Foster Garvey

Civil Service – An Introduction

45th Annual Civil Service Conference

OCTOBER 20-21, 2026

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- **2.2 Administration & Operations**
- **2.3 Collective Bargaining Issues**
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3. MEETINGS, HEARINGS & PROCEDURES

- **3.1 Open Meetings Act**
- **3.2 Public Disclosure**
- **3.3 Appearance of Fairness Doctrine**
- **3.4 Conduct of a Disciplinary Hearing**

ATTACHMENTS:

- Civil Service—A Chronology

CIVIL SERVICE

A CHRONOLOGY
Washington Law and Practice

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October 2026

1883 Pendleton Act – Federal Civil Service

1889 State of Washington Incorporation

1896 Seattle City Charter

1903 Easson v. Seattle,
32 Wash. 405, 73 Pac. 496 (1903)

1906 Ryan v. Handley,
43 Wash. 232, 86 Pac. 398 (1906)

1914 Clayton Antitrust Act
as amended, 15 U.S.C. § § 12-27

1919 Labor Unions Legalized
Chapter 185, Laws of 1919, and
RCW 49.36.010-49.36.030

1926 Railway Labor Act
as amended, 45 U.S.C. §§ 151-188

1932 Norris-LaGuardia Act
as amended, 29, U. S. C. § § 101-115

1933 Injunctions in Labor disputes
Chapter 7, Laws of 1933, Ex. Sess., and
Chapter 49.32 RCW

1935 National Labor Relations Act
as amended, 29 U.S.C. § § 151-169

Civil Service for City Firemen
Chapter 31, Laws of 1935, and
Chapter 41.08 RCW

1937 Civil Service for City Policemen
Chapter 13, Laws of 1937, and
Chapter 41.12 RCW

1939 State ex. rel. Hearty v. Mullin,
198 Wash. 99, 87 P.2d 280

1940 Isham v. Spokane,
2 Wn.2d 392, 98 P.2d 306 (1940)

1941 State ex rel Reilly v. Civil Serv. Comm.,
8 Wn.2d 498, 112 P.2d 987 (1941)

1947 Labor Management Relations Act
as amended, 29 U.S.C. § § 141, et seq.

1954 Stoor v. Seattle,
44 Wn.2d 405, 267 P.2d 902 (1954)

1958 Civil Service for County Sheriffs
Initiative Measure No. 23, and
Chapter 41.14 RCW

1959 Labor Management Reporting and Disclosure Act
29 U.S.C. § § 401-531

1960 State Civil Service
Initiative Measure No. 207, and
Chapter 41.06 RCW

1963 Reynolds v. Kirkland Police Comm.,
62 Wn.2d 720, 384 P.2d 819 (1963)

1967 Public Employees Collective Bargaining Act
Chapter 108, Laws of 1967, Ex. Sess., and
Chapter 41.56 RCW

1973 Interest Arbitration
Chapter 131, Laws of 1973, and
RCW 41.56.430-41.56.490

1976 PERC Created
Chapter 5, Laws of 1975-1976, 2nd Ex. Sess., and
Chapter 41.58 RCW

1977 Arbogast v. Westport,
18 Wn. App. 4, 567 P.2d 244 (1977)

1976- Bellingham Fire Fighters v. Bellingham,
15 Wn. App. 662, 551 P.2d 142 (1976)

1978 Firefighters v. Walla Walla,
90 Wn.2d 828, 586 P.2d 479 (1978)

1978 State Employees v. Community College,
90 Wn.2d 698, 585 P.2d 474 (1978)

1979 Deputy Sheriff's Guild v. Comm'rs,
92 Wn.2d 844, 601 P.2d 943 (1979)

1980 Seattle v. Auto Sheet Metal Workers, Local 387,
27 Wn. App. 669, 620 P.2d 119 (1980)

City of Bellevue,
Decision No. 839 (PECB, 1980)

1981 Yakima v. Yakima Police,
29 Wn. App. 756, 631 P.2d 400 (1981)

1982 Greig v. Metzler,
33 Wn. App. 223, 653 P.2d 1346 (1982)

1983 Pierce County v. Civil Service Commission,
98 Wn.2d 690, 658 P.2d 648 (1983)

Keeton v. Social & Health Servs.,
34 Wn. App. 353, 661 P.2d 982 (1983)

1984 State Employees v. State,
101 Wn.2d 536, 682 P.2d 869 (1984)

Pool v. Omak,
36 Wn. App. 844, 678 P.2d 343 (1984)

