFFICE OF GENERAL COUNSEL
		WISE DEBRA M	B	F	34	AA75	04	D	ADMINISTRATIVE ASSISTANT	11/19/91	01	KIRKLAND CORRECTIONAL INSTITUTION
		WAITES THERESA H	W	F	56	AA75	04	A	ADMINISTRATIVE ASSISTANT	2/2/92	01	CIV LABOR POOL 9511
		ARD CAROL B	W	F	52	AA75	04	E	ADMINISTRATIVE ASSISTANT	5/1/92	01	DEPUTY DIR FOR MED & PROF HEALTH SERV
		COBB TERESA F	W	F	52	AA75	04	D	ADMINISTRATIVE ASSISTANT	6/5/92	01	EDUCATIONAL SERVICES
		OSTRANDER SHARRON S	W	F	51	AA75	04	D	ADMINISTRATIVE ASSISTANT	8/1/92	01	DIVISION OF INTERNAL AFFAIRS
		MUELLER CAROLE J	W	F	59	AA75	04	D	ADMINISTRATIVE ASSISTANT	9/13/92	01	DIVISION I INSTITUTIONS
		JEFFCOAT JUNETTE	W	F	42	AA75	04	D	ADMINISTRATIVE ASSISTANT	12/18/92	01	VEHICLE COMMUNICATION MANAGEMENT
		DURHAM ANITA I	W	F	55	AA75	04	A	ADMINISTRATIVE ASSISTANT	2/13/93	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
1		MYERS KATHERINE M	W	F	50	AA75	04	A	ADMINISTRATIVE ASSISTANT	2/20/93	01	EDUCATIONAL SERVICES
		WOODS DOROTHY D	W	F	58	AA75	04	D	ADMINISTRATIVE ASSISTANT	6/13/93	01	KIRKLAND CORRECTIONAL INSTITUTION
		FORBES VERNA A	B	F	39	AA75	04	A	ADMINISTRATIVE ASSISTANT	7/10/93	01	BROAD RIVER CORRECTIONAL INSTITUTION
		TOWER MICHELE M	W	F	41	AA75	04	D	ADMINISTRATIVE ASSISTANT	8/17/93	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
		PALMER JEANNIE	B	F	42	AA75	04	D	ADMINISTRATIVE ASSISTANT	9/20/93	01	RECRUITING & EMPLOYMENT SERVICES
		CALDWELL KIMMERLY Y	B	F	38	AA75	04	D	ADMINISTRATIVE ASSISTANT	1/9/94	01	OFFICE OF GENERAL COUNSEL
		GRABER JR ALVIN	B	M	38	AA75	04	D	ADMINISTRATIVE ASSISTANT	4/30/94	01	KIRKLAND CORRECTIONAL INSTITUTION
		REED REATHER M	B	F	43	AA75	04	A	ADMINISTRATIVE ASSISTANT	9/22/94	01	KIRKLAND CORRECTIONAL INSTITUTION
		WHITAKER DESHAWN M	B	F	29	AA75	04	A	ADMINISTRATIVE ASSISTANT	1/6/95	01	SECURITY DIVISION
		RICHARDSON SANDRA J	O	F	31	AA75	04	B	ADMINISTRATIVE ASSISTANT	2/24/95	01	DIV OF CLASSIFICATION & INMATE RECORD
		STOCKER JIMMY M	W	M	49	AA75	04	C	ADMINISTRATIVE ASSISTANT	3/31/95	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
		PAGE MARY N	W	F	59	AA75	04	A	ADMINISTRATIVE ASSISTANT	4/14/95	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		WHITE MICHELLE	B	F	31	AA75	04	D	ADMINISTRATIVE ASSISTANT	3/1/96	01	CAMILLE GRAHAM CORRECTIONAL INST
		BROWN MITCHELL DAYNA L	B	F	47	AA75	04	D	ADMINISTRATIVE ASSISTANT	3/10/96	01	DIVISION OF HUMAN RESOURCES
		PRIDGEN NADINE L	W	F	39	AA75	04	D	ADMINISTRATIVE ASSISTANT	3/16/96	01	DEPUTY DIR FOR MED & PROF HEALTH SERV
		HARGROVE BOBBY	B	M	46	AA75	04	A	ADMINISTRATIVE ASSISTANT	5/4/96	01	CAMILLE GRAHAM CORRECTIONAL INST
		BRIGMAN MICHELLE G	W	F	35	AA75	04	A	ADMINISTRATIVE ASSISTANT	5/24/96	01	DEPUTY DIRECTOR ADMINISTRATION
		SMITH FERNETHIA P	B	F	44	AA75	04	D	ADMINISTRATIVE ASSISTANT	6/22/96	01	CAMILLE GRAHAM CORRECTIONAL INST
		HUGHES JOE L	B	M	49	AA75	04	D	ADMINISTRATIVE ASSISTANT	6/22/96	01	MANNING CORRECTIONAL INSTITUTION
		BROWN MARGARET A	W	F	60	AA75	04	D	ADMINISTRATIVE ASSISTANT	6/29/96	01	DIV OF CLASSIFICATION & INMATE RECORD
		AMICK DONNA C	W	F	39	AA75	04	D	ADMINISTRATIVE ASSISTANT	7/12/96	01	DIV OF MEDICAL & PROF HEALTH SVCS
1		ZANDERS SYLINDA P	B	F	34	AA75	04	D	ADMINISTRATIVE ASSISTANT	9/22/96	01	SUBSTANCE ABUSE SVCS DIV
		HOPKINS SHARON D	B	F	42	AA75	04	D	ADMINISTRATIVE ASSISTANT	10/11/96	01	BEHAVIORAL MEDICINE DIVISION
		HARVEY SALLIE C	W	F	53	AA75	04	D	ADMINISTRATIVE ASSISTANT	12/2/96	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		BAKER BEVERLY M	W	F	51	AA75	04	A	ADMINISTRATIVE ASSISTANT	2/24/97	01	OFFICE OF GENERAL COUNSEL
		FANNIN GARY L	W	M	56	AA75	04	D	ADMINISTRATIVE ASSISTANT	5/16/97	01	CAMPBELL PRE RELEASE CENTER
3		POSTELL CECIL A	B	M	44	AA75	04	B	ADMINISTRATIVE ASSISTANT	6/14/97	01	DIV OF MEDICAL & PROF HEALTH SVCS
3		WESSINGER DEBBIE S	W	F	41	AA75	04	A	ADMINISTRATIVE ASSISTANT	11/8/97	01	WATKINS PRE-RELEASE CENTER
3		NESBITT VALERIE L	B	F	39	AA75	04	A	ADMINISTRATIVE ASSISTANT	11/6/98	01	DIV OF CLASSIFICATION & INMATE RECORD
3	P	TUCKER LISA A	B	F	29	AA75	04	D	ADMINISTRATIVE ASSISTANT	11/12/02	01	VICTIM SERVICES DIVISION
		TOTAL POSITIONS ELIMINATED 4										

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F		EMPLOYEE	C	E	G	O S	N	E	CLASSIFICATION	SVC	M E	
123		NAME	E	X	E	B S	D	L	TITLE	DATE	P A	LOCATION
		WOLVERTON LINDA M	W	F	38	AD03	04	A	FISCAL TECHNICIAN II	6/11/87	01	FOOD SER WHSE INVENTORY/DISTRIBUTION
		SWINSON LORI M	W	F	37	AD03	04	A	FISCAL TECHNICIAN II	2/14/94	01	FINANCIAL ACCOUNTING
		PURVIS RUTHIE M	B	F	54	AD03	04	A	FISCAL TECHNICIAN II	3/3/94	01	CIV LABOR POOL 9511
		JORDAN SUSAN E	W	F	69	AD01	03	D	FISCAL TECHNICIAN I	2/4/74	01	FINANCIAL ACCOUNTING
		DAVIS DOROTHY M	B	F	47	AD01	03	D	FISCAL TECHNICIAN I	6/17/83	01	FOOD SERVICES ADMINISTRATION
		WHITE JACQULYN E	B	F	37	AD01	03	D	FISCAL TECHNICIAN I	7/2/88	01	FINANCIAL ACCOUNTING
		WILLIAMS ROMONA C	B	F	33	AD01	03	D	FISCAL TECHNICIAN I	10/12/91	01	KIRKLAND CORRECTIONAL INSTITUTION
		BROWNHEIM BARBARA L	W	F	41	AD01	03	D	FISCAL TECHNICIAN I	7/7/95	01	FINANCIAL ACCOUNTING
		WILLIAMS BEVERLY W	W	F	46	AD01	03	D	FISCAL TECHNICIAN I	9/17/97	01	FINANCIAL ACCOUNTING
1		BOUKNIGHT DEBBIE	B	F	46	AD01	03	D	FISCAL TECHNICIAN I	2/28/98	01	CORR INDUSTRIES ADMIN
		HALL GLORIA V	B	F	43	AD01	03	D	FISCAL TECHNICIAN I	4/4/98	01	FINANCIAL ACCOUNTING
		PURE TRACY S	B	F	28	AD01	03	D	FISCAL TECHNICIAN I	5/8/98	01	FINANCIAL ACCOUNTING
1		PERKINS VERLENE E	W	F	58	AD01	03	D	FISCAL TECHNICIAN I	6/5/98	01	CORR. INDUSTRIES ADMIN
3		SMALL TAMMY V	B	F	41	AD01	03	D	FISCAL TECHNICIAN I	8/7/98	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
3		ENSMAN JEANNIE C	W	F	45	AD01	03	D	FISCAL TECHNICIAN I	5/15/99	01	FINANCIAL ACCOUNTING
		TOTAL POSITIONS ELIMINATED 2										
		KRAMER MARTHA L	W	F	55	AD12	06	D	AUDITOR IV	9/27/90	01	DIVISION OF INTERNAL AUDITS
		MORGAN JOHN P	W	M	41	AD12	06	D	AUDITOR IV	10/16/92	01	DIVISION OF INTERNAL AUDITS
123		BOWERS DAVID C	W	M	58	AD12	06	D	AUDITOR IV	11/27/92	01	DIV OF INTERNAL AUDITS
		HUDDLE III CHARLES E	W	M	43	AD10	05	D	AUDITOR III	7/8/82	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
		SHEPARD LARRY T	W	M	53	AD10	05	D	AUDITOR III	10/13/83	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
13		HAYES LORETTA G	B	F	31	AD08	04	D	AUDITOR II	8/10/98	01	DIV OF INTERNAL AUDITS
		TOTAL POSITIONS ELIMINATED 2										
13		KENDALL JOHNNY E	W	M	51	AD18	08	E	AUDITS MANAGER II	4/17/98	01	DIV OF INTERNAL AUDITS
13		HOLTON GLENN S	W	M	42	AD15	07	E	AUDITS MANAGER I	12/10/87	01	DIV OF INTERNAL AUDITS
		TOTAL POSITIONS ELIMINATED 2										
1		HARRISON RICKIE	B	M	46	AH20	07	B	ADMINISTRATIVE MGR I	5/6/77	01	DIV OF INSPECT OPER. REVIEW DRUG TES
		DIEHL JOHN BRYANT	W	M	51	AH20	07	B	ADMINISTRATIVE MGR I	6/2/77	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
		VAUGHN WILLIAM J	W	M	62	AH20	07	E	ADMINISTRATIVE MGR I	5/7/82	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		PAGE JAMES EDWIN	W	M	43	AH20	07	C	ADMINISTRATIVE MGR I	9/3/83	01	BEHAVIORAL MEDICINE DIVISION
		MCQUEEN THOMAS EDGAR	W	M	52	AH20	07	E	ADMINISTRATIVE MGR I	10/19/85	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		GRAY ISAIAH	B	M	39	AH20	07	C	ADMINISTRATIVE MGR I	2/20/87	01	VEHICLE COMMUNICATION MANAGEMENT
		JEWELL TONJA M	W	F	42	AH20	07	D	ADMINISTRATIVE MGR I	3/19/87	01	FOOD SER WHSE INVENTORY/DISTRIBUTION
		POSTON JEFF	W	M	40	AH20	07	A	ADMINISTRATIVE MGR I	6/19/92	01	CONSTRUCTION ADMINISTRATION
		KING JR. JOHN W	W	M	56	AH20	07	A	ADMINISTRATIVE MGR I	12/16/93	01	COMMISSARY WHSE INVENTORY/DISTRIBUTION
3		KINNEY KENNETH M	B	M	49	AH20	07	B	ADMINISTRATIVE MGR I	8/4/95	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		TOTAL POSITIONS ELIMINATED 1										
		JOHNSON ANNA K	W	F	57	AH40	06	B	PROGRAM COORDINATOR II	8/28/70	01	DIVISION OF INMATE SERVICES
		RITCHIE SUSAN F	W	F	57	AH40	06	C	PROGRAM COORDINATOR II	4/22/72	01	DIV OF CLASSIFICATION & INMATE RECORD
		DANTZLER DON H	B	M	52	AH40	06	D	PROGRAM COORDINATOR II	3/17/73	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		STOBBE MICHAEL J	W	M	50	AH40	06	E	PROGRAM COORDINATOR II	5/30/75	01	DIV OF CLASSIFICATION & INMATE RECORD
		KOON BARBARA R	W	F	55	AH40	06	E	PROGRAM COORDINATOR II	10/12/75	01	DIV OF CLASSIFICATION & INMATE RECORD

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L A S S	B A N D	L E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
1		RAINEY PATRICIA A	B	F	46	AH40	06	C	PROGRAM COORDINATOR II	1/15/77	01	DIV OF CLASS & INMATE RECDS
		MATHEWS MICHAEL R	B	M	48	AH40	06	C	PROGRAM COORDINATOR II	2/20/77	01	DIV OF CLASSIFICATION & INMATE RECORD
		CANNON RICHARD L	B	M	47	AH40	06	E	PROGRAM COORDINATOR II	6/11/77	01	MANNING CORRECTIONAL INSTITUTION
		TOWNSEND HARRY EDWARD	W	M	42	AH40	06	E	PROGRAM COORDINATOR II	8/3/79	01	CAMILLE GRAHAM CORRECTIONAL INST
		CRISP DAVID E	W	M	48	AH40	06	C	PROGRAM COORDINATOR II	2/4/81	01	DIV OF CLASSIFICATION & INMATE RECORD
		LORICK, III LAWRENCE T	W	M	44	AH40	06	D	PROGRAM COORDINATOR II	5/9/81	01	DIVISION OF BUDGET AND FINANCE
		POOLE DORIS P	B	F	43	AH40	06	C	PROGRAM COORDINATOR II	7/5/81	01	DIV OF CLASSIFICATION & INMATE RECORD
		MANGUM ASHLEY D	W	M	60	AH40	06	A	PROGRAM COORDINATOR II	9/6/81	01	FOOD SER WHSE INVENTORY/DISTRIBUTION
		SAS NICHOLAS M	W	M	45	AH40	06	C	PROGRAM COORDINATOR II	9/19/81	01	CAMPBELL PRE RELEASE CENTER
		STEVENSON III ROBERT M	W	M	43	AH40	06	E	PROGRAM COORDINATOR II	9/26/81	01	KIRKLAND CORRECTIONAL INSTITUTION
		LEAKS STANLEY BH	B	M	42	AH40	06	C	PROGRAM COORDINATOR II	11/7/81	01	WATKINS PRE RELEASE CENTER
		WEEDON KENNETH B	B	M	49	AH40	06	E	PROGRAM COORDINATOR II	6/13/82	01	GOODMAN CORRECTIONAL INSTITUTION
		PATTERSON DENNIS R	B	M	40	AH40	06	E	PROGRAM COORDINATOR II	1/7/83	01	DIV OF CLASSIFICATION & INMATE RECORD
		ROBINSON ELAINE C	B	F	45	AH40	06	E	PROGRAM COORDINATOR II	2/2/83	01	STEVENSON CORRECTIONAL INSTITUTION
		LYBRAND ELIZABETH B	W	F	44	AH40	06	D	PROGRAM COORDINATOR II	2/12/83	01	DIVISION OF INMATE SERVICES
		MATHIS LINDA W	W	F	43	AH40	06	A	PROGRAM COORDINATOR II	4/1/83	01	DIVISION OF BUDGET AND FINANCE
		KNOWLIN SANDRA M	B	F	40	AH40	06	C	PROGRAM COORDINATOR II	1/27/84	01	DIV OF CLASSIFICATION & INMATE RECORD
1		SMITH TESSIE A	B	F	42	AH40	06	E	PROGRAM COORDINATOR II	5/18/84	01	OPERATION REVIEW
		COUNTS MONICA A	W	F	40	AH40	06	C	PROGRAM COORDINATOR II	9/15/84	01	DIV OF CLASSIFICATION & INMATE RECORD
		HOUSTON ARTHUR E	B	M	40	AH40	06	C	PROGRAM COORDINATOR II	11/17/84	01	DIV OF CLASSIFICATION & INMATE RECORD
		MCCALL, JR DAVID M	W	M	38	AH40	06	C	PROGRAM COORDINATOR II	12/1/84	01	KIRKLAND CORRECTIONAL INSTITUTION
1		MIMS CYNTHIA E	W	F	51	AH40	06	E	PROGRAM COORDINATOR II	12/2/84	01	OPERATION REVIEW
1		CROMER PERNELL	B	M	41	AH40	06	C	PROGRAM COORDINATOR II	1/14/85	01	DIV OF CLASS & INMATE RECDS
		LARDEN JOHN P	B	M	55	AH40	06	B	PROGRAM COORDINATOR II	1/25/85	01	COMMISSARY WHSE INVENTORY/DISTRIBUTION
1		COLEMAN MARY E	W	F	47	AH40	06	E	PROGRAM COORDINATOR II	4/24/85	01	OPERATION REVIEW
		THOMPSON ANDREA R	B	F	39	AH40	06	C	PROGRAM COORDINATOR II	7/20/85	01	DIV OF CLASSIFICATION & INMATE RECORD
		GLYMPH DELORIS M	B	F	50	AH40	06	E	PROGRAM COORDINATOR II	7/18/86	01	YOUNG OFFENDER DIVISION
		TURBEVILLE LYNN F	W	F	57	AH40	06	C	PROGRAM COORDINATOR II	7/20/86	01	DIV OF CLASSIFICATION & INMATE RECORD
		BURCKHALTER PHILIP G	W	M	51	AH40	06	E	PROGRAM COORDINATOR II	2/12/88	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		PATTERSON SHARON A	B	F	38	AH40	06	C	PROGRAM COORDINATOR II	2/12/88	01	DIV OF CLASSIFICATION & INMATE RECORD
2		BAXLEY TRACIE B	O	F	44	AH40	06	D	PROGRAM COORDINATOR II	6/25/88	01	INMATE GRIEVANCE BRANCH
2		BRENNAN JR JAMES E	W	M	54	AH40	06	C	PROGRAM COORDINATOR II	5/18/90	01	DIV OF CLASSIFICATION & INMATE RECORD
2		BROWN MARVIN A	B	M	44	AH40	06	E	PROGRAM COORDINATOR II	9/13/90	01	DIV OF CLASSIFICATION & INMATE RECORD
2		CAMPBELL ROBERT L	W	M	56	AH40	06	B	PROGRAM COORDINATOR II	5/2/93	01	BEHAVIORAL MEDICINE DIVISION
12		EDGE KELLY R	W	F	40	AH40	06	E	PROGRAM COORDINATOR II	7/9/93	01	OPERATION REVIEW
12		WITHERSPOON LAVERN	B	M	48	AH40	06	C	PROGRAM COORDINATOR II	10/10/93	01	BROAD RIVER
123		ESLICK, LONNIE J	W	M	60	AH40	06	E	PROGRAM COORDINATOR II	9/3/94	01	SECURITY DIVISION
123		CAMPBELL JENNIFER L	W	F	32	AH40	06	B	PROGRAM COORDINATOR II	9/29/96	01	YOUNG OFFENDER DIV
23		PERRY KEISHA L	B	F	33	AH40	06	B	PROGRAM COORDINATOR II	12/1/96	01	SUBSTANCE ABUSE SVCS DIV
		THOMAS MARY A	B	F	61	AH35	05	B	PROGRAM COORDINATOR I	3/15/73	01	BROAD RIVER CORRECTIONAL INSTITUTION
		WOOD DARRELL H	W	M	47	AH35	05	D	PROGRAM COORDINATOR I	1/23/75	01	MANNING CORRECTIONAL INSTITUTION
		WEED LOREENE H	W	F	60	AH35	05	A	PROGRAM COORDINATOR I	9/14/76	01	DIV OF CLASSIFICATION & INMATE RECORD
		ROGERS HARRY	B	M	52	AH35	05	C	PROGRAM COORDINATOR I	4/8/78	01	KIRKLAND CORRECTIONAL INSTITUTION
		SEABROOK GLORIA	B	F	51	AH35	05	E	PROGRAM COORDINATOR I	4/27/79	01	WATKINS PRE RELEASE CENTER

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L J A O S B S	B A N D	L E V L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		SMITH RAYMOND	W	M	61	AH35	05	E	PROGRAM COORDINATOR I	7/16/80	01	MANNING CORRECTIONAL INSTITUTION
		ROSE MARSHALL	B	F	44	AH35	05	B	PROGRAM COORDINATOR I	3/18/81	01	KIRKLAND CORRECTIONAL INSTITUTION
		METTS THOMAS A	W	M	56	AH35	05	E	PROGRAM COORDINATOR I	5/21/81	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		BUFF SUSAN R	W	F	50	AH35	05	C	PROGRAM COORDINATOR I	9/26/82	01	DIV OF CLASSIFICATION & INMATE RECORD
		DIRUSSO KEITH J	W	M	39	AH35	05	E	PROGRAM COORDINATOR I	3/3/84	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
1		FERGUSON SHARON J	B	F	49	AH35	05	E	PROGRAM COORDINATOR I	3/13/84	01	DIV OF CLASS & INMATE RECDS
		ROWE DEBORAH L	W	F	50	AH35	05	E	PROGRAM COORDINATOR I	5/5/84	01	DEPUTY DIRECTOR ADMINISTRATION
		ROLACK CAROLINE A	B	F	48	AH35	05	C	PROGRAM COORDINATOR I	5/12/84	01	DIV OF CLASSIFICATION & INMATE RECORD
		WILSON DENNIS L	W	M	53	AH35	05	D	PROGRAM COORDINATOR I	8/17/84	01	KIRKLAND CORRECTIONAL INSTITUTION
		WILLIS STEPHANIE	B	F	38	AH35	05	B	PROGRAM COORDINATOR I	10/13/84	01	MANNING CORRECTIONAL INSTITUTION
		WISE VICKIE M	B	F	37	AH35	05	E	PROGRAM COORDINATOR I	11/2/84	01	DIVISION OF POLICY DEVELOPMENT
1		MARTIN ODESSA	B	F	38	AH35	05	C	PROGRAM COORDINATOR I	12/9/84	01	OFFICE OF EXEC AFFAIRS
		HOWDESHELL THELMA S	W	F	47	AH35	05	C	PROGRAM COORDINATOR I	7/25/85	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		TISON JULIA K	W	F	52	AH35	05	E	PROGRAM COORDINATOR I	1/4/86	01	DIV OF CLASSIFICATION & INMATE RECORD
		KIRSCH THOMAS E	W	M	53	AH35	05	D	PROGRAM COORDINATOR I	5/22/86	01	FOOD PROCESSING PLANT
		VAN BORSCH DONALD	W	M	49	AH35	05	B	PROGRAM COORDINATOR I	6/12/87	01	WALDEN FARM OPER
		ADAMS JENEANN W	W	F	48	AH35	05	C	PROGRAM COORDINATOR I	7/8/88	01	CAMILLE GRAHAM CORRECTIONAL INST
		SMALL SHARON COHEN	B	F	36	AH35	05	C	PROGRAM COORDINATOR I	7/8/88	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		WATTS MONICA B	B	F	33	AH35	05	B	PROGRAM COORDINATOR I	3/25/89	01	YOUNG OFFENDER DIVISION
		FOX CLONTA S	W	M	37	AH35	05	C	PROGRAM COORDINATOR I	4/13/91	01	DIV OF CLASSIFICATION & INMATE RECORD
		GRIFFITH JOHN B	B	M	52	AH35	05	B	PROGRAM COORDINATOR I	10/18/91	01	WALDEN FARM OPER
		QUILLER PORTIA M	B	F	43	AH35	05	E	PROGRAM COORDINATOR I	2/8/92	01	VICTIM SERVICES DIVISION
		BARKLEY JOHN G	W	M	41	AH35	05	E	PROGRAM COORDINATOR I	2/8/93	01	MANNING CORRECTIONAL INSTITUTION
		BROOKS CAROL B	W	F	48	AH35	05	C	PROGRAM COORDINATOR I	4/3/93	01	DIV OF CLASSIFICATION & INMATE RECORD
3		ROWE ERNEST E	B	M	37	AH35	05	C	PROGRAM COORDINATOR I	12/11/93	01	DIV OF CLASSIFICATION & INMATE RECORD
3		MODZELEWSKI JOSEPH R	W	M	65	AH35	05	C	PROGRAM COORDINATOR I	3/11/94	01	DIV OF CLASSIFICATION & INMATE RECORD
3		HOLMES OLIVER L	B	M	65	AH35	05	A	PROGRAM COORDINATOR I	10/14/94	01	SUPPORT SERVICES ADMINISTRATION
3		HURT STACEY A	W	F	26	AH35	05	C	PROGRAM COORDINATOR I	11/13/94	01	SAFETY/FIRE INSPECTIONS DIVISION
3		MULLIS VANN S	W	M	57	AH35	05	C	PROGRAM COORDINATOR I	9/2/97	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
3		TAYLOR SHIRLIE T	W	F	57	AH35	05	C	PROGRAM COORDINATOR I	5/22/98	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
3		STANLEY WILLIAM R	W	M	25	AH35	05	C	PROGRAM COORDINATOR I	9/2/98	01	VICTIM SERVICES DIVISION
3		COBB JR LUCIUS D	W	M	32	AH35	05	C	PROGRAM COORDINATOR I	6/5/99	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		TOTAL POSITIONS ELIMINATED 11										
		TAYLOR, JR BLAKE E	W	M	57	AH45	07	E	PROGRAM MANAGER I	7/1/67	01	DIV OF INSPECT OPER REVIEW DRUG TES
		BROWN SAMMIE D	W	F	59	AH45	07	B	PROGRAM MANAGER I	8/16/70	01	DEPUTY DIRECTOR PROGRAM SERVICES
		KELLY DEBORAH B	W	F	47	AH45	07	E	PROGRAM MANAGER I	1/5/75	01	DIV OF MEDICAL & PROF HEALTH SVCS
		KAWAGUCHI LAURA H	W	F	49	AH45	07	B	PROGRAM MANAGER I	5/30/75	01	DIV OF CLASSIFICATION & INMATE RECORD
		SCARBOROUGH JOETTE D	B	F	47	AH45	07	B	PROGRAM MANAGER I	5/14/77	01	DIV OF CLASSIFICATION & INMATE RECORD
		DUNLAP LINDA J	W	F	53	AH45	07	E	PROGRAM MANAGER I	2/9/79	01	DIV OF MEDICAL & PROF HEALTH SVCS
		ROCHESTER NELLIE M	W	F	54	AH45	07	E	PROGRAM MANAGER I	8/26/82	01	DIV OF MEDICAL & PROF HEALTH SVCS
		MITCHELL JOSEPHINE L	B	F	45	AH45	07	D	PROGRAM MANAGER I	9/18/82	01	BEHAVIORAL MEDICINE DIVISION
		RILEY TIMOTHY	W	M	42	AH45	07	B	PROGRAM MANAGER I	6/2/84	01	KIRKLAND CORRECTIONAL INSTITUTION
		MONTGOMERY SUSAN A	W	F	52	AH45	07	B	PROGRAM MANAGER I	11/26/84	01	OFFICE OF EXECUTIVE AFFAIRS
		VOGT LE ANN M	W	F	46	AH45	07	A	PROGRAM MANAGER I	9/17/87	01	KIRKLAND CORRECTIONAL INSTITUTION

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F		EMPLOYEE	C	E	G	O S	N	E	CLASSIFICATION	SVC	M E	
123		NAME	E	X	E	B S	D	L	TITLE	DATE	P A	LOCATION
		RECK STEVEN J	W	M	53	AH45	07	A	PROGRAM MANAGER I	8/4/88	01	FOOD SERVICES ADMINISTRATION
		CLARK JOHN R	W	M	61	AH45	07	C	PROGRAM MANAGER I	8/10/89	01	DIVISION OF HUMAN RESOURCES
		SWEIGART LES G	W	M	59	AH45	07	D	PROGRAM MANAGER I	8/24/90	01	SUPPORT SERVICES ADMINISTRATION
		CONNELLY YVONNE T	W	F	54	AH45	07	E	PROGRAM MANAGER I	11/17/90	01	DIV OF MEDICAL & PROF HEALTH SVCS
		DEW JR HERBERT O	W	M	52	AH45	07	D	PROGRAM MANAGER I	10/10/91	01	AGRICULTURE SERVICES
		POWELL KATHLEEN F	B	F	51	AH45	07	E	PROGRAM MANAGER I	5/16/92	01	BEHAVIORAL MEDICINE DIVISION
13		SHULER THOMAS A	B	M	50	AH45	07	C	PROGRAM MANAGER I	9/11/93	01	SUBSTANCE ABUSE SVCS DIV
	R1	ELLISOR SHARON E	W	F	39	AH45	07	D	PROGRAM MANAGER I	5/4/95	01	CONSTRUCTION ADMINISTRATION
	R1	CRAIG PAMELA R	B	F	54	AH45	07	E	PROGRAM MANAGER I	12/30/95	01	SAFETY/FIRE INSPECTIONS DIVISION
		TOTAL POSITIONS ELIMINATED 1										
		SMITH ALBERT R	W	M	54	AJ45	06	E	INFO RESOURCE CONSULT II	5/9/86	01	NETWORK & TELE COMM
1		HOOKER SR GARY A	W	M	54	AJ45	06	E	INFO RESOURCE CONSULT II	6/5/93	01	NETWORK & TELE COMM
		BOVE FRED C	W	M	33	AJ45	06	B	INFO RESOURCE CONSULT II	4/3/98	01	NETWORK & TELE COMM
3		STOTTS DARRELL J	W	M	48	AJ45	06	B	INFO RESOURCE CONSULT II	5/7/02	01	CORRECTIONAL INDUSTRIES
		TOTAL POSITIONS ELIMINATED 1										
		STEVENS KAREN L.	W	F	43	AJ40	04	A	COMPUTER OPERATOR II	2/8/91	01	SYSTEMS OPER & SUPPORT
		ANDERSON SHIRLEY W	B	M	59	AJ40	04	A	COMPUTER OPERATOR II	6/20/92	01	SYSTEM OPER & SUPPORT
13		JOHNSON RICHMOND A	B	M	53	AJ40	04	A	COMPUTER OPERATOR II	3/22/98	01	SYSTEM OPER & SUPPORT
		TOTAL POSITIONS ELIMINATED 1										
13		ROBINSON KAY	B	F	37	BC30	06	D	PUBLIC INFOR DIR I	10/16/98	01	OFF OF COMMUNICATIONS
		TOTAL POSITIONS ELIMINATED 1										
13		BATES LEE CHERYL A	B	F	44	BC50	08	A	DIR INFORMATION SVCS	7/16/93	01	OFF OF COMMUNICATIONS
		TOTAL POSITIONS ELIMINATED 1										
		SUMMERS JOHN W	B	M	52	EB52	09	A	DENTIST	3/11/80	01	BROAD RIVER CORRECTIONAL INSTITUTION
		GILLIAM MEDRINA J	B	F	43	EB52	09	C	DENTIST	5/13/89	01	DEPUTY DIR FOR MED & PROF HEALTH SERV
		MCPHERSON DOUGLAS W	W	M	49	EB52	09	A	DENTIST	3/13/92	01	KIRKLAND CORRECTIONAL INSTITUTION
		MINCER EUGENE	B	M	54	EB52	09	A	DENTIST	3/8/95	01	DIV OF MEDICAL & PROF HEALTH SVCS
13		STEIN SAUNDRA G	W	F	48	EB52	09	A	DENTIST	5/24/96	01	CAMILLE GRAHAM
		TOTAL POSITIONS ELIMINATED 1										
		ROBINSON HESTER	B	F	53	EC10	02	C	MED ASST TECH I	4/20/79	01	BROAD RIVER CORR INST
		GILYARD JEAN F	B	F	54	EC10	02	C	MED ASST TECH I	6/15/79	01	CAMILLE GRAHAM CORR. INST
		WRIGHT MARGARET	B	F	43	EC10	02	C	MED ASST TECH I	2/1/98	01	KIRKLAND CORR INST
13		IRVIN MILLICENT M	B	F	32	EC10	02	C	MED ASST TECH I	5/15/98	01	DIV OF MED & PROF SVCS
	R2	BENDER MARY	B	F	38	EC10	02	C	MED ASST TECH I	9/2/98	01	CAMILLE GRAHAM CORR INST
	R2	EVANS KATRINA L	B	F	35	EC10	02	C	MED ASST TECH I	9/17/00	01	BEHAVIORAL MEDICINE DIVISION
	R2	ROBINSON LOLITTA V	B	F	27	EC10	02	C	MED ASST TECH I	2/20/01	01	KIRKLAND CORR INST
	R2	RICHARDSON KATHLEE	B	F	48	EC10	02	C	MED ASST TECH I	8/17/01	01	CAMILLE GRAHAM CORR INST
	P R2	IJAJA MARY L	B	F	45	EC10	02	C	MED ASST TECH I	6/3/02	01	KIRKLAND CORR. INST
	P R2	TINNEL, JOYCE E	W	F	54	EC10	02	C	MED ASST TECH I	7/22/02	01	KIRKLAND CORR INST
	P R2	GILL, YOLANDO	B	F	41	EC10	02	C	MED ASST TECH I	8/12/02	01	KIRKLAND CORR INST
	P R2	HICKS ANGELA J	B	F	29	EC10	02	C	MED ASST TECH I	9/1/02	01	KIRKLAND CORR INST
	P R2	GARDENER PATRICIA	B	F	37	EC10	02	C	MED ASST TECH I	12/23/02	01	CAMILLE GRAHAM CORR INST
		TOTAL POSITIONS ELIMINATED 1										

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L J A O S B S	B A N D	L E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		DUCK, MARGARET H	W	F	58	EC25	05	A	TECHNICAL MEDICAL ASSOS II	10/7/94	01	DIV OF MED & PROF SVCS
13		TINDER MELISSA G	W	F	35	EC25	05	A	TECHNICAL MEDICAL ASSOS II	2/14/99	01	DIV OF MED & PROF SVCS
		TOTAL POSITIONS ELIMINATED 1										
		WILSON ANNIE S	B	F	54	GA40	04	E	HUMAN SERVICES SPEC II	5/30/75	01	GOODMAN CORRECTIONAL INSTITUTION
		JOHNSON ARLENE	B	F	49	GA40	04	C	HUMAN SERVICES SPEC II	1/30/76	01	GOODMAN CORRECTIONAL INSTITUTION
		WRIGHT RICHARD L	W	M	57	GA40	04	C	HUMAN SERVICES SPEC II	5/16/80	01	CAMPBELL PRE RELEASE CENTER
		HARRELL DONALD B	B	M	41	GA40	04	B	HUMAN SERVICES SPEC II	5/29/82	01	WATKINS PRE RELEASE CENTER
		WALTZ DONALD R	W	M	36	GA40	04	A	HUMAN SERVICES SPEC II	8/24/85	01	DIV OF CLASSIFICATION & INMATE RECORD
		MCKIE KENNETH	B	M	44	GA40	04	C	HUMAN SERVICES SPEC II	9/14/85	01	WATKINS PRE RELEASE CENTER
		JEFFERSON JANIE E M	B	F	59	GA40	04	B	HUMAN SERVICES SPEC II	10/30/87	01	WATKINS PRE RELEASE CENTER
		THOMAS BETTY JEAN	B	F	48	GA40	04	A	HUMAN SERVICES SPEC II	12/8/89	01	DIV OF CLASSIFICATION & INMATE RECORD
		RIDGES ANTHONY R	B	M	33	GA40	04	A	HUMAN SERVICES SPEC II	8/7/92	01	DIV OF CLASSIFICATION & INMATE RECORD
		ROGERS CHARLES E	W	M	46	GA40	04	A	HUMAN SERVICES SPEC II	4/17/93	01	DIV OF CLASSIFICATION & INMATE RECORD
		JONES VALERIE C	B	F	40	GA40	04	A	HUMAN SERVICES SPEC II	4/20/97	01	DIV OF CLASSIFICATION & INMATE RECORD
1		GEDDIS VALETA A	B	F	31	GA40	04	B	HUMAN SERVICES SPEC II	6/17/97	01	GOODMAN CORR. INST
		ARMSTRONG JEROME K	B	M	46	GA40	04	A	HUMAN SERVICES SPEC II	7/19/97	01	DIV OF CLASSIFICATION & INMATE RECORD
		PRATT ANNIE M	B	F	49	GA40	04	C	HUMAN SERVICES SPEC II	11/8/97	01	GOODMAN CORRECTIONAL INSTITUTION
		NICKS TRICIA A	W	F	33	GA40	04	E	HUMAN SERVICES SPEC II	11/13/98	01	GOODMAN CORRECTIONAL INSTITUTION
	P	MCKNIGHT ALICIA D	B	F	36	GA40	04	A	HUMAN SERVICES SPEC II	7/29/02	01	BEHAVIORAL MEDICINE DIVISION
3	P	CARAWAY MARY E	B	F	30	GA40	04	A	HUMAN SERVICES SPEC II	8/26/02	01	BEHAVIORAL MEDICINE DIVISION
		TOTAL POSITIONS ELIMINATED 1										
		SHAW ERNEST	B	M	52	GA60	06	D	HUMAN SERVICES COORD II	5/3/73	01	BEHAVIORAL MEDICINE DIVISION
		WEEKS REAVER MAE	B	F	50	GA60	06	A	HUMAN SERVICES COORD II	4/13/79	01	STEVENSON CORRECTIONAL INSTITUTION
		MCMILLAN ALTON L	B	M	55	GA60	06	B	HUMAN SERVICES COORD II	5/6/83	01	BEHAVIORAL MEDICINE DIVISION
		WALTON GEORGE L	B	M	47	GA60	06	B	HUMAN SERVICES COORD II	2/3/84	01	BROAD RIVER CORRECTIONAL INSTITUTION
		MICKENS BRENDA G	B	F	51	GA60	06	D	HUMAN SERVICES COORD II	1/5/85	01	BEHAVIORAL MEDICINE DIVISION
		OBERMAN BRUCE H	W	M	42	GA60	06	B	HUMAN SERVICES COORD II	6/2/85	01	BEHAVIORAL MEDICINE DIVISION
		HASTY BARBARA A	W	F	54	GA60	06	C	HUMAN SERVICES COORD II	8/28/85	01	BROAD RIVER CORRECTIONAL INSTITUTION
		MOORE KEVIN	B	M	44	GA60	06	B	HUMAN SERVICES COORD II	10/1/88	01	KIRKLAND CORRECTIONAL INSTITUTION
		DWYER ANN M	W	F	39	GA60	06	D	HUMAN SERVICES COORD II	11/2/90	01	BEHAVIORAL MEDICINE DIVISION
		SMITH SARAH A	B	F	60	GA60	06	B	HUMAN SERVICES COORD II	2/21/93	01	BEHAVIORAL MEDICINE DIVISION
1		SHATTUCK ROBERT W	W	M	58	GA60	06	B	HUMAN SERVICES COORD II	7/10/93	01	SUBSTANCE ABUSE SVCS DIV
		RYDER GARY H	W	M	55	GA60	06	B	HUMAN SERVICES COORD II	8/7/93	01	BEHAVIORAL MEDICINE DIVISION
		FLOWERS STANLEY R	B	M	42	GA60	06	B	HUMAN SERVICES COORD II	4/22/94	01	STEVENSON CORRECTIONAL INSTITUTION
		ELLER MARGARET D	W	F	47	GA60	06	C	HUMAN SERVICES COORD II	1/27/96	01	DIVISION OF INMATE SERVICES
		MYERS KENNETH E SR	B	M	49	GA60	06	B	HUMAN SERVICES COORD II	2/2/96	01	KIRKLAND CORRECTIONAL INSTITUTION
		ADEDOKUN DORCAS I	B	F	52	GA60	06	B	HUMAN SERVICES COORD II	4/19/96	01	GOODMAN CORRECTIONAL INSTITUTION
		HOLMES WILLIE B	B	M	54	GA60	06	A	HUMAN SERVICES COORD II	3/21/97	01	WATKINS PRE RELEASE CENTER
2		GORDON STEPHANIE T	B	F	40	GA60	06	B	HUMAN SERVICES COORD II	10/25/97	01	CAMILLE GRAHAM CORRECTIONAL INST
		JAMES THOMAS E	B	M	55	GA50	05	D	HUMAN SERVICES COORD I	6/30/73	01	BROAD RIVER CORRECTIONAL INSTITUTION
		PRICE CHRISTINE H	A	F	53	GA50	05	D	HUMAN SERVICES COORD I	9/6/75	01	CAMILLE GRAHAM CORRECTIONAL INST
		CANTEY JR LAWRENCE	B	M	45	GA50	05	E	HUMAN SERVICES COORD I	3/10/77	01	BROAD RIVER CORRECTIONAL INSTITUTION
		WADFORD PAMELLA	W	F	43	GA50	05	E	HUMAN SERVICES COORD I	5/29/81	01	BEHAVIORAL MEDICINE DIVISION
		MONTGOMERY ELOUISE J	B	F	46	GA50	05	D	HUMAN SERVICES COORD I	1/8/83	01	MANNING CORRECTIONAL INSTITUTION

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L A S S	B A S E	L E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		DOWNING MARIAN Y	B	F	47	GA50	05	D	HUMAN SERVICES COORD I	6/17/83	01	GOODMAN CORRECTIONAL INSTITUTION
		BOWIE SANDRA S	W	F	49	GA50	05	C	HUMAN SERVICES COORD I	11/17/84	01	INMATE GRIEVANCE BRANCH
		GRAY EDWARD M	B	M	49	GA50	05	D	HUMAN SERVICES COORD I	3/2/85	01	BROAD RIVER CORRECTIONAL INSTITUTION
1		SMITH DENNIS O	B	M	44	GA50	05	D	HUMAN SERVICES COORD I	4/6/85	01	YOUNG OFFENDER DIV
		LAWSON JAMES G	W	M	60	GA50	05	E	HUMAN SERVICES COORD I	4/21/85	01	BEHAVIORAL MEDICINE DIVISION
		BROWN BARBARA A	B	F	52	GA50	05	A	HUMAN SERVICES COORD I	5/18/85	01	GOODMAN CORRECTIONAL INSTITUTION
		SIMMONS III JAMES	B	M	38	GA50	05	C	HUMAN SERVICES COORD I	7/1/85	01	INMATE GRIEVANCE BRANCH
		HANCOCK ROBIN A	B	F	40	GA50	05	A	HUMAN SERVICES COORD I	8/24/85	01	BEHAVIORAL MEDICINE DIVISION
		FAIR PAULETTE G	B	F	46	GA50	05	D	HUMAN SERVICES COORD I	11/16/85	01	BROAD RIVER CORRECTIONAL INSTITUTION
		HOLLIDAY CLYDE	B	M	53	GA50	05	D	HUMAN SERVICES COORD I	4/18/86	01	CAMILLE GRAHAM CORRECTIONAL INST
		SPROTT ESTHER W	W	F	66	GA50	05	C	HUMAN SERVICES COORD I	1/21/89	01	CAMILLE GRAHAM CORRECTIONAL INST
		MARION CELESTINE	B	F	57	GA50	05	D	HUMAN SERVICES COORD I	9/14/90	01	BROAD RIVER CORRECTIONAL INSTITUTION
		BROWN CHERYL L	B	F	33	GA50	05	A	HUMAN SERVICES COORD I	11/11/90	01	GOODMAN CORRECTIONAL INSTITUTION
		DEAS ANGELA M	B	F	32	GA50	05	D	HUMAN SERVICES COORD I	2/8/93	01	STEVENSON CORRECTIONAL INSTITUTION
		NOLES JR L GENE	W	M	34	GA50	05	C	HUMAN SERVICES COORD I	9/25/93	01	INMATE GRIEVANCE BRANCH
		CARTLEDGE LARRY	B	M	34	GA50	05	D	HUMAN SERVICES COORD I	10/23/93	01	BEHAVIORAL MEDICINE DIVISION
		CARTER PATRICK F	B	M	38	GA50	05	D	HUMAN SERVICES COORD I	10/30/93	01	CAMILLE GRAHAM CORRECTIONAL INST
		MCFADDEN JAKE W	B	M	38	GA50	05	D	HUMAN SERVICES COORD I	11/28/93	01	KIRKLAND CORRECTIONAL INSTITUTION
		BIGGER MURREL	B	M	53	GA50	05	A	HUMAN SERVICES COORD I	1/17/94	01	BEHAVIORAL MEDICINE DIVISION
		JONES JR CALVIN	B	M	34	GA50	05	D	HUMAN SERVICES COORD I	10/30/94	01	MANNING CORRECTIONAL INSTITUTION
		HUDSON BEULAH M	B	F	50	GA50	05	D	HUMAN SERVICES COORD I	3/3/95	01	BROAD RIVER CORRECTIONAL INSTITUTION
		ROBERTS TERRELL D	B	M	30	GA50	05	A	HUMAN SERVICES COORD I	5/13/95	01	BEHAVIORAL MEDICINE DIVISION
		RAMSEY RICHARD K	W	M	45	GA50	05	C	HUMAN SERVICES COORD I	7/6/95	01	BROAD RIVER CORRECTIONAL INSTITUTION
		HERRIOTT CHARLISA	B	F	30	GA50	05	D	HUMAN SERVICES COORD I	8/4/95	01	CAMILLE GRAHAM CORRECTIONAL INST
		DRAKE JAMES S	W	M	29	GA50	05	A	HUMAN SERVICES COORD I	1/20/96	01	BEHAVIORAL MEDICINE DIVISION
		DEAS ELIZABETH A	B	F	46	GA50	05	D	HUMAN SERVICES COORD I	4/6/96	01	BROAD RIVER CORRECTIONAL INSTITUTION
		PRIOLEAU BRENDA K	B	F	37	GA50	05	A	HUMAN SERVICES COORD I	4/13/96	01	BROAD RIVER CORRECTIONAL INSTITUTION
		WILLIAMS ELIZABETH G	W	F	56	GA50	05	D	HUMAN SERVICES COORD I	7/6/96	01	BROAD RIVER CORRECTIONAL INSTITUTION
		HARMAN CATHERINE A	W	F	43	GA50	05	C	HUMAN SERVICES COORD I	8/31/96	01	BEHAVIORAL MEDICINE DIVISION
		DENNIS PAUL N	B	M	28	GA50	05	A	HUMAN SERVICES COORD I	12/29/96	01	KIRKLAND CORRECTIONAL INSTITUTION
		HOLLIFIELD DEBORAH R	W	F	40	GA50	05	D	HUMAN SERVICES COORD I	6/7/97	01	BEHAVIORAL MEDICINE DIVISION
		AYCOTH COURTNEY S	W	F	34	GA50	05	D	HUMAN SERVICES COORD I	9/13/97	01	BEHAVIORAL MEDICINE DIVISION
		PEARSON SARAH M	B	F	40	GA50	05	A	HUMAN SERVICES COORD I	12/2/97	01	BEHAVIORAL MEDICINE DIVISION
		NICKENS TRACY M	B	F	35	GA50	05	D	HUMAN SERVICES COORD I	2/28/98	01	KIRKLAND CORRECTIONAL INSTITUTION
		DANNELS ROGER E	W	M	55	GA50	05	D	HUMAN SERVICES COORD I	4/5/98	01	BROAD RIVER CORRECTIONAL INSTITUTION
3		GEOHAGHAN ANGELA L	B	F	39	GA50	05	E	HUMAN SERVICES COORD I	5/1/98	01	CAMILLE GRAHAM CORRECTIONAL INST
3		SIMS QUANDA D	B	F	34	GA50	05	D	HUMAN SERVICES COORD I	8/28/98	01	KIRKLAND CORRECTIONAL INSTITUTION
13		JACKSON TAMALA J	B	F	35	GA50	05	A	HUMAN SERVICES COORD I	1/16/99	01	SUBSTANCE ABUSE SVCS DIV
		TOTAL POSITIONS ELIMINATED 3										
13		WHITTLETON CELESTINE	B	F	50	JA80	04	E	INSPECTOR II	6/1/80	01	KIRKLAND CORR INST
13		BUIE, JANE	W	F	50	JA80	04	E	INSPECTOR II	1/19/85	01	GOODMAN CORR INST
13		PERRY KELVIN A	B	M	34	JA80	04	E	INSPECTOR II	6/24/89	01	STEVENSON CORR INST
13		GARRELL, DEBORAH G	W	F	44	JA80	04	D	INSPECTOR II	4/14/91	01	CAMPBELL
13		COX LORIE T	W	F	40	JA80	04	D	INSPECTOR II	12/16/94	01	WATKINS PRE RELEASE CTR
13		BRINSON WILLIE E	W	M	54	JA80	04	E	INSPECTOR II	12/14/96	01	MANNING CORR INST
		TOTAL POSITIONS ELIMINATED 6										

