

# Classification Appeal Decision

Under section 5112(b) of title 5, United States Code

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**Appellant:** [Appellant]  
**Position:** Social Insurance Administrator  
GS-105-12  
Position Number [#]  
**Organization:** Branch Office  
Social Security Administration  
[Location]  
**Decision:** Social Insurance Administrator  
GS-105-12  
(Appeal denied)

**OPM decision number:** C-0105-12-02

**Copy of decision sent to:**

[Appellant]

Mr. Bert Fowler  
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Director, Center for Personnel Operations  
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S)))))))))  
Linda Kazinetz  
Classification Appeals Officer  
Washington Oversight Division

November 22, 1996  
S)))))))))

Date



U.S. Office of Personnel Management  
Washington Oversight Division  
Office of Merit Systems Oversight

## INTRODUCTION

On May 1, 1996, the Washington Oversight Division of the Office of Personnel Management (OPM) accepted a position classification appeal from [appellant] who is employed as a Social Insurance Administrator, GS-105-12, in [Branch] Office, Social Security Administration (SSA). [The appellant] requested that her position be classified as Social Insurance Administrator, GS-105-13.

This is the final administrative decision of the Government, subject to discretionary review only under the conditions and time limits specified in sections 511.605(c), 511.613, and 511.614 of Title 5, U.S. Code of Federal Regulations.

## GENERAL ISSUES

The appellant makes various statements about her agency and its evaluation of her position. In adjudicating this appeal, we must make our own independent decision solely by comparing the appellant's current duties and responsibilities to OPM standards and guidelines. Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

To help decide the appeal, a representative of this office conducted an on-site interview with the appellant on September 16, 1996, a follow-up telephone interview on October 11, 1996, and a telephone interview with the immediate supervisor on October 11, 1996. In deciding the appeal, we have carefully considered the information provided by the appellant and her agency as well as that developed during the interviews.

## POSITION INFORMATION

The appellant's duties and responsibilities are described in position description which was classified as Social Insurance Administrator, GS-105-12, by the agency on September 15, 1995.

Although the appellant states that she believes the official position description (PD) to be inaccurate, the appellant has presented no specific exceptions to it, e.g., major duties in the PD that the appellant no longer performs, etc. We believe the appellant's statement is an expression of the appellant's disagreement with the **classification** of her position rather than the accuracy of her position description. The appellant is assigned to a generic, standardized PD used throughout the Social Security Administration. Although general in nature, it contains the major duties and responsibilities assigned to the appellant's position and, when supplemented with additional organizational and related information, contains sufficient information to permit its classification. Thus, we found it generally accurate and adequate for classification purposes.

The appellant serves as Branch Manager of the [location] County Social Security Office. She administers all phases of the social insurance program for her branch. The Branch Office services the [geographic location]. The Branch Manager position is responsible for program operations and public relations within the geographical area serviced by the office. The appellant supervises a total of 19 employees. The appellant provides direct supervision to a GS-12 Operations Supervisor and indirect supervision to 12 Claims Representatives and 6 Service Representatives. The full performance level of the Claims Representative position is GS-11, although two incumbents are currently below that level. The full performance level of the Service Representative position is GS-8. Additional information about the appellant's position is provided in the appeal record and from our interview findings.

### SERIES AND TITLE DETERMINATION

#### Series

The appellant does not disagree with the series determination. Our review found that the appellant's position is properly placed in the Social Insurance Administration Series, GS-105.

#### Title

The authorized title for supervisory positions in this series that involve responsibility for planning, administering, and managing social insurance programs is Social Insurance Administrator.

### GRADE DETERMINATION

The appellant's supervisory duties were evaluated by application of the OPM General Schedule Supervisory Guide (GSSG), dated April, 1993, which is used to determine the grade of General Schedule (GS or GM) supervisory positions in grades GS-5 through GS-15. The appellant's position is also covered by the grade level criteria in the GS-105 standard. However, since application of that standard does not influence the grade of the position, it will not be further discussed in this decision. The GSSG employs a factor-point evaluation method that assesses six factors common to all supervisory positions. These are: (1) Program Scope and Effect, (2) Organizational Setting, (3) Supervisory and Managerial Authority Exercised, (4) Personal Contacts, (5) Difficulty of Typical Work Directed, and (6) Other Conditions. To grade a position, each factor is evaluated by comparing the position to the factor level definitions for that factor and crediting the points designated for the highest factor level which is met in accordance with the instructions specific to the factor being evaluated. The total points accumulated under all factors are then converted to a grade by using the point-to-grade conversion table in the Guide.

