

Office of Merit Systems Oversight and Effectiveness Digest of Significant Classification Decisions and Opinions October 1999 No. 23-02

Standard: Procurement Clerical and Technician Series, GS-1106 (September 1992)

Factor: Factors 1, 2, 3, 4, and 5

Issue: Evaluation of Credit Card Coordinator Duties

Identification of the Classification Issue

This issue arose in an OPM oversight division's adjudication of the classification appeal discussed in the previous case. As the alternate program coordinator for the International Merchant Procurement and Accounting Card (IMPAC) program, the appellant worked under the general supervision of the Financial Manager. As the liaison between the medical center, headquarters, and the contractor, the appellant: (1) served as a primary point of contact to answer questions on the operation of the program; (2) troubleshot program failures and provided direction and solutions for problem areas; (3) was responsible for issuance and destruction of credit cards; and (4) conducted initial formal training and follow-up training of cardholders and approving officials. As the facility IMPAC Billing Officer, the appellant also performed program audits to ensure compliance with applicable policy and procedures. The appellant claimed that the IMPAC program and prime vendor duties should be classified either to the Supply Systems Analysis, GS-2003 or to the Miscellaneous Administration and Program Series, GS-301.

Resolution

OPM found that the position was not classifiable to the Supply Program Management Series, GS-2003, since the appellant's work was not analytical in nature, but concerned primarily with technician work in support of a procurement program. The GS-2003 is used for positions involved in the management, direction, or administration of a supply program or responsible for analyzing, developing, evaluating, or promoting improvements in the policies, procedures, or techniques of a supply program. Similarly, the appellant's work was not classifiable to the

Miscellaneous Administration and Program Series, GS-301 since the work did not involve two-grade interval general administrative work required for inclusion in this series.

Instead, the oversight division found the appellant's IMPAC program duties to be covered by the Procurement Clerical and Technician Series, GS-1106. This work requires a practical knowledge of procurement procedures, operations, regulations, and programs to serve as an important link between the contractor and various agency or activity personnel and to provide

support to other procurement support staff. OPM found that the appellant's IMPAC and blanket purchase duties were procurement support functions within the meaning of the GS-1106 PCS. The factors and levels, which differ from those in the previous issue or otherwise have an impact on the final classification of the position, are addressed.

OPM found the appellant's applying knowledge of: (1) the IMPAC credit card program, agency, and Federal Acquisition Regulations (FAR); (2) the purchase card database and processing procedures to support bank card transactions; and (3) supply and finance regulations involved the application of a body of standardized procurement regulations and procedures related to one or more procurement functions typical of Level 1-3. As required at this level, the appellant used this knowledge to generate a variety of recurring and special reports, train cardholders, and respond to recurring questions from card users, installation personnel, and vendors. The appellant's knowledge was more specific to the credit card and prime vendor programs rather than to an in-depth or broad body of procurement phases or functions. The problems and issues with which she dealt did not require applying a depth or range of procurement program knowledge on analytically demanding issues found at Level 1-4.

OPM credited the position with Level 2-3 because the appellant planned and carried out her duties with a high degree of independence. She independently resolved most problems and deviations that occurred with cardholders, vendors, and the contractor. As the alternate program coordinator, she updated and provided training to cardholders and approving officials, served as the main resource in answering their questions, and exercised continuing responsibility for program audit and oversight. These functions provided the opportunity for the exercise of discretion not present in the appellant's voucher examining work

OPM found that the appellant used various guidelines such as FAR, agency directives and handbooks, medical center memoranda, and credit card program manuals and instructions. The appellant also utilized judgment and initiative in identifying appropriate procedures with the introduction of the new credit card and in responding to questions and resolving problems. The position, however, failed to meet Level 3-3, where work involves routinely responding to contractor protests or equivalent problems, extracting relevant information, or reconstructing incomplete files. Available guidelines were applicable to most of the appellant's work. Although the appellant was responsible for understanding and advising card users on changes in program policies and procedures, these issues did not occur with the frequency and did not entail the interpretive demands intended at Level 3-3. While the appellant disseminated

changes in program procedures, including those in local program training, her duties did not reflect the interpretation and adaptation of guidelines envisioned at Level 3-3, e.g., devising more efficient methods for procedural processing.

OPM did find that the position met Level 4-3. At this level, the employee identifies the nature of the problem, determines the need for and obtains additional information through oral contacts or written regulations, and considers how previous actions differ from or are similar to the issue at hand before deciding on an approach. The employee also makes recommendations or takes action based on a case-by-case review of the issues or problems involved in each assignment or situation.

The appellant's work as alternate program coordinator for the IMPAC credit card program involved transactions interrelated with other systems such as supply and accounting. The work in implementing the new and revised credit card programs required obtaining additional information through contacts with agency personnel, vendors, and contractors and by reviewing regulations and manuals. In addition, the appellant developed training programs for card users and approving officials and designed local guides and instructions on implementing new or revised program procedures developed by others. OPM concluded these functions reflected the variety and intricacy of tasks as well as the difficulty and originality involved in work warranting the crediting of Level 4-3.

OPM found that these same duties met Level 5-3 and its dual purpose of applying conventional practices to a variety of problems and developing recommendations, solutions, or reports that directly affect customer or vendor relations or operations. Again, as IMPAC Coordinator, the appellant treated a variety of problems in procurement transactions including the investigation and resolution of disputed procurement, credit, and billing errors and the review of purchases to ensure that proper appropriations and cost elements were being charged. This, in turn, resulted in revamping the training for card users, developing local guides for approving officials and cardholders, and monitoring card usage.

By applying the GS-1106 PCS, the total of 1,135 points fell within the GS-6 grade level point range of 1,105 to 1,350 points on the Grade Conversion Table in the GS-1106 PCS. Because the GS-1106 work controlled the classification of the position, OPM reclassified the position as Procurement Technician, GS-1106-6.