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L J A O S B S	B A N D	L E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
1		THOMAS LAVENIA P	B	F	52	UB02			CERTIFIED TEACHER M	7/2/73	01	BROAD RIVER
		HUDSON PATRICIA G	B	F	51	UB02			CERTIFIED TEACHER GA	9/18/76	01	CAMILLE GRAHAM
1		MYERS MARIAM L	B	F	54	UB02			CERTIFIED TEACHER GA	9/18/76	01	GOODMAN CORR INST
1		LAKIN YVETTE	B	F	41	UB02			CERTIFIED TEACHER GA	6/3/83	01	BROAD RIVER
1		GREEN L. S	W	F	53	UB02			CERTIFIED TEACHER MS	8/27/85	01	MANNING CORR INST
3		WILLIAMS CAROL C	W	F	50	UB02			CERTIFIED TEACHER MS	2/1/86	01	CAMILLE GRAHAM
1	R4	SMITH TALMADGE A	B	M	50	UB02			CERTIFIED TEACHER GA	3/14/86	01	MANNING CORR INST
1 3		CROXTON JEANNIE B	W	F	56	UB02			CERTIFIED TEACHER GA	5/16/86	01	MANNING CORR INST
3		RHOTEN BRENDA L	W	F	59	UB02			CERTIFIED TEACHER GA	11/8/86	01	GOODMAN CORR INST
3		MULLIS SUSAN D	W	F	54	UB02			CERTIFIED TEACHER GA	6/8/90	01	EDUCATIONAL SERVICES
1 3		GLENN NANCY B	W	F	52	UB02			CERTIFIED TEACHER MS	8/10/90	01	STEVENSON CORR INST
3		WILLIAMS MAGGIE L	B	F	65	UB02			CERTIFIED TEACHER GA	1/31/92	01	CAMILLE GRAHAM
1	R4	RUGER ROSE M	B	F	46	UB02			CERTIFIED TEACHER M	10/31/92	01	MANNING CORR INST
3		NEWMAN JR JAMES H	W	M	57	UB02			CERTIFIED TEACHER M	12/9/94	01	CAMILLE GRAHAM
3		BROWN GWYNEEDA	B	F	59	UB02			CERTIFIED TEACHER GA	10/13/95	01	STEVENSON CORR INST
1 3		MARTIN GENEVA M	W	F	59	UB02			CERTIFIED TEACHER GA	11/3/95	01	BROAD RIVER
1 3		MCMILLAN EUGENE M	B	M	51	UB02			CERTIFIED TEACHER GA	5/25/96	01	WALDEN CORR. INST
		TOTAL POSITIONS ELIMINATED 10										
		RITCHIE GERALD B	W	M	58	UB04			VOCATIONAL TEACHER VW	3/19/77	01	CAMILLE GRAHAM
1 3		KING CARROLL B	W	M	65	UB04			VOCATIONAL TEACHER VH	10/24/81	01	MANNING CORR INST
1 3		PHILLIPS THERON M	W	M	48	UB04			VOCATIONAL TEACHER VC	11/14/81	01	WALDEN CORR INST
	R4	ROSE CAREN M	B	F	51	UB04			VOCATIONAL TEACHER VO	1/16/86	01	CAMILLE GRAHAM
1 3		DITTMAR WILLIAM R	W	M	53	UB04			VOCATIONAL TEACHER VA	8/28/87	01	BROAD RIVER
1 3		MCCLANAHAN BEVERLY M	W	F	59	UB04			VOCATIONAL TEACHER VH	12/3/88	01	BROAD RIVER
1 3		SHARPE EDWARD L	W	M	61	UB04			VOCATIONAL TEACHER VA	1/11/91	01	WATKINS PRE RELEASE CTR
1 3		DORSEY JAMES R	B	M	55	UB04			VOCATIONAL TEACHER VM	9/13/98	01	MANNING CORR INST
		TOTAL POSITIONS ELIMINATED 6										
1		VENNING JACQUELINE L	B	F	54	UB06			GUIDANCE COUNSELOR G	8/10/84	01	MANNING CORR INST
		BAILEY ELLEN S	W	F	50	UB06			GUIDANCE COUNSELOR G	10/31/85	01	STEVENSON CORR INST
3		ABRAHAM GERALDINE	B	F	43	UB06			GUIDANCE COUNSELOR G	9/19/86	01	CAMILLE GRAHAM
		TOTAL POSITIONS ELIMINATED 1										
		BLANTON WENDELL J	W	M	59	UB09			SUPT OF EDUCATION	10/18/68	01	EDUCATIONAL SERVICES
1 3		LABREW DELORIS	B	F	53	UE07			ACADEMIC PROGRAM MANAGER	8/28/70	01	KIRKLAND CORR. INST
1 3		SMITH CAROLYN M	B	F	59	UE07			ACADEMIC PROGRAM MANAGER	2/10/90	01	KIRKLAND CORR INST
	R3	SHARPE HOYT R	W	M	62	UE07			ACADEMIC PROGRAM MANAGER	1/16/92	01	EDUCATIONAL SERVICES
	R3	JACKSON KATHY C	W	F	49	UE07			ACADEMIC PROGRAM MANAGER	6/5/92	01	EDUCATIONAL SERVICES
	R3	WICKER TOMMIE E	W	F	58	UE07			ACADEMIC PROGRAM MANAGER	5/6/2002	01	EDUCATIONAL SERVICES
1 3		VINSON III WILLIAM D	W	M	53	UB07			PRINCIPAL	12/11/70	01	MANNING CORR INST
		TOTAL POSITIONS ELIMINATED 3										

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L J O B S	B A N D	L E V L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		COMPETITIVE AREA 02										
		BLACK JR RAY	W	M	41	AA50	03	A	ADMIN SPECIALIST II	4/23/88	02	PALMER PRE-RELEASE CENTER
		ALFORD SHARON E	B	F	54	AA50	03	C	ADMIN SPECIALIST II	2/20/89	02	TURBEVILLE CORRECTIONAL INSTITUTION
		MONTGOMERY ROBIN	B	F	45	AA50	03	C	ADMIN SPECIALIST II	6/17/89	02	WATEREE RIVER CORRECTIONAL INSTITUTION
		GILL VENETTA J	B	F	42	AA50	03	C	ADMIN SPECIALIST II	9/27/90	02	LEE CORRECTIONAL INSTITUTION
		HARRIS SANDRA K	W	F	51	AA50	03	D	ADMIN SPECIALIST II	12/13/90	02	LEE CORRECTIONAL INSTITUTION
		MURPHY MARY A	B	F	38	AA50	03	A	ADMIN SPECIALIST II	12/13/91	02	LEE CORRECTIONAL INSTITUTION
		WINTERS ANGELA M	B	F	35	AA50	03	A	ADMIN SPECIALIST II	10/24/92	02	LEE CORRECTIONAL INSTITUTION
		WASHINGTON LISA S	B	F	29	AA50	03	A	ADMIN SPECIALIST II	1/16/93	02	TURBEVILLE CORRECTIONAL INSTITUTION
		HILTON ROSA M	B	F	38	AA50	03	A	ADMIN SPECIALIST II	4/22/94	02	LEE CORRECTIONAL INSTITUTION
		FORD LORETTA W	B	F	44	AA50	03	A	ADMIN SPECIALIST II	7/21/95	02	LEE CORRECTIONAL INSTITUTION
		BENNETT BETTY A	B	F	43	AA50	03	A	ADMIN SPECIALIST II	10/1/95	02	TURBEVILLE CORRECTIONAL INSTITUTION
		MELTON JANICE S	W	F	54	AA50	03	A	ADMIN SPECIALIST II	1/5/96	02	LEE CORRECTIONAL INSTITUTION
		WILLIAMSON GLENDA F	W	F	53	AA50	03	E	ADMIN SPECIALIST II	6/1/96	02	LEE CORRECTIONAL INSTITUTION
		BRADLEY TREVA R	B	F	32	AA50	03	A	ADMIN SPECIALIST II	11/9/96	02	TURBEVILLE CORRECTIONAL INSTITUTION
		COKER SAMANTHA M	W	F	26	AA50	03	A	ADMIN SPECIALIST II	11/16/96	02	TURBEVILLE CORRECTIONAL INSTITUTION
		WELCH CINDY Y	W	F	39	AA50	03	A	ADMIN SPECIALIST II	3/22/97	02	TURBEVILLE CORRECTIONAL INSTITUTION
		MOORE LUVIVIAN	B	F	47	AA50	03	C	ADMIN SPECIALIST II	4/3/97	02	LEE CORRECTIONAL INSTITUTION
		AUSTIN KIMBERLY H	W	F	29	AA50	03	A	ADMIN SPECIALIST II	4/25/97	02	WATEREE RIVER CORRECTIONAL INSTITUTION
		BOONE SANDRA L	W	F	41	AA50	03	A	ADMIN SPECIALIST II	12/6/97	02	LEE CORRECTIONAL INSTITUTION
		BRACEY SIMON SANDRA	B	F	42	AA50	03	A	ADMIN SPECIALIST II	1/5/98	02	LEE CORRECTIONAL INSTITUTION
		BROWN BEATRICE T	B	F	53	AA50	03	A	ADMIN SPECIALIST II	2/12/98	02	WATEREE RIVER CORRECTIONAL INSTITUTION
1		TIMMONS MARY L	W	F	65	AA50	03	A	ADMIN SPECIALIST II	9/11/98	02	LEE CORR INST
3		JOHNSON LESIA M	B	F	33	AA50	03	A	ADMIN SPECIALIST II	2/21/99	02	LEE CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
1 3		HAYES ROBIN P	W	F	39	JA80	04	E	INSPECTOR II	9/26/86	02	LEE CORR INST
1 3		BROOKS EARTHA	B	F	42	JA80	04	E	INSPECTOR II	7/12/91	02	WATEREE RIVER CORR INST
1 3		SILJAK, KAREN L	W	F	41	JA80	04	E	INSPECTOR II	8/28/93	02	TURBEVILLE CORR INST
		TOTAL POSITIONS ELIMINATED 3										
		EDDINGS JOHN B	W	M	51	UB04			VOCATIONAL TEACHER V P	6/4/82	02	TURBEVILLE CORR INST
		STOKES BOYD E	W	M	48	UB04			VOCATIONAL TEACHER VC	8/16/91	02	LEE CORR INST
		ROGERS LEONARD P	W	M	60	UB04			VOCATIONAL TEACHER VC	7/17/93	02	TURBEVILLE CORR INST
		STOKES ROGER D	W	M	52	UB04			VOCATIONAL TEACHER VEL	1/1/94	02	LEE CORR INST
1 3		CORBETT JAMES L	W	M	56	UB04			VOCATIONAL TEACHER VHO	1/29/94	02	WATEREE RIVER CORR INST
1 3		BETTENCOURT ANTHONY M	W	M	39	UB04			VOCATIONAL TEACHER VHM	9/29/95	02	WATEREE RIVER CORR INST
1 3		DELOE DAVID D	W	M	44	UB04			VOCATIONAL TEACHER VW	1/5/96	02	LEE CORR INST
	R4	CAMPBELL ROBERT J	B	M	48	UB04			VOCATIONAL TEACHER VM	8/7/98	02	TURBEVILLE CORR INST
		TOTAL POSITIONS ELIMINATED 3										
1		PIERSON RUTH A	W	F	64	UB06			GUIDANCE COUNSELOR G	8/23/74	02	LEE CORR INST
3		NEWSOME MICHAEL R	W	M	51	UB06			GUIDANCE COUNSELOR G	6/8/96	02	TURBEVILLE CORR INST
		TOTAL POSITIONS ELIMINATED 1										
		BAGNAL HENRY T	W	M	53	UB07			PRINCIPAL	7/18/92	02	TURBEVILLE CORR INST
1 3		HAYNESWORTH ALBERTHA L	B	F	55	UB07			PRINCIPAL	9/11/93	02	WATEREE RIVER CORR INST
		TOTAL POSITIONS ELIMINATED 1										

POSITIONS BEING ELIMINATED AND EMPLOYEES AFFECTED

R I F 123		EMPLOYEE NAME	RACE	SEX	AGE	CLASS JOB	CLASS GRADE	CLASS LEVEL	CLASSIFICATION TITLE	RIF SVC DATE	CAREER PAY	LOCATION
		COMPETITIVE AREA 03										
		NONE IN THIS AREA										
		COMPETITIVE AREA 04										
		SKIPPER SUE H	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT	3/21/85	04	EVANS CORRECTIONAL INSTITUTION
		STUART PATRICIA A	W	F	56	AA75	04	D	ADMINISTRATIVE ASSISTANT	2/21/88	04	EVANS CORRECTIONAL INSTITUTION
		HASTY ANTONIO R	B	M	40	AA75	04	C	ADMINISTRATIVE ASSISTANT	11/12/94	04	EVANS CORRECTIONAL INSTITUTION
		JOHNSON TERRELL S	W	M	44	AA75	04	D	ADMINISTRATIVE ASSISTANT	10/21/95	04	EVANS CORRECTIONAL INSTITUTION
		SPRATTLING NATASHA C	B	F	36	AA75	04	D	ADMINISTRATIVE ASSISTANT	2/4/96	04	EVANS CORRECTIONAL INSTITUTION
1 3		MULLINS SHARON D	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT	10/17/98	04	EVANS CORR INST
		TOTAL POSITIONS ELIMINATED 1										
1 3		HENDLEY JAMES T	W	M	60	CD20	04	C	LIBRARY SPECIALIST	6/2/98	04	EVANS CORR INST
		TOTAL POSITIONS ELIMINATED 1										
1 3		MADDOX FREDDIE M	W	M	45	JA80	04	E	INSPECTOR II	8/7/86	04	EVANS CORR INST
		TOTAL POSITIONS ELIMINATED 1										
1 3		HUDSON MARY M	B	F	55	UB02			CERTIFIED TEACHER GA	6/6/81	04	EVANS CORR INST
		TOTAL POSITIONS ELIMINATED-1										
1 3		GAINEY JR CECIL B	W	M	46	UB04			VOCATIONAL TEACHER VET	12/11/87	04	EVANS CORR INST
		TOTAL POSITIONS ELIMINATED 1										
1 3		BASS HORACE M	W	M	53	UB07			PRINCIPAL	12/17/88	04	EVANS CORR INST
		TOTAL POSITIONS ELIMINATED 1										
		COMPETITIVE AREA 05										
1 3		FLEMING RENEE	B	F	43	CD20	04	C	LIBRARY SPECIALIST	2/24/95	05	KERSHAW CORR INST
		TOTAL POSITIONS ELIMINATED 1										
1 3		GALLOWAY MARIANNE K	W	F	49	JA80	04	E	INSPECTOR II	3/26/87	05	KERSHAW CORR INST
		TOTAL POSITIONS ELIMINATED 1										
1 3		WOODLIEF PAULA L	W	F	45	UB02			CERTIFIED TEACHER E	11/3/84	05	KERSHAW CORR INST
1 3		BALKCUM CATHY S	W	F	45	UB02			CERTIFIED TEACHER GA	11/17/95	05	KERSHAW CORR INST
1 3		BEATY MARY G	B	F	56	UB02			CERTIFIED TEACHER GA	11/17/95	05	KERSHAW CORR INST
1 3		BAKER JAMES D	W	M	54	UB02			CERTIFIED TEACHER M	10/4/97	05	KERSHAW CORR INST
		TOTAL POSITIONS ELIMINMATED 4										
1 3		BROWN THOMAS A	W	M	46	UB04			VOCATIONAL TEACHER VM	8/18/95	05	KERSHAW CORR INST
1 3		YOUNG PATRICK C	W	M	52	UB04			VOCATIONAL TEACHER VC	9/8/95	05	KERSHAW CORR INST
		TOTAL POSITIONS ELIMINATED 2										
1 3		FYE MYRTICE J	B	F	59	UB06			GUIDANCE COUNSELOR GA	4/28/95	05	KERSHAW CORR INST
		TOTAL POSITIONS ELIMINATED 1										
		COMPETITIVE AREA 06										
		JENKINS VERA S	B	F	41	AA75	04	D	ADMINISTRATIVE ASSISTANT	3/1/80	06	LIEBER CORRECTIONAL INSTITUTION
1		ROWELL JAMIE L	W	F	39	AA75	04	D	ADMINISTRATIVE ASSISTANT	11/5/84	06	COASTAL OFFICE
		WESTBURY NELDA A	W	F	52	AA75	04	D	ADMINISTRATIVE ASSISTANT	2/2/85	06	LIEBER CORRECTIONAL INSTITUTION
		MORRIS KRISKA C	B	F	45	AA75	04	C	ADMINISTRATIVE ASSISTANT	4/20/85	06	MACDOUGALL CORRECTIONAL INST
		HUNTER SHERI C	W	F	36	AA75	04	A	ADMINISTRATIVE ASSISTANT	10/31/86	06	MACDOUGALL CORRECTIONAL INST
		RODRIGUEZ DEBORAH M	H	F	52	AA75	04	D	ADMINISTRATIVE ASSISTANT	11/28/86	06	COASTAL PRE RELEASE CENTER

R I F 123		EMPLOYEE NAME	RACE	SEX	AGE	CLASS	BAND	LEVEL	CLASSIFICATION TITLE	RIF SVC DATE	CAR MEM PAY	LOCATION
		RAMEY GEORGINA	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT	12/3/88	06	MACDOUGALL CORRECTIONAL INST
		CARRINGTON LISA T	W	F	37	AA75	04	D	ADMINISTRATIVE ASSISTANT	5/28/94	06	LIEBER CORRECTIONAL INSTITUTION
3		CROSBY TAMMY L	W	F	36	AA75	04	A	ADMINISTRATIVE ASSISTANT	12/29/95	06	LIEBER CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
13		HAAS JUDITH M	W	F	47	CB35	03	D	ASSOC TEACHER/CENTER DIR	6/9/84	06	LIEBER CORR INST
		TOTAL POSITIONS ELIMINATED 1										
13		SHEEDY VICTORIA H	W	F	50	JA80	04	E	INSPECTOR II	4/16/87	06	LIEBER CORR INST
13		MYERS LORI C	W	F	36	JA80	04	E	INSPECTOR II	7/24/87	06	MACDOUGALL CORR INST
		TOTAL POSITIONS ELIMINATED 2										
		REID ALMA L	B	F	56	UB02			CERTIFIED TEACHER GA	8/7/77	06	MACDOUGALL CORR INST
1		MARINKO WILLIAM T	W	M	52	UB02			CERTIFIED TEACHER GA	4/22/81	06	LIEBER CORR INST
13		PYATT ADALINE J	B	F	49	UB02			CERTIFIED TEACHER E	8/6/83	06	LIEBER CORR INST
	R4	GREENE ALFONSO	B	M	61	UB02			CERTIFIED TEACHER M	10/6/84	06	MACDOUGALL CORR INST
3		BOWEN WILLIAM S	W	M	33	UB02			CERTIFIED TEACHER GA	3/11/94	06	MACDOUGALL CORR INST
	R4	GRATZER STEVEN C	W	M	54	UB02			CERTIFIED TEACHER MS	9/3/94	06	MACDOUGALL CORR INST
13		BROWN ROBERT C	W	M	36	UB02			CERTIFIED TEACHER GA	9/11/94	06	LIEBER CORR INST
13		TRIPP JERRELYN	W	F	64	UB02			CERTIFIED TEACHER E	11/4/94	06	LIEBER CORR INST
		TOTAL POSITIONS ELIMINATED 4										
		CLARK, JR CLARENCE A	W	M	59	UB04			VOCATIONAL TEACHER VC	11/27/76	06	MACDOUGALL CORR INST
		MORANT JOSEPH	B	M	51	UB04			VOCATIONAL TEACHER- VM	7/17/89	06	MACDOUGALL CORR INST
		HILL JR BOBBY W	W	M	46	UB04			VOCATIONAL TEACHER VAB	10/4/91	06	MACDOUGALL CORR INST
13		WHITE MARK A	W	M	41	UB04			VOCATIONAL TEACHER VC	10/2/98	06	LIEBER CORR INST
		TOTAL POSITIONS ELIMINATED 1										
		COMPETITIVE AREA 07										
13		ENGLISH CRYSTAL S	W	F	47	JA80	04	E	INSPECTOR II	10/10/86	07	ALLENDALE CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
13		BEENKEN RITA A	W	F	53	UB02			CERTIFIED TEACHER E	3/3/96	07	ALLENDALE
13		HAYES JR HARVEY	B	M	59	UB02			CERTIFIED TEACHER GA	4/5/97	07	ALLENDALE
13		BROOKS ELIZABETH	B	F	49	UB02			CERTIFIED TEACHER GA	6/7/97	07	ALLENDALE
		TOTAL POSITIONS ELIMINATED 3										
13		THOMAS DONALD C	W	M	51	UB04			VOCATIONAL TEACHER VC	8/24/91	07	ALLENDALE
13		LAWSON JR JOHN M	W	M	55	UB04			VOCATIONAL TEACHER VAC	3/29/97	07	ALLENDALE
		TOTAL POSITIONS ELIMINATED 2										
13		NEWSOME JOHN D	B	M	58	UB06			GUIDANCE COUNSELOR G	5/18/96	07	ALLENDALE
		TOTAL POSITIONS ELIMINATED 1										
		COMPETITIVE AREA 08										
		NONE IN THIS AREA										
		COMPETITIVE AREA 09										
13		MILLER CONNIE A	W	F	46	JA80	04	D	INSPECTOR II	9/18/92	09	LOWER SAV PRE RELEASE
		TOTAL POSITIONS ELIMINATED 1										

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L A S S	B A D	L E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		COMPETITIVE AREA 10										
13		NEWBY CHERYL	W	F	45	JA80	04	E	INSPECTOR II	11/26/83	10	LEATH CORR INST
13		WILKIE KAREN M	W	F	39	JA80	04	E	INSPECTOR II	4/23/88	10	MCCORMICK CORR INST
		TOTAL POSITIONS ELIMINATED 2										
13		DREYER WILLIAM K	W	M	58	UB02			CERTIFIED TEACHER GA	4/30/82	10	MCCORMICK CORR INST
13		BOXX JR FRANK A	W	M	51	UB02			CERTIFIED TEACHER GA	9/23/89	10	LEATH CORR INST
13		FRITTS RUTH L	W	F	52	UB02			CERTIFIED TEACHER GA	10/7/89	10	LEATH CORR INST
13		CULBREATH BERNETHA L	B	F	42	UB02			CERTIFIED TEACHER GA	2/24/90	10	LEATH CORR INST
13		JONES ELOIS C	B	F	52	UB02			CERTIFIED TEACHER MS	6/8/90	10	LEATH CORR INST
		TOTAL POSITIONS ELIMINATED 5										
13		JEFFERIES JR GRAYSON P	W	M	50	UB04			VOCATIONAL TEACHER VA	10/22/71	10	MCCORMICK CORR INST
13		KING GEORGE R	W	M	52	UB04			VOCATIONAL TEACHER VH	4/8/88	10	LEATH CORR INST
13		DEAL SYLVIA D	W	F	62	UB04			VOCATIONAL TEACHER VS	12/8/89	10	LEATH CORR INST
13		BOWYER KATHERINA W	B	F	51	UB04			VOCATIONAL TEACHER VO	12/21/91	10	LEATH CORR INST
		TOTAL POSITIONS ELIMINATED -4										
13		BRIDGES ANN T	W	F	56	UB06			GUIDANCE COUNSELOR G	9/4/83	10	LEATH CORR INST
13		JONES ETTA J	W	F	59	UB06			GUIDANCE COUNSELOR G	8/24/84	10	MCCORMICK CORR INST
		TOTAL POSITIONS ELIMINATED 2										
13		COBB RANCE C	W	M	53	UB07			PRINCIPAL	3/12/70	10	LEATH CORR INST
		TOTAL POSITIONS ELIMINATED 1										
		COMPETITIVE AREA 11										
1		SNIPES JR CONNIE M	W	M	53	AH15	06	D	ADMINISTRATIVE COORD II	6/2/70	11	APPALACHIAN OFFICE
23		QUINN AVERY R	W	M	60	AH15	06	D	ADMINISTRATIVE COORD II	10/2/93	11	TYGER RIVER CORRECTIONAL INST
		FARMER PAMELA I	W	F	49	AH10	05	C	ADMINISTRATIVE COORD I	10/20/77	11	TYGER RIVER CORRECTIONAL INSTITUTION
		GRAYDON BENNY RAY	W	M	54	AH10	05	E	ADMINISTRATIVE COORD I	3/28/80	11	PERRY CORRECTIONAL INST
		TOTAL POSITIONS ELIMINATED 1										
		DODKIN GEORGE ADRIAN FIK	W	M	48	AH40	06	E	PROGRAM COORDINATOR II	6/30/78	11	NORTHSIDE CORRECTIONAL INSTITUTION
13		FOSTER KAROL J	W	F	54	AH35	05	A	PROGRAM COORDINATOR I	2/8/80	11	APPALACHIAN OFFICE
	R5	BALENTINE OLIN D	W	M	59	AH35	05	C	PROGRAM COORDINATOR I	3/19/81	11	PERRY CORRECTIONAL INSTITUTION
	R5	KINARD APRIL	B	F	40	AH35	05	B	PROGRAM COORDINATOR I	5/29/82	11	TYGER RIVER CORRECTIONAL INSTITUTION
	R5	ALEXANDER CHARLES E	W	M	51	AH35	05	E	PROGRAM COORDINATOR I	11/12/82	11	PERRY CORRECTIONAL INSTITUTION
	R5	JAMESON RON B	W	M	49	AH35	05	B	PROGRAM COORDINATOR I	1/7/83	11	TYGER RIVER CORRECTIONAL INSTITUTION
	R5	CARSON JOHN R	W	M	63	AH35	05	E	PROGRAM COORDINATOR I	12/15/84	11	TYGER RIVER CORRECTIONAL INSTITUTION
	R5	OGUNSILE FELICIA I	B	F	46	AH35	05	B	PROGRAM COORDINATOR I	1/21/89	11	PERRY CORRECTIONAL INSTITUTION
	R5	PARKS JACKIE E	W	M	51	AH35	05	E	PROGRAM COORDINATOR I	1/28/89	11	NORTHSIDE CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
		BROWN CAROLYN D	B	F	41	GA40	04	C	HUMAN SERVICES SPEC II	11/25/83	11	LIVESAY PRE RELEASE CENTER
13		HENLEY ALDEAN	B	M	49	GA40	04	B	HUMAN SERVICES SPEC II	3/8/91	11	PERRY CORR INST
		TOTAL POSITIONS ELIMINATED 1										
13		SWOFFORD MARIE M	W	F	54	JA80	04	E	INSPECTOR II	11/22/79	11	NORTHSIDE CORR INST
13		BLAIR CAROLYN I	W	F	57	JA80	04	E	INSPECTOR II	10/17/97	11	PERRY CORR. INST
		TOTAL POSITIONS ELIMINATED 2										

RIF		EMPLOYEE NAME	RACE	SEX	AGE	CLASS JOB	BAND	LEVEL	CLASSIFICATION TITLE	RIF SVC DATE	CAR ME PA	LOCATION
1		DAVIS RONALD M	W	M	52	UB02			CERTIFIED TEACHER M	6/18/77	11	PERRY CORR INST
1		BRATTON LINDA M	B	F	48	UB02			CERTIFIED TEACHER GA	1/3/82	11	PERRY CORR INST
		AUSTIN DIANE N	W	F	62	UB02			CERTIFIED TEACHER MS	6/4/82	11	TYGER RIVER CORR INST
1		HOWARD EILEEN L	W	F	56	UB02			CERTIFIED TEACHER E	2/1/86	11	PERRY CORR INST
13		BERNARD OTHELLA R	W	F	61	UB02			CERTIFIED TEACHER GA	1/13/90	11	PERRY CORR INST
3		HAYES MARY G	W	F	59	UB02			CERTIFIED TEACHER E	8/28/91	11	TYGER RIVER CORR INST
3		FARR JACQUELINE D	B	F	60	UB02			CERTIFIED TEACHER GA	9/20/92	11	TYGER RIVER CORR INST
13		MCCABE MARY H	W	F	55	UB02			CERTIFIED TEACHER MS	1/30/93	11	PERRY CORR INST
13		WHITE SUSAN C	W	F	55	UB02			CERTIFIED TEACHER GA	7/2/94	11	NORTH SIDE CORR INST
13		WHITE WILLIAM M	W	M	52	UB02			CERTIFIED TEACHER MS	12/8/95	11	TYGER RIVER CORR INST
13		MAILLOUX MARGUERITE J	W	F	51	UB02			CERTIFIED TEACHER E	2/17/97	11	NORTHSIDE CORR INST
3		HOWARD DAVID L	W	M	52	UB02			CERTIFIED TEACHER GA	3/9/97	11	TYGER RIVER CORR INST
		TOTAL POSITIONS ELIMINATED 8										
		WILLIAMS CHARLES L	W	M	54	UB04			VOCATIONAL TEACHER VC	6/4/81	11	TYGER RIVER CORR INST
1		HENDERSON JR ARNOLD	W	M	56	UB04			VOCATIONAL TEACHER VM	1/22/83	11	NORTHSIDE CORR INST
13		FLOYD JOHNNY	B	M	52	UB04			VOCATIONAL TEACHER VM	2/4/83	11	PERRY CORR INST
3		RANDOLPH MAX	W	M	59	UB04			VOCATIONAL TEACHER VM	7/10/86	11	TYGER RIVER CORR INST
13		BELL JAMES C	W	M	50	UB04			VOCATIONAL TEACHER VC	3/21/90	11	PERRY CORR INST
13		LENKER RICHARD E	W	M	52	UB04			VOCATIONAL TEACHER VH	3/3/95	11	PERRY CORR INST
	R4	POOLE MICHAEL T	W	M	32	UB04			VOCATIONAL TEACHER VAC	3/8/96	11	TYGER RIVER CORR INST
	R4	JUSTICE JAMES D	W	M	32	UB04			VOCATIONAL TEACHER VAB	4/20/96	11	TYGER RIVER CORR INST
	R4	PARKS JERRY T	W	M	55	UB04			VOCATIONAL TEACHER VA	1/8/99	11	TYGER RIVER CORR INST
		TOTAL POSITIONS ELIMINATED 4										
		POSITIONS TO BE ELIMINATED - NOT SUBJECT TO RIF POLICY 15 EMPLOYEES										
3	T	Brigman Merle	W	F	65	9999			ADMIN SPECIALIST II	8/19/02	01	EDUCATIONAL SERVICES
3	T	HARRISON KISHA L	B	F	33	9999			LIBRARY ASST	10/18/02	07	ALLENDALE
3	T	GIVENS LESLIE R	B	F	31	9999			ADMIN SPECIALIST II	9/23/02	06	COASTAL PRE RELEASE
3	T	RUDY KENNETH	W	M	56	9999			RECORDS SPECIALIST	8/1/02	01	DIV OF CLASS & INMATE RECDS
3	T	WARD KIMBERLY	W	F	39	9999			RECORDS ANALYST	6/24/02	01	DIV OF CLASS & INMATE RECDS
3	T	PRIOLEAU MARGIE D	B	F	39	9999			ADMIN ASST	12/31/02	06	MACDOUGALL CORR INST
3	T	SEASE JODI B	W	F	30	9999			ADMIN SPECIALIST II	9/10/02	01	TRAINING ADMIN DIV
3	P	CONYERS DANETTE	B	F	25	AA50	03	C	ADMIN SPECIALIST II	12/30/02	01	HUMAN RESOURCES DIV
3	P	FAILE AARON K.	W	M	42	KA30	06	A	BUILDING/GROUNDS MGR	10/7/02	01	MAINTENANCE ADMIN
3	P	DOSS DANNY H	W	M	54	UB02			CERTIFIED TEACHER	12/2/02	10	MCCORMICK CORR INST
3	G	LI MICHAEL S	A	M	40	HD70			ENG/ASSOS ENG III	9/11/00	01	CIV LABOR POOL
3	G	PARNELL GERALDINE	B	F	51	CB30			TEACHER ASSISTANT	1/2/02	05	KERSHAW CORR INST
3	G	THOMSON MARILYN M	W	F	55	AA75			ADMINISTRATIVE ASSISTANT	1/13/03	11	TYGER RIVER CORR INST
3	T	ODOMS GERALDEAN G	B	F	48	9999			COMPUTER LAB MGR	5/13/02	7	TYGER RIVER CORR INST
3	T	PARKS WILLA D	B	F	66	9999			SPECIAL TEACHER	5/22/02	11	ALLENDALE
		TOTAL EMPLOYEES RIF 148										
		1 RIF EMPLOYEE										
		2 EMPLOYEE SUBJECT TO BUMPING										
		3 EMPLOYEE SUBJECT TO POSSIBLE LAYOFF										

						C		L				
R			R			L	B	E			C A	
I			A	S	A	J A	A	V		RIF	O R	
F		EMPLOYEE	C	E	G	O S	N	E	CLASSIFICATION	SVC	M E	
123		NAME	E	X	E	B S	D	L	TITLE	DATE	P A	LOCATION
	P	PROBATIONARY EMPLOYEE										
	T	TEMPORARY EMPLOYEE										
	G	TEMPORARY GRANT EMPLOYEE										
		R1 R5 NOT RETAINED DUE TO NECESSARY QUALIFICATIONS SEE SECTION V OF RIF PLAN										
		KEY CODE EDUCATION TEACHERS (UB02 UB04 UB05				**UB06)**						
		MS MEDIA SPECIALIST							VET-ELECTRONIC			
		G-GUIDANCE							VM-MASONRY			
		E ENGLISH							VA AUTO MECHANICS			
		M MATH							VH HORTICULTURE			
		SE SPECIAL EDUCATION							VAC HEATING/AIR CONDITIONING			
		GA GENERAL ACADEMIC							VAB AUTO BODY REPAIR/FENDER			
		VW WELDING							VHM-HEAVY EQUIP MECHANIC			
		VC CARPENTRY							VHO HEAVEY EQUIP OPERATOR			
		VP-PLUMBING							VAR APPLIANCE REPAIR			
		VEL ELECTRICIAN							VS SEWING			
									VO OFFICE OCCUPATIONS			

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

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EXECUTIVE DIRECTOR

March 28, 2003

Mr. John Near
Director of Human Resources Management
South Carolina Department of Corrections (SCDC)
4444 Broad River Road
Post Office Box 21787
Columbia, South Carolina 29221-1787

Dear Mr. Near

Your reduction-in-force (RIF) plan for the Department of Corrections' (SCDC) eleven (11) competitive areas has been reviewed. As part of the plan, we reviewed the following components: the plan, the competitive areas diagram, the listing of competitive job classifications and job classification series, the "Listing of Positions Being Eliminated and the Employees Eligible for Bumping in Each Competitive Area", and the sample letter to employees in positions being eliminated. In light of your assessment that the Department's current organizational charts may not be completely up-to-date, we understand that the "Listing" includes all employees in each competitive area and each competitive class and class series included in the reduction in force plan. We used this information to conduct our review.

Based on the information you submitted, it appears that the plan is procedurally correct. The Office of Human Resources' approval of the procedural correctness indicates only that the required elements of the RIF plan are present and in accordance with the Department's RIF Policy/Procedure. Our approval does not include the determination of the geographic locations in the competitive areas, competitive classes, competitive class series, bumping rights, the positions to be eliminated, or any exceptions included in the plan, since these are solely the responsibility of SCDC management. Justification for any exception should be retained by the Department.

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name _____

Employee Signature S/_____

Date _____

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by _____ on _____
(Name) (Date)
and that I must make my selection and return this form within two (2) working days on _____ If I fail to return this form within the time required, I agree to automatically
(Date)
waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

____ (initial) I elect to bump into a filled or vacant position

____ (initial) I elect layoff

_____ _____
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ _____
(Position Title) (Position #)
in the area of _____ to be effective _____
I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of _____ _____
(Position Title) (Position #)
in the area of _____ As a result, I agree that the effective date of my layoff will be close of business _____

_____ _____ _____ _____
(Employee Signature) (Date) (HR Representative's Signature) (Date)

Health Care and Dental Coverage Health Care Coverage will end on the last day of the month in which you cease employment Any dependent coverage will end on the date your coverage ends You and your eligible dependents may be eligible for continuation of coverage under COBRA for a limited time To continue coverage under COBRA, a Notice of Election (NOE) form, along with the required premium, must be completed and returned to the Office of Insurance Services within 60 days of the loss of coverage or notification of the right to continue coverage, whichever is later

Life Insurance and Long Term Disability Coverage Coverage for all group life insurance, optional life insurance, dependent life insurance, and supplemental and long term disability will end on the last day of the month in which you cease employment You may apply for conversion to an individual policy by making application within 31 days of the date your coverage ceases for all of the above by contacting the SCDC Benefits Branch or the Office of Insurance Services

Grievances A covered employee who is affected by a Reduction-In-Force has the right to grieve through the Agency grievance process and appeal to the State grievance process only if the grievance is based upon inconsistent or improper application of any portion of the Agency's Reduction-In-Force Policy/Procedure or Plan

Again, I deeply regret the necessity of this action I am hopeful that while this Reduction-In-Force process was necessary, you will be able to be placed within our Agency and recalled or reinstated in order to continue employment with the State of South Carolina.

Sincerely,

Jon E Ozmint

(Third) You (or the bumped employee with the lowest RIF Service Date) must next be reassigned or demoted into a vacant position in the competitive area of the same pay band, pay level or lower, provided the agency is actively recruiting to fill the vacancy, and you meet the state and SCDC minimum training & experience requirements

If you elect to bump into another position, your annual salary may be reduced (State Office of Human Resources Regulation 19-719, revised March 4, 2003) to a salary either between 0% - 15% below your current salary or between your current salary and the midpoint of the lower pay band

Recall and Reinstatement Rights Should you be laid off, reassigned, or demoted to another position with a lower pay band or pay level, you will have recall rights for a period of one year from the effective date of the layoff (June 1, 2004) When a vacancy occurs in the competitive area which is the same job classification, pay band, and pay level or lower, that you occupied at the time of the layoff, you will be offered the vacancy in inverse order of RIF Service Date, provided you meet the minimum training and experience requirements The position must be accepted within two (2) working days of the offer, or you will waive any future recall rights You may apply for other positions with a lower pay band and pay level during the recall period, and if selected, will still retain your recall rights Probationary employees will not have recall or reinstatement rights

You may apply for any SCDC or other state job for which you meet the minimum training and experience requirements If you accept a position with a lower pay band than the one from which you were separated, you will retain recall rights to a position in the same job classification in the competitive area

Moving If you relocate to another geographic area, you may request to be considered for positions in your same job classification title in the new competitive area. You must notify the Division of Human Resources of your new address in writing and willingness to be recalled in another area.