The appellant has not disagreed with the agency evaluation of Factors 2, 3, 5 and 6. Since our independent evaluation of these factors resulted in the same factor levels awarded by the agency evaluation, they will be discussed only briefly in this decision

#### Factor 1, Scope and Effect

This factor assesses the general complexity, breadth, and impact of the program areas and work directed, including the organizational and geographic coverage. It also assesses the impact of the work both within and outside the immediate organization. To credit a particular factor level, the criteria for both scope and effect must be met.

### a. Scope

This element addresses the general complexity and breadth of: (1) the program (or program segment) directed; and (2) the work directed, the products produced, or the services delivered. The geographic and organizational coverage of the program (or program segment) within the agency structure is to be addressed under Scope.

At Level 1-3, the supervisor directs a program segment that performs technical, administrative, protective, investigative, or professional work. The program segment and work directed typically have coverage which encompasses a major metropolitan area, a State, or a small region of several States; or when most of an area's taxpayers or businesses are covered, coverage comparable to a small city. Providing complex administrative, technical, or professional services directly affecting a large or complex multimission military installation is also creditable at Level 1-3.

The overall criteria just cited are specific only in regard to the geographic aspect of the program. However, the concept of Scope involves more than just geographic coverage. Consideration of both the general factor level criteria and the illustrations yields a general pattern of analysis. Established guidance from OPM's Office of Classification on this issue indicates that there is a dynamic at work which deals with the interaction of four aspects implicit in the concept of Scope: (1) sweep: the geographic coverage of the program (e.g., city, region, or state); (2) magnitude: the total population serviced directly and significantly by the program (e.g., small and confined to an installation, moderate, or large); (3) importance: the importance of the program to the agency and its mission (e.g., whether line or staff, whether involving service to higher agency levels, other agencies, or the general public); and (4) complexity: the complexity of the products or services provided (e.g., routine or complicated).

In deciding whether a position meets a factor level, one must consider each of these implicit aspects and how they interact. No one aspect is necessarily predominant. These are considered in the evaluation of the appellant's position.

The appellant does not disagree with the evaluation of the sweep aspect at Level 1-3. We found that the appellant's position meets Level 1-3 for the sweep aspect. The general factor level criteria at Level 1-3 show that some programs at this level cover a geographic area equal in size to a major metropolitan area. The Level 1-3 illustration shows that other programs cover a geographic area of several rural counties, a small city, or a portion of a larger metropolitan area. Information initially provided by the appellant and the agency indicate that the serviced population is about 200,000. The appellant later provided information indicating a serviced population of about 400,000. In either case, this falls within the range of the Level 1-3 geographic criteria described immediately above.

In evaluating the magnitude aspect, established OPM guidance, as supported in the illustrations and the factor level definition of Effect on pages 11 and 12, stipulates that only the population serviced directly and significantly by the program may be considered. The appellant advocates that magnitude be evaluated differently with respect to the appellant's organization, the Social Security Administration. The appellant argues that the whole population in the serviced area should be counted because the client base of the appellant's organization, unlike other organizations, is virtually the whole population of a given area. However, one cannot simply count the total population in the geographic area covered by the program, as the appellant argues. Only the population serviced directly and significantly has a major and direct effect on the difficulty of the supervisor's job. Thus,

we must evaluate the magnitude aspect for the appellant's position the same way required for positions in other organizations providing services to the general public.

With respect to the magnitude aspect, the agency estimates the Branch Office processed about 17,000 actions in providing direct and significant service to the public during fiscal year 1995. This includes the most complex work of the office such as benefits authorization and claims adjudication and excludes less complex work such as processing social security number requests. Such less complex work is properly excluded since it would not meet Level 1-3 with respect to complexity, and we must consider how magnitude interacts with complexity in evaluating the appellant's position. The appellant uses a different methodology and estimates a lesser number of actions. In any case, this population, 17,000 or less, is smaller than envisioned at Level 1-3. Criteria at Level 1-3 indicates a population equivalent to a small city or portion of a larger metropolitan area. In previous appeal decisions, OPM has characterized populations in excess of 100,000, e.g., 121,000, as equivalent to small cities. Thus, the population directly and significantly serviced by the program under the direction and control of the appellant falls far short of being equivalent to a small city. The population in the appellant's situation is more comparable to Level 1-2 where the population directly and significantly serviced is equivalent to a portion of a small city. Thus, the total population directly serviced by the Branch Office and the significance of the work processed meets Level 1-2.