1985 Simonds v. Kennewick,
41 Wn. App. 851, 706 P.2d 1080 (1985)

Cleveland Board of Education v. Loudermill,
470 U.S. 532, 84 L.Ed.2d 494, 105 S.Ct. 1487 (1985)

City of Wenatchee,
Decision No. 2216 (PECB, 1985)

1986 Rose v. Erickson,
106 Wn.2d 420, 721 P.2d 969 (1986)

Micone v. Town of Steilacoom Civil Serv. Comm.,
44 Wn. App. 636, 722 P.2d 1369 (1986)

Roberts v. Fire Protection Dist.,
44 Wn. App. 744, 723 P.2d 488 (1986)

1987 Shoemaker v. City of Bremerton,
109 Wn.2d 504, 745 P.2d 858 (1987)

1988 Samuels v. Lake Stevens,
50 Wn. App. 475, 749 P.2d 187 (1988)

1991 Crippen v. Bellevue,
61 Wn. App. 251, 810 P.2d 50 (1991)

Yakima v. Yakima Firefighters,
117 Wn.2d 655, 818 P.2d 1076 (1991)

1992 Pasco v. PERC,
119 Wn.2d 504, 833 P.2d 381 (1992)

1993 Teamsters v. Moses Lake,
70 Wn. App. 404, 853 P.2d 951 (1993)

Dawson v. Daly,
120 Wn.2d 782, 845 P.2d 995 (1993)

1994 Matson v. Civil Service Board [Tacoma],
75 Wn. App. 370 (1994)

1997 Amren v. Kalama,
131 Wn.2d 25, 929 P.2d 389 (1997), and

Limstrom v. Ladenburg,
85 Wn. App. 524, 933 P.2d 1055 (1997)

1998 Civil Service Comm'n v. City of Kelso,
137 Wn. 2d 166, 969 P.2d 474 (1998)

1999 Bunko v. Puyallup Civil Service Comm'n, 95 Wn. App. 495, 975 P.2d 1055 (1999)

Civil Service Commission [City of Kelso] v. City of Kelso, 137 Wn.2d 166 (1999)

Americans with Disabilities Act ("ADA"),
42 USC §12101, et seq.

2001 Bickford v. City of Seattle,
104 Wn. App. 809, 17 P.3d 1240 (Wash. App. Div.1 2001);
review denied, 144 Wn. 2d 1019, 32 P.3d 284 (2001)

2002 Chapter 143, Laws of 2002 Amends RCW 41.12.050 (unclassified positions)

2004 Seattle Police Officers Guild v. City of Seattle,
151 Wn. 2d 823, 92 P.3d 243 (2004).

2005 Leonel v. American Airlines,
400 F.3d 702 (9th Cir. 2005)

2006 Yakima County Law Enforcement Officers Guild v. Yakima County,
133 Wn. App. 281, 135 P.3d 558 (2006)

2010 City of Seattle Police Dept. v. City of Seattle Public Safety Civil Service Comm'n.,
155 Wn. App. 878 (2010)

2010 Skinner v. City of Medina, 168 Wn.2d 845 (2010)

2011 City of Seattle v. Werner, 163 Wn. App.899, 261 P.3d 218 (2011)

2014 City of Medina v. Skinner, 184 Wn. App. 449, 336 P.3d 1172 (2014)

2015 Goding v. King County, 192 Wn. App. 270, 366 P.3d 1 (2015)

2016 McGowan v. City of Asotin, 193 Wn. App. 1052 (2016, unpublished)

2017 AGO 2017 No. 3 (March 20, 2017)

2018 Sprague v. Spokane Valley Fire Dep't, 189 Wn.2d 858, 409 P.3d 160 (2018)

Sheats v. City of East Wenatchee, 6 Wn. App. 2d 253, 431 P.3d 489 (2018)

2019 Bahra v. Cnty. of San Bernardino, 945 F.3d 1231 (9th Cir. 2019)

2020 Sidibe v. Pierce County, 14 Wn. App. 2d 1045 (2020)
Vahle v. City of Lakewood, 14 Wn. App. 2d (1068 2020)

2022 Robertson v. Clover Park Technical College, 20 Wn. App. 2d 1044 (2022)

2024 Chapter 330, WA Laws of 2024 (candidate eligibility; preference points)

2025 Bearden v. City of Ocean Shores, 5 Wn. 3d 1, 570 P.3d 684 (2025) (military leave)

2026 Fair Chance Act, Chapter 49.94 RCW