Status Upon your move into an established position (either as a result of bumping or reinstatement), you will be given either Trial or Covered status in the job classification in accordance with state and agency guidelines

Sick Leave, Annual leave, and Holidays If you are laid off, you will be paid for your unused annual leave up to a maximum of forty-five (45) days You will forfeit any unused sick leave If you are recalled or reinstated within one (1) year, you will be eligible to have all sick leave reinstated that was forfeited at the time of your layoff Non-exempt employees will be paid for any accrued holiday compensatory time, exempt employees will forfeit any accrued holiday compensatory time Upon recall or reinstatement you may buy back all, some, or none of your annual leave

Competitive Job Classification Series

AA25, AA50 – (Pay Bands 2-3) - Administrative Specialist I & II
AD01, AD03 – (Pay Bands 3-4) - Fiscal Technician I & II
AD05, AD08, AD10, AD12 – (Pay Bands 3-4-5-6) - Auditor I, II, III, IV
AD15, AD18 – (Pay Bands 7-8) – Audits Manager I & II
AH10, AH15 – (Pay Bands 5-6) - Administrative Coordinator I & II
AH35, AH40 – (Pay Bands 5-6) - Program Coordinator I & II
CB30, CB35 – (Pay Bands 2-3) - Teacher Assistant, Teacher/Center Director
GA50, GA60 – (Pay Bands 5-6) - Human Services Coordinator I & II
UB09, UE07, UB07– Superintendent, Academic Program Manager, Principal

RIF Service Date A Reduction-In-Force Service Date has been established to be used as the basis for bumping, laying off, or recalling an employee The RIF Service Date is established by combining your continuous state service date with additional credit for job performance on each of your last two scheduled EPMS performance evaluation ratings (Below = 0 months, Meets = 6 months, Exceeds = 12 months, Substantially Exceeds = 18 months)

Bumping Rights Following your meeting with a representative from the Division of Human Resources, within two (2) working days, you must elect layoff, or to exercise your bumping rights based upon your RIF Service Date Failure to provide written notification of your decision to the Division of Human Resources within two (2) working days will automatically waive your bumping rights If you elect to exercise your bumping rights and fail to attend a scheduled meeting, a subsequent meeting will be rescheduled after other employees with a lower RIF Service date have been contacted Should you elect to exercise your bumping rights, a summary of the process identified in the Reduction-In-Force Policy will be conducted as follows

(First) If your Job Classification is in one of the designated Competitive Job Classification Series identified above, you may be eligible to bump into the position occupied by the employee with the lowest RIF Service Date in your same Job Classification and pay band with the same or lower pay level, provided you meet the state and SCDC minimum training & experience requirements The bumped employee may then bump into the position occupied by the employee with the lowest RIF Service Date in the next lowest Job Classification in the designated series, provided they meet the state and agency minimum training & experience requirements

(Second) If your position is not in one of the Competitive Series designated above, you must first bump the employee in your competitive area with the lowest RIF Service Date in your same Job Classification and pay band, with the same or lower pay level, provided you meet the state and SCDC minimum training & experience requirements

explain the Reduction-In-Force process, as well as, detail your recall and reinstatement rights and benefits as an employee affected by a Reduction-In-Force

A summary of the policy on the Reduction-In-Force process offers you the following components

Competitive Areas All agency work locations have been identified and eleven (11) specific geographic areas of the state designated as competitive areas that may be eligible for employee "bumping" purposes

1 All Broad River Road Complex Institutions and Divisions, Watkins Pre-Release, Manning
2 Wateree River, Lee, Palmer Pre-Release, Turbeville
3 Catawba Pre-Release
4 Evans
5 Kershaw
6 Coastal Office, Coastal Pre-Release, Lieber, MacDougall
7 Allendale
8 Ridgeland
9 Lower Savannah Pre-Release, Trenton
10 Leath, McCormick
11 Appalachian Office, Northside, Livesay Pre-Release, Tyger River, Perry

Competitive Job Classification Series Competitive Job Classifications and Competitive Job Classification Series within each competitive area for employee bumping are identified as

Competitive Job Classifications

AA75 – (Pay Band 4) - Administrative Assistant
AH20 – (Pay Band 7) - Administrative Manager I
AH45 – (Pay Band 7) – Program Manager I
AJ40 – (Pay Band 6) – Computer Operator II
AJ45 – (Pay Band 6) – Information Resource Consultant II
BC30 – (Pay Band 6) – Public Information Director I
BC50 – (Pay Band 8) – Director of Information Services
CD20 – (Pay Band 4) – Library Specialist
EB52 – (Pay Band 9) – Dentist
EC10 – (Pay Band 2) - Medical Assistant Technician I
EC25 – (Pay Band 5) - Technical Medical Associate II
GA40 – (Pay Band 4) - Human Services Specialist II
JA80 – (Pay Band 4) – Inspector II
UB02 – Certified Teacher
UB04 – Vocational Teacher
UB05 – Guidance Counselor
UB06 – Special Education Teacher

____(Date)____

_____(Name)_____
_____(Address)_____
_____(City, State)_____

SUBJECT Notification of Reduction-In-Force

Dear Mr /Ms _____ (Name)_____,

The Department of Corrections' budget has been reduced by over $80 million during the past 30 months These cuts come at a time when incarceration rates have increased the inmate population by several thousand During this same period, efforts to cut spending have included staff reductions of nearly 1,300 employees, closing prisons, elimination of numerous programs, and drastic cuts in expenditures Conversely, efforts have also been made to increase revenue from sources such as prison industries, institutional canteens, inmate work programs, and increasing grant funding Unfortunately, the financial health of this agency remains critical and more drastic measures are necessary

As Agency Director, I have the responsibility to focus on our primary mission which is to protect the public and to continuously assess the need for further cuts in spending, which now must include further reductions in our employee staffing levels As a result, I regret to inform you that I have submitted a Reduction-In-Force Plan to the State Office of Human Resources, and received approval for procedural correctness, to eliminate your position along with a large portion of our administrative and support employee population, to be effective close of business June 1, 2003 The approved Reduction-In-Force Plan will be made available for your review, at your request, excluding the Reduction-In-Force Service Dates of other employees

While the Reduction-In-Force process can be very stressful, steps have been taken to ensure you are advised of the entire process and employee benefits continuation, should you eventually lose your position with the Agency A Reduction-In-Force Service Date has been established for all employees within your job classification that will determine the order for bumping If you are not eligible to bump another individual, you may be offered a vacant lower level position for which you meet the state and Agency minimum training & experience requirements

Additionally, should you ultimately be laid off, the Agency will provide you with an SCDC and state application form and notify the Office of Human Resources State Career Center will be notified of this Reduction-In-Force and their assistance will be requested to help the affected employees in their search for other state employment In addition, the employee will be entered into the automated State Employee RIF Applicant Pool, which will allow the employee to provide updated information and eligibility for other state agency's vacancies

Mr John A Near, Division Director – Human Resources, or designee from the Division of Human Resources, will be meeting with you to provide a copy of the Agency's Reduction-In-Force Policy,

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
DIVISION OF HUMAN RESOURCES

MEMORANDUM

To Chris Poore, Human Resources Consultant
Office of Human Resources

From John A Near, Division Director - Human Resources

Subject Final Corrections to Reduction-In-Force Information

Date May 14, 2003

The Department of Corrections received approval of the Reduction-In-Force Plan by the Office of Human Resources on March 28, 2003 As discussed at that time, minor changes to the RIF Plan were projected to occur based upon the option elections by individual employees as well as, information obtained in meeting with each employee The final changes have been identified below and are forwarded for your record

Most of the changes were Reduction-In-Force Service Dates based upon prior state service that were verified when meeting with employees In no case was the outcome of the RIF process impacted by these changes

One employee's age was incorrectly calculated

Five employees were retained due to the necessary qualifications of the position (RNQ) that no other employee possessed The necessary qualifications of the positions were reviewed by examining the current employee's position description

One typographical error was identified

RIF Service Date Corrections

Name	Comp Area	Job Class	Corrected Date
Tracie Baxley	01	AH40	01/17/89
David Bowers	01	AD12	8/2/86
Deborah Garrell	01	JA80	12/1/84
Brenda L Rhoten	01	UB02	6/17/88
Susan Mullis	01	UB02	12/8/89
Geraldine Abraham	01	UB06	12/12/81
Carolyn Smith	01	UE07	1/16/79
Bernetha L Culbreath	01	UB02	8/24/89
William D Vinson	01	UB07	12/04/70
Ann Bridges	10	UB06	9/4/82
Susan White	11	UB02	12/12/97

Age Correction

The age was corrected for **Tessie Smith** AH40 Comp Area 01 to age 40

In accordance with SC Code of Laws Ann §8-11-185 (1976 & 2002 Supp), any state agency implementing a RIF must report information pertaining to employees affected by a RIF to the Office of Human Resources to be included in the RIF applicant pool State law also requires agencies to consult the RIF applicant pool and give priority consideration to employees affected by a RIF when seeking to fill vacancies For this purpose, the RIF applicant pool may be accessed through the web-site *www state.sc us/ohr/rif* Should you have questions about these requirements, please call Bob Karel at 734-0980

If I can be of further assistance, please give me a call at (803)737-0952

Sincerely,

Christopher Poore

Christopher Poore
Human Resources Consultant

From Patricia Thrailkill
Sent Wednesday April 02, 2003 10 50 AM
To cpoore@ohr state sc us'
Cc John Near Betsy Stewart
Subject Reduction in Force Policy - Adm 11 05

Chris

In reading the above policy which was approved by OHR March 14 2003, we are requesting a change to be made to 7 9 under Recall and Reinstatement Rights of the Employees It should read Employees who are recalled or reinstated within one year of the effective date of the RIF will be eligible for all benefits including sick leave restored in accordance with state regulations and will have the option of buying back all some or none of the annual leave paid as a result of the RIF

Thanks,

Pat Thrailkill

Retained Due to Necessary Qualifications (RNQ)

Oliver Holmes (AH35) Competitive Area 01 - Position requires a CDL license to be in the position

Robert Campbell (AH40) Competitive Area 01 - Position requires experience in in a clinical setting

Shirlie Taylor (AH35) Competitive Area 01 - Position is budgeted to the Central Office of Division of Industries however this is a sales position and requires that the incumbent live within a 35 mile radius of Charleston

Fred Bove (AJ45) Competitive Area 01 - Position requires experience relating to office automation standards microcomputer Local Area Network hardware and software as well as all peripherals

Darrell J Stotts (AJ45) Competitive Area 01 - Position requires experience in software applications Requires problem-solving experience relating to software application and format in graphics and use of pagemaker quark photoshop, CorelDraw illustrator acrobat MS Publisher

Typographical Error

The Competitive Job Classification Series & Employee Notification of Reduction in Force letter that was approved contained a typographical error UB05 should be UB06 - Guidance Counselor UB06 should be UB05 - Special Education Teacher The actual description of the Job Classification is correct The incorrect Job Classification Code number had no impact on the outcome of the RIF process

X_____
John A Near

11
BELL JAMES C
407 BELL RD

DONALDS SC 29638-0000

-219-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

John Near

In accordance with SCDC Policy ADM-11.05 "Reduction-In-Force," I have been advised of the bumping options available to me by James C Bell (Name) on 04-03-03 (Date)

and that I must make my selection and return this form within two (2) working days on 4-7-03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

JB (initial) I elect to bump into a filled or vacant position

___ (initial) I elect layoff

James C Bell 4-03-03
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ _____
(Position Title) (Position #)

in the area of _____ to be effective _____
I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER SEVERAL LOCATIONS
(Position Title) (Position #)

in the area of SEVERAL LOCATIONS As a result, I agree that the effective date of my layoff will be close of business 4-1-03

James C Bell 4-27-03 John C. Near 4/24/03
(Employee Signature) (Date) (HR Representative's Signature) (Date)

1672

11
BELL JAMES C
407 BELL RD -220-
DONALDS SC 29638-0000

)

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name J Cal Bell

Employee Signature S/ [signature]

Date 4-03-03

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT, Director

April 25, 2003

James Bell
407 Bell Road
Donalds, SC 29638

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Mr Bell,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003

EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

South Carolina Department of Corrections
Office of Workforce Relations

GRIEVANCE REPORT

TO Office of Workforce Relations

FROM James "Cal" Bell (Name) Educator (Title)

DATE 6/11/03 250.98 3702 (SS #)

Date of Hire 9/21/92 Perry (Work Location)

Work Telephone Number (864) 243 4700

Home Telephone Number (864) 456 3202

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion how can your grievance be solved? Be as specific as possible

See attached

S/ James "Cal" Bell by Dona Gaffey
Employee (Grievant)

Home Address 407 Bell Rd
Donalds, SC Zip 29638

This form must be completed and submitted to the Office of Workforce Relations no later than 6/15/03 in compliance with SCDC policy/procedure ADM 11 02

Date 6/10/03

S/ Robin Gracie
Director or Designee Office of Workforce Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16, 2003

CERTIFIED MAIL

Mr W Allen Nickles, III
Gergel, Nickles & Solomon, P A.
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE James Cal Bell

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency's Reduction In-Force (RIF) that was effective June 1 2003 your client s position was eliminated and elected lay off He was classified as a Vocational Teacher (Job Class UB04) and is appealing the Reduction-In Force based upon following (summarized)

1 The District Board was not involved in the decision,
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion,
3 Restriction on ' bumping rights to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM 11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District, who is a member of the District Board, was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above, the Department does not agree with your opinion that educators were singled out for Reduction-In Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above, SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in your report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street, Suite 1000 Columbia, South Carolina 29201 within 10 calendar days of receipt of this letter

If I can be of further assistance, you may contact me at 896-8527

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director, Division of Human Resources
James C Bell
File

11
BERNARD OTHELLA R
7028 GREENPOND RD

GRAY COURT SC 29645-0000

-229-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Dean (Name) on 4-3-03 (Date)

and that I must make my selection and return this form within two (2) working days on 4-7-03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

OKB (initial) I elect to bump into a filled or vacant position

___ (initial) I elect layoff

_____ _____
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ _____
(Position Title) (Position #)

in the area of _____ to be effective _____
I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER SEVERAL POSITIO
(Position Title) (Position #)

in the area of SEVERAL LOCATIONS As a result, I agree that the effective date of my layoff will be close of business 6-1-03

168

Othella R. Bernard 4-24-03 John A. Dean 4/24/03
(Employee Signature) (Date) (HR Representative's Signature) (Date)

11
BERNARD OTHELLA R
7028 GREENPOND RD -230-
GRAY COURT SC 29645-0000

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Othella R. Bernard

Employee Signature S/ Othella R Bernard

Date 4-3-03

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO All Employees Affected by Reduction-In-Force

FROM John A Near, Division Director – Human Resources

SUBJECT Recall Rights After Retirement

DATE April 9, 2003

Several employees whose position was affected by the Reduction-In-Force had requested information regarding recall rights after retirement

The Budget & Control Board's Office of Human Resources has indicated that any employee who retires on or before June 1, 2003 is not employed as of the effective date of the Reduction-In-Force, and is therefore not eligible for recall and reinstatement rights under the Reduction-In-Force Plan Only Employees who retire June 2, 2003 or after would eligible for recall

If you have any questions regarding retirement, you may contact the Employee Benefits Branch at 896-1673 or the South Carolina Retirement System at 737-6800

S/ John A Near

Acknowledgement of Receipt S/ Ethel R Bernard (Employee Name) 4-24-03 (Date)

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

April 25, 2003

Othella Bernard
7028 Greenpond Road
Gray Court, SC 29645

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Ms Bernard,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

GERGEL, NICKLES & SOLOMON, P A
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles, III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003

EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of Workforce Relations

GRIEVANCE REPORT

TO Office of Workforce Relations

FROM Othella Bernard (Name) Educator (Title)

DATE 6/11/03 296.38.1695 (SS #)

Date of Hire 07/13/92 Perry (Work Location)

Work Telephone Number (864) 243 4700

Home Telephone Number (864) 575 3039

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

see attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion how can your grievance be solved? Be as specific as possible

see attached

S/ Othella Bernard by Dona Griffey
Employee (Grievant)

Home Address 7028 Greenpond Rd
Gray Court, SC Zip 29645

This form must be completed and submitted to the Office of Workforce Relations no later than 6/15/03 in compliance with SCDC policy/procedure ADM 11 02

Date 6/10/03

S/ [signature]
Director or Designee Office of Workforce Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

1690

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel, Nickles & Solomon, P A
Attorneys at Law
Post Office Box 1866
Columbia, South Carolina 29201

RE Othella Bernard

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction-In-Force (RIF) that was effective June 1, 2003 your client s position was eliminated and elected lay off She was classified as a Certified Teacher (Job Class UB02) and is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on "bumping rights ' to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency's RIF Plan or Policy

In response to item 1 above, Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy, the Superintendent of the Palmetto Unified School District, who is a member of the District Board, was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above SCDC Policy ADM-11 05, Reduction In Force, states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

PO Box 21787 - 4444 Broad River Road - Columbia, SC 29221 1787 - Telephone (803) 896 8555

In response to item 5 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action, to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services, 1201 Main Street, Suite 1000 Columbia, South Carolina 29201, within 10 calendar days of receipt of this letter

If I can be of further assistance, you may contact me at 896-8527

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Othella Bernard
File

10
BOWYER KATHERINA W
501 HALTIWANGER RD
APT M-2
GREENWOOD SC 29649-0000

-240

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on 4/3/03 (Date) and that I must make my selection and return this form within two (2) working days on 4/7/03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

KWB (initial) I elect to bump into a filled or vacant position

___ (initial) I elect layoff

Katherina W. Bowyer 4/3/03
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ _____
(Position Title) (Position #)

in the area of _____ to be effective _____
I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER SEVERAL POSITIONS
(Position Title) (Position #)

in the area of SEVERAL LOCATIONS As a result, I agree that the effective date of my layoff will be close of business 6-1-03

Katherina W. Bowyer 4/23/03 _____ 4/23/03
(Employee Signature) (Date) (HR Representative's Signature) (Date)

10
BOWYER KATHERINA W
501 HALTIWANGER RD
APT M-2
GREENWOOD SC 29649-0000

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Katherina W. Bowyer

Employee Signature S/ Katherina W. Bowyer

Date 4/3/03

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

April 24, 2003

Katherina Bowyer
501 Haltiwanger Road Apt M-2
Greenwood, SC 29649

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Ms Bowyer,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia, South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003

EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations

GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM Katherina W. Bowyer (Name) : Educator (Title)

DATE 6/11/03 249-86-2877 (SS #)

Date of Hire 06/21/1993 Leath (Work Location)

Work Telephone Number ( ) _____ _____

Home Telephone Number (864) 374 7918

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion how can your grievance be solved? Be as specific as possible

See attached

S/ Katherina W. Bowyer
Employee (Grievant)

Home Address P.O. Box 49553
Greenwood, SC Zip 29649

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date 5-29-03

S/ _____
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

South Carolina Department of Corrections

MARK SANFORD, Governor
JON OZMINT Director

June 16, 2003

CERTIFIED MAIL

Mr W Allen Nickles, III
Gergel, Nickles & Solomon, P A.
Attorneys at Law
Post Office Box 1866
Columbia, South Carolina 29201

RE Katherina W Bowyer

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency's Reduction In-Force (RIF) that was effective June 1 2003, your client s position was eliminated and elected lay off She was classified as a Vocational Teacher (Job Class UB04) and is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on "bumping rights to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures, a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board, was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above, the Department does not agree with your opinion that educators were singled out for Reduction-In Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above, SCDC Policy ADM-11 05, Reduction In Force, states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5, the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services, 1201 Main Street, Suite 1000 Columbia, South Carolina 29201 within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely,

Robin M. Gracien

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Katherina W Bowyer
File

11
BRATTON LINDA M
108 TOLLGATE CT
SIMPSONVILLE SC 29681-2944

FAX 896-1931

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on 4-3-03 (Date) and that I must make my selection and return this form within two (2) working days on 4-7-03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

LMB (initial) I elect to bump into a filled or vacant position

____ (initial) I elect layoff

Linda M. Bratton (Employee Signature) 4-3-03 (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of CERTIFIED TEACHER (Position Title) (GA) 011914/02161 (Position #) in the area of TYGER RIVER to be effective 6-2-03 I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

Linda M. Bratton (Employee) 4-24-03 (Date) [signature] (HR Representative) 4/24/03 (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of _____ (Position Title) _____ (Position #) in the area of _____ As a result, I agree that the effective date of my layoff will be close of business _____

1703

_____ (Employee Signature) _____ (Date) _____ (HR Representative's Signature) _____ (Date)

11
BRATTON LINDA M
108 TOLLGATE CT

-251-

SIMPSONVILLE SC 29681-2944

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Linda M. Bratton

Employee Signature S/ Linda M. Bratton

3 LB

Date 4-4-03

PLEASE REMOVE THIS PAGE AND RETURN IT TO A REPRESENTATIVE IN THE DIVISION OF HUMAN RESOURCES

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO LINDA M BRATTON

FROM John A Near, Division Director – Human Resources

SUBJECT Notification of Reassignment and/or Demotion Due to Reduction-In-Force

DATE 4-24-03

The Department of Corrections announced a Reduction-In-Force on March 31, 2003 Your position was one of 148 positions eliminated, or was subject to bumping by another employee with a higher RIF Service Date Following our meeting on this date, you elected to bump into a filled or vacant position, in accordance with Reduction-In-Force Policy ADM 11 05 Your new position is

State Position Title CERT TEACHER (GA) Pay Band 3/A Pay Level 3H

Work location TYGER RIVER New Base Annual Salary $ 37,062

Effective Date of Reassignment or Demotion June 2, 2003

Your new annual base salary does not include any additional benefits you may be currently receiving Your reassignment or demotion into the position identified above also requires that you meet the minimum state and agency requirements of the new position

Special Notice to Employees Reassigned or Demoted into a Security Positions Only

If you elected to bump into a security position, you must meet the minimum requirements of the position, to include passing a background check You must also obtain LETA certification no later than December 2, 2003 If you do not obtain LETA certification by December 2, 2003, your employment must be terminated, and your recall rights under this Reduction-In-Force will continue through June 1, 2004 The new annual base salary indicated above includes any previous security salary step increases, and no additional security increases will be awarded

You may use this memorandum at the agency's Commissary as authorization to obtain your uniforms In addition, you should contact the Warden or Associate Warden at your new work location to be advised of your new work hours and post assignment

S/ John A. Near
John A Near

Acknowledgement of Receipt S/ Linda Bratton 4/24/03
Employee Name Date

Cc Warden/Division Director
HR Manager
Recruiting Office
Payroll

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations

GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM Linda M.W Bratton — Education Coordinator ~~Teacher~~ LB
Name — Title

DATE ~~06~~ 06 / ~~07~~ 03 / [redacted]2003

247-06-8807
SS #

Date of Hire 01/03/1984

Perry
Work Location

Work Telephone Number (864) 243 4700

Home Telephone Number (864) 967 4860

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JAN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion, how can your grievance be solved? Be as specific as possible

See attached

S/ Linda M W. Bratton
Employee (Grievant)

Home Address 108 Tollgate Court
Simpsonville, SC Zip 29681

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date 4-10-03

S/ Carrie A. Grant
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles, III
Gergel Nickles & Solomon, P A.
Attorneys at Law
Post Office Box 1866
Columbia, South Carolina 29201

RE Linda M. W Bratton

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12, 2003 As a result of the Agency s Reduction In-Force (RIF) that was effective June 1 2003 your client s position as a Certified Teacher (Job Class UB02) was eliminated and she was able to bump into the same classification at another institution within the competitive area She is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision,
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion,
3 Restriction on "bumping rights to designated areas within the Palmetto Unified School is arbitrary capricious, and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above, Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District, who is a member of the District Board was informed prior to the effective date of the Reduction In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above SCDC Policy ADM-11 05, Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency's RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action, to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore, the grievance must be denied.

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services, 1201 Main Street, Suite 1000, Columbia, South Carolina 29201 within 10 calendar days of receipt of this letter

If I can be of further assistance, you may contact me at 896-8527

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Linda M W Bratton
File

10
BRIDGES ANN T
212 HAMPTON AVE

CLINTON SC 29325-0000

-260-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Mean (Name) on 4-3-03 (Date)

and that I must make my selection and return this form within two (2) working days on 4-7-03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

atb (initial) I elect to bump into a filled or vacant position

___ (initial) I elect layoff

Ann T Bridges (Employee Signature) 4-3-03 (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

010502 037901

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of CORRECTIONAL OFFICER (Position Title) SEVERAL POSITIONS (Position #)

in the area of LEATH to be effective 6-2-03

I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

Ann T Bridges (Employee) 4-23-03 (Date) (HR Representative) 4/23/03 (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of _____ (Position Title) _____ (Position #)

in the area of _____ As a result, I agree that the effective date of my layoff will be close of business _____

_____ (Employee Signature) _____ (Date) _____ (HR Representative's Signature) _____ (Date)

1713

Ann Bridges
212 Hampton ave

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11.05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Neal (Name) on 4-3-03 (Date)

and that I must make my selection and return this form within two (2) working days on 4-7-03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11.05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

___ (initial) I elect to bump into a filled or vacant position

___ (initial) I elect layoff

SEE original form for signature of this section

_____ _____
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ (Position Title) _____ (Position #)

in the area of _____ to be effective _____

I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of Correctional Officer (Position Title) Several #'s (Position #)

in the area of Leath As a result, I agree that the effective date of my layoff will be close of business 6/1/03

* Ann T Bridges 5/5/03 John A Temple 5/5/03
(Employee Signature) (Date) (HR Representative's Signature) (Date)

10
BRIDGES ANN T
212 HAMPTON AVE

CLINTON SC 29325-0000

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Ann T. Bridges

Employee Signature S/ Ann T. Bridges

Date 4/3/03

**PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES**

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

May 6, 2003

Ann Bridges
212 Hampton Avenue
Clinton, SC 29325

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Ms Bridges,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 16, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

PO Box 21787 - 4444 Broad River Road - Columbia, SC 29221-1787 - Telephone (803) 896-8555
http //www state sc us/scdc E-mail corrections info@doc state sc us

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations

GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM Ann Bridges (Name) Guidance Counselor (Title)

DATE 6/11/03 249.74.1280 (SS#) Leath (Work Location)

Date of Hire 09/04/84

Work Telephone Number (803) 896 1041

Home Telephone Number 864 833 5875

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

JUN 12 2003

EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion how can your grievance be solved? Be as specific as possible

see attached

S/ Ann T. Bridges
Employee (Grievant)

Home Address 212 Hampton Ave
Clinton, SC Zip 29325

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date 6/21/03

S/ Sherry T Spurlock
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16, 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel Nickles & Solomon, P A.
Attorneys at Law
Post Office Box 1866
Columbia, South Carolina 29201

RE Ann Bridges

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction-In Force (RIF) that was effective June 1 2003 your client s position was eliminated and elected lay off She was classified as a Guidance Counselor (Job Class UB06) and is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion,
3 Restriction on "bumping rights to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees,
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above, Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy, the Superintendent of the Palmetto Unified School District, who is a member of the District Board was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above SCDC Policy ADM 11 05 Reduction In Force, states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street, Suite 1000 Columbia, South Carolina 29201, within 10 calendar days of receipt of this letter

If I can be of further assistance, you may contact me at 896-8527

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near, Director, Division of Human Resources
Ann Bridges
File

10
COBB RANCE C
211 HARVEST LANE
GREENWOOD SC 29649-0000

-271-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on 4-3-03 (Date)

and that I must make my selection and return this form within two (2) working days on 4-7-03 (Date). If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

RCC (initial) I elect to bump into a filled or vacant position

_____ (initial) I elect layoff

Rance C. Cobb (Employee Signature) 4-3-03 (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ (Position Title) _____ (Position #)

in the area of _____ to be effective _____

I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ (Employee) _____ (Date) _____ (HR Representative) _____ (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER SEVERAL POSITION (Position Title) (Position #)

in the area of SEVERAL LOCATIONS As a result, I agree that the effective date of my layoff will be close of business 6-1-03

Rance C. Cobb (Employee Signature) 4/23/03 (Date) John A. Near (HR Representative's Signature) 4/23/03 (Date)

1724

10
COBB RANCE C
211 HARVEST LANE

-272-

GREENWOOD SC 29649-0000

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Rance C Cobb

Employee Signature S/ Rance C Cobb

Date 4-3-03

PLEASE REMOVE THIS PAGE AND RETURN IT TO A REPRESENTATIVE IN THE DIVISION OF HUMAN RESOURCES

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT, Director

April 24, 2003

Rance Cobb
211 Harvest Lane
Greenwood, SC 29649

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Mr Cobb,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

1726

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003

EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations

GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM Rance Cobb (Name) Principal (Title)

DATE 6/9/03 251-78-7880 (SS #)

Date of Hire 3/12/73 Leath (Work Location)

Work Telephone Number (803) 896 1040

Home Telephone Number (864) 223 5772

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion how can your grievance be solved? Be as specific as possible

See attached

S/ Rance C. Cobb
Employee (Grievant)

Home Address 211 Harvest Lane
Greenwood, SC Zip 29649

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date May 6, 2003

S/ Sherry F. Sherlock
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel, Nickles & Solomon, P A.
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE Rance Cobb

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction In-Force (RIF) that was effective June 1 2003 your client s position was eliminated and elected lay off He was classified as a Principal (Job Class UB07) and is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision,
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on "bumping rights' to designated areas within the Palmetto Unified School is arbitrary, capricious and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above, SCDC Policy ADM-11 05, Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street, Suite 1000, Columbia, South Carolina 29201, within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896 8527

Sincerely,

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near, Director Division of Human Resources
Rance Cobb
File

01
CROXTON JEANNIE B
3900B HANSON AVE
COLUMBIA SC 29204-4113

-281-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on April 7, 2003 (Date) and that I must make my selection and return this form within two (2) working days on April 9, 2003 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

JC (initial) I elect to bump into a filled or vacant position

___ (initial) I elect layoff

Jeannie Croxton (Employee Signature) April 9, 2003 (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ (Position Title) _____ (Position #)

in the area of _____ to be effective _____

I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ (Employee) _____ (Date) _____ (HR Representative) _____ (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER (Position Title) TO BE DETERMINED (Position #)

in the area of SEVERAL LOCATIONS As a result, I agree that the effective date of my layoff will be close of business 6-1-03

Jeannie B Croxton (Employee Signature) 4-11-03 (Date) _____ (HR Representative's Signature) 4/11/03 (Date)

01
CROXTON JEANNIE B
3900B HANSON AVE
COLUMBIA SC 29204-4113

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Jeannie B. Croxton

Employee Signature S/ Jeannie B. Croxton

Date April 7, 2003

**PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES**

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO All Employees Affected by Reduction-In-Force

FROM John A Near, Division Director – Human Resources

SUBJECT Recall Rights After Retirement

DATE April 9, 2003

Several employees whose position was affected by the Reduction-In-Force had requested information regarding recall rights after retirement

The Budget & Control Board's Office of Human Resources has indicated that any employee who retires on or before June 1, 2003 is not employed as of the effective date of the Reduction-In-Force, and is therefore not eligible for recall and reinstatement rights under the Reduction-In-Force Plan Only Employees who retire June 2, 2003 or after would eligible for recall

If you have any questions regarding retirement, you may contact the Employee Benefits Branch at 896-1673 or the South Carolina Retirement System at 737-6800

S/ John A. Near
John A Near

Acknowledgement of Receipt S/ Jeannie B. Crofter April 11, 2003
Employee Name Date

South Carolina Department of Corrections

MARK SANFORD Governor
JON E OZMINT Director

April 16, 2003

Jeannie Croxton
3900 B Hanson Ave
Columbia, SC 29204-4113

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Ms Croxton,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

1737

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

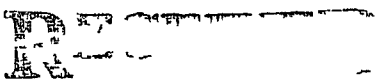
Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
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10 Jacqueline D Farr
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12 Nancy Glenn
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14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief



I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations
GRIEVANCE REPORT

Employee

TO Office of ~~Workforce~~ Relations

FROM Jeannie B. Croxton (Name) Educator (Title)

DATE 6/11/03 247.82.1765 (SS #)

Date of Hire 05/16/1988 Manning (Work Location)

Work Telephone Number (803) 935 7203

Home Telephone Number (803) 787 0726

The subsequent gnevance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion, how can your grievance be solved? Be as specific as possible

See attached

S/ Jeannie B Croxton
Employee (Grievant)

Home Address 3900-B Hanson Ave
Columbia SC Zip 29204

Employee

This form must be completed and submitted to the Office of ~~Workforce~~ Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date May 27, 2003

S/ Sherry L. Sourlock
Director or Designee Office of ~~Workforce~~ Relations

Employee

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

South Carolina Department of Corrections

MARK SANFORD, Governor
JON OZMINT Director

June 16, 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel Nickles & Solomon, P A.
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE Jeannie B Croxton

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency's Reduction-In-Force (RIF) that was effective June 1 2003 your client s position was eliminated and elected lay off She was classified as a Certified Teacher (Job Class UB02) and is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion,
3 Restriction on "bumping rights' to designated areas within the Palmetto Unified School is arbitrary, capricious, and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02, Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy, the Superintendent of the Palmetto Unified School District, who is a member of the District Board, was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above, the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above, SCDC Policy ADM-11 05 Reduction In Force, states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency's RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

PO Box 21787 4444 Broad River Road - Columbia, SC 29221 1787 Telephone (803) 896-8555

In response to item 5, the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore, the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street Suite 1000 Columbia, South Carolina 29201, within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near, Director Division of Human Resources
Jeannie B Croxton
File

10
CULBREATH BERNETHA L
820 CARTER RD

NINETY SIX SC 29666-0000

-292-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on 4/3/03 (Date) and that I must make my selection and return this form within two (2) working days on 4/7/03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

BBC (initial) I elect to bump into a filled or vacant position

___ (initial) I elect layoff

Bernetha R Culbreath 4/7/03
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ _____
(Position Title) (Position #)
in the area of _____ to be effective _____
I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER SEVERAL POSITIONS
(Position Title) (Position #)
in the area of SEVERAL LOCATIONS As a result, I agree that the effective date of my layoff will be close of business 6-5-03

1745

Bernetha Culbreath 4/23/03 John A Near 4/23/03
(Employee Signature) (Date) (HR Representative's Signature) (Date)

10
CULBREATH BERNETHA L
820 CARTER RD

NINETY SIX SC 29666-0000

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Bernetha Culbreath

Employee Signature S/Bernetha K Culbreath

Date 4/3/03

**PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES**

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

April 24, 2003

Bernetha Culbreath
820 Carter Road
Ninety Six, SC 29666

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Ms Culbreath,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

1747

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia, South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003

EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations
GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM Bernetha L. Culbreath (Name) Teacher (Title)

DATE 6/3/03 249-21-5974 (SS #)

Date of Hire 8/24/92 Leath - Greenwood (Work Location)

Work Telephone Number ( ) _____ _____

Home Telephone Number (864 543 5338

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUL 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion, how can your grievance be solved? Be as specific as possible

See attached

S/ Bernetha L Culbreath
Employee (Grevant)

Home Address 820 Carters Rd
Ninety Six, SC Zip 29666

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date 4/15/03

S/ _____
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

1752

SCDC 16 33 (Revised April 2000)

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel, Nickles & Solomon, P A
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE Bernetha L Culbreath

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency's Reduction-In-Force (RIF) that was effective June 1 2003, your client s position was eliminated and elected lay off She was classified as a Certified Teacher (Job Class UB02) and is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision,
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on "bumping rights' to designated areas within the Palmetto Unified School is arbitrary, capricious, and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above, Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District, who is a member of the District Board, was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion

In response to items 3 and 4 above SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency's RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5, the basis for the Reduction-In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street Suite 1000 Columbia, South Carolina 29201, within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near, Director, Division of Human Resources
Bernetha L Culbreath
File

10
DREYER WILLIAM K
1600 EAST LAUREL AVE

GREENWOOD SC 29649-9172

-302-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by ~~William K. Dreyer~~ John Dear on 4-03-03
(Name) (Date)

and that I must make my selection and return this form within two (2) working days on 4-7-03 If I fail to return this form within the time required, I agree to automatically
(Date)
waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

WD (initial) I elect to bump into a filled or vacant position

____ (initial) I elect layoff

WD 4-03-03
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ _____
(Position Title) (Position #)

in the area of _____ to be effective _____
I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER SEVERAL POSITIONS
(Position Title) (Position #)

in the area of SEVERAL LOCATIONS As a result, I agree that the effective date of my layoff will be close of business 6-1-03

1755

WD 4-23-03 [signature] 4/23/03
(Employee Signature) (Date) (HR Representative's Signature) (Date)

10
DREYER WILLIAM K
1600 EAST LAUREL AVE -303-
GREENWOOD SC 29649-9172

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name William K Dreyer

Employee Signature S/ 479-54-7772 WKD

Date 4-02-03

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

April 24, 2003

William Dreyer
1600 East Laurel Ave
Greenwood, SC 29649-9172

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Mr Dreyer,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

1757

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003

EMPLOYEE RELATIONS

Michael H Montgomery, Esquire
June 12, 2003
Page two

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

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e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations

GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM William K. Dreyer (Name) Educator (Title)

DATE 6/11/03 479 54 7772 (SS #)

Date of Hire 04/30/1984 McCormick (Work Location)

Work Telephone Number (864) 443 2114

Home Telephone Number (864) 223 4308

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

see attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion how can your grievance be solved? Be as specific as possible

see attached

S/ W K Dreyer
Employee (Grievant)

Home Address 1600 East Laurel Ave
Greenwood SC Zip 29649

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable action in compliance with SCDC policy/procedure ADM 11 02

Date 5/13/03

S/ Harvey H Gurlock
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

SCDC 16 33 (Revised April 2000)

1762

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16, 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel Nickles & Solomon, P A.
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE William K Dreyer

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction In-Force (RIF) that was effective June 1 2003 your client s position was eliminated and elected lay off He was classified as a Certified Teacher (Job Class UB02) and is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
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5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM 11 02, Employee Grievance and Appeals Procedures, a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above SCDC Policy ADM-11 05 Reduction In Force, states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

PO Box 21787 - 4444 Broad River Road Columbia SC 29221 1787 - Telephone (803) 896-8555

In response to item 5 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services, 1201 Main Street Suite 1000, Columbia, South Carolina 29201 within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near, Director Division of Human Resources
William K Dreyer
File

11
FARR JACQUELINE D
P O BOX 2763
151 LUMIS AVE
SPARTANBURG SC 29302-0000

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on 4/28/03 (Date)

and that I must make my selection and return this form within two (2) working days on 4/30/03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

J.D.F. (initial) I elect to bump into a filled or vacant position

___ (initial) I elect layoff

Jacqueline D. Farr (Employee Signature) 4/28/03 (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ (Position Title) _____ (Position #)

in the area of _____ to be effective _____

I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ (Employee) _____ (Date) _____ (HR Representative) _____ (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of Correctional Officer 56000 Position (Position Title) (Position #)

in the area of Various Locations As a result, I agree that the effective date of my layoff will be close of business 6-1-03

1765

Jacqueline D. Farr (Employee Signature) 5-2-03 (Date) _____ (HR Representative's Signature) 5/2/03 (Date)

April 23, 2003

Mr John Near
Director of Personnel
SC Department of Corrections
4444 Broad River Road
Columbia, South Carolina 29210

Dear Mr Near

Please be advised that in view of my involuntary separation from employment due to the reduction in force, I have been compelled to take early retirement In taking this action, I specifically do not waive my right to grieve this reduction in force nor do I waive my right to recall during the waiting period Should I be recalled for employment, I will take the steps necessary to be able to report to work at that time

Sincerely,

Jacqueline D. Farr

11
FARR JACQUELINE D
P O BOX 2763
151 LUMIS AVE
SPARTANBURG SC 29302-0000

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Jacqueline D. Farr

Employee Signature S/ Jacqueline D Farr

Date 4/28/03

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO All Employees Affected by Reduction-In-Force

FROM John A Near, Division Director – Human Resources

SUBJECT Recall Rights After Retirement

DATE April 9, 2003

Several employees whose position was affected by the Reduction-In-Force had requested information regarding recall rights after retirement

The Budget & Control Board's Office of Human Resources has indicated that any employee who retires on or before June 1, 2003 is not employed as of the effective date of the Reduction-In-Force, and is therefore not eligible for recall and reinstatement rights under the Reduction-In-Force Plan Only Employees who retire June 2, 2003 or after would eligible for recall

If you have any questions regarding retirement, you may contact the Employee Benefits Branch at 896-1673 or the South Carolina Retirement System at 737-6800

S/ John A. Near
John A Near

Acknowledgement of Receipt S/ Jacqueline D. Farr 5-2-03
Employee Name Date

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

May 5, 2003

Jacqueline Farr
P O Box 2763
151 Lumis Ave
Spartanburg, SC 29302

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Ms Farr,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

1769

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

Michael H Montgomery, Esquire
June 12, 2003
Page two

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of Workforce Relations

GRIEVANCE REPORT

TO Employee ~~Office of Workforce~~ Relations

FROM Jacqueline D. Farr (Name) Teacher (Title)

DATE 6/9/03 249-80-8915 (SS #)

Date of Hire 3/20/95 Tyger River CI Upper (Work Location)

Work Telephone Number ( ) ____

Home Telephone Number (864) 582 8627

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attachment "Nature of Grievance"

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion, how can your grievance be solved? Be as specific as possible

See attachment "Relief Sought"

S/ Jacqueline D. Farr
Employee (Grievant)

Home Address P.O. Box 2763
Spartanburg SC Zip 29304

This form must be completed and submitted to the Office of Workforce Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date June 9, 2003

S/ Sherry G Sourlock
Director or Designee ~~Office of Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

SCDC 16 33 (R v d Apnl 2000)

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel, Nickles & Solomon P A
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE Jacqueline D Farr

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction-In Force (RIF) that was effective June 1 2003 your client was bumped by another Certified Teacher (Job Class UB02) with a higher RIF service date and elected lay off She is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on 'bumping rights' to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees,
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above, Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District, who is a member of the District Board was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above, SCDC Policy ADM-11 05, Reduction In Force, states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street, Suite 1000 Columbia, South Carolina 29201 within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Jacqueline D Farr
File

10
FRITTS RUTH L
118 HIAWATHA DR

BELTON SC 29627-2108

-324-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on 4/3/03 (Date) and that I must make my selection and return this form within two (2) working days on 4/7/03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

RFV (initial) I elect to bump into a filled or vacant position

___ (initial) I elect layoff

Ruth L. Fritts (Employee Signature) 4/7/03 (Date)

RECEIVED S.C. DEPT. OF C.
2003 MAY -5 PM 3:43

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of CORRECTIONAL OFFICER (Position Title) 010502/037901 (TO BE ASSIGNED) (Position #) in the area of LEATH CORR INST to be effective 6-2-03 I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

Ruth L. Fritts (Employee) 5/1/03 (Date) J. Near (HR Representative) 4/16/03 (Date)

See Step Increase "2" Due Date 10/1/91

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of _____ (Position Title) _____ (Position #) in the area of _____ As a result, I agree that the effective date of my layoff will be close of business _____

1777

_____ (Employee Signature) _____ (Date) _____ (HR Representative's Signature) _____ (Date)

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Ruth L Fritts

Employee Signature S/ Ruth L Fritts

Date 4/3/03

**PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES**

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO RUTH L. FRITTS

FROM John A Near, Division Director – Human Resources

SUBJECT Notification of Reassignment and/or Demotion Due to Reduction-In-Force

DATE 4-16-03

The Department of Corrections announced a Reduction-In-Force on March 31, 2003 Your position was one of 148 positions eliminated, or was subject to bumping by another employee with a higher RIF Service Date Following our meeting on this date, you elected to bump into a filled or vacant position, in accordance with Reduction-In-Force Policy ADM 11 05 Your new position is

State Position Title CORR OFFICER Pay Band 3 Pay Level E

Work location LEATH New Base Annual Salary $ 26,909

Effective Date of Reassignment or Demotion June 2, 2003

Your new annual base salary does not include any additional benefits you may be currently receiving Your reassignment or demotion into the position identified above also requires that you meet the minimum state and agency requirements of the new position

Special Notice to Employees Reassigned or Demoted into a Security Positions Only

If you elected to bump into a security position, you must meet the minimum requirements of the position, to include passing a background check You must also obtain LETA certification no later than December 2, 2003 If you do not obtain LETA certification by December 2, 2003, your employment must be terminated, and your recall rights under this Reduction-In-Force will continue through June 1, 2004 The new annual base salary indicated above includes any previous security salary step increases, and no additional security increases will be awarded

You may use this memorandum at the agency's Commissary as authorization to obtain your uniforms In addition, you should contact the Warden or Associate Warden at your new work location to be advised of your new work hours and post assignment

S/ John A. Near
John A Near

Acknowledgement of Receipt S/ Ruth L. Fritts 4/30/03
Employee Name Date

Cc Warden/Division Director
HR Manager
Recruiting Office
Payroll

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations
GRIEVANCE REPORT

TO Office of ~~Workforce~~ Relations

FROM Ruth Griffis (Employee) Name — Teacher Title

DATE 6/6/03 — 411-78-1232 SS # — Leath C.I Work Location

Date of Hire 10/7/91

Work Telephone Number (803) 896 1051

Home Telephone Number (864) 356 3907

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion, how can your grievance be solved? Be as specific as possible

See attached

S/ Ruth Griffis
Employee (Grievant)

Home Address 118 Hiawatha Dr
Belton SC Zip 29627

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date 4/14/03

S/ Robin Thacker
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

SCDC 16 33 (Revised Apr 12000)

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT, Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel, Nickles & Solomon, P A.
Attorneys at Law
Post Office Box 1866
Columbia, South Carolina 29201

RE Ruth Fritts

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction-In-Force (RIF) that was effective June 1 2003 your client s position as a Certified Teacher (Job Class UB02) was eliminated and elected to bump into a Correctional Officer (Job Class JD30 Pay Band/Level 3E) with a salary reduction She is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on "bumping rights to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees,
4 All educators were grouped under generic terms for purposes of reduction in force, and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above, Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board, was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above, SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

P O Box 21787 - 4444 Broad River Road - Columbia, SC 29221 1787 - Telephone (803) 896-8555

Ruth Fritts
June 16 2003
Page 2

In response to item 5, the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street, Suite 1000, Columbia, South Carolina 29201, within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Ruth Fritts
File

01
GLENN NANCY B
617 RIVERWALK WAY

IRMO SC 29063-0000

-334-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on 4-7-03 (Date) and that I must make my selection and return this form within two (2) working days on 4-9-03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

NB (initial) I elect to bump into a filled or vacant position

NEED AN Application

___ (initial) I elect layoff

Nancy B Glenn (Employee Signature) 4-7-03 (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of CORRECTIONAL OFFICER 010737 (Vide) (To Be Assigned) (Position Title) (Position #)

in the area of STEVENSON to be effective 6-2-03

I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities See Site Indicator 8/10/92 See SVC Date 4/14/03

Nancy B Glenn (Employee) 4-14-03 (Date) John R. Lamm (HR Representative) 4/14/03 (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of _____ (Position Title) _____ (Position #)

in the area of _____ As a result, I agree that the effective date of my layoff will be close of business _____

_____ (Employee Signature) _____ (Date) _____ (HR Representative's Signature) _____ (Date)

01
GLENN NANCY B
617 RIVERWALK WAY

IRMO SC 29063-0000

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Nancy Glenn

Employee Signature S/ Nancy Glenn

Date 4-7-03

**PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES**

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO Nancy Glenn

FROM John A Near, Division Director – Human Resources

SUBJECT Notification of Reassignment and/or Demotion Due to Reduction-In-Force

DATE 4-14-03

The Department of Corrections announced a Reduction-In-Force on March 31, 2003 Your position was one of 148 positions eliminated, or was subject to bumping by another employee with a higher RIF Service Date Following our meeting on this date, you elected to bump into a filled or vacant position, in accordance with Reduction-In-Force Policy ADM 11 05 Your new position is

State Position Title Correctional Officer Pay Band 3 Pay Level E

Work location Stevenson New Base Annual Salary $ 26,909

Effective Date of Reassignment or Demotion June 2, 2003

Your new annual base salary does not include any additional benefits you may be currently receiving Your reassignment or demotion into the position identified above also requires that you meet the minimum state and agency requirements of the new position

Special Notice to Employees Reassigned or Demoted into a Security Positions Only

If you elected to bump into a security position, you must meet the minimum requirements of the position, to include passing a background check You must also obtain LETA certification no later than December 2, 2003 If you do not obtain LETA certification by December 2, 2003, your employment must be terminated, and your recall rights under this Reduction-In-Force will continue through June 1, 2004 The new annual base salary indicated above includes any previous security salary step increases, and no additional security increases will be awarded

You may use this memorandum at the agency's Commissary as authorization to obtain your uniforms In addition, you should contact the Warden or Associate Warden at your new work location to be advised of your new work hours and post assignment

S/ John A Near

Acknowledgement of Receipt S/ Nancy Glenn 4-14-03

Employee Name Date

Cc Warden/Division Director
HR Manager
Recruiting Office
Payroll

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003

EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations
GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM Nancy Glenn (Name) Classroom Teacher (Librarian) (Title)

DATE 5/30/03 251-82-5953 (SS #)

Date of Hire 8/10/92 Stevenson C I (Work Location)

Work Telephone Number (803) 896 1863

Home Telephone Number (803) 749 9124

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion, how can your grievance be solved? Be as specific as possible

See attached

S/ Nancy Glenn
Employee (Grievant)

Home Address 617 Riverwalk Way
Irmo SC Zip 29063

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date 5/30/03

S/ Robin M. Graceni
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

SCDC 16 33 (Re ed Apr 2000)

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16, 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel, Nickles & Solomon P A
Attorneys at Law
Post Office Box 1866
Columbia, South Carolina 29201

RE Nancy Glenn

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction In-Force (RIF) that was effective June 1 2003 your client s position as a Certified Teacher (Job Class UB02) was eliminated and elected to bump into a Correctional Officer (Job Class JD30 Pay Band/Level 3E) with a salary reduction She is appealing the Reduction In Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on bumping rights' to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees,
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures, a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District, who is a member of the District Board was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above, the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above, SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied.

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street Suite 1000 Columbia, South Carolina 29201 within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely

Robin M Gracien

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Nancy Glenn
File

10
JONES ETTA J
2313 RUBY DRIVE

AUGUSTA GA 30906-3047

✓344-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by JOHN NOCK (Name) on 4-3-03 (Date)

and that I must make my selection and return this form within two (2) working days on 4-7-03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

EB (Initial) I elect to bump into a filled or vacant position

___ (initial) I elect layoff

Etta Jones (Employee Signature) 4-3-03 (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ _____ (Position Title) (Position #)

in the area of _____ to be effective _____

I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER SEVERAL POSITIONS (Position Title) (Position #)

in the area of CENTRAL CORRECTIONS As a result, I agree that the effective date of my layoff will be close of business 6-1-03

Etta Jones 4-23-03 (Employee Signature) (Date) (HR Representative's Signature) 4/23/03 (Date)

1797

10
JONES ETTA J
2313 RUBY DRIVE

AUGUSTA GA 30906-3047

-345-

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Etta Jane Jones

Employee Signature S/ Etta Jane Jones

Date 4-3-03

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO All Employees Affected by Reduction-In-Force

FROM John A Near, Division Director – Human Resources

SUBJECT Recall Rights After Retirement

DATE April 9, 2003

Several employees whose position was affected by the Reduction-In-Force had requested information regarding recall rights after retirement

The Budget & Control Board's Office of Human Resources has indicated that any employee who retires on or before June 1, 2003 is not employed as of the effective date of the Reduction-In-Force, and is therefore not eligible for recall and reinstatement rights under the Reduction-In-Force Plan Only Employees who retire June 2, 2003 or after would eligible for recall

If you have any questions regarding retirement, you may contact the Employee Benefits Branch at 896-1673 or the South Carolina Retirement System at 737-6800

S/ John A. Near
John A Near

Acknowledgement of Receipt S/ [signature] 4-23-03
Employee Name Date

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

April 24, 2003

Etta Jones
2313 Ruby Drive
Augusta, GA 30906-3047

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Ms Jones,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

1800

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003
EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations

GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM Etta Jane Jones (Name) Guidance Counselor (Title)

DATE 6/5/03 255-64-4111 (SS #)

Date of Hire 8/24/87 McCormick Cor Inst. (Work Location)

Work Telephone Number ( ) _____ _____

Home Telephone Number (706) 798 8142

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

see attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion, how can your grievance be solved? Be as specific as possible

see attached

S/ Etta Jane Jones
Employee (Grievant)

Home Address 2313 Ruby Drive
Augusta GA Zip 30906

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date April 30, 2003

S/ Sherry L Spurlock
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

SCDC 16 33 (R sed Ap 12000)

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel Nickles & Solomon, P A.
Attorneys at Law
Post Office Box 1866
Columbia, South Carolina 29201

RE Etta Jane Jones

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction-In Force (RIF) that was effective June 1 2003 your client s position was eliminated and elected lay off She was classified as a Guidance Counselor (Job Class UB06) and is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on "bumping rights ' to designated areas within the Palmetto Unified School is arbitrary capricious, and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District, who is a member of the District Board was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above, SCDC Policy ADM-11 05, Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore, the grievance must be denied.