The appellant does not disagree with the evaluation of the importance aspect at Level 1-3. We found that the appellant's position is properly evaluated at Level 1-3 for the importance aspect. The illustration at Level 1-3 indicates that some offices at this level provide a significant portion of an agency's line program to the general public. Although the appellant's Branch Office does not include some major agency line functions, such as decisions issued by the Office of Hearings and Appeals, it otherwise provides much of the agency's line services to the public, as is intended at Level 1-3.

The appellant does not disagree with the evaluation of the complexity aspect at Level 1-3. We found that the appellant's position is properly evaluated at Level 1-3 for the complexity aspect. As indicated at Level 1-3, the employees in the appellant's organization perform moderately complex technical and administrative work such as benefits authorization, claims adjudication, disability insurance determinations, and complex post entitlement actions.

In summary, the appellant's position meets Level 1-3 with respect to the sweep, importance, and complexity aspects. The position meets Level 1-2 for magnitude. As noted, none of the four aspects is necessarily predominant. Considering all four aspects, how they interact, and the extent to which the appellant's position falls short of Level 1-3 for magnitude, the appellant's position must be evaluated at Level 1-2 for Scope.

#### b. Effect

This element of Factor 1 addresses the impact of the work, the products, and/or the programs described under "Scope" on the mission and programs of the customer(s), the activity, other activities in or outside the Federal Government, the agency, other agencies, the general public, or other entities.

The appellant's position is properly evaluated at Level 1-2 for Effect. This level involves providing services to a moderate, local, or limited population of clients comparable to a major portion of a small city. As discussed above, the Branch Office of the appellant has provided direct and significant service to a population of 17,000 or less. This meets the criteria for Level 1-2 and falls short of the

criteria for Level 1-3, where the population directly and significantly serviced is equivalent to a small city.

With both elements of Factor 1 evaluated at Level 1-2, Factor 1 is properly evaluated at Level 1-2.

### Factor 2. Organizational Setting

The appellant's position meets the requirements of Level 2-1. Like the requirements at Level 2-1, the appellant's position is accountable to a position that is two or more levels below the lowest SES position in the direct supervisory chain. The lowest SES position in the appellant's direct supervisory chain is three levels from the appellant's position, i.e., Regional Commissioner. The appellant reports through a District Manager and Area Director.

### Factor 3. Supervisory and Managerial Authority Exercised

The appellant's position meets the requirements of Level 3-2. Meeting the requirements of either 3-2a, b or c described on pages 15-17 in the GSSG warrants credit at this level. The appellant's position meets 3-2c. The appellant carries out all of the authorities and responsibilities described in 3-2c except development of performance standards, which are developed centrally as national performance standards. The appellant's position does not meet the requirements for Level 3-3 as described in 3-3a and b on pages 17 and 18. The appellant is neither delegated the degree of management authority nor does the size and complexity of the appellant's organization require the exercise of responsibilities to the extent described at Level 3-3 on pages 17 and 18.

### Factor 4. Personal Contacts

This is a two-part factor which assesses the nature and the purpose of personal contacts related to supervisory and managerial responsibilities. The same contacts that serve as the basis for the level credited under Subfactor 4A must be used to determine the correct level under Subfactor 4B.

#### Subfactor 4A. Nature of Contacts

This subfactor covers the organizational relationships, authority or influence level, setting, and difficulty of preparation associated with making personal contacts involved in supervisory and managerial work. To be credited, the level of contacts must contribute to the successful performance of the work, be a recurring requirement, have a demonstrable impact on the difficulty and responsibility of the position, and require direct contact.

The appellant's primary contacts include the staff of the Branch Office, regional support staff, staff in Area Director's office, social services organizations, and private employers. These contacts are comparable to those listed at Level 4A-2 such as members of the business community, higher ranking employees within the agency, and operating or technical level personnel of State and local governments.