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street, Suite 1000, Columbia, South Carolina 29201, within 10 calendar days of receipt of this letter

If I can be of further assistance, you may contact me at 896-8527

Sincerely

Robin M Gracien

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director, Division of Human Resources
Etta Jane Jones
File

01
MARTIN,GENEVA M
2218 GADSDEN STREET
COLUMBIA SC 29201-0000

-355-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on April 7, 2003 (Date) and that I must make my selection and return this form within two (2) working days on 4-9-03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

GM 4-7-03 (initial) I elect to bump into a filled or vacant position

____ (initial) I elect layoff

Geneva Martin (Employee Signature) 4-7-03 (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of CORRECTIONAL OFFICER (Position Title) 011024 TO BE ASSIGNED (Position #) in the area of BROAD RIVER to be effective 6-1-03 I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

Geneva Martin (Employee) 4-15-03 (Date) John A Ross (HR Representative) 4/15/03 (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of _____ (Position Title) _____ (Position #) in the area of _____ As a result, I agree that the effective date of my layoff will be close of business _____

1808

_____ (Employee Signature) _____ (Date) _____ (HR Representative's Signature) _____ (Date)

01
MARTIN GENEVA M
2218 GADSDEN STREET
COLUMBIA SC 29201-0000

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Geneva M. Martin

Employee Signature S/ Geneva M. Martin

Date 4/7/03

PLEASE REMOVE THIS PAGE AND RETURN IT TO A REPRESENTATIVE IN THE DIVISION OF HUMAN RESOURCES

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO GENEVA M. MARTIN

FROM John A Near, Division Director – Human Resources

SUBJECT Notification of Reassignment and/or Demotion Due to Reduction-In-Force

DATE 4-15-03

The Department of Corrections announced a Reduction-In-Force on March 31, 2003 Your position was one of 148 positions eliminated, or was subject to bumping by another employee with a higher RIF Service Date Following our meeting on this date, you elected to bump into a filled or vacant position, in accordance with Reduction-In-Force Policy ADM 11 05 Your new position is

State Position Title CORRECTIONAL OFF Pay Band 3 Pay Level E

Work location BROAD RIVER New Base Annual Salary $ 26,909

Effective Date of Reassignment or Demotion June 2, 2003

Your new annual base salary does not include any additional benefits you may be currently receiving Your reassignment or demotion into the position identified above also requires that you meet the minimum state and agency requirements of the new position

Special Notice to Employees Reassigned or Demoted into a Security Positions Only

If you elected to bump into a security position, you must meet the minimum requirements of the position, to include passing a background check You must also obtain LETA certification no later than December 2, 2003 If you do not obtain LETA certification by December 2, 2003, your employment must be terminated, and your recall rights under this Reduction-In-Force will continue through June 1, 2004 The new annual base salary indicated above includes any previous security salary step increases, and no additional security increases will be awarded

You may use this memorandum at the agency's Commissary as authorization to obtain your uniforms In addition, you should contact the Warden or Associate Warden at your new work location to be advised of your new work hours and post assignment

S/ John A. Near
John A Near

Acknowledgement of Receipt S/ Geneva Martin Employee Name 4-15-03 Date

Cc Warden/Division Director
HR Manager
Recruiting Office
Payroll

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
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5 Ann Bridges
6 Rance Cobb
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9 William K Dreyer
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12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations
Employee GRIEVANCE REPORT

TO Office of ~~Workforce~~ Relations

FROM Geneva Martin (Name) Teacher (Title)

DATE 6/11/03 425-88-0743 (SS #)

Date of Hire 11/3/97 Broad River (Work Location)

Work Telephone Number (803) 896 2855

Home Telephone Number (803) 446 9775

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion, how can your grievance be solved? Be as specific as possible

See attached

S/ Geneva Martin
Employee (Grievant)

Home Address 2218 Gadsden St
Columbia, SC Zip 29201

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date May 28, 2003

S/ Sherry T Spurlock
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

SCDC 16 33 (Revised April 2000)

1815

South Carolina Department of Corrections

MARK SANFORD, Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel Nickles & Solomon P A
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE Geneva Martin

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction-In-Force (RIF) that was effective June 1 2003 your client s position as a Certified Teacher (Job Class UB02) was eliminated and elected to bump into a Correctional Officer (Job Class JD30 Pay Band/Level 3E) with a salary reduction She is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on ' bumping rights" to designated areas within the Palmetto Unified School is arbitrary, capricious and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above, Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction-In Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion

In response to items 3 and 4 above SCDC Policy ADM-11 05 Reduction In Force, states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5, the basis for the Reduction In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services, 1201 Main Street Suite 1000, Columbia, South Carolina 29201, within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director, Division of Human Resources
Geneva M Martin
File

11
MCCABE MARY H
105 MARSEILLE DRIVE -365-
SIMPSONVILLE SC 29680-000

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on 4/3/03 (Date)

and that I must make my selection and return this form within two (2) working days on 4/7/03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

✓ mhm (initial) I elect to bump into a filled or vacant position

____ (initial) I elect layoff

Mary H. McCabe (Employee Signature) 4/3/03 (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy 01/2023 and agree to accept the position of CORR. OFFICER (Position Title) TO BE ASSIGNED (Position #)

in the area of PERRY to be effective 6-2-03

I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

M. H. McCabe 4/24/03 (Employee) (Date) _____ (HR Representative) 4/24/03 (Date)

See Step "2"

ELECTION TO SELECT LAYOFF

See Service Date 1/30/95

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of _____ (Position Title) _____ (Position #)

in the area of _____ As a result, I agree that the effective date of my layoff will be close of business _____

1818

_____ (Employee Signature) _____ (Date) _____ (HR Representative's Signature) _____ (Date)

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO MARY H. MCCABE

FROM John A Near, Division Director – Human Resources

SUBJECT Notification of Reassignment and/or Demotion Due to Reduction-In-Force

DATE 4-24-03

The Department of Corrections announced a Reduction-In-Force on March 31, 2003 Your position was one of 148 positions eliminated, or was subject to bumping by another employee with a higher RIF Service Date Following our meeting on this date, you elected to bump into a filled or vacant position, in accordance with Reduction-In-Force Policy ADM 11 05 Your new position is

State Position Title CORR OFFICER Pay Band 3 Pay Level E

Work location PERRY New Base Annual Salary $ 26,909

Effective Date of Reassignment or Demotion June 2, 2003

Your new annual base salary does not include any additional benefits you may be currently receiving Your reassignment or demotion into the position identified above also requires that you meet the minimum state and agency requirements of the new position

Special Notice to Employees Reassigned or Demoted into a Security Positions Only

If you elected to bump into a security position, you must meet the minimum requirements of the position, to include passing a background check You must also obtain LETA certification no later than December 2, 2003 If you do not obtain LETA certification by December 2, 2003, your employment must be terminated, and your recall rights under this Reduction-In-Force will continue through June 1, 2004 The new annual base salary indicated above includes any previous security salary step increases, and no additional security increases will be awarded

You may use this memorandum at the agency's Commissary as authorization to obtain your uniforms In addition, you should contact the Warden or Associate Warden at your new work location to be advised of your new work hours and post assignment

S/ John A Near

Acknowledgement of Receipt S/ Mary H. McCabe (Employee Name) 4/24/03 (Date)

Cc Warden/Division Director
HR Manager
Recruiting Office
Payroll

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003

EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations
GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM Mary H. McCabe (Name) Librarian (Title)

DATE 6/11/03 250 82 6872 (SS #)

Date of Hire 1/30/95 Perry (Work Location)

Work Telephone Number 864 243 4700

Home Telephone Number 864 243 9799

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion, how can your grievance be solved? Be as specific as possible

see attached

S/ Mary H McCabe
Employee (Grievant)

Home Address 105 Marseille Dr.
Simpsonville SC Zip 29680

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date 6/2/03

S/ [signature]
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

SCDC 16 33 (Rev sed Apnl 2000)

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles, III
Gergel, Nickles & Solomon P A
Attorneys at Law
Post Office Box 1866
Columbia, South Carolina 29201

RE Mary H McCabe

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction-In Force (RIF) that was effective June 1 2003 your client s position as a Certified Teacher (Job Class UB02) was eliminated and elected to bump into a Correctional Officer (Job Class JD30, Pay Band/Level 3E) with a salary reduction She is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on 'bumping rights' to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force, and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District, who is a member of the District Board was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above SCDC Policy ADM-11 05, Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

P O Box 21787 - 4444 Broad River Road - Columbia, SC 29221-1787 - Telephone (803) 896-8555

In response to item 5 the basis for the Reduction-In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street Suite 1000 Columbia, South Carolina 29201 within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Mary H McCabe
File

01
MCCLANAHAN BEVERLY M
3110 MONTCREST ROAD

COLUMBIA SC 29210-5523

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by ~~Beverly McClanahan~~ John Nunn (Name) on 4-7-03 (Date) and that I must make my selection and return this form within two (2) working days on 4-9-03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

BM (initial) I elect to bump into a filled or vacant position

____ (initial) I elect layoff

Beverly McClanahan 4-7-03
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

014790 (Rec #) 116324 (

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of CORRECTIONAL OFFICER (TO BE DETERMINED)
(Position Title) (Position #)
in the area of BROAD RIVER to be effective 6-2-03
I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

Beverly McClanahan 4-14-03 John A. Nunn 4/14/03
(Employee) (Date) (HR Representative) (Date)

Step Indicator "2"
Rec Sec Date 12/3/90

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of _____ _____
(Position Title) (Position #)
in the area of _____ As a result, I agree that the effective date of my layoff will be close of business _____

1827

_____ _____ _____ _____
(Employee Signature) (Date) (HR Representative's Signature) (Date)

01
MCCLANAHAN BEVERLY M
3110 MONTCREST ROAD
COLUMBIA SC 29210-5523

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Beverly McClanahan

Employee Signature S/ Beverly McClanahan

Date 4-7-03

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO All Employees Affected by Reduction-In-Force

FROM John A Near, Division Director – Human Resources

SUBJECT Recall Rights After Retirement

DATE April 9, 2003

Several employees whose position was affected by the Reduction-In-Force had requested information regarding recall rights after retirement

The Budget & Control Board's Office of Human Resources has indicated that any employee who retires on or before June 1, 2003 is not employed as of the effective date of the Reduction-In-Force, and is therefore not eligible for recall and reinstatement rights under the Reduction-In-Force Plan Only Employees who retire June 2, 2003 or after would eligible for recall

If you have any questions regarding retirement, you may contact the Employee Benefits Branch at 896-1673 or the South Carolina Retirement System at 737-6800

S/ John A Near

Acknowledgement of Receipt S/ Employee Name 4-14-03 Date

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO BEVERLY McCLANAHAN

FROM John A Near, Division Director – Human Resources

SUBJECT Notification of Reassignment and/or Demotion Due to Reduction-In-Force

DATE 4-14-03

The Department of Corrections announced a Reduction-In-Force on March 31, 2003 Your position was one of 148 positions eliminated, or was subject to bumping by another employee with a higher RIF Service Date Following our meeting on this date, you elected to bump into a filled or vacant position, in accordance with Reduction-In-Force Policy ADM 11 05 Your new position is

State Position Title CORRECTIONAL OFF Pay Band 3 Pay Level E

Work location BROAD RIVER New Base Annual Salary $ 26,909

Effective Date of Reassignment or Demotion June 2, 2003

Your new annual base salary does not include any additional benefits you may be currently receiving Your reassignment or demotion into the position identified above also requires that you meet the minimum state and agency requirements of the new position

Special Notice to Employees Reassigned or Demoted into a Security Positions Only

If you elected to bump into a security position, you must meet the minimum requirements of the position, to include passing a background check You must also obtain LETA certification no later than December 2, 2003 If you do not obtain LETA certification by December 2, 2003, your employment must be terminated, and your recall rights under this Reduction-In-Force will continue through June 1, 2004 The new annual base salary indicated above includes any previous security salary step increases, and no additional security increases will be awarded

You may use this memorandum at the agency's Commissary as authorization to obtain your uniforms In addition, you should contact the Warden or Associate Warden at your new work location to be advised of your new work hours and post assignment

S/ John A. Near
John A Near

Acknowledgement of Receipt S/ B McClanahan 4-14-03
Employee Name Date

Cc Warden/Division Director
HR Manager
Recruiting Office
Payroll

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003
EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

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e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations

GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM Beverly McClanahan (Name) Educator (Title)

DATE 6/11/03 249-70-1727 (SS #)

Date of Hire 12/01/1990 Broad River (Work Location)

Work Telephone Number (803) 896 2853

Home Telephone Number (803) 772 1834

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion how can your grievance be solved? Be as specific as possible

See attached

S/ Beverly M McClanahan
Employee (Grievant)

Home Address 3110 Monterest Rd.
Columbia, SC Zip 29210

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date 5-29-03

S/ Carrie H. Grant
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

1835

SCDC 16 33 (Revised April 2000)

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel Nickles & Solomon P A
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE Beverly McClanahan

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction-In Force (RIF) that was effective June 1 2003 your client s position as a Vocational Teacher (Job Class UB04) was eliminated and elected to bump into a Correctional Officer (Job Class JD30, Pay Band/Level 3E) with a salary reduction. She is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on "bumping rights" to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
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According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District, who is a member of the District Board was informed prior to the effective date of the Reduction In-Force of the decision by the Agency Director to implement a Reduction-In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 3 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government, through legal action to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street, Suite 1000, Columbia, South Carolina 29201 within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely

Robin M Gracien

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near, Director Division of Human Resources
Beverly McClanahan
File

11
RANDOLPH MAX
388 ISLAND CREEK RD -385-
COWPENS SC 29330-9423

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on 4-28-03 (Date) and that I must make my selection and return this form within two (2) working days on 4.30.'03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

MDR (initial) I elect to bump into a filled or vacant position

____ (initial) I elect layoff

M.D. Randolph 4-28.'03
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ _____
(Position Title) (Position #)
in the area of _____ to be effective _____
I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER SEVERAL POSITIONS
(Position Title) (Position #)
in the area of SEVERAL LOCATIONS As a result, I agree that the effective date of my layoff will be close of business 6-1-03

M.D. Randolph 5-2 03 John A. Near 5/2/03
(Employee Signature) (Date) (HR Representative's Signature) (Date)

11
RANDOLPH MAX
388 ISLAND CREEK RD

COUPENS SC 29330-9423

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Max D. Randolph

Employee Signature S/ Max D. Randolph

Date 4-28-'03

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO All Employees Affected by Reduction-In-Force

FROM John A Near, Division Director – Human Resources

SUBJECT Recall Rights After Retirement

DATE April 9, 2003

Several employees whose position was affected by the Reduction-In-Force had requested information regarding recall rights after retirement

The Budget & Control Board's Office of Human Resources has indicated that any employee who retires on or before June 1, 2003 is not employed as of the effective date of the Reduction-In-Force, and is therefore not eligible for recall and reinstatement rights under the Reduction-In-Force Plan Only Employees who retire June 2, 2003 or after would eligible for recall

If you have any questions regarding retirement, you may contact the Employee Benefits Branch at 896-1673 or the South Carolina Retirement System at 737-6800

S/ _____
John A Near

Acknowledgement of Receipt S/ _____ 5-2-03
Employee Name Date

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

May 5, 2003

Max Randolph
388 Island Creek Road
Cowpens, SC 29330-9423

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Mr Randolph,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003
EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Relations

GRIEVANCE REPORT

TO Employer ~~Office of Workforce~~ Relations

FROM Max D. Randolph (Name) Teacher (Title)

Hire DATE 07/10/89 250-64-1284 (SS #)

Date ~~of Filing~~ 06/09/03 Tyger River C. I. (Work Location)

Work Telephone Number ( ) _____

Home Telephone Number (864) 461 2583

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion how can your grievance be solved? Be as specific as possible

See attached

S/ M D. Randolph
Employee (Grievant)

Home Address 388 Island Creek Rd.
Cowpens, SC Zip 29330

This form must be completed and submitted to the Office of Workforce Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date 6/6/03

S/ Robin Stacier
Director or Designee ~~Office of Workforce~~ Relations
Employer

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

South Carolina Department of Corrections

MARK SANFORD, Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel Nickles & Solomon, P A
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE Max D Randolph

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency's Reduction-In-Force (RIF) that was effective June 1, 2003 your client s position as a Vocational Teacher (Job Class UB04) was bumped by another employee with a higher RIF service date in the same classification and elected lay off He is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on bumping rights to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force, and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above, Department and State policy provide that the authority to implement a Reduction-In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District, who is a member of the District Board, was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above, SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5 the basis for the Reduction In Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied.

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street, Suite 1000 Columbia, South Carolina 29201, within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Max D Randolph
File

01
SMITH CAROLYN M
321 SPRING POINT DR

-396-

COLUMBIA SC 29229-0000

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by MR. JOHN MEAR (Name) on APRIL 7, 2003 (Date) and that I must make my selection and return this form within two (2) working days on APRIL 9, 2003 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

CMS (initial) I elect to bump into a filled or vacant position

____ (initial) I elect layoff

Carolyn M Smith April 7, 2003
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ _____
(Position Title) (Position #)

in the area of _____ to be effective _____
I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER (SEVERAL AVAILABLE)
(Position Title) (Position #)

in the area of SEVERAL CORRECTIONS As a result, I agree that the effective date of my layoff will be close of business 6-1-03

Carolyn M Smith 4-14-03 John A. Mear 4/14/03
(Employee Signature) (Date) (HR Representative's Signature) (Date)

1849

01
SMITH CAROLYN M
321 SPRING POINT DR -397-
COLUMBIA SC 29229-0000

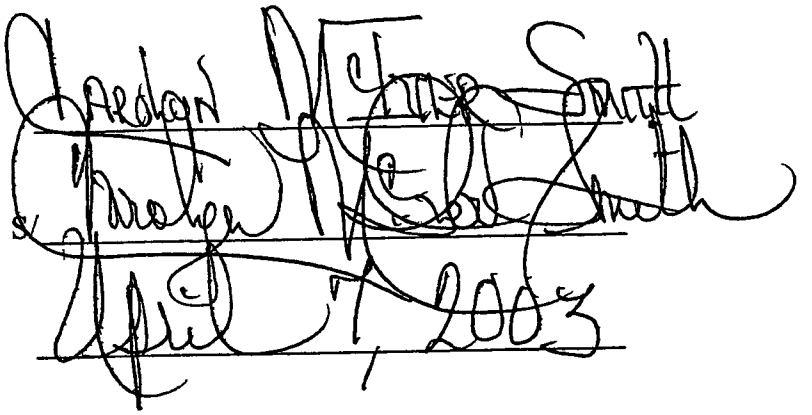
Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name

Employee Signature

Date



PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO All Employees Affected by Reduction-In-Force

FROM John A Near, Division Director – Human Resources

SUBJECT Recall Rights After Retirement

DATE April 9, 2003

Several employees whose position was affected by the Reduction-In-Force had requested information regarding recall rights after retirement

The Budget & Control Board's Office of Human Resources has indicated that any employee who retires on or before June 1, 2003 is not employed as of the effective date of the Reduction-In-Force, and is therefore not eligible for recall and reinstatement rights under the Reduction-In-Force Plan Only Employees who retire June 2, 2003 or after would eligible for recall

If you have any questions regarding retirement, you may contact the Employee Benefits Branch at 896-1673 or the South Carolina Retirement System at 737-6800

S/ John A Near

Acknowledgement of Receipt S/ _____ 4-14-03
Employee Name Date

South Carolina Department of Corrections

MARK SANFORD Governor
JON E OZMINT Director

April 16, 2003

Carolyn Smith
321 Spring Point Drive
Columbia, SC 29229

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Ms Smith,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003

EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations

GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM Marilyn McGee Smith (Name) Academic Program Manager (Title)

DATE 6/5/03

Date of Hire 2/10/92

266-68-7065 (SS #)

Kirkland R&E (Work Location)

Work Telephone Number ~~803~~ 896-3974

Home Telephone Number (803) 699-9826

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUN 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion, how can your grievance be solved? Be as specific as possible

See attached

S/ Marilyn McGee Smith
Employee (Grievant)

Home Address 321 Spring Point Drive
Columbia, SC Zip 29229

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date _____

S/ _____
Director or Designee Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel Nickles & Solomon P A
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE Carolyn McIver Smith

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency's Reduction-In-Force (RIF) that was effective June 1 2003 your client s position was eliminated and elected lay off She was classified as a Academic Program Manager (Job Class UE07) and is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on bumping rights to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency's RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy, the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency's RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore, the grievance must be denied.

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street Suite 1000 Columbia, South Carolina 29201 within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896-8527

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near, Director Division of Human Resources
Carolyn McIver Smith
File

01
WILLIAMS MAGGIE L
207 WEDDELL STREET
UNIT 1-C
COLUMBIA SC 29223-0000

-467-

TH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on 4/28/03 (Date)

and that I must make my selection and return this form within two (2) working days on 4/30/03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

MWW (initial) I elect to bump into a filled or vacant position

____ (initial) I elect layoff

Maggie L Williams 4/28/03
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ _____
(Position Title) (Position #)

in the area of _____ to be effective _____
I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER SEVERAL POSITIONS
(Position Title) (Position #)

in the area of SEVERAL LOCATIONS As a result, I agree that the effective date of my layoff will be close of business 6-1-03

Maggie L Williams 4/29/03 _____ 4/29/03
(Employee Signature) (Date) (HR Representative's Signature) (Date)

TH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO All Employees Affected by Reduction-In-Force

FROM John A Near, Division Director – Human Resources

SUBJECT Recall Rights After Retirement

DATE April 9, 2003

Several employees whose position was affected by the Reduction-In-Force had requested information regarding recall rights after retirement

The Budget & Control Board's Office of Human Resources has indicated that any employee who retires on or before June 1, 2003 is not employed as of the effective date of the Reduction-In-Force, and is therefore not eligible for recall and reinstatement rights under the Reduction-In-Force Plan Only Employees who retire June 2, 2003 or after would eligible for recall

If you have any questions regarding retirement, you may contact the Employee Benefits Branch at 896-1673 or the South Carolina Retirement System at 737-6800

S/ John A Near

Acknowledgement of Receipt S/ Maggie L Williams 4/29/03
Employee Name Date

01
WILLIAMS MAGGIE L
207 WEDDELL STREET
UNIT 1-C
COLUMBIA SC 29223-0000

-409-

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name Maggie L. Williams

Employee Signature S/ Maggie L Williams

Date April 28, 2003

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

May 2, 2003

Maggie Williams
207 Weddell Street
Unit 1-C
Columbia, SC 29223

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Ms Williams,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 12, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

1863

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003

EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

South Carolina Department of Corrections
Office of ~~Workforce~~ Employee Relations

GRIEVANCE REPORT

TO Office of ~~Workforce~~ Employee Relations

FROM Maggie L. Williams (Name) — Educator (Title)

DATE 6/11/03 — 248.64.9801 (SS #)

Date of Hire 1/31/94 — Griffin-Graham (Work Location)

Work Telephone Number (803) 896 2713

Home Telephone Number (803) 736 6797

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RECEIVED
JUL 12 2003
EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion how can your grievance be solved? Be as specific as possible

See attached

S/ Maggie L Williams
Employee (Grievant)

Home Address 207 Wedgell St, 1-C
Columbia Zip 29223

This form must be completed and submitted to the Office of ~~Workforce~~ Employee Relations no later than 14 days of Grievable Action in compliance with SCDC policy/procedure ADM 11 02

Date May 29, 2003

S/ Sherry F Burlock
Director or Designee, Office of ~~Workforce~~ Employee Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel Nickles & Solomon, P A
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE Maggie L Williams

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency's Reduction-In-Force (RIF) that was effective June 1 2003 your client s position as a Certified Teacher (Job Class UB02) was bumped by another employee with a higher RIF service date in the same classification and elected lay off She is appealing the Reduction-In-Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on bumping rights to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM-11 02, Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non-educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District, who is a member of the District Board was informed prior to the effective date of the Reduction In-Force of the decision by the Agency Director to implement a Reduction In Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction In-Force in an arbitrary and capricious fashion.

In response to items 3 and 4 above SCDC Policy ADM-11 05, Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5 the basis for the Reduction In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action, to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore, the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street, Suite 1000 Columbia, South Carolina 29201 within 10 calendar days of receipt of this letter

If I can be of further assistance, you may contact me at 896 8527

Sincerely

Robin M Gracien Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Maggie L Williams
File

05
WOODLIEF PAULA L
2233 FLINT HILL RD

CAMDEN SC 29020-0000

-418-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by John Near (Name) on 4-4-03 (Date)

and that I must make my selection and return this form within two (2) working days on 4-8-03 (Date) If I fail to return this form within the time required, I agree to automatically waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

WX (initial) I elect to bump into a filled or vacant position

___ (initial) I elect layoff

Paula Woodlief (Employee Signature) 4-4-03 (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ (Position Title) _____ (Position #)

in the area of _____ to be effective _____

I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ (Employee) _____ (Date) _____ (HR Representative) _____ (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse to accept the position of CORRECTIONAL OFFICER SEVERAL POSITIO (Position Title) (Position #)

in the area of Kershaw As a result, I agree that the effective date of my layoff will be close of business 6-1-03

_____ (Employee Signature) 4-21-03 (Date) _____ (HR Representative's Signature) 4/21/03 (Date)

1871

05
WOODLIEF PAULA L
2233 FLINT HILL RD -419-
CAMDEN SC 29020-000C

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name _____

Employee Signature S/_____

Date _____

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

Refused to Sign Acknowledgement
D L Shankle 4/4/03
Betty Stewart 4/4/03

1872

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT, Director

April 22, 2003

Paula Woodlief
2233 Flint Hill Road
Camden, SC 29020

SUBJECT Notification of Termination Due to Reduction-In-Force

Dear Ms Woodlief,

On March 31, 2003 I announced a Reduction-In-Force at the Department of Corrections One hundred and forty-eight positions were eliminated due to a projected budget shortfall of nearly $20 million for Fiscal Year 2003/2004

Your position was either eliminated or you were bumped by another employee You elected to be laid off rather than transfer into a vacant position Effective close of business June 1, 2003 your employment with the Department of Corrections will be terminated due to a Reduction-In-Force You have provided a valuable service to the Department of Corrections and I deeply regret the need to take this action

Your final paycheck with the South Carolina Department of Corrections should be June 16, 2003 To receive your final paycheck you must go through the clearance process You should consult your Human Resources Manager/Liaison to assist you with the clearance process Once you have cleared through your work location, the final clearance process will be through the Division of Human Resources, Room 100, Headquarters You will turn in your Identification card to the Division of Human Resources Additionally, the Division of Human Resources will be happy to assist you with any questions you may have relating to your final paycheck, refund of retirement contributions and continuation of your benefits If you are planning to retire effective June 2, 2003, please contact Ms Linda Bramlett or Ms Jeanne McKay no later than May 1, 2003, so they may assist you with this process

You will be eligible for recall rights through June 1, 2004 Should a vacancy occur that you are eligible for, the Recruiting and Employment Services Branch will be in contact with you Please remember it is very important for you to keep the Division of Human Resources informed of your current phone number and address

I am hopeful that conditions will improve and if you are interested in seeking employment within state government, opportunities will become available for you I truly wish you success in future endeavors

Sincerely,

Jon E Ozmint

Cc Warden/Division Director
Human Resources

PO Box 21787 - 4444 Broad River Road - Columbia, SC 29221 1787 - Telephone (803) 896-8555

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

June 12, 2003

Via Hand Delivery
Michael H Montgomery, Esquire
1812 Lincoln Street
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mike

In keeping with our agreement concerning service of grievances arising out of the Department of Corrections' reduction in force by members of the Palmetto Unified School District, enclosed are grievance reports and attachments for each of the following employees

1 James Cal Bell
2 Othella Bernard
3 Catherina W Bowyer
4 Linda M W Bratton
5 Ann Bridges
6 Rance Cobb
7 Jeannie B Croxton
8 Bernetha L Culbreath
9 William K Dreyer
10 Jacqueline D Farr
11 Ruth Fritts
12 Nancy Glenn
13 Etta Jane Jones
14 Geneva Martin
15 Nancy H McCabe
16 Beverly McClanahan
17 Max D Randolph
18 Carolyn McIver Smith
19 Maggie L Williams
20 Paula Woodlief

JUN 12 2003

EMPLOYEE RELATIONS

I understand that delivery of these materials to you satisfies any notice requirement under the grievance procedures of the South Carolina Department of Corrections It is my further understanding that, to the extent appropriate, these grievances will be consolidated If any additional information is required to initiate the grievance, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Patsy Fulmer
File #03-156

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

3052

South Carolina Department of Corrections
Office of Workforce Relations

-425-

Employee

GRIEVANCE REPORT

TO Office of ~~Workforce~~ Relations

FROM Paula Woodlief (Name) Education Coordinator (Title)

DATE 10 / 2 / 03 249-31-2809 (SS #)

Date of Hire 11 / 03 / 86 Kershaw (Work Location)

Work Telephone Number (803) 896 3343

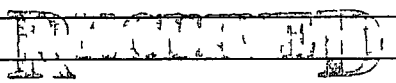
Home Telephone Number (803) 425 8332

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached



JUN 12 2003

EMPLOYEE RELATIONS

RELIEF SOUGHT

In your opinion, how can your grievance be solved? Be as specific as possible

See attached

S/ Paula L Woodlief
Employee (Grievant)

Home Address 2233 Flint Hill Road
Camden SC Zip 29020

Employee

This form must be completed and submitted to the Office of ~~Workforce~~ Relations no later than 14 days of grievable action in compliance with SCDC policy/procedure ADM 11 02

Date June 2, 2003

S/ Sherry L Spurlock
Director or Designee Office of ~~Workforce~~ Relations

Employee

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

1878

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

June 16, 2003

CERTIFIED MAIL

Mr W Allen Nickles III
Gergel Nickles & Solomon P A
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29201

RE Paula Woodlief

Dear Mr Nickles

The Employee Relations Branch received the grievance report of the above referenced individual on June 12 2003 As a result of the Agency s Reduction-In-Force (RIF) that was effective June 1 2003 your client s position was eliminated and elected lay off She was classified as a Certified Teacher (Job Class UB02) and is appealing the Reduction-In Force based upon following (summarized)

1 The District Board was not involved in the decision
2 Educators were singled out for reduction in force in an arbitrary and capricious fashion
3 Restriction on 'bumping rights to designated areas within the Palmetto Unified School is arbitrary capricious and aversely effects veteran educators and educators holding advanced degrees
4 All educators were grouped under generic terms for purposes of reduction in force and
5 The reduction in force plan is exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

According to SCDC Policy ADM 11 02 Employee Grievance and Appeals Procedures a RIF is considered grievable only if the Department determines there is a material issue of fact that the Department inconsistently and/or improperly applied the Agency s RIF Plan or Policy

In response to item 1 above Department and State policy provide that the authority to implement a Reduction In Force belongs to the Agency Director The elimination of educational and non educational positions was based upon insufficient operating funds and reorganization within the agency Although not a requirement of policy the Superintendent of the Palmetto Unified School District who is a member of the District Board was informed prior to the effective date of the Reduction-In-Force of the decision by the Agency Director to implement a Reduction In-Force

In response to item 2 above the Department does not agree with your opinion that educators were singled out for Reduction-In Force in an arbitrary and capricious fashion

In response to items 3 and 4 above SCDC Policy ADM-11 05 Reduction In Force states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights The Agency s RIF Policy and Plan were submitted and approved by the State Office of Human Resources prior to the implementation of the RIF

In response to item 5 the basis for the Reduction-In-Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees who petitioned the government through legal action to compel the Department to provide compensation in accordance with law

I have reviewed the issues presented in the grievance report and find that the plan and policy were consistently and properly applied Therefore the grievance must be denied

You have the right the appeal this decision to the State Office of Human Resources by contacting Grievance and Mediations Services 1201 Main Street Suite 1000 Columbia, South Carolina 29201 within 10 calendar days of receipt of this letter

If I can be of further assistance you may contact me at 896 8527

Sincerely

Robin M Gracien

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc John Near Director Division of Human Resources
Paula Woodlief
File

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L. PATTERSON JR.
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR.
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL, JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737-0900

SAMUEL L. WILKINS
DIRECTOR

August 22, 2003

Ms Donna Guffey
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections (SCDC)

Dear Ms Guffey

This letter is to request additional information regarding the above referenced appeals filed with the State Human Resources Director This office is seeking clarification concerning the fourth contention listed in your letter of June 20, 2003, which states

> 4 Individuals and/or positions were arbitrarily protected or removed from consideration for separation for reasons unrelated to RIF criteria

In addition, please send a copy of your response to Ms Gracien If we do not receive a response by Friday, August 29, 2003, we will make a determination based on the information that we have

Sincerely,

Terry M Baggott

Terry M Baggott
Grievance and Mediation Services Manager

c Mr John Near
Ms Robin Gracien

FAX (803) 737 0968

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles, III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256-1816
office@gnslaw com

August 26, 2003



Via Facsimile (737-0968)
Terry M Baggott
State Budget and Control Board
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Terry

Confirming our telephone conversation of August 25 2003, I would appreciate an extension of ten (10) days beyond August 29, 2003 in which to provide a response to your request By copy of this letter, I am informing Mike Montgomery, attorney for the Department of Corrections, of this request

Sincerely,

W Allen Nickles, III

WAN/pfb
cc Mike Montgomery, Esquire
File #03-156

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L. PATTERSON JR.
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K. LEATHERMAN SR.
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL, JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737-0900

SAMUEL L. WILKINS
DIRECTOR

August 27, 2003

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Dept of Corrections

Dear Mr Nickles

I received your letter dated August 26, 2003, in which you request an extension to submit a response to my request for additional information regarding the above referenced appeals I am granting your request for an extension until September 8, 2003

Please call me at 737-0292 should you have any questions

Sincerely,

Terry M Baggott
Grievance and Mediation Services Manager

cc Mr John Near
Ms Robin Gracien

1883

FAX (803) 737 0968

* * * COMMUNICATION RESULT REPORT (AUG 27 2003 8 14AM) * * * -431-

TTI SC OHR

FILE MODE	OPTION	ADDRESS (GROUP)	RESULT	PAGE
MEMORY TX		92561816	OK	P 2/2

REASON FOR ERROR
E-1) HANG UP OR LINE FAIL
E-2) BUSY
E-3) NO ANSWER
E-4) NO FACSIMILE CONNECTION

FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Fax. (803) 737-0968
Phone. (803) 737-0970

TO: Al Nickles **DATE:** Aug 27, 2003

Fax #: 779-8080 **# of Pages:** 2

Phone #: 256-1816 **(including cover sheet)**

From: Jerry Baggott **Phone #:** 737-0292

COMMENTS:

* * * COMMUNICATION RESULT REPORT (AUG 27 2003 8 18AM) * * *

TTI SC OHR

FILE MODE	OPTION	ADDRESS (GROUP)	RESULT	PAGE
MEMORY TX		62726	OK	P 2/2

REASON FOR ERROR
E-1) HANG UP OR LINE FAIL
E-2) BUSY
E-3) NO ANSWER
E-4) NO FACSIMILE CONNECTION

FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Fax: (803) 737-0968
Phone. (803) 737-0970

TO: John Near Robin Gracen

DATE: 8-27-03

Fax #: 6-2726

# of Pages. 2 (including cover sheet)

Phone #: 6-1927

From: Terry Baggott

Phone #. 7-0292 7-0950 (Debbie Clark)

COMMENTS:

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 250-1816
office@gnslaw com



August 29, 2003

Terry M Baggott
State Budget and Control Boara
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE Palmetto Unified School District Reduction In Force

Dear Terry

In preparing a response to your letter of August 22, 2003, the following materials which should be available from your office are required

A) A complete copy of materials submitted by the Department of Corrections in support of its reduction in force implemented effective June 1, 2003

B) A complete copy of all materials provided to the Department of Corrections by the Office of Human Resources in reference to the reduction in force

C) A complete list of all positions occupied at the Department of Corrections prior to the reduction in force

D) A complete list of all positions eliminated as result of the reduction in force

E) A complete list of all vacancies existing immediately prior to the reduction in force

F) A complete list of all vacancies filled since the reduction in force

G) A complete list of all new positions approved since the reduction in force

H) A complete copy of materials submitted by the Department of Corrections in support of any retirement incentives offered during the calendars years 2002 and 2003

I) A complete list of new positions approved for the Department of Corrections during the calendar years 2002 and 2003

J) A complete list of all reclassifications and promotions and transfers implemented by the Department of Corrections during the calendar years 2002 and 2003

I very much appreciate your assistance and cooperation in this matter and request an opportunity to review these materials prior to responding to your letter of August 22, 2003 If any of the materials requested are not available or available only from another source, please contact me

Sincerely,

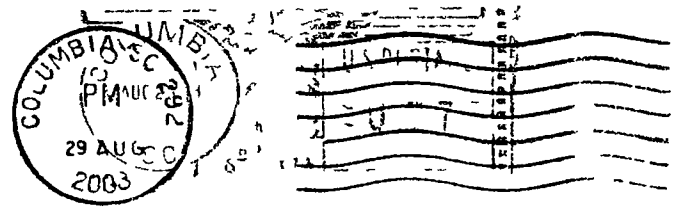
W Allen Nickles, III

WAN/pgm
File # 03-156

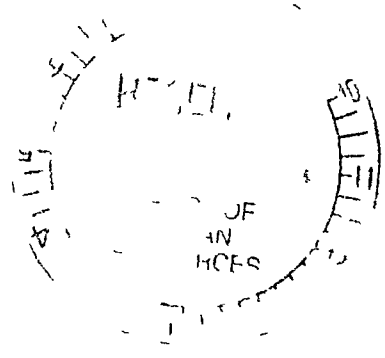
cc Mike Montgomery (via facsimile 799-2755)

03 156 08a wpd

GERGEL, NICKLES & SOLOMON, P A
1519 Richland Street
Post Office Box 1866
Columbia South Carolina 29202 1866



Terry M Baggott
State Budget and Control Board
1201 Main Street, Suite 1000
Columbia, South Carolina 29201



29201+3291

1888

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

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RICHARD ECKSTROM
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CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L. WILKINS
DIRECTOR

September 5, 2003

VIA FACSIMILE & REGULAR U S MAIL
Ms Robin M Gracien, Chief
Employee Relations Branch
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 2929221-1787

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections (SCDC)

Dear Ms Gracien

I have received the attached letter dated August 29, 2003, from Mr Al Nickles regarding the above referenced matter Please respond to Mr Nickles's letter by stating your position on this matter in writing to us no later than Monday, September 8, 2003

If we do not receive a response by the indicated date, a determination will be made based on the information we have

Please call if you have any questions

Sincerely,

Terry M Baggott
Grievance and Mediation Services Manager

Attachment

cc Mr John Near
Mr Al Nickles

1889

* * * COMMUNICATION RESULT REPORT (SEP 5 2003 9 32AM) * * * -437-

TTI SC OHR

FILE MODE	OPTION	ADDRESS (GROUP)	RESULT	PAGE
3 MEMORY TX		92561816	OK	P 4/4

REASON FOR ERROR
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E-2) BUSY
E-3) NO ANSWER
E-4) NO FACSIMILE CONNECTION

FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Fax. (803) 737-0968
Phone· (803) 737-0970

TO: Al Nickles **DATE.** 9-5-03

Fax #. 256-1816 **# of Pages:** 4 (including cover sheet)

Phone #:

From· Terry Baggott **Phone #:** 737-0292

COMMENTS:

* * * COMMUNICATION RESULT REPOPT (SEP 5 2003 9 26AM) * * * -438-

TTI SC OHR

FILE MODE	OPTION	ADDRESS (GROUP)	RESULT	PAGE
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REASON FOR ERROR
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E-2) BUSY
E-3) NO ANSWER
E-4) NO FACSIMILE CONNECTION

FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Fax (803) 737-0968
Phone (803) 737-0970

TO: Robin Kracien / John Near

DATE: 9-5-03

Fax #: 6-2726

# of Pages: 4 (including cover sheet)

Phone #:

From: Jerry Baggott

Phone #: 737-0292

COMMENTS:

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
David E Rothstein
Dona L Guffey
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1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

September 8, 2003



Via Hand Delivery
Terry M Baggott
State Budget and Control Board
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Terry

The following is a preliminary response to your request for additional information seeking clarification concerning the fourth issue listed in our grievance letter of June 20, 2003 which states

4 Individuals and/or positions were arbitrarily protected or removed from consideration for separation for reasons unrelated to RIF criteria

This is a preliminary response as we have not received the requested information from your office as well as Mike Montgomery's office We are in receipt of your letter of September 5, 2003 to Ms Robin Gracien and reserve the right to supplement this response upon receipt of the requested information

a The Principal and special education teacher at the Tyger River facility were not subject to the RIF

b It is our understanding that a reorganization took place prior to the first reduction in force that shifted high-ranking administrators and provided some promotions prior to the actual first wave of RIF For example, Mike Metts, Canine Division Director, was moved prior to RIF as his original position was eliminated Also, Brenda Reed was moved just prior to RIF from the Training Academy to Personnel Ms Reed's previous position at the Academy was eliminated by RIF

c Three Division Directors, Richard Bazzle, Bernard Mackey, and Judy Anderson, received demotions but kept their salaries without confinement in

competitive areas This was done just a few days before the RIF was announced to those who would be displaced Additionally, several employees were permitted to maintain their salary with a change in position Bernard McKie, Warden, Kirkland R & E Center, and Laurie Bessinger, Director, Division of Security and Training It is our understanding that Mr Bessinger's move was a promotion

d Director Ozmint stated on multiple occasions that most of the layoffs came from those employees in Headquarters as he was including the 87 educators in his Headquarters count to give the impression that most of the cuts were management

e Ms Wessinger, Administrative Assistant at Watkins or Walden was recalled to her position It is our understanding that Ms Wessinger had been bumped by a teacher and was recalled to her position in error as there were other people in line who had bumping rights prior to Ms Wessinger being recalled

f Glen Eaves, an uncertified probationary employee, did not lose his position

g Four staff members in the Division of Education at Headquarters Wendell Branton, Kathy Jackson, Tommy Wicker and Marilyn Dozier received letters from Director Ozmint extending an invitation for retirement and giving them the option to return to work in 60 days as a temporary employee with a salary not to exceed $50,000 per year or 75% of his or her salary Two teachers at the Turbeville Institution are being allowed to retire and come back to work for 75% of their salary Warden Koley Rushton at McCormick Correctional is being allowed to retire and come back to work at 75% of his salary This offer was not extended to others similarly situated in the RIF process

h Medical service providers, food service workers and correctional officers were exempt from the RIF and these job categories were actually hiring during this time period

i Rose Reuger bumped into a math position, subsequently resigned within a few weeks of the bump The position still has not been filled at this time

j Employees in Columbia were offered jobs for which they were unqualified other than correctional officers However, educators were only offered correctional officer positions

k Jackie Benning, former Guidance Counselor at Manning Institution, is currently working in two positions, one believed to be a part-time data entry position Other educators affected by RIF were only offered correctional officer positions even if qualified for other positions For example, Rance Cobb, former Principal at Leath, qualified for two positions at Leath but was not offered either although both were actively open at the time of RIF

l Ricky Harrison, an employee in the security department whose position was eliminated through the RIF bumped a print shop supervisor It is our understanding that Mr Harrison bumped Ken Kinney who runs the print shop However, Mr Harrison had no experience with print shop materials and Mr Kinney was allowed to remain Mr Harrison remains assigned to the print shop without a specific job assignment

m It is our understanding that the Leath Institution was targeted because 7 out of 9 educators at Leath hold Master's degrees or above and have the highest educator salaries The competitive areas appear to be drawn so that these employees would have no bumping opportunities

n Educators were targeted in retaliation for a previous lawsuit against the Department of Education in which 17 of the 20 RIF grievants were Plaintiffs Max Randolph, grievant, had a conversation with Director Ozmint wherein Director Ozmint stated to Mr Randolph that the teachers should not have sued for pay increases because it was wrong

o Mr Aiken, retired educator, was hired in March 2003 to lead computer classes at the Manning institution filling a position that the Department of Corrections knew could be utilized by an employee subject to RIF It is our understanding he is still in that position

p The Operational Review Manager at Wateree Correctional Institute was offered a Sergeant position instead of a regular Correctional Officer position despite the fact that she is not certified as an officer

q Grievant Maggie Williams, certified in secondary English, was bumped from her position by a Ms Myers who holds only elementary certification Palmetto Unified School District teachers remaining are now being told that they must obtain certification in the area that they have been placed within a certain time frame

r John Ozmint, Director, received an 8% increase in salary during the time that the RIF plan was designed and implemented Director Ozmint also approved structural improvements in the amount of $100,000 for the home located on South Carolina Department of Corrections property where he resides during his term Former Director Gary Manard recently had substantial work done on the residence

s Ms Lakin, an educator at Stevenson Correctional, holds a teaching position but is not currently teaching and is reported to have less service time than other educators affected by the RIF

t The Principal and a vocational teacher at the Wateree facility, which remains operational, were the only educators at that facility affected by the RIF It is our understanding that the Principal, Bert Haynsworth, is an older employee with substantial years of service

u Hoyt Sharpe, Director of Vocational Education, remains unaffected by the RIF even though there are no vocational programs to supervise

We appreciate your careful consideration and look forward to receiving your responses to our request for additional information as well

Sincerely,

Dona L Guffey

DLG/pfb

File #03-156

GERGEL, NICKLES & SOLOMON, P A
1519 Richland Street
Post Office Box 1866
Columbia South Carolina 29202 1866



Via Hand Delivery
Terry M Baggott
State Budget and Control Board
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

September 8, 2003

VIA FACSIMILE & U S MAIL

Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE RIF (Education) v SCDC

Dear Mr Baggott

This letter is in response to your request for a response to Mr Nickels letter dated August 29, 2003 regarding the grievance appeal of his clients

On August 22 2003 you requested a clarification of a contention Mr Nickels presented in his grievance appeal to the Office of Human Resources However, Mr Nickels was not able to respond and in turn is asking for additional information to explain his objection to the RIF process

It is the agency s position that your request to clarify a contention in the grievance appeal was not answered and should be cause for removal of the item from consideration in their appeal

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc Grievance File
Mr W Allen Nickels

1897

South Carolina Department of Corrections

MARK SANFORD, Governor
JON E OZMINT Director

FAX COVER SHEET

EMPLOYEE RELATIONS

HEADQUARTERS - ROOM #103
896-8527
896-2726 (fax#)

TO Jerry

FROM Robin

DATE 9/8/03

PAGE 1 OF 2

SUBJECT

GERGEL, NICKLES & SOLOMON, PA
- ATTORNEYS AT LAW -
Post Office Box 1866
Columbia South Carolina 29202 - 1866

Richard Mark Gergel
W Allen Nickles, III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779-8080
Facsimile (803) 256 1816
office@gnslaw com

September 9, 2003



Via Facsimile (737-0968)
Terry M Baggott
State Budget and Control Board
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Terry

I appreciate your providing a facsimile copy of Ms Gracien's letter to you of September 8, 2003 As you are aware, a preliminary response has been provided to your request for information of August 22, 2003 As we have previously expressed, however, additional information is needed in order to respond fully to your inquiry

It has been our understanding that Mike Montgomery represents the Department of Corrections in this matter Accordingly, we have not communicated directly with Ms Gracien By copy of this letter, I am requesting clarification as to the appropriate parties for this office to address in reference to the pending grievance

It is my understanding that the Office of Human Resources is responsible for assisting both parties in grievance matters In this case, if the Department is unwilling to provide information which should be of a public nature, I request your assistance in obtaining that information on behalf of the employee

I look forward to hearing from you

Sincerely,

W Allen Nickles, III

WAN/pfb
cc Mike Montgomery, Esquire (via facsimile)
File #03-156

* * * COMMUNICATION RESULT REPORT (SEP 10 2003 9 24AM) * * *

-447-

TTI SC OHR

FILE MODE	OPTION	ADDRESS (GROUP)	RESULT	PAGE
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REASON FOR ERROR
E-1) HANG UP OR LINE FAIL
E-2) BUSY
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E-4) NO FACSIMILE CONNECTION

FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Fax: (803) 737-0968
Phone. (803) 737-0970

TO: ROBIN GRAGEN **DATE.** 10 SEPT. 2003

Fax #: 6-2726 **# of Pages:** 6 **(including cover sheet)**

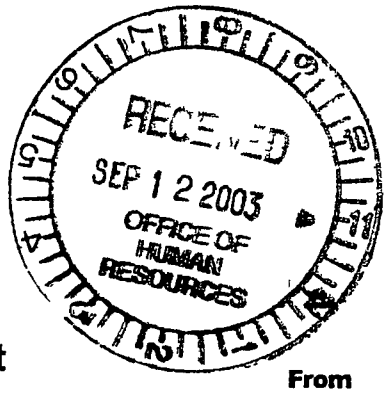
Phone #: 6-1927

From: TERRY BAGGOTT **Phone #.** 737-0292

COMMENTS:

Office of General Counsel
4444 Broad River Road - Headquarters
Columbia SC 29210
Phone (803) 896 8508
Fax (803) 896-1766

S C Department of Corrections



Fax

To	Terry Baggott	**From**	Debbie Deutschmann Deputy General Counsel
Fax	737-0968	**Date**	September 11, 2003
Phone	737-0292	**Pages**	2 pages including cover page
Re	SCDC RIF Appeal	**CC**	

☐ **Urgent** **X For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

•Comments

The following letter clarifies that all correspondence relating to the administrative proceedings administered by OHR should be directed to my attention

Debbie

The information contained in this facsimile message is attorney privileged and confidential information intended only for the use of the individual or entity named above If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited If you have received this communication in error, please immediately notify us by telephone (803) 896-8508 and return the original message at the above address via the U.S. Postal Service Thank you

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

September 11, 2003

VIA FACSIMILE AND U S MAIL

Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections

Dear Mr Baggott

In regards to the above captioned matters, this correspondence will serve to clarify that the General Counsel's Office of the Department of Corrections will be representing the Department in administrative proceedings under the State Employee Grievance Procedure Act Please direct all future correspondence from your office relating to these appeals to my attention

Sincerely,

Deborah Drucker Deutschmann
Deputy General Counsel

cc W Allen Nickles, III, Esquire
Michael H Montgomery, Esquire
Robin Gracien

PO Box 21787 - 4444 Broad River Road - Columbia, SC 29221 1787 Telephone (803) 896-8555

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director



September 8 2003

VIA FACSIMILE & U S MAIL

Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE RIF (Education) v SCDC

Dear Mr Baggott

This letter is in response to your request for a response to Mr Nickels letter dated August 29 2003, regarding the grievance appeal of his clients

On August 22 2003, you requested a clarification of a contention Mr Nickels presented in his grievance appeal to the Office of Human Resources However, Mr Nickels was not able to respond and in turn is asking for additional information to explain his objection to the RIF process

It is the agency's position that your request to clarify a contention in the grievance appeal was not answered and should be cause for removal of the item from consideration in their appeal

Sincerely,

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc Grievance File
Mr W Allen Nickels

South Carolina Department of Corrections
Employee Relations
PO Box 21787/4444 Broad River Road
Columbia South Carolina 29221 1787



Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

29201+2255

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director



September 11, 2003

VIA FACSIMILE AND U S MAIL

Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections

Dear Mr Baggott

In regards to the above captioned matters, this correspondence will serve to clarify that the General Counsel's Office of the Department of Corrections will be representing the Department in administrative proceedings under the State Employee Grievance Procedure Act Please direct all future correspondence from your office relating to these appeals to my attention

Sincerely,

Deborah Drucker Deutschmann
Deputy General Counsel

cc W Allen Nickles, III, Esquire
Michael H Montgomery, Esquire
Robin Gracien

South Carolina Department of Corrections
Office of General Counsel
PO Box 21787/4444 Broad River Road
Columbia South Carolina 29721 1787

COLUMBIA SC 292
PM
12 SEP
2003

SEP 15 2003
OFFICE OF HUMAN RESOURCES

Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

29201+3253

1906

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L. PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR.
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737-0900

SAMUEL L. WILKINS
DIRECTOR

September 15, 2003

VIA FACSIMILE
Ms Deborah Drucker Deutschmann
Deputy General Counsel
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221 1787

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections (SCDC)

Dear Ms Deutschmann

I have received the attached letters regarding the above referenced appeals from Ms Dona L Guffey and from Mr W Allen Nickles, III dated September 8, 2003, and August 29, 2003, respectively Please respond to Ms Guffey's preliminary response to my request for additional information and Mr Nickles's request for specific materials Send your response to me no later than Monday, September 22, 2003 In addition, please send a copy of your response to Mr Nickles

Please call if you have any questions

Sincerely,

Terry M Baggott
Grievance and Mediation Services Manager

Attachments

cc Mr W Allen Nickles, III (without attachments)

FAX (803) 737 0968

* * * COMMUNICATION RESULT REPORT (SEP 15 2003 12 55PM) * * * -455-

TTI SC OHR

FILE MODE	OPTION	ADDRESS (GROUP)	RESULT	PAGE
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E-3) NO ANSWER
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FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Fax: (803) 737-0968
Phone: (803) 737-0970

TO: Deborah Deutschmann **DATE:** 9-15-03

Fax #: 896-1766 **# of Pages:** 8

Phone #: 896-1355 **(including cover sheet)**

From: Terry Baggott **Phone #.** 737-0292

COMMENTS:

* * * COMMUNICATION RESULT REPORT (SEP 15 2003 12 56PM) * * * -456-

TTI SC OHR

FILE MODE	OPTION	ADDRESS (GROUP)	RESULT	PAGE
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REASON FOR ERROR
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E-2) BUSY
E-3) NO ANSWEP
E-4) NO FACSIMILE CONNECTION

FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Fax (803) 737-0968
Phone (803) 737-0970

TO: Mr. W Allen Nickles, III **DATE:** 9-15-03

Fax #: 256-1816 **# of Pages:** 2

Phone #: _____ **(including cover sheet)**

From: Terry Baggott **Phone #.** 737-0950

COMMENTS:

Office of General Counsel
4444 Broad River Road Headquarters
Columbia SC 29210
Phone (803) 896-8508
Fax (803) 896 1766

S C Department of Corrections



Fax

To	Terry Baggott	**From**	Debbie Deutschmann Deputy General Counsel
Fax•	737-0968	**Date**	September 22, 2003
Phone	737-0292	**Pages**	2 pages including cover page
Re	Appeal of Teachers affected by RIF at SCDC	**CC**	

☐**Urgent** **X For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

•Comments

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South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

September 22, 2003

VIA FACSIMILE AND U S MAIL

Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections

Dear Mr Baggott

As of this date, the Department has not had sufficient opportunity to prepare its response to your September 15, 2003 request I would respectfully request that the Department be given until October 1, 2003 to submit its response

Sincerely,

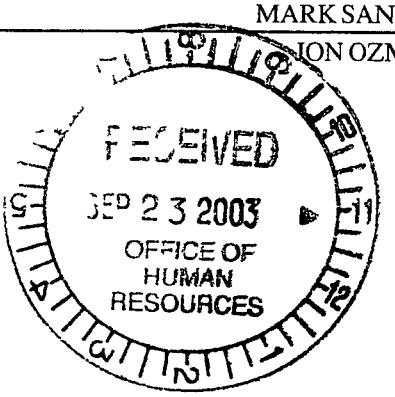
Deborah Drucker Deutschmann
Deputy General Counsel

cc W Allen Nickles, III, Esquire

1911

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director



September 22, 2003

VIA FACSIMILE AND U S MAIL

Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections

Dear Mr Baggott

As of this date, the Department has not had sufficient opportunity to prepare its response to your September 15, 2003 request I would respectfully request that the Department be given until October 1, 2003 to submit its response

Sincerely,

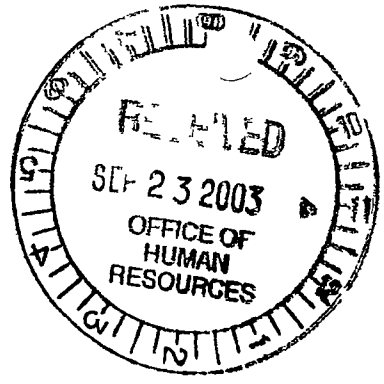
Deborah Drucker Deutschmann
Deputy General Counsel

cc W Allen Nickles, III, Esquire

PO Box 21787 4444 Broad River Road Columbia SC 29221 1787 Telephone (803) 896 8555

South Carolina Department of Corrections

Office of General Counsel
P.O. Box 21787/4444 Broad River Road
Columbia, South Carolina 29221 1787



Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

29201+3255

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

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CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L. WILKINS
DIRECTOR

September 24, 2003

VIA FACSIMILE
Ms Deborah Drucker Deutschmann
Deputy General Counsel
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Dept of Corrections

Dear Ms Deutschmann

I received your letter dated September 22, 2003, in which you request an extension to submit a response to my request for a response to Ms Guffey's September 8, 2003 letter and Mr Nickles's August 29, 2003 letter regarding the above referenced appeals I am granting your request for an extension until October 1, 2003

Please call me at 737-0292 should you have any questions

Sincerely,

Terry M Baggott
Grievance and Mediation Services Manager

cc Mr W Allen Nickles, III

FAX (803) 737 0968

* * * COMMUNICATION RESULT REPORT (SEP 24 2003 9 54AM) * * * -462-

TTI SC OHR

FILE MODE	OPTION	ADDRESS (GROUP)	RESULT	PAGE
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E-2) BUSY
E-3) NO ANSWER
E-4) NO FACSIMILE CONNECTION

FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Fax. (803) 737-0968
Phone (803) 737-0970

TO: Debbie Gustafson **DATE:** 9-24-03

Fax #: _____ **# of Pages:** 2 **(including cover sheet)**

Phone #: _____

From: Jerry Boggs **Phone #:** _____

COMMENTS:

* * * COMMUNICATION RESULT REPORT (SEP 24 2003 9 55AM) * * * -463-

TTI SC OHR

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E-2) BUSY
E-3) NO ANSWER
E-4) NO FACSIMILE CONNECTION

FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Fax. (803) 737-0968
Phone· (803) 737-0970

TO· [illegible] **DATE.** 9-24-03

Fax #: _____ **# of Pages:** 2

Phone #: _____ **(including cover sheet)**

From: [illegible] **Phone #.** _____

COMMENTS:

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

RECEIVED
OCT 06 2003
OFFICE OF HUMAN RESOURCES

October 1, 2003

Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections

Dear Mr Baggott

The following information is provided in response to your September 15, 2003 request for me to respond to prior letters submitted by the law firm of Gergel Nickles & Solomon, P A

In response to the September 8, 2003 request, I submit the following

a The positions of Principal and Special Education Teacher were not eliminated due to the Reduction in Force (RIF) in competitive area 11, which included the Appalachian Office, Tyger River, Perry, Livesay, and Northside Correctional Institutions It is the Department's position that throughout the RIF process, it retains the right to make management decisions regarding the administration of resources

b The complex mission of an agency which includes 29 correctional institutions, nearly 25 thousand inmates, and nearly 6,000 employees requires continuous analysis, reorganization and movement of staff both prior to and after a RIF It is the Department's position that this question does not pertain to the grievance issue (the manner in which the RIF was executed) currently before the Office of Human Resources The Department of Corrections retains the right to make management decisions regarding the administration of resources

c Warden vacancies had existed at several institutions within the agency due to the budget deficit In an effort to further reduce expenses, the agency Director eliminated several executive staff positions and moved individuals into positions where they were needed most Mr Bessinger, who was the Warden at Kirkland Correctional Institution, was given an increase in duties and responsibilities without a promotion or pay increase Further, it is the Department's position that this question does not pertain to the grievance issue (the manner in which the RIF was executed) currently before the Office of Human Resources

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d In a memorandum to all employees on March 31, 2003, Director Ozmint stated that 148 positions were identified for RIF in many areas throughout the agency to reduce staff, primarily in the headquarters, institutional non-security, and support functions Educational Services was only one of the 20 areas affected See Attachment

e Deborah Wessinger an Administrative Assistant at Watkins was bumped by Katherine Myers an Administrative Assistant in the Division of Education Her position was not eligible to be bumped by a teacher Ms Wessinger originally bumped into a vacant correctional officer slot at Walden Correctional Institution She was recalled to work in accordance with the RIF plan to an administrative assistant position in the office of State and Local Inspections

f Lynn Eaves is a non-certified Teacher Assistant at Tyger River and holds a classified state position (pay band 2), not an unclassified teacher position The Teacher Assistant position was not eliminated in Competitive Area 11, nor are unclassified certified teachers eligible to bump into this classified position

g The RIF in Fiscal Year 2002-03 was intended to permanently eliminate positions and to reduce overall payroll costs Similar to other state agencies, the Department of Corrections received additional budget cuts in Fiscal Year 2003-04, even after implementing a RIF the previous year The agency subsequently offered a plan to remaining staff to retire and return to work in their present position at a substantially lower salary – all without health insurance and other leave benefits This plan is one of several cost-cutting actions for the current Fiscal Year and maintains our lower staffing levels and further reduces cost

h The Department of Corrections has the right to make management decisions regarding the administration of resources This question does not pertain to the grievance issue before the Office of Human Resource

i Rose Ruger taught math at Manning Correctional Institution, and held certification in both math and general academics Ms Ruger bumped a math teacher at Camille Graham with less service This position has not been filled at this time due to current budget reductions It is the Department's position that it is not required to fill every vacant position

j All employees who were displaced by the RIF were offered vacant positions for which they met the minimum training and experience requirements, in descending pay band and pay level order The Department has no information regarding any person being offered a position for which they were not qualified

k Jacqueline Venning, was a Guidance Counselor at Manning and is certified in Guidance, Special Education, and General Academics Ms Venning's position was eliminated and she bumped a less senior Guidance Counselor At this time, Ms Venning continues to provide Guidance Counselor duties, as well as other additional educational services she is qualified to perform and are necessary due to budget reductions As stated in item (j) above, all employees subject to RIF were offered vacant positions in descending pay band and pay level order for which they met the minimum training & experience requirements

l Ricky Harrison's position was eliminated and he bumped into the position held by Mr Ken Kinney, a less senior employee in the Division of Industries print shop Mr Harrison met the established minimum qualifications for the position Mr Harrison has been reassigned to a position in Industries that needed to be filled and Mr Kinney has been recalled in accordance with RIF policy

m Education employees at Leath Correctional Institution were not targeted for RIF based upon the level of their educational degree The RIF competitive area for Leath, which is located in Greenwood, included the town of McCormick which is a reasonable driving distance and within the normal recruiting area for Greenwood

n Educators were not targeted in retaliation for a previous lawsuit filed against the agency Over 40 of the positions eliminated and 19 of the 20 areas identified under the RIF were from non-education areas

o Mr Sherl Akins was hired in March 2003 as a temporary grant employee Due to his temporary status, his position could not be bumped by a full-time employee who was subject to RIF

p Eartha Brooks, Inspector (Operational Review Manager) at Wateree River Correctional Institution, was subject to RIF and elected layoff Ms Brooks was not offered a Sergeant position because she did not meet the minimum qualifications for the position, but was offered a Correctional Officer position

q Maggie Williams was bumped by Mariam Myers, a more senior employee who met the minimum qualifications for the position All of the teachers retained meet the qualifications for the position they are holding There is no need for additional certification

r The salary of the Director of the Department of Corrections is established by the state Agency Head Salary Commission The agency does not believe questions relating to the Director's residence pertain to the grievance issue before the Office of Human Resources, which is the manner in which the Reduction-In-Force was executed

s Ms Lakin, who was a certified teacher at Broad River Correctional Institution, bumped a less senior employee, and actually had RIF seniority over almost all other certified teachers

t The positions held by two vocational teachers and the Principal at Wateree River were eliminated by RIF The two vocational teacher positions eliminated were a vocational heavy equipment operator and a vocational heavy equipment mechanic and neither were eligible to bump a less senior employee The Principal position was held by Albertha Haynesworth who was not eligible to bump a Principal with more seniority at Turbeville Correctional Institution

u Hoyte Sharpe, continues to be responsible for a number of areas including coordinating vocational programs and grants The agency continues to have vocational programs to supervise at several institutions

In response to the August 29, 2003 request, I submit the following

A) & B) are requests that were directed to the State Office of Human Resources As such, these materials should be submitted by your office and not the Department of Corrections

Regarding C) & E) – J), it is the Department's position that the grievance currently pending before the State Office of Human Resources is limited to how the Department's Reduction in Force Plan and Policy were applied These requests regarding the Department's use and allocation of its resources exceed the scope of this grievance matter

Regarding D), this material has already been provided by the Department

I trust that this information satisfies your request Please contact me if you have any further questions regarding this matter

Sincerely,

Deborah Drucker Deutschmann
Deputy General Counsel

enclosure

cc W Allen Nickles, III, Esquire

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO All Employees

FROM Jon E Ozmint

SUBJECT Reorganization and Agency Reduction-In-Force

DATE March 31, 2003

Over the last two and a half months, I have gained tremendous respect for the mission of the Department of Corrections and the fine employees who work here I have been to almost every location and seen our employees perform their jobs at admirable levels

Without question, the most difficult task I have ever faced is to operate this agency without adequate funding For two years, the agency has stretched its dollars farther than ever before Programs have continued without sufficient staff, often only because employees have set high standards to continue providing quality service

For two years, the agency has failed to operate within our allocated funding Again this year, the Budget & Control Board authorized us to operate with a deficit of nearly $28 million At the same time, however, I was advised that the agency must take immediate steps to operate within our budget for the next fiscal year Unfortunately, funding shortages now appear to be at least as bad next year

I have reviewed the organizational structure of the agency and determined that changes must be made to adjust to our level of funding and prepare for the future The organization that I have put in place should be equipped to handle the challenges that face us A general outline of the organizational change is listed at the end of this memorandum

One of the most difficult decision any leader must make is to eliminate the jobs of employees However, our agency has reached the point of financial crisis so that we must now have a Reduction-In-Force I have identified 148 positions in many areas throughout the agency to reduce staff, primarily in headquarters, institutional non-security, and support functions Employees in areas that will be affected include

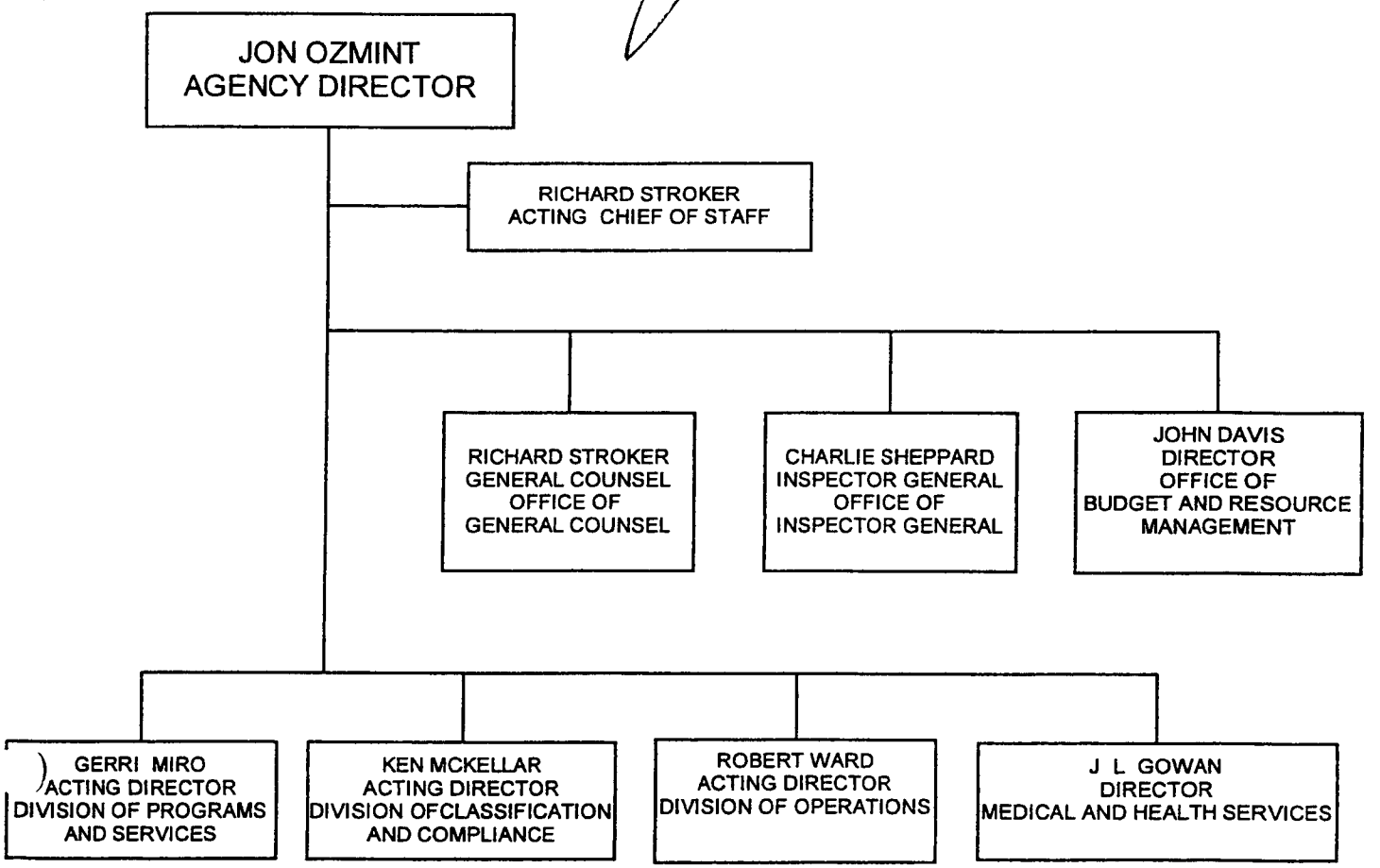
Educational Services
Youthful Offender
Industries
Classification & Inmate Records
Inmate Drug Testing
Office of Communications
Human Resources
Training Academy
Coastal Office
Temporary & Temporary Grant
Inspections, Operational Review & Accreditation
Substance Abuse Services
Internal Audits
Executive Affairs
Human Services
Health Services & Behavioral Medicine
Resource & Information Management
Maintenance & Construction
Appalachian Office
Probationary Employees

The Reduction-In-Force process identifies positions and functions to be eliminated Pursuant to state law, the process also allows senior employees in their job classification who are subject to a Reduction-In-Force to bump the least senior employees in the same job classification or job classification series, in the competitive area As a result, many employees who may not be located in these areas may also be subject to Reduction-In-Force A representative from the Division of Human Resources will be contacting affected employees in the near future to set up times to meet and discuss the Reduction-In-Force options available

Again, I regret the need to take such a drastic step I am hopeful the economy will improve and that many of the employees affected by this action will be able to return to work

I appreciate your understanding of these decisions during difficult times I ask for your support and prayers for our agency and our employees

S/ Jon E. Ozmint
Jon E. Ozmint



South Carolina Department of Corrections
Office of General Counsel
PO Box 21787/4444 Broad River Road
Columbia, South Carolina 29221 1787



Mr Terry Baggott
Grievance and Mediation Services Manager
State Budget and Control Board
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

29201+3231

STATE OF SOUTH CAROLINA
State Budget and Control Board
DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

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ROBERT W HARRELL JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

October 9, 2003

Mr W Allen Nickles, III
Gergel, Nickles, & Solomon, P A
Attorneys at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Dear Mr Nickles

This letter is in response to your August 29, 2003 letter requesting information from Mr Terry Baggott regarding the South Carolina Department of Corrections' (SCDC) reduction in force effective June 1, 2003 I serve as a consultant with the Office of Human Resources (OHR) for SCDC, therefore, Mr Baggott has forwarded to me your request for this information

In a letter dated October 1, 2003, responding to your request, Ms Deborah Drucker Deutschmann, Deputy General Counsel for SCDC, has indicated that this office should provide you with the requested information directed to the Office of Human Resources (OHR) Specifically, Ms Deutschmann indicates in her letter that OHR should provide you with A) a complete copy of materials submitted by the Department of Corrections in support of its reduction in force implemented effective June 1, 2003, and B) a complete copy of all materials provided to the Department of Corrections by the Office of Human Resources in reference to the reduction in force Accordingly, please find the enclosed information that you requested in items A) and B) of your August 29, 2003 letter

In addition, Ms Deutschmann contends in her letter that the other information, items C) and E) through J), requested in your August 29, 2003 letter "exceed[s] the scope of this grievance matter' and "the grievance currently pending before the State Office of Human Resources is limited to how the Department's Reduction in Force Plan and Policy were applied " Also, Ms Deutschmann contends in her letter that item D "has already been provided by the Department' Please respond to Ms Deutschmann's contentions regarding this information by October 16, 2003

FAX (803) 737 0968

If you have any questions please do not hesitate to give me a call at 737-0952

Sincerely,

Chris Poore
HR Consultant

Enclosures

c Ms Deborah Drucker Deutschmann (with enclosures)

STATE OF SOUTH CAROLINA

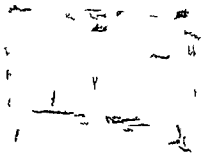
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OFFICE OF HUMAN RESOURCES

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RICHARD ECKSTROM
COMPTROLLER CENERAL



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SAMUEL L. WILKINS
DIRECTOR

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL, JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

March 28, 2003

Mr John Near
Director of Human Resources Management
South Carolina Department of Corrections (SCDC)
4444 Broad River Road
Post Office Box 21787
Columbia, South Carolina 29221-1787

Dear Mr Near

Your reduction-in-force (RIF) plan for the Department of Corrections' (SCDC) eleven (11) competitive areas has been reviewed As part of the plan, we reviewed the following components the plan, the competitive areas diagram, the listing of competitive job classifications and job classification series, the "Listing of Positions Being Eliminated and the Employees Eligible for Bumping in Each Competitive Area", and the sample letter to employees in positions being eliminated In light of your assessment that the Department's current organizational charts may not be completely up-to-date, we understand that the "Listing" includes all employees in each competitive area and each competitive class and class series included in the reduction in force plan We used this information to conduct our review

Based on the information you submitted, it appears that the plan is procedurally correct The Office of Human Resources' approval of the procedural correctness indicates only that the required elements of the RIF plan are present and in accordance with the Department's RIF Policy/Procedure Our approval does not include the determination of the geographic locations in the competitive areas, competitive classes, competitive class series, bumping rights, the positions to be eliminated, or any exceptions included in the plan, since these are solely the responsibility of SCDC management Justification for any exception should be retained by the Department

FAX (803) 737 0968

In accordance with SC Code of Laws Ann §8-11-185 (1976 & 2002 Supp), any state agency implementing a RIF must report information pertaining to employees affected by a RIF to the Office of Human Resources to be included in the RIF applicant pool State law also requires agencies to consult the RIF applicant pool and give priority consideration to employees affected by a RIF when seeking to fill vacancies For this purpose, the RIF applicant pool may be accessed through the web-site *www state sc us/ohr/rif* Should you have questions about these requirements, please call Bob Karel at 734-0980

If I can be of further assistance, please give me a call at (803)737-0952

Sincerely,

Christopher Poore

Christopher Poore
Human Resources Consultant

South Carolina Department of Corrections

MARK SANFORD Governor
JON E OZMINT Director

March 28, 2003

Samuel L Wilkins, Director
Office of Human Resources
1201 Main St Suite 1000
Columbia, South Carolina 29201

SUBJECT Reduction-In-Force Plan

Dear Mr Wilkins,

As Director of the South Carolina Department of Corrections (SCDC), I am formally submitting a Reduction-In-Force (RIF) Plan for the elimination of several positions within our agency

I Overview

The Department of Corrections' budget has been reduced by over $80 million during the past 30 months These cuts come at a time when incarceration rates have increased the inmate population by several thousand During this same period, efforts to cut spending have included staff reductions of nearly 1,300 employees, closing prisons, elimination of numerous programs, and drastic cuts in expenditures Conversely, efforts have also been made to increase revenue from sources such as prison industries, institutional canteens, inmate work programs, and increasing grant funding Unfortunately, the financial health of this agency remains critical and more drastic measures are necessary

II Reason for the Reduction-In-Force

As agency Director, I have the responsibility to focus on our primary mission, which is to protect the public I must continuously assess the needs of the agency, no matter how difficult, and recommend necessary changes in order to meet that mission

Sufficient operating funds are not expected to be restored in FY2003-2004, and an additional deficit of over $10 million is projected As a result, priorities have been established to ensure the continued efficient operation of the agency The need to maintain certain programs and administrative positions must now be identified as secondary to achieving our primary mission, and have been targeted for reduction or elimination

I have made the decision to eliminate 148 non-security positions through a Reduction-In-Force in three primary functions within the agency

Headquarters management and administrative support staff
Non-essential inmate support programs
Certified education and support staff

The implementation of this Reduction-In-Force Plan is projected to save approximately $8 million (including fringe benefits), assuming the employees occupying the positions to be eliminated will be laid off Of course, actual saving will be less, based upon employees bumping into filled positions occupied by lower-paid employees, or employees reassigned or demoted into vacant positions for which the agency is actively recruiting

Long term, I feel the overall operation of the agency could be adversely impacted by the elimination of these positions without additional plans to maximize the valuable programs these positions represent Therefore, I have developed an organizational plan that should provide the necessary staff oversight and allow continued educational opportunity for the alternate instruction of inmates

The decision to layoff staff is not one that I take lightly Employees occupying these positions signify the reason why the Department of Corrections has been so successful with such a difficult mission In a very short time, I have come to know these employees personally and their level of professionalism is overwhelming Unfortunately, I must look beyond individuals to prepare this agency for the future

Included in this Reduction-In-Force Plan are the state requirements for the elimination of positions More importantly, I have identified a number of resources to assist these valuable employees after leaving the Department of Corrections

III Competitive Areas and Competitive Job Classification Series

The positions to be eliminated in this Reduction-In-Force Plan are located across the state of South Carolina. Competitive areas have been designated to include entire groups of institutions and divisions within a reasonable geographic area to accommodate the realistic opportunity for staff relocation, and hopefully, recall and reinstatement In addition, by expanding the number of locations, adverse impact may be minimized on specific groups of employees

Competitive Areas – (Attached)

Competitive Job Classifications and Classification Series – (Attached)

Positions Being Eliminated and Employees Eligible for Bumping in Each Competitive Area– (Attached)

IV Name, Age, Race, Sex, Classification, and RIF Service Date of Affected Employees

(See attached) In order to submit the Reduction-In-Force Plan to the Office of Human Resources for review and approval for procedural correctness prior to the effective date of June 1, 2003, each employee's age was based upon their age as of April 1, 2003 The RIF Service Date was calculated based upon EPMS performance evaluations with review dates through March 2, 2003

V Reduction-In-Force Projected Outcome

Following the review and approval of this Reduction-In-Force Plan for procedural correctness by the Office of Human Resources, each of the affected employees will meet with Mr John A Near, Division Director – Human Resources, or designee, who will advise them of their Reduction-In-Force rights with regard to layoff, bumping, reassignment, demotion, recall, and reinstatement

After the meeting with a representative from the Human Resources Division, within two (2) working days, the employee must elect layoff, or to exercise their bumping rights based upon their RIF Service Date Meetings with employees who exercise their bumping rights will be conducted as follows

(First) If the Job Classification is in one of the designated Competitive Job Classification Series identified above, the employee may be eligible to bump into the position occupied by the employee with the lowest RIF Service Date in the same Job Classification and pay band with the same or lower pay level (provided they meet the state and SCDC minimum training & experience requirements) The bumped employee may then bump into the position occupied by the employee with the lowest RIF Service Date in the next lowest Job Classification in the designated series (provided they meet the state and agency minimum training & experience requirements)

(Second) If the position is not in one of the Competitive Series designated above, the employee may first bump the employee in the competitive area with the lowest RIF Service Date in the same Job Classification and pay band, with the same or lower pay level (provided s/he meets the state and SCDC minimum training & experience requirements)

(Third) The employee (or the bumped employee with the lowest RIF Service Date) may next be reassigned or demoted into a vacant position in the competitive area of the same pay band, pay level or lower, provided the agency is actively recruiting to fill the vacancy, and s/he meets the state and SCDC minimum training & experience requirements

In some cases, in accordance with Section 6 9 of the Department's approved RIF Policy, employees with a higher RIF Service Date were retained over other employees with a lower RIF Service Date in the same generic state job classification or job classification series due to the necessary qualifications of the position, or their higher pay level within the pay band (code "R" on listing of employees to be laid off) The specific reasons in each of these cases are as follows

R1 (Area 01) – AH45 Program Manager I in the substance abuse area did not qualify to bump employees whose job duties included engineering/construction experience, or a position requiring knowledge of OSHA, EPA/environmental, or emergency preparedness

R2 (Area 01) – EC10 Medical Assistant Technician I (dental assistant) did not qualify to bump employees with a higher RIF Service Date whose positions are a certified nursing assistant (CNA)

R3 (Area 01) – UE07 Academic Program Managers (2) with a lower RIF Service Date did not possess a principal's or superintendent's certification required for either of the two central office Academic Program Managers who had a higher RIF Service Date In addition, the (UB07) Principal in the same competitive area, was not eligible to upward bump his supervisor who is an Academic Program Manager

R4 (Areas 01, 02, 06, 11) – UB02, UB04 - Certified Teacher, Vocational Teacher — In four competitive areas of the state, several certified teachers and vocational teachers did not possess the specific educational credentials or skills necessary to qualify for bumping into positions occupied by employees with a lower RIF Service Date

R5 (Area 11) - AH35 Program Coordinator I did not qualify to bump employees in the same job classification within the competitive area because the job duties and responsibility levels of all other employees were greater, and the other employees occupied a higher pay level, as indicated in the RIF policy

The Positions Being Eliminated and Employees Eligible for Bumping in each Competitive Area (attached) has been developed to identify employees in each competitive area occupying the same job classification, or classification series, of positions that are being eliminated

Disclaimer This plan indicates the rights of each employee under the Reduction-In-Force. A specific employee subject to demotion or separation may not be affected due to the decision of the other employees to exercise, or not exercise, their bumping rights

VI Efforts Made to Assist the Affected Employees

1 Affected employees will receive at least a two week written notice prior to separation

2 The Office of Human Resources State Career Center will be notified of this Reduction-In-Force and their assistance will be requested to help the affected employees in their search for other state employment In addition, the employee will be entered into the automated State Employee RIF Applicant Pool, which will allow the employee to provide updated information and eligibility for other state agency's vacancies

3 A Department of Corrections application form will be provided to the affected employee to maintain updated education, work history, and job skills

4 The Department of Corrections will contact the State Department of Education's unit responsible for teacher recruitment to advise them of the availability of certified teachers and administrators If directed by the State Department of Education, the Department of Corrections will contact local school districts in the competitive area to make them aware of available applicants for vacant positions

5 Temporary positions, particularly in the area of educational instruction to inmates, may be developed and made available to affected employees by the Reduction-In-Force

6 Outplacement services will be solicited from local vendors to provide cost-free services to affected employees

7 The S C Employment Security Commission will be contacted in order to supply information required for application for unemployment compensation, to be completed on-site at the Department of Corrections, if possible In addition, information will be obtained necessary for registration for application into their statewide database of available job openings

8 Local employers may be contacted in competitive areas which have advertised for openings of qualified employees

9 The Employee Assistance Program (EAP) for the Department of Corrections will be contacted and counseling services made available for affected employees for a period of 90 days which is equal to current employees

10 Affected employees will be advised of all recall and reinstatement rights and privileges and will be asked to maintain a current address with the Department of Corrections' Division of Human Resources

11 Affected employees will be informed about the state group benefits for which the employee is eligible, and the effect of their employment separation upon state benefits such as health & dental insurance, retirement, etc

12 Affected employees will be informed of their right, upon request, to review the Reduction-In-Force plan, with the exception of the RIF service date of other affected employees The employees will be entitled to view their own RIF service date and the order of other employees in RIF Service Date order

13 The affected employees will be informed of their right to grieve the Reduction-In-Force through the agency grievance process and appeal through the state grievance process only if the grievance or appeal is based upon an improper or inconsistent application of the Reduction-In-Force policy/procedure, or plan

VII Summary

Mr Wilkins, a Reduction-In-Force is one of the most unpleasant tasks that I must undertake as Director However, I am committed to the primary mission of Department of Corrections and to the legal responsibilities to operate within the funds allocated by the Legislature

The timeframe necessary to implement a Reduction-In-Force of this size across the state mandates our agency move as quickly to implement the procedures of the plan Therefore, I ask that you give priority to the review and approval of this Reduction-In-Force plan and contact Mr Near at 896-1645 if you have any questions

I truly appreciate any assistance you can provide

Sincerely,

Jon E Ozmint

Attachments

1 SCDC Approved Reduction-In-Force Policy
2 Listing of Competitive Areas, Areas Map, and Competitive Job Classifications & Classification Series
3 Listing of Positions being eliminated and Employees eligible for Bumping in Each Competitive Area.
4 Sample Letter - Notification of Reduction-In-Force

Cc file

DEPARTMENT OF CORRECTIONS

REDUCTION-IN-FORCE - COMPETITIVE AREAS

Competitive Area	Location(s)
1	All Broad River Road Complex Institutions and Divisions Watkins Pre-Release Center Manning Correctional Institution
2	Wateree River Correctional Institution Lee Correctional Institution Palmer Pre-Release Center Turbeville Correctional Institution
3	Catawba Pre Release Center
4	Evans Correctional Institution
5	Kershaw Correctional Institution
6	Coastal Office Coastal Pre-Release Center Lieber Correctional Institution MacDougall Correctional Institution
7	Allendale Correctional Institution
8	Ridgeland Correctional Institution
9	Lower Savannah Pre-Release Center Trenton Correctional Institution
10	Leath Correctional Institution McCormick Correctional Institution
11	Appalachian Office Northside Correctional Institution Livesay Pre-Release Center Tyger River Correctional Institution Perry Correctional Institution

Locations of Existing Institutions and Ce s

***23 Greenville County**
1 Perry Correctional Institution

***42 Spartanburg County**
2 Livesay Pre Release Center
Northside Correctional Institution
3 Tyger River Correctional Institution

***46 York County**
4 Catawba Pre Release Center

***29 Lancaster County**
5 Kershaw Correctional Institution

***24 Greenwood County**
6 Leath Correctional Institution

***33 McCormick County**
7 McCormick Correctional Institution

***19 Edgefield County**
8 Trenton Correctional Institution

***02 Aiken County**
9 Lower Savannah Pre Release Center

***40 Richland County**
10 Broad River Correctional Institution
Campbell Correctional Institution
Goodman Correctional Institution
Kirkland Reception & Evaluation Center
Stevenson Correctional Institution
Walden Correctional Institution
Watkins Pre Release Center
Women's Correctional Institution
11 Manning Correctional Institution

***43 Sumter County**
12 Wateree River Correctional Institution

***31 Lee County**
13 Lee Correctional Institution

***35 Marlboro County**
14 Evans Correctional Institution

***21 Florence County**
15 Palmer Pre Release Center

***14 Clarendon County**
16 Turbeville Correctional Institution

***08 Berkeley County**
17 MacDougall Correctional Institution

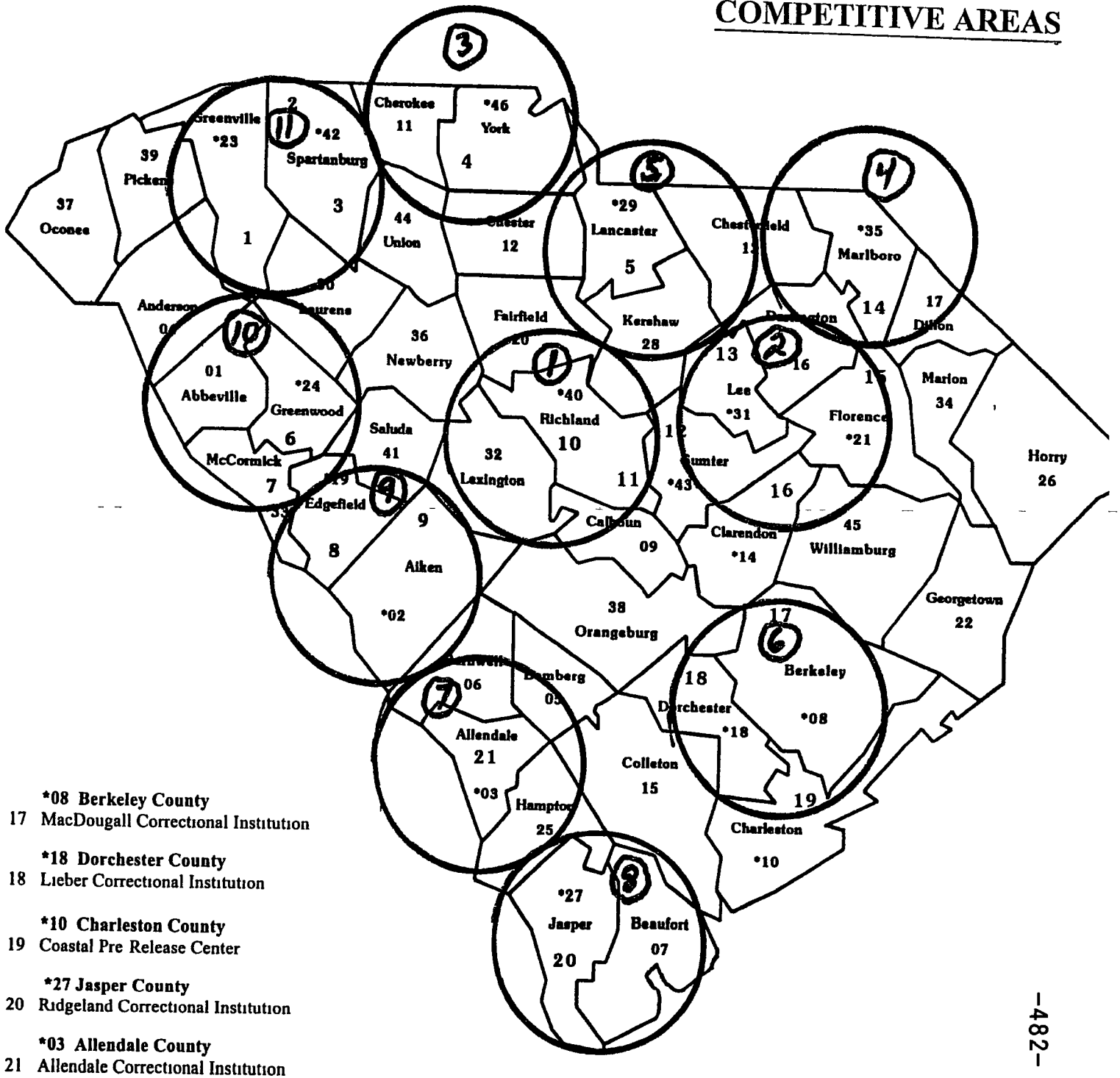
***18 Dorchester County**
18 Lieber Correctional Institution

***10 Charleston County**
19 Coastal Pre Release Center

***27 Jasper County**
20 Ridgeland Correctional Institution

***03 Allendale County**
21 Allendale Correctional Institution

COMPETITIVE AREAS



DEPARTMENT OF CORRECTIONS

COMPETITIVE JOB CLASSIFICATIONS & SERIES

Competitive Job Classifications and Competitive Job Classification Series within each competitive area for employee bumping are identified as

Competitive Job Classifications

AA75 – (Pay Band 4) - Administrative Assistant
AH20 – (Pay Band 7) - Administrative Manager I
AH45 – (Pay Band 7) – Program Manager I
AJ40 – (Pay Band 6) – Computer Operator II
AJ45 – (Pay Band 6) – Information Resource Consultant II
BC30 – (Pay Band 6) – Public Information Director I
BC50 – (Pay Band 8) – Director of Information Services
CD20 – (Pay Band 4) – Library Specialist
EB52 – (Pay Band 9) – Dentist
EC10 – (Pay Band 2) - Medical Assistant Technician I
EC25 – (Pay Band 5) - Technical Medical Associate II
GA40 – (Pay Band 4) - Human Services Specialist II
JA80 – (Pay Band 4) – Inspector II
UB02 – Certified Teacher
UB04 – Vocational Teacher
UB05 – Guidance Counselor
UB06 – Special Education Teacher

Competitive Job Classification Series

AA25, AA50 – (Pay Bands 2-3) - Administrative Specialist I & II
AD01, AD03 – (Pay Bands 3-4) - Fiscal Technician I & II
AD05, AD08, AD10, AD12 – (Pay Bands 3-4-5-6) - Auditor I, II, III, IV
AD15, AD18 – (Pay Bands 7-8) – Audits Manager I & II
AH10, AH15 – (Pay Bands 5-6) - Administrative Coordinator I & II
AH35, AH40 – (Pay Bands 5-6) - Program Coordinator I & II
CB30, CB35 – (Pay Bands 2-3) - Teacher Assistant, Teacher/Center Director
GA50, GA60 – (Pay Bands 5-6) - Human Services Coordinator I & II
UB09, UE07, UB07– Superintendent, Academic Program Manager, Principal

F 123	EMPLOYEE NAME	RACE	SEX	AGE	CLASSIFICATION TITLE	CLASS BASE	CLASS LEVEL	RIF SVC DATE	CAREER PATH	LOCATION
	RAJU VISVESWARAN	O	M	65	AA50	03	A	ADMIN SPECIALIST II	[redacted]	01 DIV OF CLASSIFICATION & INMATE RECORD
	DICOSTANZA NINA M	W	F	53	AA50	03	D	ADMIN SPECIALIST II		01 DIVISION OF INMATE SERVICES
	YENNY PATRICIA J	W	F	60	AA50	03	C	ADMIN SPECIALIST II		01 BROAD RIVER CORRECTIONAL INSTITUTION
	AUTON MCCORMICK KATHY S	W	F	44	AA50	03	E	ADMIN SPECIALIST II		01 TRAINING ADMINISTRATION
1	FLOYD CLAUDETTE L	B	F	53	AA50	03	C	ADMIN SPECIALIST II		01 SUBSTANCE ABUSE SVCS DIV
	HARMON PEARLENE	B	F	43	AA50	03	D	ADMIN SPECIALIST II		01 BROAD RIVER CORRECTIONAL INSTITUTION
	BLUME NANCY G	W	F	45	AA50	03	C	ADMIN SPECIALIST II		01 KIRKLAND CORRECTIONAL INSTITUTION
	ENTZMINGER RONALD G	B	M	39	AA50	03	C	ADMIN SPECIALIST II		01 KIRKLAND CORRECTIONAL INSTITUTION
	HILLER ADELL G	B	F	51	AA50	03	A	ADMIN SPECIALIST II		01 KIRKLAND CORRECTIONAL INSTITUTION
	ROBINSON GLENDA D	B	F	39	AA50	03	A	ADMIN SPECIALIST II		01 BROAD RIVER CORRECTIONAL INSTITUTION
	CURRY DONNA C	W	F	54	AA50	03	C	ADMIN SPECIALIST II		01 DIV OF MEDICAL & PROF HEALTH SVCS
	BARNES NATHANIEL E	B	M	38	AA50	03	C	ADMIN SPECIALIST II		01 FINANCIAL ACCOUNTING
	SHEALY GLORIA E	W	F	59	AA50	03	D	ADMIN SPECIALIST II		01 RECRUITING & EMPLOYMENT SERVICES
	SCHROER PATRICIA A	W	F	61	AA50	03	D	ADMIN SPECIALIST II		01 FOOD SER WHSE INVENTORY/DISTRIBUTION
	BENNETT BARRY F	B	M	37	AA50	03	C	ADMIN SPECIALIST II		01 BROAD RIVER CORRECTIONAL INSTITUTION
	ABSTON MORRIS JEANNIE S	W	F	43	AA50	03	D	ADMIN SPECIALIST II		01 MAINTENANCE ADMINISTRATION
	CARRINGTON YVONNE	B	F	36	AA50	03	A	ADMIN SPECIALIST II		01 BROAD RIVER CORRECTIONAL INSTITUTION
	SCHEPP SHERYL K	W	F	50	AA50	03	C	ADMIN SPECIALIST II		01 KIRKLAND CORRECTIONAL INSTITUTION
	BOUKNIGHT SHANNA R	W	F	27	AA50	03	D	ADMIN SPECIALIST II		01 RECRUITING & EMPLOYMENT SERVICES
	NELSON JERLEAN JOHNSON	B	F	48	AA50	03	A	ADMIN SPECIALIST II		01 DIV OF MEDICAL & PROF HEALTH SVCS
	CLARK DIANE M	W	F	55	AA50	03	A	ADMIN SPECIALIST II		01 BROAD RIVER CORRECTIONAL INSTITUTION
	GROFF YONCE PATRICIA	A	F	43	AA50	03	C	ADMIN SPECIALIST II		01 TRAINING ADMINISTRATION
	BRACEY APRIL C P	B	F	36	AA50	03	D	ADMIN SPECIALIST II		01 DIV OF MEDICAL & PROF HEALTH SVCS
	HICKSON ANN	B	F	51	AA50	03	C	ADMIN SPECIALIST II		01 TRAINING ADMINISTRATION
	PEACE JOY A	W	F	60	AA50	03	A	ADMIN SPECIALIST II		01 BEHAVIORAL MEDICINE DIVISION
	MOSES MARTHA	B	F	45	AA50	03	A	ADMIN SPECIALIST II		01 MANNING CORRECTIONAL INSTITUTION
	TORRUELLA TERESA A	B	F	54	AA50	03	C	ADMIN SPECIALIST II		01 MANNING CORRECTIONAL INSTITUTION
	STRONG JR PRESS	B	M	46	AA50	03	A	ADMIN SPECIALIST II		01 CAMILLE GRAHAM CORRECTIONAL INST
	SPURLOCK SHERRY F	W	F	50	AA50	03	D	ADMIN SPECIALIST II		01 DIVISION OF HUMAN RESOURCES
	GASKINS BRENDA K	B	F	48	AA50	03	A	ADMIN SPECIALIST II		01 KIRKLAND CORRECTIONAL INSTITUTION
	MARSALKO KATHLEEN A	W	F	44	AA50	03	D	ADMIN SPECIALIST II		01 MAINTENANCE ADMINISTRATION
	STOWE PEGGY L	W	F	60	AA50	03	A	ADMIN SPECIALIST II		01 KIRKLAND CORRECTIONAL INSTITUTION
	WARD FAYON R	B	F	34	AA50	03	C	ADMIN SPECIALIST II		01 GOODMAN CORRECTIONAL INSTITUTION
	BURTON PAMELA M	B	F	43	AA50	03	D	ADMIN SPECIALIST II		01 DIVISION OF HUMAN RESOURCES
	LIVINGSTON JACQUELINE	B	F	28	AA50	03	A	ADMIN SPECIALIST II		01 CAMILLE GRAHAM CORRECTIONAL INST
	GREEN KELLEY	B	F	33	AA50	03	A	ADMIN SPECIALIST II		01 GOODMAN CORRECTIONAL INSTITUTION
	SIMS SANDRA D	B	F	40	AA50	03	C	ADMIN SPECIALIST II		01 DIV OF CLASSIFICATION & INMATE RECORD
	SMITH DONNA C	W	F	47	AA50	03	A	ADMIN SPECIALIST II		01 WALDEN CORRECTIONAL INSTITUTION
	MADISON LINDA C	B	F	47	AA50	03	C	ADMIN SPECIALIST II		01 KIRKLAND CORRECTIONAL INSTITUTION
	CHABICA MARINA M	O	F	50	AA50	03	C	ADMIN SPECIALIST II		01 KIRKLAND CORRECTIONAL INSTITUTION

F I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L J A O S B S	B A N D	L V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		BROWN CLAUDIA B	W	F	50	AA50	03	A	ADMIN SPECIALIST II		01	KIRKLAND CORRECTIONAL INSTITUTION
		INGRAM GLENDA C	W	F	47	AA50	03	C	ADMIN SPECIALIST II		01	MANNING CORRECTIONAL INSTITUTION
		MILLER LISA A	W	F	29	AA50	03	C	ADMIN SPECIALIST II		01	DIV OF CLASSIFICATION & INMATE RECORD
		MORGAN CORIE L	B	F	26	AA50	03	C	ADMIN SPECIALIST II		01	KIRKLAND CORRECTIONAL INSTITUTION
3	P	HODGE LORETTA D	B	F	45	AA50	03	C	ADMIN SPECIALIST II		01	KIRKLAND CORRECTIONAL INSTITUTION
		WILSON BEATRICE YOUNG	B	F	65	AA25	02	C	ADMIN SPECIALIST I		01	GOODMAN CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
		CLAYTOR LYDIA C	W	F	62	AA75	04	B	ADMINISTRATIVE ASSISTANT		01	CAMPBELL PRE RELEASE CENTER
		DEAS VALVITA M	B	F	58	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	STEVENSON CORRECTIONAL INSTITUTION
		HINSON DENISE G	W	F	43	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	BROAD RIVER CORRECTIONAL INSTITUTION
		DOZIER MARILYN	W	F	46	AA75	04	A	ADMINISTRATIVE ASSISTANT		01	EDUCATIONAL SERVICES
		MONTGOMERY JANICE L	B	F	48	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	BROAD RIVER CORRECTIONAL INSTITUTION
		MODZELEWSKI KATHLEEN M	W	F	60	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	OFFICE OF GENERAL COUNSEL
1		ALEXANDER EDNA N	B	F	47	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	DIV OF INSP & OPER REV
		RAWL LYNDA R	W	F	61	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	DIVISION OF POLICY DEVELOPMENT
		LONG REBECCA A	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT		01	CONSTRUCTION ADMINISTRATION
		FOLEY JENNIFER A	W	F	39	AA75	04	A	ADMINISTRATIVE ASSISTANT		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		HINGLE DIANE	W	F	51	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	DIV OF CLASSIFICATION & INMATE RECORD
		ROBERTSON ALICE J	B	F	48	AA75	04	A	ADMINISTRATIVE ASSISTANT		01	DIRECTOR S OFFICE ADMINISTRATION
		BEIDLER SANDRA J	W	F	41	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	KIRKLAND CORRECTIONAL INSTITUTION
		MELTON LINDA G	W	F	52	AA75	04	B	ADMINISTRATIVE ASSISTANT		01	MANNING CORRECTIONAL INSTITUTION
		WIGGINS BARBARA A	B	F	52	AA75	04	A	ADMINISTRATIVE ASSISTANT		01	BROAD RIVER CORRECTIONAL INSTITUTION
		TOOLE LOUISE W	W	F	59	AA75	04	A	ADMINISTRATIVE ASSISTANT		01	VEHICLE COMMUNICATION MANAGEMENT
		DRISKELL DONALD L	W	M	38	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	BROAD RIVER CORRECTIONAL INSTITUTION
		HORNSBY JUDY H	W	F	49	AA75	04	A	ADMINISTRATIVE ASSISTANT		01	STEVENSON CORRECTIONAL INSTITUTION
		STACKHOUSE ZIGMOND A	B	M	45	AA75	04	C	ADMINISTRATIVE ASSISTANT		01	MAIL ROOM
		BRADLEY JUDY K	B	F	49	AA75	04	E	ADMINISTRATIVE ASSISTANT		01	WALDEN CORRECTIONAL INSTITUTION
		KELLY LATONYA Y	B	F	38	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	MANNING CORRECTIONAL INSTITUTION
		BANKS SHIRLEY J	W	F	51	AA75	04	A	ADMINISTRATIVE ASSISTANT		01	CIV LABOR POOL 9511
		PAGE SONYA M	B	F	36	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	DIVISION III INSTITUTIONS
		MCMANUS MINDY L	W	F	35	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	RECRUITING & EMPLOYMENT SERVICES
		EMERSON NELDA J	W	F	55	AA75	04	A	ADMINISTRATIVE ASSISTANT		01	KIRKLAND CORRECTIONAL INSTITUTION
		MULLER GAIL J	W	F	55	AA75	04	B	ADMINISTRATIVE ASSISTANT		01	GOODMAN CORRECTIONAL INSTITUTION
		GOUDELOCK DELORES J	W	F	55	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	PURCHASING BRANCH
		SANSBURY RAMONA Z	W	F	57	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		BRAZELL NORA S	W	F	57	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	MAINTENANCE ADMINISTRATION
		SKIDMORE MIRIAM M	W	F	60	AA75	04	B	ADMINISTRATIVE ASSISTANT		01	CANTEEN WHSE INVENTORY/DISTRIBUTION
		FULLER DEBRA F	W	F	45	AA75	04	C	ADMINISTRATIVE ASSISTANT		01	CAMILLE GRAHAM CORRECTIONAL INST
		CHRETIAN FLORENCE J	B	F	45	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	MANNING CORRECTIONAL INSTITUTION
1		CRIDER REBEKAH S	W	F	34	AA75	04	D	ADMINISTRATIVE ASSISTANT		01	YOUNG OFFENDER DIV

						C		L					
			R			L	B	E			C A		
			A	S	A	J A	A	V		RIF	O R		
F		EMPLOYEE	C	E	G	O S	N	E	CLASSIFICATION	SVC	M E		
1 2 3		NAME	E	X	E	B S	D	L	TITLE	DATE	P A		LOCATION
		MYERS MARILYN	B	F	42	AA75	04	B	ADMINISTRATIVE ASSISTANT	[redacted]	01		STEVENSON CORRECTIONAL INSTITUTION
		CANNARELLA DENISE M	W	F	44	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		OFFICE OF GENERAL COUNSEL
		WISE DEBRA M	B	F	34	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		KIRKLAND CORRECTIONAL INSTITUTION
		WAITES THERESA H	W	F	56	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		CIV LABOR POOL 9511
		ARD CAROL B	W	F	52	AA75	04	E	ADMINISTRATIVE ASSISTANT		01		DEPUTY DIR FOR MED & PROF HEALTH SERV
		COBB TERESA F	W	F	52	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		EDUCATIONAL SERVICES
		OSTRANDER SHARRON S	W	F	51	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		DIVISION OF INTERNAL AFFAIRS
		MUELLER CAROLE J	W	F	59	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		DIVISION I INSTITUTIONS
		JEFFCOAT JUNETTE	W	F	42	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		VEHICLE COMMUNICATION MANAGEMENT
		DURHAM ANITA I	W	F	55	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		CORRECTIONAL INDUSTRIES ADMINISTRATION
1		MYERS KATHERINE M	W	F	50	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		EDUCATIONAL SERVICES
		WOODS DOROTHY D	W	F	58	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		KIRKLAND CORRECTIONAL INSTITUTION
		FORBES VERNA A	B	F	39	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		BROAD RIVER CORRECTIONAL INSTITUTION
		TOWER MICHELE M	W	F	41	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		CANTEEN WHSE INVENTORY/DISTRIBUTION
		PALMER JEANNIE	B	F	42	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		RECRUITING & EMPLOYMENT SERVICES
		CALDWELL KIMMERLY Y	B	F	38	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		OFFICE OF GENERAL COUNSEL
		GRABER JR ALVIN	B	M	38	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		KIRKLAND CORRECTIONAL INSTITUTION
		REED REATHER M	B	F	43	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		KIRKLAND CORRECTIONAL INSTITUTION
		WHITAKER DESHAWN M	B	F	29	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		SECURITY DIVISION
		RICHARDSON SANDRA J	O	F	31	AA75	04	B	ADMINISTRATIVE ASSISTANT		01		DIV OF CLASSIFICATION & INMATE RECORD
		STOCKER JIMMY M	W	M	49	AA75	04	C	ADMINISTRATIVE ASSISTANT		01		CANTEEN WHSE INVENTORY/DISTRIBUTION
		PAGE MARY N	W	F	59	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		CORRECTIONAL INDUSTRIES ADMINISTRATION
		WHITE MICHELLE	B	F	31	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		CAMILLE GRAHAM CORRECTIONAL INST
		BROWN MITCHELL DAYNA L	B	F	47	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		DIVISION OF HUMAN RESOURCES
		PRIDGEN NADINE L	W	F	39	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		DEPUTY DIR FOR MED & PROF HEALTH SERV
		HARGROVE BOBBY	B	M	46	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		CAMILLE GRAHAM CORRECTIONAL INST
		BRIGMAN MICHELLE G	W	F	35	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		DEPUTY DIRECTOR ADMINISTRATION
		SMITH FERNETHIA P	B	F	44	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		CAMILLE GRAHAM CORRECTIONAL INST
		HUGHES JOE L	B	M	49	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		MANNING CORRECTIONAL INSTITUTION
		BROWN MARGARET A	W	F	60	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		DIV OF CLASSIFICATION & INMATE RECORD
		AMICK DONNA C	W	F	39	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		DIV OF MEDICAL & PROF HEALTH SVCS
1		ZANDERS SYLINDA P	B	F	34	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		SUBSTANCE ABUSE SVCS DIV
		HOPKINS SHARON D	B	F	42	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		BEHAVIORAL MEDICINE DIVISION
		HARVEY SALLIE C	W	F	53	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		CORRECTIONAL INDUSTRIES ADMINISTRATION
		BAKER BEVERLY M	W	F	51	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		OFFICE OF GENERAL COUNSEL
		FANNIN GARY L	W	M	56	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		CAMPBELL PRE RELEASE CENTER
3		POSTELL CECIL A	B	M	44	AA75	04	B	ADMINISTRATIVE ASSISTANT		01		DIV OF MEDICAL & PROF HEALTH SVCS
3		WESSINGER DEBBIE S	W	F	41	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		WATKINS PRE RELEASE CENTER
3		NESBITT VALERIE L	B	F	39	AA75	04	A	ADMINISTRATIVE ASSISTANT		01		DIV OF CLASSIFICATION & INMATE RECORD
3	P	TUCKER LISA A	B	F	29	AA75	04	D	ADMINISTRATIVE ASSISTANT		01		VICTIM SERVICES DIVISION
		TOTAL POSITIONS ELIMINATED 4											

SEE DISCLAIMER IN SECTION V OF RIF PLAN

F						C		L				
I			R			L	B	E			C A	
F		EMPLOYEE	A C	S E	A G	J A O S	A N	V E	CLASSIFICATION	RIF SVC	O R M E	
123		NAME	E	X	E	B S	D	L	TITLE	DATE	P A	LOCATION
		WOLVERTON LINDA M	W	F	38	AD03	04	A	FISCAL TECHNICIAN II		01	FOOD SER WHSE INVENTORY/DISTRIBUTION
		SWINSON LORI M	W	F	37	AD03	04	A	FISCAL TECHNICIAN II		01	FINANCIAL ACCOUNTING
		PURVIS RUTHIE M	B	F	54	AD03	04	A	FISCAL TECHNICIAN II		01	CIV LABOR POOL 9511
		JORDAN SUSAN E	W	F	69	AD01	03	D	FISCAL TECHNICIAN I		01	FINANCIAL ACCOUNTING
		DAVIS DOROTHY M	B	F	47	AD01	03	D	FISCAL TECHNICIAN I		01	FOOD SERVICES ADMINISTRATION
		WHITE JACQULYN E	B	F	37	AD01	03	D	FISCAL TECHNICIAN I		01	FINANCIAL ACCOUNTING
		WILLIAMS ROMONA C	B	F	33	AD01	03	D	FISCAL TECHNICIAN I		01	KIRKLAND CORRECTIONAL INSTITUTION
		BROWNHEIM BARBARA L	W	F	41	AD01	03	D	FISCAL TECHNICIAN I		01	FINANCIAL ACCOUNTING
		WILLIAMS BEVERLY W	W	F	46	AD01	03	D	FISCAL TECHNICIAN I		01	FINANCIAL ACCOUNTING
1		BOUKNIGHT DEBBIE	B	F	46	AD01	03	D	FISCAL TECHNICIAN I		01	CORR INDUSTRIES ADMIN
		HALL GLORIA V	B	F	43	AD01	03	D	FISCAL TECHNICIAN I		01	FINANCIAL ACCOUNTING
		PURE TRACY S	B	F	28	AD01	03	D	FISCAL TECHNICIAN I		01	FINANCIAL ACCOUNTING
1		PERKINS VERLENE E	W	F	58	AD01	03	D	FISCAL TECHNICIAN I		01	CORR INDUSTRIES ADMIN
3		SMALL TAMMY V	B	F	41	AD01	03	D	FISCAL TECHNICIAN I		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
3		ENSMAN JEANNIE C	W	F	45	AD01	03	D	FISCAL TECHNICIAN I		01	FINANCIAL ACCOUNTING
		TOTAL POSITIONS ELIMINATED 2										
		KRAMER MARTHA L	W	F	55	AD12	06	D	AUDITOR IV		01	DIVISION OF INTERNAL AUDITS
		MORGAN JOHN P	W	M	41	AD12	06	D	AUDITOR IV		01	DIVISION OF INTERNAL AUDITS
123		BOWERS DAVID C	W	M	58	AD12	06	D	AUDITOR IV		01	DIV OF INTERNAL AUDITS
		HUDDLE III CHARLES E	W	M	43	AD10	05	D	AUDITOR III		01	CANTEEN WHSE INVENTORY/DISTRIBUTION
		SHEPARD LARRY T	W	M	53	AD10	05	D	AUDITOR III		01	CANTEEN WHSE INVENTORY/DISTRIBUTION
13		HAYES LORETTA G	B	F	31	AD08	04	D	AUDITOR II		01	DIV OF INTERNAL AUDITS
		TOTAL POSITIONS ELIMINATED 2										
13		KENDALL JOHNNY E	W	M	51	AD18	08	E	AUDITS MANAGER II		01	DIV OF INTERNAL AUDITS
13		HOLTON GLENN S	W	M	42	AD15	07	E	AUDITS MANAGER I		01	DIV OF INTERNAL AUDITS
		TOTAL POSITIONS ELIMINATED 2										
1		HARRISON RICKIE	B	M	46	AH20	07	B	ADMINISTRATIVE MGR I		01	DIV OF INSPECT OPER REVIEW DRUG TES
		DIEHL JOHN BRYANT	W	M	51	AH20	07	B	ADMINISTRATIVE MGR I		01	CANTEEN WHSE INVENTORY/DISTRIBUTION
		VAUGHN WILLIAM J	W	M	62	AH20	07	E	ADMINISTRATIVE MGR I		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		PAGE JAMES EDWIN	W	M	43	AH20	07	C	ADMINISTRATIVE MGR I		01	BEHAVIORAL MEDICINE DIVISION
		MCQUEEN THOMAS EDGAR	W	M	52	AH20	07	E	ADMINISTRATIVE MGR I		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		GRAY ISAIAH	B	M	39	AH20	07	C	ADMINISTRATIVE MGR I		01	VEHICLE COMMUNICATION MANAGEMENT
		JEWELL TONJA M	W	F	42	AH20	07	D	ADMINISTRATIVE MGR I		01	FOOD SER WHSE INVENTORY/DISTRIBUTION
		POSTON JEFF	W	M	40	AH20	07	A	ADMINISTRATIVE MGR I		01	CONSTRUCTION ADMINISTRATION
		KING JR JOHN W	W	M	56	AH20	07	A	ADMINISTRATIVE MGR I		01	COMMISSARY WHSE INVENTORY/DISTRIBUTION
3		KINNEY KENNETH M	B	M	49	AH20	07	B	ADMINISTRATIVE MGR I		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		TOTAL POSITIONS ELIMINATED 1										
		JOHNSON ANNA K	W	F	57	AH40	06	B	PROGRAM COORDINATOR II		01	DIVISION OF INMATE SERVICES
		RITCHIE SUSAN F	W	F	57	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
		DANTZLER DON H	B	M	52	AH40	06	D	PROGRAM COORDINATOR II		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		STOBBE MICHAEL J	W	M	50	AH40	06	E	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
		KOON BARBARA R	W	F	55	AH40	06	E	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD

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F I F 123	EMPLOYEE NAME	RACE	SEX	AGE	CLASS TITLE	BAND	LEVEL	CLASSIFICATION TITLE	RIF SVC DATE	CAR ME PA	LOCATION
1	RAINEY PATRICIA A	B	F	46	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASS & INMATE RECDS
	MATHEWS MICHAEL R	B	M	48	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
	CANNON RICHARD L	B	M	47	AH40	06	E	PROGRAM COORDINATOR II		01	MANNING CORRECTIONAL INSTITUTION
	TOWNSEND HARRY EDWARD	W	M	42	AH40	06	E	PROGRAM COORDINATOR II		01	CAMILLE GRAHAM CORRECTIONAL INST
	CRISP DAVID E	W	M	48	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
	LORICK III LAWRENCE T	W	M	44	AH40	06	D	PROGRAM COORDINATOR II		01	DIVISION OF BUDGET AND FINANCE
	POOLE DORIS P	B	F	43	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
	MANGUM ASHLEY D	W	M	60	AH40	06	A	PROGRAM COORDINATOR II		01	FOOD SER WHSE INVENTORY/DISTRIBUTION
	SAS NICHOLAS M	W	M	45	AH40	06	C	PROGRAM COORDINATOR II		01	CAMPBELL PRE RELEASE CENTER
	STEVENSON III ROBERT M	W	M	43	AH40	06	E	PROGRAM COORDINATOR II		01	KIRKLAND CORRECTIONAL INSTITUTION
	LEAKS STANLEY BH	B	M	42	AH40	06	C	PROGRAM COORDINATOR II		01	WATKINS PRE RELEASE CENTER
	WEEDON KENNETH B	B	M	49	AH40	06	E	PROGRAM COORDINATOR II		01	GOODMAN CORRECTIONAL INSTITUTION
	PATTERSON DENNIS R	B	M	40	AH40	06	E	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
	ROBINSON ELAINE C	B	F	45	AH40	06	E	PROGRAM COORDINATOR II		01	STEVENSON CORRECTIONAL INSTITUTION
	LYBRAND ELIZABETH B	W	F	44	AH40	06	D	PROGRAM COORDINATOR II		01	DIVISION OF INMATE SERVICES
	MATHIS LINDA W	W	F	43	AH40	06	A	PROGRAM COORDINATOR II		01	DIVISION OF BUDGET AND FINANCE
	KNOWLIN SANDRA M	B	F	40	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
1	SMITH TESSIE A	B	F	42	AH40	06	E	PROGRAM COORDINATOR II		01	OPERATION REVIEW
	COUNTS MONICA A	W	F	40	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
	HOUSTON ARTHUR E	B	M	40	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
	MCCALL, JR DAVID M	W	M	38	AH40	06	C	PROGRAM COORDINATOR II		01	KIRKLAND CORRECTIONAL INSTITUTION
1	MIMS CYNTHIA E	W	F	51	AH40	06	E	PROGRAM COORDINATOR II		01	OPERATION REVIEW
1	CROMER PERNELL	B	M	41	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASS & INMATE RECDS
	LARDEN JOHN P	B	M	55	AH40	06	B	PROGRAM COORDINATOR II		01	COMMISSARY WHSE INVENTORY/DISTRIBUTION
1	COLEMAN MARY E	W	F	47	AH40	06	E	PROGRAM COORDINATOR II		01	OPERATION REVIEW
	THOMPSON ANDREA R	B	F	39	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
	GLYMPH DELORIS M	B	F	50	AH40	06	E	PROGRAM COORDINATOR II		01	YOUNG OFFENDER DIVISION
	TURBEVILLE LYNN F	W	F	57	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
	BURCKHALTER PHILIP G	W	M	51	AH40	06	E	PROGRAM COORDINATOR II		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
	PATTERSON SHARON A	B	F	38	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
2	BAXLEY TRACIE B	O	F	44	AH40	06	D	PROGRAM COORDINATOR II		01	INMATE GRIEVANCE BRANCH
2	BRENNAN JR JAMES E	W	M	54	AH40	06	C	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
2	BROWN MARVIN A	B	M	44	AH40	06	E	PROGRAM COORDINATOR II		01	DIV OF CLASSIFICATION & INMATE RECORD
2	CAMPBELL ROBERT L	W	M	56	AH40	06	B	PROGRAM COORDINATOR II		01	BEHAVIORAL MEDICINE DIVISION
12	EDGE KELLY R	W	F	40	AH40	06	E	PROGRAM COORDINATOR II		01	OPERATION REVIEW
12	WITHERSPOON LAVERN	B	M	48	AH40	06	C	PROGRAM COORDINATOR II		01	BROAD RIVER
123	ESLICK LONNIE J	W	M	60	AH40	06	E	PROGRAM COORDINATOR II		01	SECURITY DIVISION
123	CAMPBELL JENNIFER L	W	F	32	AH40	06	B	PROGRAM COORDINATOR II		01	YOUNG OFFENDER DIV
23	PERRY KEISHA L	B	F	33	AH40	06	B	PROGRAM COORDINATOR II		01	SUBSTANCE ABUSE SVCS DIV
	THOMAS MARY A	B	F	61	AH35	05	B	PROGRAM COORDINATOR I		01	BROAD RIVER CORRECTIONAL INSTITUTION
	WOOD DARRELL H	W	M	47	AH35	05	D	PROGRAM COORDINATOR I		01	MANNING CORRECTIONAL INSTITUTION
	WEED LOREENE H	W	F	60	AH35	05	A	PROGRAM COORDINATOR I		01	DIV OF CLASSIFICATION & INMATE RECORD
	ROGERS HARRY	B	M	52	AH35	05	C	PROGRAM COORDINATOR I		01	KIRKLAND CORRECTIONAL INSTITUTION
	SEABROOK GLORIA	B	F	51	AH35	05	E	PROGRAM COORDINATOR I		01	WATKINS PRE RELEASE CENTER

I F 123	EMPLOYEE NAME	RACE	SEX	AGE	CLASS JOBS	BAND	LEVEL	CLASSIFICATION TITLE	RIF SVC DATE	CAMP	LOCATION
	SMITH RAYMOND	W	M	61	AH35	05	E	PROGRAM COORDINATOR I		01	MANNING CORRECTIONAL INSTITUTION
	ROSE MARSHALL	B	F	44	AH35	05	B	PROGRAM COORDINATOR I		01	KIRKLAND CORRECTIONAL INSTITUTION
	METTS THOMAS A	W	M	56	AH35	05	E	PROGRAM COORDINATOR I		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
	BUFF SUSAN R	W	F	50	AH35	05	C	PROGRAM COORDINATOR I		01	DIV OF CLASSIFICATION & INMATE RECORD
	DIRUSSO KEITH J	W	M	39	AH35	05	E	PROGRAM COORDINATOR I		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
1	FERGUSON SHARON J	B	F	49	AH35	05	E	PROGRAM COORDINATOR I		01	DIV OF CLASS & INMATE RECDS
	ROWE DEBORAH L	W	F	50	AH35	05	E	PROGRAM COORDINATOR I		01	DEPUTY DIRECTOR ADMINISTRATION
	ROLACK CAROLINE A	B	F	48	AH35	05	C	PROGRAM COORDINATOR I		01	DIV OF CLASSIFICATION & INMATE RECORD
	WILSON DENNIS L	W	M	53	AH35	05	D	PROGRAM COORDINATOR I		01	KIRKLAND CORRECTIONAL INSTITUTION
	WILLIS STEPHANIE	B	F	38	AH35	05	B	PROGRAM COORDINATOR I		01	MANNING CORRECTIONAL INSTITUTION
	WISE VICKIE M	B	F	37	AH35	05	E	PROGRAM COORDINATOR I		01	DIVISION OF POLICY DEVELOPMENT
1	MARTIN ODESSA	B	F	38	AH35	05	C	PROGRAM COORDINATOR I		01	OFFICE OF EXEC AFFAIRS
	HOWDESHELL THELMA S	W	F	47	AH35	05	C	PROGRAM COORDINATOR I		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
	TISON JULIA K	W	F	52	AH35	05	E	PROGRAM COORDINATOR I		01	DIV OF CLASSIFICATION & INMATE RECORD
	KIRSCH THOMAS E	W	M	53	AH35	05	D	PROGRAM COORDINATOR I		01	FOOD PROCESSING PLANT
	VAN BORSCH DONALD	W	M	49	AH35	05	B	PROGRAM COORDINATOR I		01	WALDEN FARM OPER
	ADAMS JENEANN W	W	F	48	AH35	05	C	PROGRAM COORDINATOR I		01	CAMILLE GRAHAM CORRECTIONAL INST
	SMALL SHARON COHEN	B	F	36	AH35	05	C	PROGRAM COORDINATOR I		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
	WATTS MONICA B	B	F	33	AH35	05	B	PROGRAM COORDINATOR I		01	YOUNG OFFENDER DIVISION
	FOX CLONTA S	W	M	37	AH35	05	C	PROGRAM COORDINATOR I		01	DIV OF CLASSIFICATION & INMATE RECORD
	GRIFFITH JOHN B	B	M	52	AH35	05	B	PROGRAM COORDINATOR I		01	WALDEN FARM OPER
	QUILLER PORTIA M	B	F	43	AH35	05	E	PROGRAM COORDINATOR I		01	VICTIM SERVICES DIVISION
	BARKLEY JOHN G	W	M	41	AH35	05	E	PROGRAM COORDINATOR I		01	MANNING CORRECTIONAL INSTITUTION
	BROOKS CAROL B	W	F	48	AH35	05	C	PROGRAM COORDINATOR I		01	DIV OF CLASSIFICATION & INMATE RECORD
3	ROWE ERNEST E	B	M	37	AH35	05	C	PROGRAM COORDINATOR I		01	DIV OF CLASSIFICATION & INMATE RECORD
3	MODZELEWSKI JOSEPH R	W	M	65	AH35	05	C	PROGRAM COORDINATOR I		01	DIV OF CLASSIFICATION & INMATE RECORD
3	HOLMES OLIVER L	B	M	65	AH35	05	A	PROGRAM COORDINATOR I		01	SUPPORT SERVICES ADMINISTRATION
3	HURT STACEY A	W	F	26	AH35	05	C	PROGRAM COORDINATOR I		01	SAFETY/FIRE INSPECTIONS DIVISION
3	MULLIS VANN S	W	M	57	AH35	05	C	PROGRAM COORDINATOR I		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
3	TAYLOR SHIRLIE T	W	F	57	AH35	05	C	PROGRAM COORDINATOR I		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
3	STANLEY WILLIAM R	W	M	25	AH35	05	C	PROGRAM COORDINATOR I		01	VICTIM SERVICES DIVISION
3	COBB JR LUCIUS D	W	M	32	AH35	05	C	PROGRAM COORDINATOR I		01	CORRECTIONAL INDUSTRIES ADMINISTRATION
	TOTAL POSITIONS ELIMINATED 11										
	TAYLOR JR BLAKE E	W	M	57	AH45	07	E	PROGRAM MANAGER I		01	DIV OF INSPECT OPER REVIEW DRUG TES
	BROWN SAMMIE D	W	F	59	AH45	07	B	PROGRAM MANAGER I		01	DEPUTY DIRECTOR PROGRAM SERVICES
	KELLY DEBORAH B	W	F	47	AH45	07	E	PROGRAM MANAGER I		01	DIV OF MEDICAL & PROF HEALTH SVCS
	KAWAGUCHI LAURA H	W	F	49	AH45	07	B	PROGRAM MANAGER I		01	DIV OF CLASSIFICATION & INMATE RECORD
	SCARBOROUGH JOETTE D	B	F	47	AH45	07	B	PROGRAM MANAGER I		01	DIV OF CLASSIFICATION & INMATE RECORD
	DUNLAP LINDA J	W	F	53	AH45	07	E	PROGRAM MANAGER I		01	DIV OF MEDICAL & PROF HEALTH SVCS
	ROCHESTER NELLIE M	W	F	54	AH45	07	E	PROGRAM MANAGER I		01	DIV OF MEDICAL & PROF HEALTH SVCS
	MITCHELL JOSEPHINE L	B	F	45	AH45	07	D	PROGRAM MANAGER I		01	BEHAVIORAL MEDICINE DIVISION
	RILEY TIMOTHY	W	M	42	AH45	07	B	PROGRAM MANAGER I		01	KIRKLAND CORRECTIONAL INSTITUTION
	MONTGOMERY SUSAN A	W	F	52	AH45	07	B	PROGRAM MANAGER I		01	OFFICE OF EXECUTIVE AFFAIRS
	VOGT LE ANN M	W	F	46	AH45	07	A	PROGRAM MANAGER I		01	KIRKLAND CORRECTIONAL INSTITUTION

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L J A O S B S	B A N D	L E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		RECK STEVEN J	W	M	53	AH45	07	A	PROGRAM MANAGER I		01	FOOD SERVICES ADMINISTRATION
		CLARK JOHN R	W	M	61	AH45	07	C	PROGRAM MANAGER I		01	DIVISION OF HUMAN RESOURCES
		SWEIGART LES G	W	M	59	AH45	07	D	PROGRAM MANAGER I		01	SUPPORT SERVICES ADMINISTRATION
		CONNELLY YVONNE T	W	F	54	AH45	07	E	PROGRAM MANAGER I		01	DIV OF MEDICAL & PROF HEALTH SVCS
		DEW JR HERBERT O	W	M	52	AH45	07	D	PROGRAM MANAGER I		01	AGRICULTURE SERVICES
		POWELL KATHLEEN F	B	F	51	AH45	07	E	PROGRAM MANAGER I		01	BEHAVIORAL MEDICINE DIVISION
13		SHULER THOMAS A	B	M	50	AH45	07	C	PROGRAM MANAGER I		01	SUBSTANCE ABUSE SVCS DIV
	R1	ELLISOR SHARON E	W	F	39	AH45	07	D	PROGRAM MANAGER I		01	CONSTRUCTION ADMINISTRATION
	R1	CRAIG PAMELA R	B	F	54	AH45	07	E	PROGRAM MANAGER I		01	SAFETY/FIRE INSPECTIONS DIVISION
		TOTAL POSITIONS ELIMINATED 1										
		SMITH ALBERT R	W	M	54	AJ45	06	E	INFO RESOURCE CONSULT II		01	NETWORK & TELE COMM
1		HOOKER SR GARY A	W	M	54	AJ45	06	E	INFO RESOURCE CONSULT II		01	NETWORK & TELE COMM
		BOVE FRED C	W	M	33	AJ45	06	B	INFO RESOURCE CONSULT II		01	NETWORK & TELE COMM
3		STOTTS DARRELL J	W	M	48	AJ45	06	B	INFO RESOURCE CONSULT II		01	CORRECTIONAL INDUSTRIES
		TOTAL POSITIONS ELIMINATED 1										
		STEVENS KAREN L	W	F	43	AJ40	04	A	COMPUTER OPERATOR II		01	SYSTEMS OPER & SUPPORT
		ANDERSON SHIRLEY W	B	M	59	AJ40	04	A	COMPUTER OPERATOR II		01	SYSTEM OPER & SUPPORT
13		JOHNSON RICHMOND A	B	M	53	AJ40	04	A	COMPUTER OPERATOR II		01	SYSTEM OPER & SUPPORT
		TOTAL POSITIONS ELIMINATED 1										
13		ROBINSON KAY	B	F	37	BC30	06	D	PUBLIC INFOR DIR I		01	OFF OF COMMUNICATIONS
		TOTAL POSITIONS ELIMINATED 1										
13		BATES LEE CHERYL A	B	F	44	BC50	08	A	DIR INFORMATION SVCS		01	OFF OF COMMUNICATIONS
		TOTAL POSITIONS ELIMINATED 1										
		SUMMERS JOHN W	B	M	52	EB52	09	A	DENTIST		01	BROAD RIVER CORRECTIONAL INSTITUTION
		GILLIAM MEDRINA J	B	F	43	EB52	09	C	DENTIST		01	DEPUTY DIR FOR MED & PROF HEALTH SERV
		MCPHERSON DOUGLAS W	W	M	49	EB52	09	A	DENTIST		01	KIRKLAND CORRECTIONAL INSTITUTION
		MINCER EUGENE	B	M	54	EB52	09	A	DENTIST		01	DIV OF MEDICAL & PROF HEALTH SVCS
13		STEIN SAUNDRA G	W	F	48	EB52	09	A	DENTIST		01	CAMILLE GRAHAM
		TOTAL POSITIONS ELIMINATED 1										
		ROBINSON HESTER	B	F	53	EC10	02	C	MED ASST TECH I		01	BROAD RIVER CORR INST
		GILYARD JEAN F	B	F	54	EC10	02	C	MED ASST TECH I		01	CAMILLE GRAHAM CORR INST
		WRIGHT MARGARET	B	F	43	EC10	02	C	MED ASST TECH I		01	KIRKLAND CORR INST
13		IRVIN MILLICENT M	B	F	32	EC10	02	C	MED ASST TECH I		01	DIV OF MED & PROF SVCS
	R2	BENDER MARY	B	F	38	EC10	02	C	MED ASST TECH I		01	CAMILLE GRAHAM CORR INST
	R2	EVANS KATRINA L	B	F	35	EC10	02	C	MED ASST TECH I		01	BEHAVIORAL MEDICINE DIVISION
	R2	ROBINSON LOLITTA V	B	F	27	EC10	02	C	MED ASST TECH I		01	KIRKLAND CORR INST
	R2	RICHARDSON KATHLEE	B	F	48	EC10	02	C	MED ASST TECH I		01	CAMILLE GRAHAM CORR INST
	P R2	IJAJA, MARY L	B	F	45	EC10	02	C	MED ASST TECH I		01	KIRKLAND CORR INST
	P R2	TINNEL JOYCE E	W	F	54	EC10	02	C	MED ASST TECH I		01	KIRKLAND CORR INST
	P R2	GILL YOLANDO	B	F	41	EC10	02	C	MED ASST TECH I		01	KIRKLAND CORR INST
	P R2	HICKS ANGELA J	B	F	29	EC10	02	C	MED ASST TECH I		01	KIRKLAND CORR INST
	P R2	GARDENER PATRICIA	B	F	37	EC10	02	C	MED ASST TECH I		01	CAMILLE GRAHAM CORR INST
		TOTAL POSITIONS ELIMINATED 1										

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R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L A S S	L B A N D	L E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		DUCK MARGARET H	W	F	58	EC25	05	A	TECHNICAL MEDICAL ASSOS II		01	DIV OF MED & PROF SVCS
13		TINDER MELISSA G	W	F	35	EC25	05	A	TECHNICAL MEDICAL ASSOS II		01	DIV OF MED & PROF SVCS
		TOTAL POSITIONS ELIMINATED 1										
		WILSON ANNIE S	B	F	54	GA40	04	E	HUMAN SERVICES SPEC II		01	GOODMAN CORRECTIONAL INSTITUTION
		JOHNSON ARLENE	B	F	49	GA40	04	C	HUMAN SERVICES SPEC II		01	GOODMAN CORRECTIONAL INSTITUTION
		WRIGHT RICHARD L	W	M	57	GA40	04	C	HUMAN SERVICES SPEC II		01	CAMPBELL PRE RELEASE CENTER
		HARRELL DONALD B	B	M	41	GA40	04	B	HUMAN SERVICES SPEC II		01	WATKINS PRE RELEASE CENTER
		WALTZ DONALD R	W	M	38	GA40	04	A	HUMAN SERVICES SPEC II		01	DIV OF CLASSIFICATION & INMATE RECORD
		MCKIE KENNETH	B	M	44	GA40	04	C	HUMAN SERVICES SPEC II		01	WATKINS PRE RELEASE CENTER
		JEFFERSON JANIE E M	B	F	59	GA40	04	B	HUMAN SERVICES SPEC II		01	WATKINS PRE RELEASE CENTER
		THOMAS BETTY JEAN	B	F	48	GA40	04	A	HUMAN SERVICES SPEC II		01	DIV OF CLASSIFICATION & INMATE RECORD
		RIDGES ANTHONY R	B	M	33	GA40	04	A	HUMAN SERVICES SPEC II		01	DIV OF CLASSIFICATION & INMATE RECORD
		ROGERS CHARLES E	W	M	46	GA40	04	A	HUMAN SERVICES SPEC II		01	DIV OF CLASSIFICATION & INMATE RECORD
		JONES VALERIE C	B	F	40	GA40	04	A	HUMAN SERVICES SPEC II		01	DIV OF CLASSIFICATION & INMATE RECORD
1		GEDDIS VALETA A	B	F	31	GA40	04	B	HUMAN SERVICES SPEC II		01	GOODMAN CORR INST
		ARMSTRONG JEROME K	B	M	46	GA40	04	A	HUMAN SERVICES SPEC II		01	DIV OF CLASSIFICATION & INMATE RECORD
		PRATT ANNIE M	B	F	49	GA40	04	C	HUMAN SERVICES SPEC II		01	GOODMAN CORRECTIONAL INSTITUTION
		NICKS TRICIA A	W	F	33	GA40	04	E	HUMAN SERVICES SPEC II		01	GOODMAN CORRECTIONAL INSTITUTION
	P	MCKNIGHT ALICIA D	B	F	36	GA40	04	A	HUMAN SERVICES SPEC II		01	BEHAVIORAL MEDICINE DIVISION
3	P	CARAWAY MARY E	B	F	30	GA40	04	A	HUMAN SERVICES SPEC II		01	BEHAVIORAL MEDICINE DIVISION
		TOTAL POSITIONS ELIMINATED 1										
		SHAW ERNEST	B	M	52	GA60	06	D	HUMAN SERVICES COORD II		01	BEHAVIORAL MEDICINE DIVISION
		WEEKS REAVER MAE	B	F	50	GA60	06	A	HUMAN SERVICES COORD II		01	STEVENSON CORRECTIONAL INSTITUTION
		MCMILLAN ALTON L	B	M	55	GA60	06	B	HUMAN SERVICES COORD II		01	BEHAVIORAL MEDICINE DIVISION
		WALTON GEORGE L	B	M	47	GA60	06	B	HUMAN SERVICES COORD II		01	BROAD RIVER CORRECTIONAL INSTITUTION
		MICKENS BRENDA G	B	F	51	GA60	06	D	HUMAN SERVICES COORD II		01	BEHAVIORAL MEDICINE DIVISION
		OBERMAN BRUCE H	W	M	42	GA60	06	B	HUMAN SERVICES COORD II		01	BEHAVIORAL MEDICINE DIVISION
		HASTY BARBARA A	W	F	54	GA60	06	C	HUMAN SERVICES COORD II		01	BROAD RIVER CORRECTIONAL INSTITUTION
		MOORE KEVIN	B	M	44	GA60	06	B	HUMAN SERVICES COORD II		01	KIRKLAND CORRECTIONAL INSTITUTION
		DWYER ANN M	W	F	39	GA60	06	D	HUMAN SERVICES COORD II		01	BEHAVIORAL MEDICINE DIVISION
		SMITH SARAH A	B	F	60	GA60	06	B	HUMAN SERVICES COORD II		01	BEHAVIORAL MEDICINE DIVISION
1		SHATTUCK ROBERT W	W	M	58	GA60	06	B	HUMAN SERVICES COORD II		01	SUBSTANCE ABUSE SVCS DIV
		RYDER GARY H	W	M	55	GA60	06	B	HUMAN SERVICES COORD II		01	BEHAVIORAL MEDICINE DIVISION
		FLOWERS STANLEY R	B	M	42	GA60	06	B	HUMAN SERVICES COORD II		01	STEVENSON CORRECTIONAL INSTITUTION
		ELLER MARGARET D	W	F	47	GA60	06	C	HUMAN SERVICES COORD II		01	DIVISION OF INMATE SERVICES
		MYERS KENNETH E SR	B	M	49	GA60	06	B	HUMAN SERVICES COORD II		01	KIRKLAND CORRECTIONAL INSTITUTION
		ADEDOKUN DORCAS I	B	F	52	GA60	06	B	HUMAN SERVICES COORD II		01	GOODMAN CORRECTIONAL INSTITUTION
		HOLMES WILLIE B	B	M	54	GA60	06	A	HUMAN SERVICES COORD II		01	WATKINS PRE RELEASE CENTER
2		GORDON STEPHANIE T	B	F	40	GA60	06	B	HUMAN SERVICES COORD II		01	CAMILLE GRAHAM CORRECTIONAL INST
		JAMES THOMAS E	B	M	55	GA50	05	D	HUMAN SERVICES COORD I		01	BROAD RIVER CORRECTIONAL INSTITUTION
		PRICE CHRISTINE H	A	F	53	GA50	05	D	HUMAN SERVICES COORD I		01	CAMILLE GRAHAM CORRECTIONAL INST
		CANTEY JR LAWRENCE	B	M	45	GA50	05	E	HUMAN SERVICES COORD I		01	BROAD RIVER CORRECTIONAL INSTITUTION
		WADFORD PAMELLA	W	F	43	GA50	05	E	HUMAN SERVICES COORD I		01	BEHAVIORAL MEDICINE DIVISION
		MONTGOMERY ELOUISE J	B	F	46	GA50	05	D	HUMAN SERVICES COORD I		01	MANNING CORRECTIONAL INSTITUTION

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R I F 123		EMPLOYEE NAME	RACE	SEX	AGE	CLASS CODE	LEVEL	CLASSIFICATION TITLE	RIF SVC DATE	CAR ORME PA	LOCATION
		DOWNING MARIAN Y	B	F	47	GA50	05 D	HUMAN SERVICES COORD I		01	GOODMAN CORRECTIONAL INSTITUTION
		BOWIE SANDRA S	W	F	49	GA50	05 C	HUMAN SERVICES COORD I		01	INMATE GRIEVANCE BRANCH
		GRAY EDWARD M	B	M	49	GA50	05 D	HUMAN SERVICES COORD I		01	BROAD RIVER CORRECTIONAL INSTITUTION
1		SMITH DENNIS O	B	M	44	GA50	05 D	HUMAN SERVICES COORD I		01	YOUNG OFFENDER DIV
		LAWSON JAMES G	W	M	60	GA50	05 E	HUMAN SERVICES COORD I		01	BEHAVIORAL MEDICINE DIVISION
		BROWN BARBARA A	B	F	52	GA50	05 A	HUMAN SERVICES COORD I		01	GOODMAN CORRECTIONAL INSTITUTION
		SIMMONS III JAMES	B	M	38	GA50	05 C	HUMAN SERVICES COORD I		01	INMATE GRIEVANCE BRANCH
		HANCOCK ROBIN A	B	F	40	GA50	05 A	HUMAN SERVICES COORD I		01	BEHAVIORAL MEDICINE DIVISION
		FAIR PAULETTE G	B	F	46	GA50	05 D	HUMAN SERVICES COORD I		01	BROAD RIVER CORRECTIONAL INSTITUTION
		HOLLIDAY CLYDE	B	M	53	GA50	05 D	HUMAN SERVICES COORD I		01	CAMILLE GRAHAM CORRECTIONAL INST
		SPROTT ESTHER W	W	F	66	GA50	05 C	HUMAN SERVICES COORD I		01	CAMILLE GRAHAM CORRECTIONAL INST
		MARION CELESTINE	B	F	57	GA50	05 D	HUMAN SERVICES COORD I		01	BROAD RIVER CORRECTIONAL INSTITUTION
		BROWN CHERYL L	B	F	33	GA50	05 A	HUMAN SERVICES COORD I		01	GOODMAN CORRECTIONAL INSTITUTION
		DEAS ANGELA M	B	F	32	GA50	05 D	HUMAN SERVICES COORD I		01	STEVENSON CORRECTIONAL INSTITUTION
		NOLES JR L GENE	W	M	34	GA50	05 C	HUMAN SERVICES COORD I		01	INMATE GRIEVANCE BRANCH
		CARTLEDGE LARRY	B	M	34	GA50	05 D	HUMAN SERVICES COORD I		01	BEHAVIORAL MEDICINE DIVISION
		CARTER PATRICK F	B	M	38	GA50	05 D	HUMAN SERVICES COORD I		01	CAMILLE GRAHAM CORRECTIONAL INST
		MCFADDEN JAKE W	B	M	38	GA50	05 D	HUMAN SERVICES COORD I		01	KIRKLAND CORRECTIONAL INSTITUTION
		BIGGER MURREL	B	M	53	GA50	05 A	HUMAN SERVICES COORD I		01	BEHAVIORAL MEDICINE DIVISION
		JONES JR CALVIN	B	M	34	GA50	05 D	HUMAN SERVICES COORD I		01	MANNING CORRECTIONAL INSTITUTION
		HUDSON BEULAH M	B	F	50	GA50	05 D	HUMAN SERVICES COORD I		01	BROAD RIVER CORRECTIONAL INSTITUTION
		ROBERTS TERRELL D	B	M	30	GA50	05 A	HUMAN SERVICES COORD I		01	BEHAVIORAL MEDICINE DIVISION
		RAMSEY RICHARD K	W	M	45	GA50	05 C	HUMAN SERVICES COORD I		01	BROAD RIVER CORRECTIONAL INSTITUTION
		HERRIOTT CHARLISA	B	F	30	GA50	05 D	HUMAN SERVICES COORD I		01	CAMILLE GRAHAM CORRECTIONAL INST
		DRAKE JAMES S	W	M	29	GA50	05 A	HUMAN SERVICES COORD I		01	BEHAVIORAL MEDICINE DIVISION
		DEAS ELIZABETH A	B	F	46	GA50	05 D	HUMAN SERVICES COORD I		01	BROAD RIVER CORRECTIONAL INSTITUTION
		PRIOLEAU BRENDA K	B	F	37	GA50	05 A	HUMAN SERVICES COORD I		01	BROAD RIVER CORRECTIONAL INSTITUTION
		WILLIAMS ELIZABETH G	W	F	56	GA50	05 D	HUMAN SERVICES COORD I		01	BROAD RIVER CORRECTIONAL INSTITUTION
		HARMAN CATHERINE A	W	F	43	GA50	05 C	HUMAN SERVICES COORD I		01	BEHAVIORAL MEDICINE DIVISION
		DENNIS PAUL N	B	M	28	GA50	05 A	HUMAN SERVICES COORD I		01	KIRKLAND CORRECTIONAL INSTITUTION
		HOLLIFIELD DEBORAH R	W	F	40	GA50	05 D	HUMAN SERVICES COORD I		01	BEHAVIORAL MEDICINE DIVISION
		AYCOTH COURTNEY S	W	F	34	GA50	05 D	HUMAN SERVICES COORD I		01	BEHAVIORAL MEDICINE DIVISION
		PEARSON SARAH M	B	F	40	GA50	05 A	HUMAN SERVICES COORD I		01	BEHAVIORAL MEDICINE DIVISION
		NICKENS TRACY M	B	F	35	GA50	05 D	HUMAN SERVICES COORD I		01	KIRKLAND CORRECTIONAL INSTITUTION
		DANNELS ROGER E	W	M	55	GA50	05 D	HUMAN SERVICES COORD I		01	BROAD RIVER CORRECTIONAL INSTITUTION
3		GEOHAGHAN ANGELA L	B	F	39	GA50	05 E	HUMAN SERVICES COORD I		01	CAMILLE GRAHAM CORRECTIONAL INST
3		SIMS QUANDA D	B	F	34	GA50	05 D	HUMAN SERVICES COORD I		01	KIRKLAND CORRECTIONAL INSTITUTION
13		JACKSON TAMALA J	B	F	35	GA50	05 A	HUMAN SERVICES COORD I		01	SUBSTANCE ABUSE SVCS DIV
		TOTAL POSITIONS ELIMINATED 3									
13		WHITTLETON CELESTINE	B	F	50	JA80	04 E	INSPECTOR II		01	KIRKLAND CORR INST
13		BUIE JANE	W	F	50	JA80	04 E	INSPECTOR II		01	GOODMAN CORR INST
13		PERRY KELVIN A	B	M	34	JA80	04 E	INSPECTOR II		01	STEVENSON CORR INST
13		GARRELL, DEBORAH G	W	F	44	JA80	04 D	INSPECTOR II		01	CAMPBELL
13		COX LORIE T	W	F	40	JA80	04 D	INSPECTOR II		01	WATKINS PRE RELEASE CTR
13		BRINSON WILLIE E	W	M	54	JA80	04 E	INSPECTOR II		01	MANNING CORR INST
		TOTAL POSITIONS ELIMINATED 6									

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R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L J A O S B S	B A N D	L E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
1		THOMAS LAVENIA P	B	F	52	UB02			CERTIFIED TEACHER M		01	BROAD RIVER
		HUDSON PATRICIA G	B	F	51	UB02			CERTIFIED TEACHER GA		01	CAMILLE GRAHAM
1		MYERS MARIAM L	B	F	54	UB02			CERTIFIED TEACHER GA		01	GOODMAN CORR INST
1		LAKIN YVETTE	B	F	41	UB02			CERTIFIED TEACHER GA		01	BROAD RIVER
1		GREEN L S	W	F	53	UB02			CERTIFIED TEACHER MS		01	MANNING CORR INST
3		WILLIAMS CAROL C	W	F	50	UB02			CERTIFIED TEACHER MS		01	CAMILLE GRAHAM
1	R4	SMITH TALMADGE A	B	M	50	UB02			CERTIFIED TEACHER GA		01	MANNING CORR INST
13		CROXTON JEANNIE B	W	F	56	UB02			CERTIFIED TEACHER GA		01	MANNING CORR INST
3		RHOTEN BRENDA L	W	F	59	UB02			CERTIFIED TEACHER GA		01	GOODMAN CORR INST
3		MULLIS SUSAN D	W	F	54	UB02			CERTIFIED TEACHER GA		01	EDUCATIONAL SERVICES
13		GLENN NANCY B	W	F	52	UB02			CERTIFIED TEACHER MS		01	STEVENSON CORR INST
3		WILLIAMS MAGGIE L	B	F	65	UB02			CERTIFIED TEACHER GA		01	CAMILLE GRAHAM
1	R4	RUGER ROSE M	B	F	46	UB02			CERTIFIED TEACHER M		01	MANNING CORR INST
3		NEWMAN JR JAMES H	W	M	57	UB02			CERTIFIED TEACHER M		01	CAMILLE GRAHAM
3		BROWN GWYNEEDA	B	F	59	UB02			CERTIFIED TEACHER GA		01	STEVENSON CORR INST
13		MARTIN GENEVA M	W	F	59	UB02			CERTIFIED TEACHER GA		01	BROAD RIVER
13		MCMILLAN EUGENE M	B	M	51	UB02			CERTIFIED TEACHER GA		01	WALDEN CORR INST
		TOTAL POSITIONS ELIMINATED 10										
		RITCHIE GERALD B	W	M	58	UB04			VOCATIONAL TEACHER VW		01	CAMILLE GRAHAM
13		KING CARROLL B	W	M	65	UB04			VOCATIONAL TEACHER VH		01	MANNING CORR INST
13		PHILLIPS THERON M	W	M	48	UB04			VOCATIONAL TEACHER VC		01	WALDEN CORR INST
	R4	ROSE CAREN M	B	F	51	UB04			VOCATIONAL TEACHER VO		01	CAMILLE GRAHAM
13		DITTMAR WILLIAM R	W	M	53	UB04			VOCATIONAL TEACHER VA		01	BROAD RIVER
13		MCCLANAHAN BEVERLY M	W	F	59	UB04			VOCATIONAL TEACHER VH		01	BROAD RIVER
13		SHARPE EDWARD L	W	M	61	UB04			VOCATIONAL TEACHER VA		01	WATKINS PRE RELEASE CTR
13		DORSEY JAMES R	B	M	55	UB04			VOCATIONAL TEACHER VM		01	MANNING CORR INST
		TOTAL POSITIONS ELIMINATED 6										
1		VENNING JACQUELINE L	B	F	54	UB06			GUIDANCE COUNSELOR G		01	MANNING CORR INST
		BAILEY ELLEN S	W	F	50	UB06			GUIDANCE COUNSELOR G		01	STEVENSON CORR INST
3		ABRAHAM GERALDINE	B	F	43	UB06			GUIDANCE COUNSELOR G		01	CAMILLE GRAHAM
		TOTAL POSITIONS ELIMINATED 1										
		BLANTON WENDELL J	W	M	59	UB09			SUPT OF EDUCATION		01	EDUCATIONAL SERVICES
13		LABREW DELORIS	B	F	53	UE07			ACADEMIC PROGRAM MANAGER		01	KIRKLAND CORR INST
13		SMITH CAROLYN M	B	F	59	UE07			ACADEMIC PROGRAM MANAGER		01	KIRKLAND CORR INST
	R3	SHARPE HOYT R	W	M	62	UE07			ACADEMIC PROGRAM MANAGER		01	EDUCATIONAL SERVICES
	R3	JACKSON KATHY C	W	F	49	UE07			ACADEMIC PROGRAM MANAGER		01	EDUCATIONAL SERVICES
	R3	WICKER TOMMIE E	W	F	58	UE07			ACADEMIC PROGRAM MANAGER		01	EDUCATIONAL SERVICES
13		VINSON III WILLIAM D	W	M	53	UB07			PRINCIPAL		01	MANNING CORR INST
		TOTAL POSITIONS ELIMINATED 3										

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F I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L J A O S B S	B A N D	L E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		COMPETITIVE AREA 02										
		BLACK JR RAY	W	M	41	AA50	03	A	ADMIN SPECIALIST II		02	PALMER PRE RELEASE CENTER
		ALFORD SHARON E	B	F	54	AA50	03	C	ADMIN SPECIALIST II		02	TURBEVILLE CORRECTIONAL INSTITUTION
		MONTGOMERY ROBIN	B	F	45	AA50	03	C	ADMIN SPECIALIST II		02	WATEREE RIVER CORRECTIONAL INSTITUTION
		GILL VENETTA J	B	F	42	AA50	03	C	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		HARRIS SANDRA K	W	F	51	AA50	03	D	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		MURPHY MARY A	B	F	38	AA50	03	A	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		WINTERS ANGELA M	B	F	35	AA50	03	A	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		WASHINGTON LISA S	B	F	29	AA50	03	A	ADMIN SPECIALIST II		02	TURBEVILLE CORRECTIONAL INSTITUTION
		HILTON ROSA M	B	F	38	AA50	03	A	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		FORD LORETTA W	B	F	44	AA50	03	A	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		BENNETT BETTY A	B	F	43	AA50	03	A	ADMIN SPECIALIST II		02	TURBEVILLE CORRECTIONAL INSTITUTION
		MELTON JANICE S	W	F	54	AA50	03	A	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		WILLIAMSON GLENDA F	W	F	53	AA50	03	E	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		BRADLEY TREVA R	B	F	32	AA50	03	A	ADMIN SPECIALIST II		02	TURBEVILLE CORRECTIONAL INSTITUTION
		COKER SAMANTHA M	W	F	26	AA50	03	A	ADMIN SPECIALIST II		02	TURBEVILLE CORRECTIONAL INSTITUTION
		WELCH CINDY Y	W	F	39	AA50	03	A	ADMIN SPECIALIST II		02	TURBEVILLE CORRECTIONAL INSTITUTION
		MOORE LUVIVIAN	B	F	47	AA50	03	C	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		AUSTIN KIMBERLY H	W	F	29	AA50	03	A	ADMIN SPECIALIST II		02	WATEREE RIVER CORRECTIONAL INSTITUTION
		BOONE SANDRA L	W	F	41	AA50	03	A	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		BRACEY SIMON SANDRA	B	F	42	AA50	03	A	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		BROWN BEATRICE T	B	F	53	AA50	03	A	ADMIN SPECIALIST II		02	WATEREE RIVER CORRECTIONAL INSTITUTION
1		TIMMONS MARY L	W	F	65	AA50	03	A	ADMIN SPECIALIST II		02	LEE CORR INST
3		JOHNSON LESIA M	B	F	33	AA50	03	A	ADMIN SPECIALIST II		02	LEE CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
13		HAYES ROBIN P	W	F	39	JA80	04	E	INSPECTOR II		02	LEE CORR INST
13		BROOKS EARTHA	B	F	42	JA80	04	E	INSPECTOR II		02	WATEREE RIVER CORR INST
13		SILJAK KAREN L	W	F	41	JA80	04	E	INSPECTOR II		02	TURBEVILLE CORR INST
		TOTAL POSITIONS ELIMINATED 3										
		EDDINGS JOHN B	W	M	51	UB04			VOCATIONAL TEACHER VP		02	TURBEVILLE CORR INST
		STOKES BOYD E	W	M	48	UB04			VOCATIONAL TEACHER VC		02	LEE CORR INST
		ROGERS LEONARD P	W	M	60	UB04			VOCATIONAL TEACHER VC		02	TURBEVILLE CORR INST
		STOKES ROGER D	W	M	52	UB04			VOCATIONAL TEACHER VEL		02	LEE CORR INST
13		CORBETT JAMES L	W	M	56	UB04			VOCATIONAL TEACHER VHO		02	WATEREE RIVER CORR INST
13		BETTENCOURT ANTHONY M	W	M	39	UB04			VOCATIONAL TEACHER VHM		02	WATEREE RIVER CORR INST
13		DELOE DAVID D	W	M	44	UB04			VOCATIONAL TEACHER VW		02	LEE CORR INST
	R4	CAMPBELL ROBERT J	B	M	48	UB04			VOCATIONAL TEACHER VM		02	TURBEVILLE CORR INST
		TOTAL POSITIONS ELIMINATED 3										
1		PIERSON RUTH A	W	F	54	UB06			GUIDANCE COUNSELOR G		02	LEE CORR INST
3		NEWSOME MICHAEL R	W	M	51	UB06			GUIDANCE COUNSELOR G		02	TURBEVILLE CORR INST
		TOTAL POSITIONS ELIMINATED 1										
		BAGNAL HENRY T	W	M	53	UB07			PRINCIPAL		02	TURBEVILLE CORR INST
13		HAYNESWORTH ALBERTHA L	B	F	55	UB07			PRINCIPAL		02	WATEREE RIVER CORR INST
		TOTAL POSITIONS ELIMINATED 1										

F I F 123	EMPLOYEE NAME	RACE	SEX	AGE	CLASS JOB	BASE	LEVEL	CLASSIFICATION TITLE	RIF SVC DATE	CAREER PAY	LOCATION
	COMPETITIVE AREA 03										
	NONE IN THIS AREA										
	COMPETITIVE AREA 04										
	SKIPPER SUE H	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT		04	EVANS CORRECTIONAL INSTITUTION
	STUART PATRICIA A	W	F	56	AA75	04	D	ADMINISTRATIVE ASSISTANT		04	EVANS CORRECTIONAL INSTITUTION
	HASTY ANTONIO R	B	M	40	AA75	04	C	ADMINISTRATIVE ASSISTANT		04	EVANS CORRECTIONAL INSTITUTION
	JOHNSON TERRELL S	W	M	44	AA75	04	D	ADMINISTRATIVE ASSISTANT		04	EVANS CORRECTIONAL INSTITUTION
	SPRATTLING NATASHA C	B	F	36	AA75	04	D	ADMINISTRATIVE ASSISTANT		04	EVANS CORRECTIONAL INSTITUTION
13	MULLINS SHARON D	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT		04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	HENDLEY JAMES T	W	M	60	CD20	04	C	LIBRARY SPECIALIST		04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	MADDOX FREDDIE M	W	M	45	JA80	04	E	INSPECTOR II		04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	HUDSON MARY M	B	F	55	UB02			CERTIFIED TEACHER GA		04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	GAINEY JR CECIL B	W	M	46	UB04			VOCATIONAL TEACHER VET		04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	BASS HORACE M	W	M	53	UB07			PRINCIPAL		04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
	COMPETITIVE AREA 05										
13	FLEMING RENEE	B	F	43	CD20	04	C	LIBRARY SPECIALIST		05	KERSHAW CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	GALLOWAY MARIANNE K	W	F	49	JA80	04	E	INSPECTOR II		05	KERSHAW CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	WOODLIEF PAULA L	W	F	45	UB02			CERTIFIED TEACHER E		05	KERSHAW CORR INST
13	BALKCUM CATHY S	W	F	45	UB02			CERTIFIED TEACHER GA		05	KERSHAW CORR INST
13	BEATY MARY G	B	F	56	UB02			CERTIFIED TEACHER GA		05	KERSHAW CORR INST
13	BAKER JAMES D	W	M	54	UB02			CERTIFIED TEACHER M		05	KERSHAW CORR INST
	TOTAL POSITIONS ELIMINMATED 4										
13	BROWN THOMAS A	W	M	46	UB04			VOCATIONAL TEACHER VM		05	KERSHAW CORR INST
13	YOUNG PATRICK C	W	M	52	UB04			VOCATIONAL TEACHER VC		05	KERSHAW CORR INST
	TOTAL POSITIONS ELIMINATED 2										
13	FYE MYRTICE J	B	F	59	UB06			GUIDANCE COUNSELOR GA		05	KERSHAW CORR INST
	TOTAL POSITIONS ELIMINATED 1										
	COMPETITIVE AREA 06										
	JENKINS VERA S	B	F	41	AA75	04	D	ADMINISTRATIVE ASSISTANT		06	LIEBER CORRECTIONAL INSTITUTION
1	ROWELL JAMIE L	W	F	39	AA75	04	D	ADMINISTRATIVE ASSISTANT		06	COASTAL OFFICE
	WESTBURY NELDA A	W	F	52	AA75	04	D	ADMINISTRATIVE ASSISTANT		06	LIEBER CORRECTIONAL INSTITUTION
	MORRIS KRISKA C	B	F	45	AA75	04	C	ADMINISTRATIVE ASSISTANT		06	MACDOUGALL CORRECTIONAL INST
	HUNTER SHERI C	W	F	36	AA75	04	A	ADMINISTRATIVE ASSISTANT		06	MACDOUGALL CORRECTIONAL INST
	RODRIGUEZ DEBORAH M	H	F	52	AA75	04	D	ADMINISTRATIVE ASSISTANT		06	COASTAL PRE RELEASE CENTER

F			R			C		L			CA	
						L	B	E				
			A	S	A	J A	A	V		RIF	OR	
123		EMPLOYEE NAME	C	E	G	O S	N	E	CLASSIFICATION TITLE	SVC DATE	ME	
			E	X	E	B S	D	L			PA	LOCATION
		RAMEY GEORGINA	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT		06	MACDOUGALL CORRECTIONAL INST
		CARRINGTON LISA T	W	F	37	AA75	04	D	ADMINISTRATIVE ASSISTANT		06	LIEBER CORRECTIONAL INSTITUTION
3		CROSBY TAMMY L	W	F	36	AA75	04	A	ADMINISTRATIVE ASSISTANT		06	LIEBER CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
13		HAAS JUDITH M	W	F	47	CB35	03	D	ASSOC TEACHER/CENTER DIR		06	LIEBER CORR INST
		TOTAL POSITIONS ELIMINATED 1										
13		SHEEDY VICTORIA H	W	F	50	JA80	04	E	INSPECTOR II		06	LIEBER CORR INST
13		MYERS LORI C	W	F	36	JA80	04	E	INSPECTOR II		06	MACDOUGALL CORR INST
		TOTAL POSITIONS ELIMINATED 2										
		REID ALMA L	B	F	56	UB02			CERTIFIED TEACHER GA		06	MACDOUGALL CORR INST
1		MARINKO WILLIAM T	W	M	52	UB02			CERTIFIED TEACHER GA		06	LIEBER CORR INST
13		PYATT ADALINE J	B	F	49	UB02			CERTIFIED TEACHER E		06	LIEBER CORR INST
	R4	GREENE ALFONSO	B	M	61	UB02			CERTIFIED TEACHER M		06	MACDOUGALL CORR INST
3		BOWEN WILLIAM S	W	M	33	UB02			CERTIFIED TEACHER GA		06	MACDOUGALL CORR INST
	R4	GRATZER STEVEN C	W	M	54	UB02			CERTIFIED TEACHER MS		06	MACDOUGALL CORR INST
13		BROWN ROBERT C	W	M	36	UB02			CERTIFIED TEACHER GA		06	LIEBER CORR INST
13		TRIPP JERRELYN	W	F	64	UB02			CERTIFIED TEACHER E		06	LIEBER CORR INST
		TOTAL POSITIONS ELIMINATED 4										
		CLARK JR CLARENCE A	W	M	59	UB04			VOCATIONAL TEACHER VC		06	MACDOUGALL CORR INST
		MORANT JOSEPH	B	M	51	UB04			VOCATIONAL TEACHER VM		06	MACDOUGALL CORR INST
		HILL JR BOBBY W	W	M	46	UB04			VOCATIONAL TEACHER VAB		06	MACDOUGALL CORR INST
13		WHITE MARK A	W	M	41	UB04			VOCATIONAL TEACHER VC		06	LIEBER CORR INST
		TOTAL POSITIONS ELIMINATED 1										
		COMPETITIVE AREA 07										
13		ENGLISH CRYSTAL S	W	F	47	JA80	04	E	INSPECTOR II		07	ALLENDALE CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
13		BEENKEN RITA A	W	F	53	UB02			CERTIFIED TEACHER E		07	ALLENDALE
13		HAYES JR HARVEY	B	M	59	UB02			CERTIFIED TEACHER GA		07	ALLENDALE
13		BROOKS ELIZABETH	B	F	49	UB02			CERTIFIED TEACHER GA		07	ALLENDALE
		TOTAL POSITIONS ELIMINATED 3										
13		THOMAS DONALD C	W	M	51	UB04			VOCATIONAL TEACHER VC		07	ALLENDALE
13		LAWSON JR JOHN M	W	M	55	UB04			VOCATIONAL TEACHER VAC		07	ALLENDALE
		TOTAL POSITIONS ELIMINATED 2										
13		NEWSOME JOHN D	B	M	58	UB06			GUIDANCE COUNSELOR G		07	ALLENDALE
		TOTAL POSITIONS ELIMINATED 1										
		COMPETITIVE AREA 08										
		NONE IN THIS AREA										
		COMPETITIVE AREA 09										
13		MILLER CONNIE A	W	F	46	JA80	04	D	INSPECTOR II		09	LOWER SAV PRE RELEASE
		TOTAL POSITIONS ELIMINATED 1										

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F 123		EMPLOYEE NAME	RACE	SEX	AGE	CLASS JOB	BASE SAL	LEVEL DED	CLASSIFICATION TITLE	RIF SVC DATE	CAREER PAY	LOCATION
		COMPETITIVE AREA 10										
13		NEWBY CHERYL	W	F	45	JA80	04	E	INSPECTOR II		10	LEATH CORR INST
13		WILKIE KAREN M	W	F	39	JA80	04	E	INSPECTOR II		10	MCCORMICK CORR INST
		TOTAL POSITIONS ELIMINATED 2										
13		DREYER WILLIAM K	W	M	58	UB02			CERTIFIED TEACHER GA		10	MCCORMICK CORR INST
13		BOXX JR FRANK A	W	M	51	UB02			CERTIFIED TEACHER GA		10	LEATH CORR INST
13		FRITTS RUTH L	W	F	52	UB02			CERTIFIED TEACHER GA		10	LEATH CORR INST
13		CULBREATH BERNETHA L	B	F	42	UB02			CERTIFIED TEACHER GA		10	LEATH CORR INST
13		JONES ELOIS C	B	F	52	UB02			CERTIFIED TEACHER MS		10	LEATH CORR INST
		TOTAL POSITIONS ELIMINATED 5										
13		JEFFERIES JR GRAYSON P	W	M	50	UB04			VOCATIONAL TEACHER VA		10	MCCORMICK CORR INST
13		KING GEORGE R	W	M	52	UB04			VOCATIONAL TEACHER VH		10	LEATH CORR INST
13		DEAL SYLVIA D	W	F	62	UB04			VOCATIONAL TEACHER VS		10	LEATH CORR INST
13		BOWYER KATHERINA W	B	F	51	UB04			VOCATIONAL TEACHER VO		10	LEATH CORR INST
		TOTAL POSITIONS ELIMINATED 4										
13		BRIDGES ANN T	W	F	56	UB06			GUIDANCE COUNSELOR G		10	LEATH CORR INST
13		JONES ETTA J	W	F	59	UB06			GUIDANCE COUNSELOR G		10	MCCORMICK CORR INST
		TOTAL POSITIONS ELIMINATED 2										
13		COBB RANCE C	W	M	53	UB07			PRINCIPAL		10	LEATH CORR INST
		TOTAL POSITIONS ELIMINATED 1										
		COMPETITIVE AREA 11										
1		SNIPES JR CONNIE M	W	M	53	AH15	06	D	ADMINISTRATIVE COORD II		11	APPALACHIAN OFFICE
23		QUINN AVERY R	W	M	60	AH15	06	D	ADMINISTRATIVE COORD II		11	TYGER RIVER CORRECTIONAL INST
		FARMER PAMELA I	W	F	49	AH10	05	C	ADMINISTRATIVE COORD I		11	TYGER RIVER CORRECTIONAL INSTITUTION
		GRAYDON BENNY RAY	W	M	54	AH10	05	E	ADMINISTRATIVE COORD I		11	PERRY CORRECTIONAL INST
		TOTAL POSITIONS ELIMINATED 1										
		DODKIN GEORGE ADRIAN FIK	W	M	48	AH40	06	E	PROGRAM COORDINATOR II		11	NORTHSIDE CORRECTIONAL INSTITUTION
13		FOSTER KAROL J	W	F	54	AH35	05	A	PROGRAM COORDINATOR I		11	APPALACHIAN OFFICE
	R5	BALENTINE OLIN D	W	M	59	AH35	05	C	PROGRAM COORDINATOR I		11	PERRY CORRECTIONAL INSTITUTION
	R5	KINARD APRIL	B	F	40	AH35	05	B	PROGRAM COORDINATOR I		11	TYGER RIVER CORRECTIONAL INSTITUTION
	R5	ALEXANDER CHARLES E	W	M	51	AH35	05	E	PROGRAM COORDINATOR I		11	PERRY CORRECTIONAL INSTITUTION
	R5	JAMESON RON B	W	M	49	AH35	05	B	PROGRAM COORDINATOR I		11	TYGER RIVER CORRECTIONAL INSTITUTION
	R5	CARSON JOHN R	W	M	63	AH35	05	E	PROGRAM COORDINATOR I		11	TYGER RIVER CORRECTIONAL INSTITUTION
	R5	OGUNSILE FELICIA I	B	F	46	AH35	05	B	PROGRAM COORDINATOR I		11	PERRY CORRECTIONAL INSTITUTION
	R5	PARKS JACKIE E	W	M	51	AH35	05	E	PROGRAM COORDINATOR I		11	NORTHSIDE CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
		BROWN CAROLYN D	B	F	41	GA40	04	C	HUMAN SERVICES SPEC II		11	LIVESAY PRE RELEASE CENTER
13		HENLEY ALDEAN	B	M	49	GA40	04	B	HUMAN SERVICES SPEC II		11	PERRY CORR INST
		TOTAL POSITIONS ELIMINATED 1										
13		SWOFFORD MARIE M	W	F	54	JA80	04	E	INSPECTOR II		11	NORTHSIDE CORR INST
13		BLAIR CAROLYN I	W	F	57	JA80	04	E	INSPECTOR II		11	PERRY CORR INST
		TOTAL POSITIONS ELIMINATED 2										

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SEE DISCLAIMER IN SECTION V OF RIF PLAN

F		EMPLOYEE NAME	RACE	SEX	AGE	CLASS JOBS	BAND	LEVEL	CLASSIFICATION TITLE	RIF SVC DATE	CAR PAY	LOCATION
1		DAVIS RONALD M	W	M	52	UB02			CERTIFIED TEACHER M	[redacted]		PERRY CORR INST
1		BRATTON LINDA M	B	F	48	UB02			CERTIFIED TEACHER GA		11	PERRY CORR INST
		AUSTIN DIANE N	W	F	62	UB02			CERTIFIED TEACHER MS		11	TYGER RIVER CORR INST
1		HOWARD EILEEN L	W	F	56	UB02			CERTIFIED TEACHER E		11	PERRY CORR INST
13		BERNARD OTHELLA R	W	F	61	UB02			CERTIFIED TEACHER GA		11	PERRY CORR INST
3		HAYES MARY G	W	F	59	UB02			CERTIFIED TEACHER E		11	TYGER RIVER CORR INST
3		FARR JACQUELINE D	B	F	60	UB02			CERTIFIED TEACHER GA		11	TYGER RIVER CORR INST
13		MCCABE MARY H	W	F	55	UB02			CERTIFIED TEACHER MS		11	PERRY CORR INST
13		WHITE SUSAN C	W	F	55	UB02			CERTIFIED TEACHER GA		11	NORTH SIDE CORR INST
13		WHITE WILLIAM M	W	M	52	UB02			CERTIFIED TEACHER MS		11	TYGER RIVER CORR INST
13		MAILLOUX MARGUERITE J	W	F	51	UB02			CERTIFIED TEACHER E		11	NORTHSIDE CORR INST
3		HOWARD DAVID L	W	M	52	UB02			CERTIFIED TEACHER GA		11	TYGER RIVER CORR INST
		TOTAL POSITIONS ELIMINATED 8										
		WILLIAMS CHARLES L	W	M	54	UB04			VOCATIONAL TEACHER VC		11	TYGER RIVER CORR INST
1		HENDERSON JR ARNOLD	W	M	56	UB04			VOCATIONAL TEACHER VM		11	NORTHSIDE CORR INST
13		FLOYD JOHNNY	B	M	52	UB04			VOCATIONAL TEACHER VM		11	PERRY CORR INST
3		RANDOLPH MAX	W	M	59	UB04			VOCATIONAL TEACHER VM		11	TYGER RIVER CORR INST
13		BELL JAMES C	W	M	50	UB04			VOCATIONAL TEACHER VC		11	PERRY CORR INST
13		LENKER RICHARD E	W	M	52	UB04			VOCATIONAL TEACHER VH		11	PERRY CORR INST
	R4	POOLE MICHAEL T	W	M	32	UB04			VOCATIONAL TEACHER VAC		11	TYGER RIVER CORR INST
	R4	JUSTICE JAMES D	W	M	32	UB04			VOCATIONAL TEACHER VAB		11	TYGER RIVER CORR INST
	R4	PARKS JERRY T	W	M	55	UB04			VOCATIONAL TEACHER VA		11	TYGER RIVER CORR INST
		TOTAL POSITIONS ELIMINATED 4										
		POSITIONS TO BE ELIMINATED NOT SUBJECT TO RIF POLICY 15 EMPLOYEES										
3	T	Brigman Merle	W	F	65	9999			ADMIN SPECIALIST II		01	EDUCATIONAL SERVICES
3	T	HARRISON KISHA L	B	F	33	9999			LIBRARY ASST		07	ALLENDALE
3	T	GIVENS LESLIE R	B	F	31	9999			ADMIN SPECIALIST II		06	COASTAL PRE RELEASE
3	T	RUDY KENNETH	W	M	56	9999			RECORDS SPECIALIST		01	DIV OF CLASS & INMATE RECDS
3	T	WARD KIMBERLY	W	F	39	9999			RECORDS ANALYST		01	DIV OF CLASS & INMATE RECDS
3	T	PRIOLEAU MARGIE D	B	F	39	9999			ADMIN ASST		06	MACDOUGALL CORR INST
3	T	SEASE JODI B	W	F	30	9999			ADMIN SPECIALIST II		01	TRAINING ADMIN DIV
3	P	CONYERS DANETTE	B	F	25	AA50	03	C	ADMIN SPECIALIST II		01	HUMAN RESOURCES DIV
3	P	FAILE AARON K	W	M	42	KA30	06	A	BUILDING/GROUNDS MGR		01	MAINTENANCE ADMIN
3	P	DOSS DANNY H	W	M	54	UB02			CERTIFIED TEACHER		10	MCCORMICK CORR INST
3	G	LI MICHAEL S	A	M	40	HD70			ENG/ASSOS ENG III		01	CIV LABOR POOL
3	G	PARNELL GERALDINE	B	F	51	CB30			TEACHER ASSISTANT		05	KERSHAW CORR INST
3	G	THOMSON MARILYN M	W	F	55	AA75			ADMINISTRATIVE ASSISTANT		11	TYGER RIVER CORR INST
3	T	ODOMS GERALDEAN G	B	F	48	9999			COMPUTER LAB MGR		7	TYGER RIVER CORR INST
3	T	PARKS WILLA D	B	F	66	9999			SPECIAL TEACHER		11	ALLENDALE
		TOTAL EMPLOYEES RIF 148										
		1 RIF EMPLOYEE										
		2 EMPLOYEE SUBJECT TO BUMPING										
		3 EMPLOYEE SUBJECT TO POSSIBLE LAYOFF										

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SEE DISCLAIMER IN SECTION V OF RIF PLAN

I F 123		EMPLOYEE NAME	RACE	SEX	AGE	CLASS JAS	LAB SEN	LEV EL	CLASSIFICATION TITLE	RIF SVC DATE	CAR ME PA	LOCATION
	P	PROBATIONARY EMPLOYEE										
	T	TEMPORARY EMPLOYEE										
	G	TEMPORARY GRANT EMPLOYEE										
		R1 R5 NOT RETAINED DUE TO NECESSARY QUALIFICATIONS SEE SECTION V OF RIF PLAN										
		KEY CODE EDUCATION TEACHERS (UB02 UB04 UB05 UB06)										
		MS MEDIA SPECIALIST							VET ELECTRONIC			
		G GUIDANCE							VM-MASONRY			
		E ENGLISH							VA AUTO MECHANICS			
		M MATH							VH HORTICULTURE			
		SE SPECIAL EDUCATION							VAC HEATING/AIR CONDITIONING			
		GA GENERAL ACADEMIC							VAB AUTO BODY REPAIR/FENDER			
		VW WELDING							VHM HEAVY EQUIP MECHANIC			
		VC CARPENTRY							VHO HEAVEY EQUIP OPERATOR			
		VP PLUMBING							VAR APPLIANCE REPAIR			
		VEL ELECTRICIAN							VS SEWING			
									VO OFFICE OCCUPATIONS			

____(Date)____

_____(Name)_____
_____(Address)_____
_____(City, State)_____

SUBJECT Notification of Reduction-In-Force

Dear Mr /Ms _____ (Name)_____,

The Department of Corrections' budget has been reduced by over $80 million during the past 30 months These cuts come at a time when incarceration rates have increased the inmate population by several thousand During this same period, efforts to cut spending have included staff reductions of nearly 1,300 employees, closing prisons, elimination of numerous programs, and drastic cuts in expenditures Conversely, efforts have also been made to increase revenue from sources such as prison industries, institutional canteens, inmate work programs, and increasing grant funding Unfortunately, the financial health of this agency remains critical and more drastic measures are necessary

As Agency Director, I have the responsibility to focus on our primary mission which is to protect the public and to continuously assess the need for further cuts in spending, which now must include further reductions in our employee staffing levels As a result, I regret to inform you that I have submitted a Reduction-In-Force Plan to the State Office of Human Resources, and received approval for procedural correctness, to eliminate your position along with a large portion of our administrative and support employee population, to be effective close of business June 1, 2003 The approved Reduction-In-Force Plan will be made available for your review, at your request, excluding the Reduction-In-Force Service Dates of other employees

While the Reduction-In-Force process can be very stressful, steps have been taken to ensure you are advised of the entire process and employee benefits continuation, should you eventually lose your position with the Agency A Reduction-In-Force Service Date has been established for all employees within your job classification that will determine the order for bumping If you are not eligible to bump another individual, you may be offered a vacant lower level position for which you meet the state and Agency minimum training & experience requirements

Additionally, should you ultimately be laid off, the Agency will provide you with an SCDC and state application form and notify the Office of Human Resources State Career Center will be notified of this Reduction-In-Force and their assistance will be requested to help the affected employees in their search for other state employment In addition, the employee will be entered into the automated State Employee RIF Applicant Pool, which will allow the employee to provide updated information and eligibility for other state agency's vacancies

Mr John A Near, Division Director – Human Resources, or designee from the Division of Human Resources, will be meeting with you to provide a copy of the Agency's Reduction-In-Force Policy,

explain the Reduction-In-Force process, as well as, detail your recall and reinstatement rights and benefits as an employee affected by a Reduction-In-Force

A summary of the policy on the Reduction-In-Force process offers you the following components

Competitive Areas All agency work locations have been identified and eleven (11) specific geographic areas of the state designated as competitive areas that may be eligible for employee "bumping" purposes

1 All Broad River Road Complex Institutions and Divisions, Watkins Pre-Release, Manning
2 Wateree River, Lee, Palmer Pre-Release, Turbeville
3 Catawba Pre-Release
4 Evans
5 Kershaw
6 Coastal Office, Coastal Pre-Release, Lieber, MacDougall
7 Allendale
8 Ridgeland
9 Lower Savannah Pre-Release, Trenton
10 Leath, McCormick
11 Appalachian Office, Northside, Livesay Pre-Release, Tyger River, Perry

Competitive Job Classification Series Competitive Job Classifications and Competitive Job Classification Series within each competitive area for employee bumping are identified as

Competitive Job Classifications

AA75 – (Pay Band 4) - Administrative Assistant
AH20 – (Pay Band 7) - Administrative Manager I
AH45 – (Pay Band 7) – Program Manager I
AJ40 – (Pay Band 6) – Computer Operator II
AJ45 – (Pay Band 6) – Information Resource Consultant II
BC30 – (Pay Band 6) – Public Information Director I
BC50 – (Pay Band 8) – Director of Information Services
CD20 – (Pay Band 4) – Library Specialist
EB52 – (Pay Band 9) – Dentist
EC10 – (Pay Band 2) - Medical Assistant Technician I
EC25 – (Pay Band 5) - Technical Medical Associate II
GA40 – (Pay Band 4) - Human Services Specialist II
JA80 – (Pay Band 4) – Inspector II
UB02 – Certified Teacher
UB04 – Vocational Teacher
UB05 – Guidance Counselor
UB06 – Special Education Teacher

Competitive Job Classification Series

AA25, AA50 – (Pay Bands 2-3) - Administrative Specialist I & II
AD01, AD03 – (Pay Bands 3-4) - Fiscal Technician I & II
AD05, AD08, AD10, AD12 – (Pay Bands 3-4-5-6) - Auditor I, II, III, IV
AD15, AD18 – (Pay Bands 7-8) – Audits Manager I & II
AH10, AH15 – (Pay Bands 5-6) - Administrative Coordinator I & II
AH35, AH40 – (Pay Bands 5-6) - Program Coordinator I & II
CB30, CB35 – (Pay Bands 2-3) - Teacher Assistant, Teacher/Center Director
GA50, GA60 – (Pay Bands 5-6) - Human Services Coordinator I & II
UB09, UE07, UB07– Superintendent, Academic Program Manager, Principal

RIF Service Date A Reduction-In-Force Service Date has been established to be used as the basis for bumping, laying off, or recalling an employee The RIF Service Date is established by combining your continuous state service date with additional credit for job performance on each of your last two scheduled EPMS performance evaluation ratings (Below = 0 months, Meets = 6 months, Exceeds = 12 months, Substantially Exceeds = 18 months)

Bumping Rights Following your meeting with a representative from the Division of Human Resources, within two (2) working days, you must elect layoff, or to exercise your bumping rights based upon your RIF Service Date Failure to provide written notification of your decision to the Division of Human Resources within two (2) working days will automatically waive your bumping rights If you elect to exercise your bumping rights and fail to attend a scheduled meeting, a subsequent meeting will be rescheduled after other employees with a lower RIF Service date have been contacted Should you elect to exercise your bumping rights, a summary of the process identified in the Reduction-In-Force Policy will be conducted as follows

(First) If your Job Classification is in one of the designated Competitive Job Classification Series identified above, you may be eligible to bump into the position occupied by the employee with the lowest RIF Service Date in your same Job Classification and pay band with the same or lower pay level, provided you meet the state and SCDC minimum training & experience requirements The bumped employee may then bump into the position occupied by the employee with the lowest RIF Service Date in the next lowest Job Classification in the designated series, provided they meet the state and agency minimum training & experience requirements

(Second) If your position is not in one of the Competitive Series designated above, you must first bump the employee in your competitive area with the lowest RIF Service Date in your same Job Classification and pay band, with the same or lower pay level, provided you meet the state and SCDC minimum training & experience requirements

(Third) You (or the bumped employee with the lowest RIF Service Date) must next be reassigned or demoted into a vacant position in the competitive area of the same pay band, pay level or lower, provided the agency is actively recruiting to fill the vacancy, and you meet the state and SCDC minimum training & experience requirements

If you elect to bump into another position, your annual salary may be reduced (State Office of Human Resources Regulation 19-719, revised March 4, 2003) to a salary either between 0% - 15% below your current salary or between your current salary and the midpoint of the lower pay band

Recall and Reinstatement Rights Should you be laid off, reassigned, or demoted to another position with a lower pay band or pay level, you will have recall rights for a period of one year from the effective date of the layoff (June 1, 2004) When a vacancy occurs in the competitive area which is the same job classification, pay band, and pay level or lower, that you occupied at the time of the layoff, you will be offered the vacancy in inverse order of RIF Service Date, provided you meet the minimum training and experience requirements The position must be accepted within two (2) working days of the offer, or you will waive any future recall rights You may apply for other positions with a lower pay band and pay level during the recall period, and if selected, will still retain your recall rights Probationary employees will not have recall or reinstatement rights

You may apply for any SCDC or other state job for which you meet the minimum training and experience requirements If you accept a position with a lower pay band than the one from which you were separated, you will retain recall rights to a position in the same job classification in the competitive area.

Moving If you relocate to another geographic area, you may request to be considered for positions in your same job classification title in the new competitive area You must notify the Division of Human Resources of your new address in writing and willingness to be recalled in another area

Status Upon your move into an established position (either as a result of bumping or reinstatement), you will be given either Trial or Covered status in the job classification in accordance with state and agency guidelines

Sick Leave, Annual leave, and Holidays If you are laid off, you will be paid for your unused annual leave up to a maximum of forty-five (45) days You will forfeit any unused sick leave If you are recalled or reinstated within one (1) year, you will be eligible to have all sick leave reinstated that was forfeited at the time of your layoff Non-exempt employees will be paid for any accrued holiday compensatory time, exempt employees will forfeit any accrued holiday compensatory time Upon recall or reinstatement you may buy back all, some, or none of your annual leave

Health Care and Dental Coverage Health Care Coverage will end on the last day of the month in which you cease employment Any dependent coverage will end on the date your coverage ends You and your eligible dependents may be eligible for continuation of coverage under COBRA for a limited time To continue coverage under COBRA, a Notice of Election (NOE) form, along with the required premium, must be completed and returned to the Office of Insurance Services within 60 days of the loss of coverage or notification of the right to continue coverage, whichever is later

Life Insurance and Long Term Disability Coverage Coverage for all group life insurance, optional life insurance, dependent life insurance, and supplemental and long term disability will end on the last day of the month in which you cease employment You may apply for conversion to an individual policy by making application within 31 days of the date your coverage ceases for all of the above by contacting the SCDC Benefits Branch or the Office of Insurance Services

Grievances A covered employee who is affected by a Reduction-In-Force has the right to grieve through the Agency grievance process and appeal to the State grievance process only if the grievance is based upon inconsistent or improper application of any portion of the Agency's Reduction-In-Force Policy/Procedure or Plan

Again, I deeply regret the necessity of this action I am hopeful that while this Reduction-In-Force process was necessary, you will be able to be placed within our Agency and recalled or reinstated in order to continue employment with the State of South Carolina.

Sincerely,

Jon E Ozmint

Acknowledgement of Receipt of Notification of Reduction-In-Force

I have received the attached Notification of Reduction-In-Force from Director Ozmint

Print Employee Name _____

Employee Signature S/_____

Date _____

PLEASE REMOVE THIS PAGE
AND RETURN IT TO A REPRESENTATIVE IN THE
DIVISION OF HUMAN RESOURCES

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

REDUCTION-IN-FORCE
POSITION BUMPING SELECTION/REFUSAL

In accordance with SCDC Policy ADM-11 05 "Reduction-In-Force," I have been advised of the bumping options available to me by _____ on _____
(Name) (Date)
and that I must make my selection and return this form within two (2) working days on _____ If I fail to return this form within the time required, I agree to automatically
(Date)
waive my rights to elect to bump in to a position and voluntarily select layoff In accordance with SCDC Reduction-In-Force Policy – ADM-11 05, paragraph 4 3, I must select the option offered to me, or elect to be laid off with recall and reinstatement rights as provided by the provisions of the Reduction-In-Force Policy Regardless of my selection, I understand I will have recall rights for a period of one year from the effective date of the layoff

____ (initial) I elect to bump into a filled or vacant position

____ (initial) I elect layoff

_____ _____
(Employee Signature) (Date)

ELECTION TO BUMP INTO A FILLED OR VACANT POSITION

I elect to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and agree to accept the position of _____ _____
(Position Title) (Position #)
in the area of _____ to be effective _____
I understand I must fulfill all requirements of the position, in accordance with Agency policy, to include satisfactory completion of all job duties and responsibilities

_____ _____ _____ _____
(Employee) (Date) (HR Representative) (Date)

ELECTION TO SELECT LAYOFF

I decline to exercise my bumping rights under the provisions of the Reduction-In-Force Policy and refuse accept the position of _____ _____
(Position Title) (Position #)
in the area of _____ As a result, I agree that the effective date of my layoff will be close of business _____

_____ _____ _____ _____
(Employee Signature) (Date) (Employee Signature) (Date)

STATE OF SOUTH CAROLINA

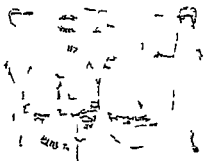
State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

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CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL, JR.
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

March 14, 2003

Mr John Near
Human Resources Director
S C Department of Corrections
4444 Broad River Road
Post Office Box 21787
Columbia, South Carolina 29221-1787

Dear Mr Near

The revised Reduction-In-Force policy submitted to our office has been approved and is enclosed for your files This revised policy becomes effective only after covered employees receive actual notice of the revisions, including a date for implementation

Should you determine that further revisions are necessary, please submit them to our office for review and approval as required by statute

Please let us know if we may be of further assistance to you

Sincerely,

Chris Byrd
Assistant Director

FAX (803) 737 0968

South Carolina Department of Corrections

SCDC POLICY/PROCEDURE

NUMBER ADM-11 05

TITLE REDUCTION IN FORCE

ISSUE DATE MARCH 14, 2003

RESPONSIBLE AUTHORITY DIVISION OF HUMAN RESOURCES

OPERATIONS MANUAL ADMINISTRATION

SUPERSEDES ADM-11 05 (July 1, 2000)

RELEVANT SCDC FORMS/SUPPLIES 16-5, 16-7

ACA/CAC STANDARDS None

STATE/FEDERAL STATUTES Sub-regulations *19-703, 19-704, 19-705, 19-706, 19-715, 19-718, and 19-719*, State Office of Human Resources Regulations Manual

THE LANGUAGE USED IN THIS POLICY/PROCEDURE DOES NOT CREATE AN EMPLOYMENT CONTRACT BETWEEN THE EMPLOYEE AND THE AGENCY THE AGENCY RESERVES THE RIGHT TO REVISE THIS CONTENTS OF THIS POLICY/PROCEDURE

PURPOSE To establish guidelines for a reduction-in-force (RIF) in the event of reduced Agency funding, change in workload, or reorganization

POLICY STATEMENT In order for the SCDC to continue effectively meeting its financial and/or operational objectives, the Agency Director may authorize a reduction-in-force (RIF) due to the reorganization of the SCDC, reduced funding, and/or change in workload Any RIF will be planned and conducted in compliance with all applicable State of South Carolina Office of Human Resources regulations and policies/procedures

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6 BUMPING RIGHTS OF EMPLOYEES
7 RECALL *AND REINSTATEMENT* RIGHTS OF EMPLOYEES
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9 REORGANIZATION
10 REHIRES
11 DEFINITIONS

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3/14/03

SPECIFIC PROCEDURES

1 AUTHORIZATION FOR A REDUCTION-IN-FORCE (RIF)

1 1 The Agency Director *or designee* is authorized to approve any position(s) to be abolished and to approve the competitive areas within which employees subject to a lay off will be able to exercise their rights under this policy/procedure (NOTE The competitive area may be *agency wide, a* department, or a more restricted *geographical* area where the staff is separately organized and clearly distinguishable from the staff in other areas) The Agency Director will be the final authority for approving a reduction-in-force whereby

- *employees may only bump into vacant positions, which are actively recruiting to be filled,*
- filled positions are abolished with the subsequent removal of some or all employees from the payroll and/or the reassignment, and/or possible transfer *or demotion* of others

1 2 A RIF plan based on the directives of the Agency Director will be developed by the Division Director of Human Resources

1 3 A copy of the RIF plan will be submitted to the State Office of Human Resources (OHR) for approval of procedural correctness prior to the effective date of the RIF At a minimum, the plan will contain the reasons for the RIF, a proposed list of affected employees in the order of their RIF Service Dates (see Section 5, below), the competitive area(s) and classification(s) affected, and the age, race, and sex of the affected employees, *organizational chart of affected areas, and a sample letter to employees* In addition, efforts will be made to assist laid-off employees to find other employment through the State Career Center of the OHR The Recruiting and Employment Services Branch of the SCDC Division of Human Resources will be provided with updated employment applications of all employees affected by the RIF

1 4 Upon approval of the RIF plan by the OHR, the Division Director of Human Resources will be responsible for implementing the actions called for in the plan No action will be taken nor will information be provided to any employee without the written approval of the Division Director of Human Resources No action will be considered official without the written approval of the Division Director of Human Resources

2 GENERAL PROVISIONS GOVERNING RIFs

2 1 The Division Director of Human Resources will maintain a roster of employees who have been bumped or who have been laid-off It will be the responsibility of all Agency managers to furnish the Division Director of Human Resources with any and all information related to the filling of positions upon request

2 2 It is the responsibility of all employees to ensure that the Division of Human Resources has current information on their home addresses and telephone numbers at all times

2 3 Whenever a RIF is in effect, no additional new hires, internal promotions, or reassignments into vacant positions *in the competitive area* will be allowed in any position without first determining through the Division Director of Human Resources or designee those employees with recall rights These employees have recall rights as a result of being bumped or laid off and must be notified of such vacancies to determine their eligibility

3 EXCEPTIONS IN SPECIAL OR UNIQUE CASES

3 1 In exceptional cases, the Agency Director reserves the right to approve actions outside the provisions of this policy/procedure if, in his/her opinion, circumstances warrant such approval If any provisions of this policy/procedure are affected by a proposed exception, justification and specific instructions to be followed will be recommended in writing to the Agency Director by the *appropriate member of the Director's staff*

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w th the concurrence of the General Counsel and the Division Director of Human Resources

3 2 Reasons or justification for such actions above may include, but are not limited to the following

3 2 1 Sufficient evidence exists that the movement by an employee into a position may aggravate a pre-existing health related condition Such evidence would require medical documentation and diagnosis of inability to perform the essential functions of the position

3 2 2 A particular employee may be retained over another employee within the Agency regardless of RIF Service Date and bumping rights of other employees because s/he possesses supervisory skills, knowledge, experience, or abilities that cannot be learned within a reasonable training period In such cases, a statement of facts must be made in the reduction-in-force plan and approved in advance by the Agency Director The SCDC will retain documentation to support any exceptions made on this basis

3 3 3 The move would violate State and/or Agency nepotism policies/procedures

3 3 4 Sufficient evidence exists to show that it would not be in the best interest of the SCDC or the employee to allow a move

4 EMPLOYEE NOTIFICATION

4 1 After a RIF plan is approved and reviewed for procedural correctness by OHR and before it becomes effective, employees to be affected by an approved RIF will be notified in writing by the Division Director of Human Resources Notification will be made by either

- A personally delivered letter to the affected employee requiring the signed acknowledgment of receipt by the employee, or
- Certified mail (return receipt requested)

4 2 An employee affected by a RIF may make a written request to the Division Director of Human Resources to receive a copy of the RIF plan affecting the employee The RIF Service Dates of affected employees (see Section 5, below) will not be disclosed in the copy of the plan provided to such employees

4 3 Employees notified that their position is to be abolished (and those employees subsequently bumped under these procedures) will be scheduled to meet with a designated representative of the Division of Human Resources to review their rights under these procedures After reviewing their rights, affected employees must indicate in writing whether they will exercise or waive their bumping rights (see Section 6, below) Written notification of each employee's decision must be filed with the Division of Human Resources representative designated to meet with the employee no later than two (2) working days following the meeting, or else that employee's bumping rights will be automatically waived

4 4 Generally, employee meetings and ***employees exercising their*** bumping ***rights*** will be made in decreasing order based on each affected employee's RIF Service Date Exceptions may be made by the Division Director of Human Resources when

- A change in the order of meetings and transactions does not affect other employees with a lower RIF Service Date, or
- To delay a meeting or transaction would jeopardize efficient operations of the RIF, or
- An employee either fails to keep or fails to notify the Division of Human Resources of his/her inability to keep a required appointment date and therefore ***the appointment will be rescheduled after other employees with a lower RIF Service Date have been contacted***

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Christopher D Byrd 3/14/03

4 5 After the final list of employees to be laid off is determined, these employees will be informed in writing by the Division Director of Human Resources or an approved designee no later than 14 calendar days before the actual date the lay off is to become effective Notification will, at a minimum, include the following information

- Reason for the lay off,
- Competitive classification ***and/or competitive*** series (job class, pay band, pay level) and competitive area,
- Benefits to which the affected employee is entitled,
- Where to obtain benefit information,
- Recall ***and reinstatement rights***,
- Services available for seeking other employment,
- Efforts taken (or to be taken) to place the affected employee, and
- ***Employee grievance rights***

4 6 Notification will be made to such employees by either a hand-delivered letter to the employee requiring the employee's written acknowledgment of the same, or by certified mail (return receipt requested)

4 7 The Division of Human Resources will be responsible for ensuring that SCDC Form 16-5, "Personnel Advice Form," and SCDC Form 16-7, "Employee Termination Clearance," are completed for all employees being removed from the SCDC payroll

5 ESTABLISHMENT OF RIF SERVICE DATES A RIF Service Date will be established for any employee affected by a RIF and will be used as the basis for bumping, laying-off, recalling, or reinstating an affected employee All approved RIFs will be conducted in such a manner which provides employees the optimum security for past performance and length of service, while minimizing disruption to the Agency's operations The RIF Service Date will be established by combining the continuous state service date of each affected employee with credit for his/her job/merit performance, as follows

5 1 Continuous State Service The continuous state service date of each affected employee will be determined by the employee's most recent date of hire with the state Section ***19-719*** of the State Office of Human Resources Regulations Manual outlines conditions affecting the employee's length of continuous state service

5 2 Job Performance Credit All employees will be awarded additional service credit based on the total of their last two (2) scheduled performance appraisals (special appraisals are excluded) which precede the date of designation of positions to be eliminated by the Agency Director The additional service credit will be allocated as follows

- - Below Performance Requirements = 0 months credit
- - Meets Performance Requirements = 6 months credit
- - Exceeds Performance Requirements = 12 months credit
- - Substantially Exceeds Performance Requirements = 18 months credit

5 3 The calculated additional service credit will be added to the employee's continuous state service date to determine the RIF Service Date for all RIF purposes

5 4 Where two (2) employees have equal RIF Service Dates, deadlocks will be broken by using each employee's Agency hire date If the deadlock continues, other impartial means (e g , drawing lots, etc) may be used to break the deadlock

5 5 Probationary employees will not have any rights under these RIF procedures and may be terminated at

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Christopher D Boyd 3/14/03

any time during their initial 12 month probationary period

6 BUMPING RIGHTS OF EMPLOYEES

6 1 Applicability Only those employees considered covered state employees are authorized to have bumping rights Temporary ("pink-slip"), contract, full/part-time temporary grant employees, and probationary employees have no bumping or RIF rights

6 2 Covered Employees Covered employees have bumping rights only when

6 2 1 The position the employee occupies is being abolished or the employee is bumped by another employee and the bumped employee has a greater RIF Service Date than remaining employees in the classification *and/or job classification* series, or

6 2 2 The employee elects to exercise his/her bumping rights in writing no later than two (2) working days following the review meeting with the designated representative of the Division of Human Resources (see Section 4 3, above)

6 3 If an employee elects to exercise his/her bumping rights, the employee must utilize the option below which provides him/her the highest resulting pay band or s/he may elect to be laid-off with recall or reinstatement rights as provided by the provisions within these procedures (**NOTE** Under no circumstances may an employee gain from a RIF Bumping rights are only provided laterally or downward)

6 4 *The following procedures must be followed only in cases where the position eliminated is one of a designated competitive series (e g Administrative Specialist I, AA25, Band 2, and Administrative Specialist II, AA50, Band 3)*

- *If the employee whose position is eliminated has a higher RIF Service Date than other employees in the designated competitive series in the competitive area, s/he will bump into the position occupied by the employee with the lowest RIF Service Date in the same job classification and pay band with the same or lower pay level The bumped employee may then bump into the position occupied by the employee with the lowest RIF Service Date in the next lowest job classification in the designated competitive series Once the employee with the lowest RIF Service Date in the series is determined, s/he must then follow the procedures outlined in Section 6 6, below*
- *In all cases, the employee bumping into a position must meet the State and SCDC minimum training and experience requirements as outlined in 6 10, below*

6 5 *If a position eliminated is not one of a designated series and the employee elects to exercise his/her bumping rights, the employee must first bump the employee in the competitive area with the lowest RIF Service Date in the same job classification and pay band, and same or lower pay level, provided s/he meets the State and SCDC minimum training and experience requirements*

6 6 *The employee must next be reassigned or demoted into a vacant position in the competitive area of the same pay band, and pay level or lower, provided the agency is actively recruiting to fill the vacancy, and provided s/he meets the State and SCDC minimum training and experience requirements*

6 7 For those employees bumped or bumping into a position with a lower pay band, the employee's pay rate and review date will be determined in accordance with the Office of Human Resources Regulations Manual

6 8 If a position is offered to an employee under RIF bumping procedures, and the employee *refuses the position, s/he* has the right to elect to be laid-off with recall/reinstatement rights

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6 9 An employee is considered as meeting the minimum training and experience requirements provided that

- S/he meets minimum state training and experience with regard to education and experience, and
- The experience required is considered acceptable to perform the specific essential functions of the position (i e , a vocational teacher of a specific trade such as electrical, automotive, plumbing, etc) as defined in the position's SCDC Additional Requirements

6 10 Any employee exercising his/her bumping rights will be notified in writing by the Division of Human Resources of the position (job title, ***pay*** band, ***pay level,*** location, and salary) and effective date of the position change Notification of the position change will also be made to the Recruiting and Employment Services Branch The Recruiting and Employment Services Branch will be responsible for keying the selection and notifying the Payroll Branch so that the change can be made effective

6 11 An employee bumped out of his/her position during a RIF (regardless of source of funds) may then exercise his/her rights according to these procedural guidelines

6 12 A second wave of bumping rights for ***covered*** employees who have been displaced will not be implemented until first wave RIF bumping procedures have been completed

6 13 An employee subject to lay off may waive his/her bumping rights in writing Once waived, s/he forfeits bumping rights for the remainder of the RIF An employee who waives bumping rights does not waive any recall rights under these procedures

7 RECALL *AND REINSTATEMENT* RIGHTS OF EMPLOYEES

7 1 Covered employees who have been laid-off or bumped to a position with a lower pay band and pay level will have recall and reinstatement rights for a period of one (1) year from the effective date of their lay off, bumping, or reassignment to another ***position*** Employees will be reinstated in inverse order of lay off

7 2 ***Recall Rights*** When a vacancy occurs in an employee's competitive area which is (1) in the ***same job class,*** pay band, pay level ***or lower***, and ***functionally similiar*** as the position held prior to the lay off, downward bumping, or reassignment and (2) within a reasonable geographic distance (30 mile radius) of the work location of the employee, then the eligible employee will be offered the vacancy provided s/he meets the minimum training and experience qualifications The position must be accepted in writing by the employee within two (2) working days of the offer or s/he waives any future recall rights

7 3 Upon refusal of the position by an eligible employee, the offer will be extended in decreasing RIF Service Date order to other eligible employees on the recall list If all eligible employees on the recall list refuse the position, the vacancy will be filled pursuant to normal Agency hiring policy/procedure

7 4 ***Reinstatement Rights*** ***An employee affected by a Reduction-In-Force may apply for any SCDC or State job for which s/he meets the minimum training and experience requirements If the employee accepts a position with a lower pay band than the one from which s/he was separated, s/he still retains recall rights to a position in the same job classification in the competitive area***

7 5 Probationary, temporary ***(pink slip)***, or temporary grant employees will not have recall ***or reinstatement*** rights They may, however, apply for rehire through regular Agency employment policy/procedure

7 6 If an employee on the recall list relocates to another geographic area, s/he will be eligible for recall in the new competitive area After relocation it will be the employee's responsibility to notify the Division Director of Human Resources in writing of the relocation in order to be eligible for recall within that competitive area

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Christopher D Boyd 3/14/03

7 7 Upon appointment to an established position (either as a result of bumping or recall), an employee shall be given one of the following types of status in accordance with State regulations and Agency policies/procedures

- Trial, or
- *Covered*

7 8 Any changes in salary, job date, or performance appraisal review dates will be in accordance with established State regulations and Agency policies/procedures

7 9 Employees who are recalled ***or reinstated*** within one (1) year of the effective date of the RIF will be eligible for all benefits including sick leave restored in accordance with state regulations, and will have the option of buying back all, some, or none of the annual leave lost as a result of the RIF

8 GRIEVANCES A ***covered*** employee who is affected by a reduction-in-force has the right to appeal through the Agency's employee grievance procedures and to the State Employee Grievance Process only if the appeal is based upon inconsistent or improper application of any portion of the Agency's reduction-in-force policy/procedure or plan ***The grievance must be filed within 14 calendar days of the effective date of the RIF as outlined in SCDC Policy/Procedure ADM-11 02***

9 REORGANIZATION Reorganization of the SCDC after a RIF will be implemented in compliance with all existing departmental policies Those employees remaining after reorganization will not be eligible for moving expenses or travel to and from their home to their work stations if they are transferred to meet the mission of the Agency

10 REHIRES An employee affected by a RIF who waives his/her bumping or recall rights or who is not eligible for such rights may apply for rehire with the Agency through normal hiring and employment policies/procedures

11 DEFINITIONS

Bumping refers to the action taken when an employee subject to lay off is placed in a vacant position or displaces ("bumps") another employee in the same or another job classification and/or location

Class Series refers to a group of classes which are sufficiently similar in the kind of work performed to warrant similar state class titles, but sufficiently different in level of responsibilities to warrant different state salary ranges

Competitive Area refers to a common geographic or organizational area in which employees will be considered for reduction-in-force procedures including transfers, reassignments, and/or bumping which is determined and approved by the Agency Director

Competitive Class refers to classifications (job class, pay band, pay level) designated to compete in a reduction-in-force

Continuous State Service refers to service with the state determined by the most recent date of hire with the State of South Carolina without a break in service

Employee Subject to Lay Off refers to an employee who is subject to termination because s/he has a lower RIF Service Date than another employee

Lay Off refers to the actual termination of employment from the Agency because of reduced funding

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3/14/03

change in workload, or reorganization

State Minimum Qualifications refers to those qualifications specified by the state job specifications and specific job functions as required for an employee to enter a job classification

Probationary Employee refers to an employee in a covered position who has less than 12 months of continuous state service

Recall refers to the reinstatement of an employee who is in lay-off status within one (1) year of the effective date of the lay off

Reduction-in-Force (RIF) refers to the reduction or abolishing of positions because of reduced funding, change in workload, or reorganization

Reduction-in-Force (RIF) Service Date refers to date upon which all RIF procedures are based RIF Service Date is determined by continuous state service date with additional service credits awarded for job performance rating

Temporary Employee refers to a full-time or part-time employee who does not occupy an FTE position, whose employment is not to exceed one year, and who is not a covered employee ***(S C Code Ann §8-17-320)***

Trial Period/Status refers to a six (6) month working trial period/status of a covered employee following a promotion, demotion, or reclassification transfer or reassignment to any class in which the employee has not held permanent status

s/ Jon E Ozmint, Director

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3/14/03

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office@gnslaw com

October 14, 2003



Via Facsimile (737-0968)
Mr Chris Poore
H R Consultant
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mr Poore

We are in receipt of your letter dated October 9, 2003 with enclosures We respectfully disagree with the Department of Corrections' contention that the information requested ' exceed[s] the scope of this grievance matter" The requested information delineated in our August 29, 2003 letter is pertinent to our assertion that "individuals and/or positions were arbitrarily protected or removed from consideration for separation for reasons unrelated to the RIF criteria" The information requested specifically addresses those documents that indicate the movement of personnel immediately prior to the notification that a reduction in force plan would be implemented on June 1, 2003 The requested information also addresses those persons who were either offered retirement incentives or other accommodations both during and after the RIF implementation The timing of the personnel movement along with the revision of the SCDC reduction in force policy in close proximity to the approval of the reduction in force plan also makes these documents pertinent to our grievance

At the request of the Office of Human Resources, we provided several examples which illustrate circumvention of RIF procedures by the SCDC The requested information will, upon information and belief, provide more and specific evidence of these violations The Department's reluctance to provide requested documentation as well as its direct response that the Department may manage itself without explanation or question is of grave concern The South Carolina Department of Corrections' administration apparently does not adhere to the State's requirement that government action must be open to the public it serves

Those items enumerated in our August 29th letter directly speak to the grievants' assertion that there were individuals or positions arbitrarily protected or removed from consideration both

Mr Chris Poore
October 15, 2003
Page two

prior to and after the implementation of the RIF Accordingly, we renew our request for the information

Sincerely,

Dona L Guffey

DLG/pfb
File #03-156
cc Ms Deborah Drucker Deutschmann (via facsimile & U S Mail)

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October 14, 2003

Via Facsimile (737-0968)
Mr Chris Poore
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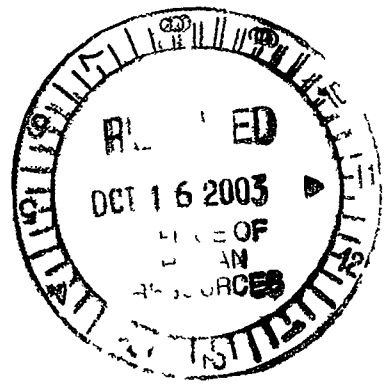
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Sincerely,

Dona L Guffey

DLG/pfb
File #03-156
cc Ms Deborah Drucker Deutschmann (via facsimile & U S Mail)

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STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

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(803) 737-0900

SAMUEL L. WILKINS
DIRECTOR

October 21, 2003

VIA FACSIMILE
Ms Deborah Drucker Deutschmann
Deputy General Counsel
S C Department of Corrections
Post Office Box 21787
Columbia South Carolina 29221-1787

Re Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections (SCDC)

Dear Ms Deutschmann

I have received the attached letter dated October 14, 2003 from Ms Dona L Guffey regarding the above referenced matter Please respond to Ms Guffey s letter by stating your position on this matter in writing to us no later than Tuesday, October 28, 2003

Please call if you have any questions

Sincerely,

Chris Poore
Human Resources Consultant
Office of Human Resources

Attachment

cc Ms Dona L Guffey

FAX (803) 737 0968

* * * COMMUNICATION RESULT REPORT (OCT 21 2003 2 36PM) * * * -522-

FILE MODE	OPTION	ADDRESS (GROUP)	TTI SC OHR RESULT	PAGE
97 MEMORY TX		61766	OK	P 4/4

REASON FOR ERROR
E-1) HANG UP OR LINE FAIL
E-2) BUSY
E-3) NO ANSWER
E-4) NO FACSIMILE CONNECTION

FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
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Fax: (803) 737-0968
Phone (803) 737-0970

Debbie D Deutschmann

TO: Dona L. Guffey

DATE. 10-21-03

Fax #: 896-1766
256-1816

# of Pages: 4 (including cover sheet)

Phone #:

From: Chris Poore

Phone #: 737-0952

COMMENTS:

* * * COMMUNICATION RESULT REPORT (OCT 21 2003 2 38PM) * * *

TTI SC OHR

FILE MODE	OPTION	ADDRESS (GROUP)	RESULT	PAGE
8 MEMORY TX		92561816	OK	P 4/4

REASON FOR ERROR
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FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
Columbia, South Carolina 29201

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Phone (803) 737-0970

Debbie D Deutschmann

TO: Dona L. Guffey

DATE: 10-21-03

Fax #: 896-1766
256-1816

# of Pages. 4 (including cover sheet)

Phone #:

From: Chris Poore

Phone #: 737-0952

COMMENTS:

1976

Terry Baggott - SCDC Teacher FOIA

From Christopher Poore
To Terry Baggott
Date 10/28/2003 2 52 PM
Subject SCDC Teacher FOIA

TBag-
Debbie called today and said that she was trying to get a response to us regarding that FOIA She said it may be a couple of more days before she could get us something

Chris Poore
Office of Human Resources
HR Consultant
737-0952

Our vision is to provide state government with the best human resources program development, consultation, and delivery We will accomplish this through a unified staff who coordinate their strengths and talents to effectively serve our customers

GERGEL, NICKLES & SOLOMON, PA
- ATTORNEYS AT LAW
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Richard Mark Gergel
W Allen Nickles, III
Carl L Solomon
David E Rothstein
Dona L Guffey
Dwayne T Maryck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256-1816
office@gnslaw com

November 7, 2003

Via Facsimile (737-0968)
Mr Chris Poore
H R Consultant
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph; Carolyn McIver Smith, Maggie L Williams, Paula Woodlief v SC Department of Corrections

Dear Mr Poore

I have been unable to reach you by telephone having left a voice mail message for you on November 5, 2003 Please inform me of the status of the grievance as it is my understanding Ms Deutschmann was to respond in writing by October 28, 2003 and I have not received a response to date I appreciate your attention to this matter I look forward to hearing from you

Sincerely,

Dona L Guffey

DLG/pfb
cc Ms Deborah Drucker Deutschmann
File #03-156

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

November 10, 2003

Mr Chris Poore
Human Resources Consultant
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections

Dear Mr Poore

The following is in response to your October 21 request for me to state the Department's position regarding Ms Guffey's October 14, 2003 letter

The Department believes that adequate information has been provided to demonstrate that the Department complied with its Reduction in Force policy and plan It is the Department's position that materials requested by the appellants' attorneys are not relevant in order for the State Human Resources Director to determine that there is no material issue of fact concerning an improper or inconsistent application of the Reduction in Force policy or plan The Department fully answered all of the questions regarding how the RIF policy and plan was applied and answered all questions regarding management decisions in the functional area, educational programs, where all of these appellants worked

The Department does not believe that a ruling has been made regarding the relevancy issue raised and, in the event the Department receives a ruling that the materials that the Department has objected to are deemed relevant, the Department will comply with such a directive The Department is not attempting to conduct business improperly, as Ms Guffey implies, but is objecting to information requested that is outside the scope of review in this matter

Sincerely,

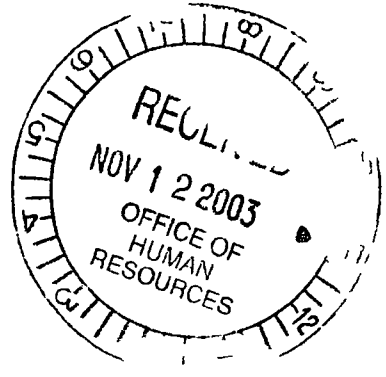
Deborah Drucker Deutschmann
Deputy General Counsel

cc Dona L Guffey, Esquire

1979

South Carolina Department of Corrections
Office of General Counsel
PO Box 21787/4444 Broad River Road
Columbia South Carolina 29721 1787

Mr Chris Poore
Human Resources Consultant
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201



STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L. PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K. LEATHERMAN SR.
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL, JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L. WILKINS
DIRECTOR

January 9, 2004

CERTIFIED MAIL
Ms Dona L Guffey
Gergel, Nickles & Solomon, P A
Attorneys at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re James 'Cal Bell v S C Department of Corrections (SCDC)

Dear Ms Guffey

This letter is in response to Mr Bell s appeal to the State Human Resources Director Based on information provided by both parties, a review of the appeal has been conducted As a result of this review, the appeal must be denied because Mr Bell's contentions regarding SCDC's Reduction in Force (RIF) do not constitute a material issue of fact concerning an improper or inconsistent application of the agency's RIF policy or plan

Section 8-17-350 of the S C Code of Laws of 1976, as amended, states in part "When an appeal is filed, the State Human Resources Director shall assemble all records, reports, and documentation of the earlier proceedings on the grievance and review the case to ascertain that there has been full compliance with established grievance policies, procedures, and regulations within the agency involved and shall determine whether or not the action is grievable to the committee or a mediator-arbitrator " Section 8-17-330 of the Code of Laws is specific as to those employment actions that are considered grievable or appealable

Section 8-17-330 of the S C Code of Laws of 1976, as amended, states in part 'A reduction in force is an adverse employment action considered as a grievance only if the agency, or as an appeal if the State Human Resources Director, determines that there is a material issue of fact that an agency inconsistently or improperly applied its reduction in force policy or plan "

The record presented by both parties reflects the following information

1 as a result of a RIF due to budgetary reductions, Mr Bell's position at SCDC as Vocational Teacher (UB04) with the Palmetto Unified School District (PUSD) was eliminated effective close of business on June 1, 2003,
2 Mr Bell filed a grievance with SCDC on June 12, 2003, regarding the elimination of his position as a result of the June 1, 2003 RIF,

FAX (803) 737 0968

3 SCDC's Employee Relations Chief, Ms Robin Gracien, denied Mr Bell's grievance by letter dated June 16, 2003, stating that, the plan and policy were consistently and properly applied Therefore, the grievance must be denied",
4 in his grievance, Mr Bell contends, in part, that, 'the Department of Corrections did not involve the District s Board in the reduction in force",
5 SCDC contends that, 'Department and State policy provide that the authority to implement a Reduction in Force belongs to the Agency Director Further, SCDC contends, "[a]lthough not a requirement of policy, the Superintendent of the PUSD, who is a member of the District Board, was informed prior to the effective date of the Reduction in Force of the decision by the Agency Director to implement a Reduction in Force' ,
6 Mr Bell also contends that, ' educators were singled out for reduction in force in an arbitrary and capricious fashion",
7 SCDC does not agree with Mr Bell's assertion that educators were arbitrarily or capriciously singled out for RIF Rather, SCDC asserts that the RIF was implemented due to 'insufficient operating funds and reorganization within the Agency," and that educators were not singled out arbitrarily and capriciously,
8 further, Mr Bell contends, [t]he restriction on 'bumping rights' to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects[sic] veteran educators and educators holding advanced degrees",
9 he also contends, "all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications",
10 SCDC contends that, "SCDC Policy ADM-11 05, Reduction in Force, states that the Agency Director is authorized to approve any position(s) to be abolished and to approve the competitive areas in which each employee subject to a lay off will be able to exercise their rights' ,
11 in addition, Mr Bell contends that, "the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law' ,
12 SCDC contends that, "the basis for the Reduction in Force plan was to reduce expenditures because of reduced funding by the General Assembly and not to retaliate against a class of employees",
13 Mr Bell further contends that, "individuals and/or positions were arbitrarily protected or removed from consideration for separation for reasons unrelated to RIF criteria,
14 SCDC maintains that it is the Department's position that throughout the RIF process, it retains the right to make management decisions regarding the administration of agency resources, and
15 Mr Bell timely filed an appeal to the State Human Resources Director which was handdelivered on June 20, 2003

As to Mr Bell s contention that SCDC did not involve the District's Board in the RIF, SCDC's RIF Policy ADM-11 05 (1 2) provides that, "The Agency Director or designee is authorized to approve any position(s) to be abolished and to approve the competitive areas within which employees subject to a lay off will be able to exercise their rights under this policy/procedure " In addition, S C Code of Laws Section 24-25-90, regarding the PUSD, states that, "[t]he superintendent of the district and all other educational personnel shall be employed, supervised, and terminated according to the South Carolina Department of Corrections' personnel policies and procedures " As such,

the Agency Director was not required to involve the District s Board in the RIF Therefore, this contention does not raise a material issue of fact as to the improper or inconsistent application of SCDC's RIF policy or plan

Mr Bell also contends that SCDC s RIF was arbitrary and capricious because (1) educators were singled out for RIF, (2) the restriction on bumping rights to designated areas within the PUSD adversely impacted veteran educators and those educators with advanced degrees, (3) educators were grouped under generic terms for RIF purposes, (4) the RIF was used to "retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law", and (5) individuals and/or positions were protected or removed from consideration for separation for reasons unrelated to RIF criteria It appears from the record that SCDC developed its RIF Plan because of reduced funding by the General Assembly As provided by SCDC's RIF Policy ADM-11 05 (1 2), "[t]he Agency Director or designee is authorized to approve any position(s) to be abolished and to approve the competitive areas within which employees subject to a lay off will be able to exercise their rights under this policy/procedure " The Agency Director has the prerogative to make management decisions in determining the positions to be eliminated in a RIF SCDC s stated reasons for the RIF were insufficient operating funds and reorganization Further, SCDC s RIF Plan indicates that many non-educator positions were also affected by the RIF, contrary to Mr Bell s contention that educators were arbitrarily and capriciously singled out for RIF Therefore, Mr Bell's contentions do not raise a material issue of fact as to the improper or inconsistent application of SCDC s RIF policy or plan

Because the issues Mr Bell presents do not raise a material issue of fact as to the improper or inconsistent application of SCDC's RIF policy or plan, the State Human Resources Director has determined that his appeal must be denied and SCDC's decision under its internal grievance plan must be upheld

While the issues raised in Mr Bell s appeal do not constitute a grievance or an appeal, this decision does not address whether any other legal remedy is available to consider the issues he raises

This letter concludes the processing of Mr Bell's appeal

Sincerely,

Samuel L. Wilkins

Samuel L Wilkins
Director

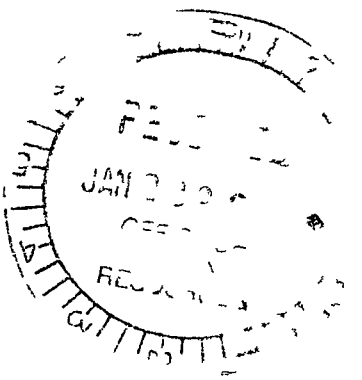
c Mr Jon Ozmint
Ms Robin Gracien

GERGEL, NICKLES & SOLOMON, P.A.
- ATTORNEYS AT LAW
Post Office Box 1866
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Richard Mark Gergel
W Allen Nickles, III
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Telephone (803) 779 8080
Facsimile (803) 256 1816
office@gnslaw com

January 28, 2004



Via Facsimile (737-0968)
Samuel L Wilkins, Esquire
State Budget and Control Board
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Sam

I am in receipt of your correspondence dated January 9, 2004 regarding the challenge by the Department of Corrections employees of the Palmetto Unified School District to separation from employment due to reduction in force As stated in this letter, it is the responsibility of your office to ' assemble all records, reports and documentation ' in reference to this matter

As you are aware, it is the position of the employees that the Agency violated law in separating their employment due to reduction in force In order to challenge the denial of the employees' appeal, and to pursue other claims as appropriate, it is important that a comprehensive record is available for review by the court Accordingly, I would appreciate a copy of all records considered in reaching the conclusions set forth in your correspondence of January 9, 2004

It is my understanding that your correspondence of January 9, 2004 constitutes the final determination of the Office of Human Resources regarding the employees' appeal If there is a procedure for further review within your Agency or to the Budget and Control Board, please let me know

I look forward to hearing from you

Sincerely,

W Allen Nickles, III

WAN/pfb

File #03-156

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
Post Office Box 1866
Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
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1519 Richland Street
Telephone (803) 779 8080
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office@gnslaw com

February 2, 2004

Via Facsimile (737-0968) & U S Mail
Sam Wilkins, Esquire
Director, State Office of Human Resources
Grievance and Mediation Services
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie L Williams, Paula Woodlief

Dear Sam

As you are aware, this firm represents the above named individuals who were separated from employment as educators with Palmetto Unified School District No 1 effective June 1, 2003 as a result of a reduction in force implemented by the South Carolina Department of Corrections By letter dated January 9, 2004, you indicated that the issues raised by these individuals "do not constitute a grievance or an appeal" subject to review by the State Employee Grievance Committee This correspondence constitutes a request for reconsideration of this decision It is my understanding based upon communication from Ms Debbie Clark of your staff and the South Carolina Administrative Procedures Act that this request for reconsideration tolls the period for any petition for judicial review arising out of the decision contained in your letter of January 9, 2004

This request for reconsideration is based upon the following factors

1 The South Carolina Constitution in Article I, § 22 provides, in part, that "No person shall be bound by a judicial or quasi judicial decision of an administrative agency affecting private rights except on due notice and opportunity to be heard "

2 The decision of January 9, 2004 was taken without affording the individuals affected an opportunity to present sworn testimony or to cross-examine parties responsible for terminating their employment

3 Throughout the administrative process, SCDOC refused or failed to provide the individuals affected by the reduction in force access to information relevant to their claims This information includes, but is not limited to, the Department's refusal to provide documents that indicate the movement of personnel immediately prior to notification of the reduction in force, and information relating to retirement incentives or other accommodations offered both during and after the reduction in force

4 Neither the SCDOC nor the January 9, 2004 letter provide any legal justification for the violation of law in the reduction in force by failure to treat educators employed in the District in a "unified" fashion Instead, the SCDOC arbitrarily divided the legislatively established "special statewide unified school district" into geographic regions which resulted in the inability of educators to compete for positions based upon their service and qualifications

5 Neither the SCDOC nor the January 9, 2004 letter offer any justification for the elimination of educational programs to inmates and severely restricting access to the availability of educational programs in a manner which is contrary to the expressed public policy of this State (See, State of the State Address, Governor Mark Sanford, January 21, 2004 wherein the Governor "instructed" the Director of SCDOC to make participation in education programs mandatory for appropriate inmates and to deprive privileges to inmates who do not participate in educational programs The Governor stated "it is crazy to continue sending folks out of a criminal justice system with no better educational leg to stand on and expect good results ")

6 In denying the affected individuals an opportunity to be heard, the January 9, 2004 letter shields the SCDOC Director from examination regarding comments that educators employed by the Department were disloyal in enforcing their rights to lawful compensation It is respectfully submitted that both the circumstances surrounding the reduction in force, exemptions to the reduction in force and the Director's comments will demonstrate to the Grievance Committee that the Department ignored the "unified" standing of the District in order to separate senior educators from employment

7 The contention that administrative policy allows the Agency Director or designee to take actions in reduction in force without the involvement of the District's Board is contrary to law which assigns primary responsibility for the administrative functions of the District, including determining the physical facilities needed to carry out all educational programs to the Board and which delegates to the Director the limited role of "consent and concurrence" S C Code Ann § 25-24-70 Clearly, any administrative policy contrary to law is void and any action pursuant to such a policy is *ultra vires*

For the reasons outlined above, each of the affected individuals request that the decision contained in your letter of January 9, 2004 be reconsidered and that a hearing be scheduled on all issues raised in the grievances presented to your Agency Should you have any questions concerning this matter, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
cc Ms Robin M Gracien
File #03-156

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

GRADY L PATTERSON JR
STATE TREASURER

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COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

February 4, 2004

Ms Robin M Gracien, Chief
Employee Relations Branch
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections (SCDC)

Dear Ms Gracien

I have received the attached letter dated February 2, 2004, from Mr W Allen Nickles, III, requesting that the decision of the State Human Resources Director concerning the denial of the above referenced appeals be reconsidered Please respond to Mr Nickles's request by stating your position on this matter in writing to us no later than Wednesday, February 11, 2004

If we do not receive a response by the indicated date, a determination will be made based on the information we have

Please call if you have any questions

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosure
cc Mr W Allen Nickles III

1988

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

CRADY I PATTERSON JR
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

ROBERT W HARRELL JR
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
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1201 MAIN STREET SUITE 1000
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(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

February 23 2004

Ms Dona Guffey
Gergel, Nickles & Soloman P A
Post Office Box 1866
Columbia South Carolina 29202-1866

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr Ruth Fritts, Nancy Glenn Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections (SCDC)

Dear Ms Guffey

As requested in Mr Nickles s January 28, 2004, and our telephone conversations, I have enclosed for your review a copy of the appeal files in the above referenced matters The enclosed documents include the entire record maintained by this office except the following

a) your June 20, 2003 letter initiating the above appeals (with attached State Appeal Forms for each appellant and the ' Nature of Grievance and Relief Sought' attachment),
b) my June 24, 2003 letters on each appeal to Ms Robin Gracien, Chief of Employee Relations Branch at SCDC, requesting the agency records concerning each appeal,
c) my June 24, 2003 letters on each appeal to Mr Nickles notifying him that we had received the above appeals, and
d) Samuel L Wilkins s January 9, 2004 denial letters to you on each of the above appeals

There is no charge for copies of these documents

Let me know if I can be of further assistance

Sincerely,

Deborah Clark

Deborah Clark
Program Coordinator
Grievance and Mediation Services

Enclosures

FAX (803) 737 0968

* * * COMMUNICATION RESULT REPORT (FEB 24 2004 3 48PM) * * * -537-

TTI SC OHR

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E-2) BUSY
E-3) NO ANSWER
E-4) NO FACSIMILE CONNECTION

FAX

OFFICE OF HUMAN RESOURCES
SOUTH CAROLINA BUDGET AND CONTROL BOARD

1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Fax. (803) 737-0968
Phone. (803) 737-0970

TO: Debbie Deutschmann **DATE:** 2-24-04

Fax #: 6-1766 **# of Pages:** 5

Phone #. _____ **(including cover sheet)**

From: Debbie Clark **Phone #:** 737-0950

COMMENTS:

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

February 25, 2004

Ms Deborah Clark
Grievance and Mediation Services Program Coordinator
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections

Dear Ms Clark

The following information is provided in response to your February 24, 2004 facsimile and request for me to respond to the February 2, 2004 reconsideration request submitted by Mr Nickles on behalf of the above named individuals

It is the Department's position that the State Human Resources Director properly determined that these cases do not contain issues that are grievable before the State Employee Grievance Committee The jurisdiction of the State Employee Grievance Committee is limited regarding reductions in force See S C Code Ann § 8-17-330 and S C H R Reg 19-718 04(A) The Department contends that it properly and consistently applied its Reduction in Force policy and plan to each of these individuals

The Department believes that the February 2, 2004 letter does not raise any information that has not been previously raised regarding the issue of whether the Department had improperly or inconsistently applied its Reduction in Force policy or plan that would justify the granting of this request for reconsideration

Further, it is the Department's position that it has not refused or failed to provide information regarding this matter As I indicated on November 10, 2003, the Department believes that it has submitted all relevant information regarding the application of this Reduction in Force policy and plan All other materials requested during the course of this appeal, by the attorneys for the above named individuals, are not relevant for the determination of whether there exists a material issue of fact regarding the application of the Reduction in Force policy or plan

Additionally, the Department maintains that it complied with South Carolina Code of Laws Section 24-25-90 and its Reduction in Force policy when it developed its Reduction in Force plan

The Department made difficult decisions regarding the use of its financial resources and determined that positions in many areas, including educational services, would have to be eliminated in order to meet its financial obligations as outlined by the South Carolina legislature

Governor Sanford's January 21, 2004 State of the State Address, in which he outlined a plan for educating inmates, cannot be a basis for reconsidering the Reduction in Force plan that was effective on June 1, 2003 Governor Sanford's "instructions" had not been given to Director Jon Ozmint at the time that the Reduction in Force plan at issue was developed Further, Governor Sanford also requested in this Address that $2 5 million dollars be given to the Department to fund this initiative If the Department does receive this money, it will make hiring decisions in accordance with the recall rights in its Reduction in Force policy and plan

Finally, I apologize for any confusion regarding the Department's Response to this Request for Reconsideration However, I would like to point out that in correspondence dated September 11, 2003, I clarified that all correspondence relating to these appeals should be sent to my attention at the Department of Corrections

Please contact me if you have any further questions regarding this matter

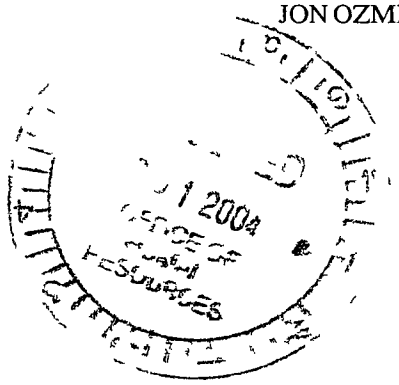
Sincerely,

Deborah Drucker Deutschmann
Deputy General Counsel

cc W Allen Nickles, III, Esquire
Gergel, Nickles & Solomon, P A
Post Office Box 1866
Columbia, South Carolina 29202-1866

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director



February 25, 2004

Ms Deborah Clark
Grievance and Mediation Services Program Coordinator
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections

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The Department believes that the February 2, 2004 letter does not raise any information that has not been previously raised regarding the issue of whether the Department had improperly or inconsistently applied its Reduction in Force policy or plan that would justify the granting of this request for reconsideration

Further, it is the Department's position that it has not refused or failed to provide information regarding this matter As I indicated on November 10, 2003, the Department believes that it has submitted all relevant information regarding the application of this Reduction in Force policy and plan All other materials requested during the course of this appeal, by the attorneys for the above named individuals, are not relevant for the determination of whether there exists a material issue of fact regarding the application of the Reduction in Force policy or plan

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Please contact me if you have any further questions regarding this matter

Sincerely,

Deborah Drucker Deutschmann
Deputy General Counsel

cc W Allen Nickles, III, Esquire
Gergel, Nickles & Solomon, P A
Post Office Box 1866
Columbia, South Carolina 29202-1866

South Carolina Department of Corrections
Office of General Counsel
P.O. Box 21787/4444 Broad River Road
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Ms Deborah Clark
Grievance and Mediation Services Program
Coordinator
Office of Human Resources
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State Budget and Control Board

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SAMUEL L WILKINS
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March 22, 2004

CERTIFIED MAIL
Mr W Allen Nickles III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections (SCDC)

Dear Mr Nickles

The State Human Resources Director has received your request for reconsideration, on behalf of the above referenced appellants, dated February 2, 2004, and SCDC s response dated February 25, 2004, to your request for reconsideration Based upon a review of your request and SCDC s response, it has been determined that the request should be denied

Section 19-718 05 (E) of the State Human Resources Regulations states "If the State Human Resources Director determines that the appeal is untimely or fails to comply with the requirements of the Act, he will notify the covered employee or his representative that the appeal is denied and no further action will be taken concerning the appeal As a result of the State Human Resources Director's decision, the covered employee may request reconsideration within 30 calendar days from notification of the decision

In your letter of February 2, 2004 you contend the following

1) the South Carolina Constitution in Article I, § 22 provides, in part, that "No person shall be bound by a judicial or quasi judicial decision of an administrative agency affecting private rights except on due notice and opportunity to be heard",
2) the decision of the State Human Resources Director on January 9, 2004, was taken without affording the individuals affected an opportunity to present sworn testimony or to cross-examine parties responsible for terminating their employment,
3) throughout the administrative process, SCDC refused or failed to provide the individuals affected by the reduction in force (RIF) access to information relevant to their claims This information includes, but is not limited to, the Department's refusal to provide documents that indicate the movement of personnel immediately prior to notification of the RIF, and information relating to retirement incentives or other accommodations offered both during and after the RIF,

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4) neither SCDC nor the January 9, 2004 letter provide any legal justification for the violation of law in the RIF by failure to treat educators employed in the District in a "unified' fashion Instead, SCDC arbitrarily divided the legislatively established "special statewide unified school district" into geographic regions which resulted in the inability of educators to compete for positions based upon their service and qualifications,
5) neither SCDC nor the January 9, 2004 letter offer any justification for the elimination of educational programs to inmates and severely restricting access to the availability of educational programs in a manner which is contrary to the expressed public policy of the State Governor Mark Sanford's State of the State Address on January 21, 2004, "instructed' the Director of SCDC to make participation in education programs mandatory for appropriate inmates and to deprive privileges to inmates who do not participate in educational programs The Governor states "it is crazy to continue sending folks out of a criminal justice system with no better educational leg to stand on and expect good results",
6) in denying the affected individuals an opportunity to be heard, the January 9, 2004 letter shields the SCDC Director from examination regarding comments that educators employed by the Department were disloyal in enforcing their rights to lawful compensation It is respectfully submitted that both the circumstances surrounding the RIF, exemptions to the RIF, and the Director's comments will demonstrate to the Grievance Committee that SCDC ignored the "unified" standing of the District in order to separate senior educators from employment, and
7) the contention that administrative policy allows SCDC's Director or designee to take actions in a RIF without the involvement of the District's Board is contrary to law which assigns primary responsibility for the administrative functions of the District, including determining the physical facilities needed to carry out all educational programs to the District s Board and which delegates to SCDC s Director the limited role of "consent and concurrence " S C Code Ann §25-24-70 [sic] Clearly, any administrative policy contrary to law is void and any action pursuant to such a policy is *ultra vires*

In SCDC's response letter of February 25, 2004, it contends the following
1) these cases do not contain issues that are grievable before the State Employee Grievance Committee,
2) the jurisdiction of the State Employee Grievance Committee is limited regarding a RIF (S C Code Ann §8-17-330 and State Human Resources Regulations 19-718 04(A),
3) the February 2, 2004 request for reconsideration letter does not raise any information that has not been previously raised as to whether SCDC improperly or inconsistently applied its RIF policy or plan,
4) it has not refused or failed to provide information regarding this matter, rather, it has submitted all relevant information regarding the application of the RIF policy and plan,
5) all other materials requested by the attorneys representing the individuals in the above referenced appeals, are not relevant for the determination of whether there exists a material issue of fact regarding the application of the RIF policy or plan,
6) it complied with S C Code of Laws §24-25-90 and its RIF policy when it developed its RIF plan,
7) it made difficult decisions regarding the use of financial resources and determined that positions in many areas, including educational services, would have to be eliminated in order to meet its financial obligations,