Some of the contacts listed by the appellant in support of arguing for a higher level than Level 4A-2 are not a recurring requirement of the position. For example, while the appellant has interacted with local congress members in the course of providing information on Social Security benefits, this is not a recurring requirement of the position. Similarly, the appellant typically contacts the Immigration and Naturalization Service (INS) via telephone about once every other month. The appellant's need

to contact other law enforcement agencies is also infrequent, e.g., Bureau of Alcohol, Tobacco, and Firearms, Federal Bureau of Investigation, and the U.S. Attorney's Office. These contacts with law enforcement agencies are usually efforts to obtain information or verification or report suspected criminal activity. Likewise, the appellant infrequently contacts the U.S. State Department and American and foreign embassies to obtain information or verification.

Other contacts listed by the appellant are more comparable to Level 4A-2 than to Level 4A-3. These include contacts with personnel from advocacy groups and social service organizations. Such contacts are comparable to examples listed at Level 4A-2 such as contacts with representatives of local public interest groups, case workers in congressional district offices, and technical or operating level personnel of State and local governments. Some preparation may be necessary to make some of these contacts, but it is more akin to Level 4B-2, i.e., informal and require nonroutine or special preparation, than Level 4B-3. The appellant's contacts are usually case-oriented and do not require the level of difficulty of preparation associated with making contacts envisioned at Level 4A-3, i.e., extensive preparation of briefing materials or up-to-date technical familiarity with complex subject matter.

In summary, while some of the appellant's contacts approach Level 4A-3, they do not fully meet Level 4A-3 in terms of recurring requirements of the position or the difficulty of preparation in making contacts. Thus, this subfactor is properly evaluated at Level 4A-2.

#### Subfactor 4B, Purpose of Contacts

This subfactor covers the purpose of the personal contacts credited in Subfactor 4A, including the advisory, representational, negotiating, and commitment-making responsibilities related to supervision and management.

At Level 4B-3, the purpose of contacts is to justify, defend, or negotiate in: (1) representing the project, program segment(s), or organizational unit(s) directed; (2) obtaining or committing resources; and (3) gaining compliance with established policies, regulations or contracts.

Established OPM guidance stipulates that all three conditions must be present in order to warrant Level 4B-3. This level requires justifying, defending, or negotiating on behalf of the organization, i.e., having the necessary level of authority to be able to commit resources and gain compliance with established policies of the organization. This guidance further indicates that in order to represent the organization in program defense or negotiations, a manager must necessarily have the requisite control over resources and the authority necessary to gain support and compliance on policy matters.

We find that the purpose of the appellant's recurring contacts are not generally for the purposes required at Level 4B-3, despite the characterization of the purpose of these contacts in the appellant's appeal. The purpose of contacting regional support staff and staff in the Area Director's office is to obtain or exchange information and coordinate technical work and program matters. Similarly, contacts with social services organizations, advocacy organizations, and private employers are primarily made to provide program information, obtain and provide specific case information, resolve problems, and to coordinate work. Most such contacts are easily performed via telephone and, in contrast with Level 4B-3, do not require more formal settings such as conferences, meetings, hearings, or presentations. Likewise, the appellant's presentations to community organizations are not for the purpose of justifying, defending or negotiating the three conditions listed in Level 4B-3, i.e., in representing the organization in program defense, in obtaining or committing resources, and,

in gaining compliance with established policies. The appellant's contacts are comparable to Level 4B-2 where the purpose of contacts is to ensure that information provided to outside parties is accurate and consistent; to plan and coordinate the work directed with that of others outside the organization; and resolve differences of opinion among managers, supervisors, employees, or others. Even most of the infrequent contacts made by the appellant that are discussed in subfactor 4A are generally for the purpose of providing or obtaining information or verification, coordinating work, and resolving specific case problems. Perhaps one event that exceeds Level 4B-2 is the appellant's work with the County Department of Social Services in regard to their Foster Care Program, although the District Director concurred in this project. Again, however, this was a project and not a recurring requirement of the position. We find this subfactor properly evaluated at Level 4B-2.

#### Factor 5, Difficulty of Typical Work Directed

For purposes of this factor (based on the requirements on pages 23 and 24), the appellant supervises 12 GS-11 Claims Representative positions and 6 GS-8 Service Representative positions. The agency estimates about 75 percent of the time of the Claims Representatives are spent performing GS-11 work. In evaluating this factor, we have accepted the agency's determinations on the grade value of the work of the unit and the allocation of that work to the subordinate nonsupervisory positions. Thus, assuming these nonsupervisory positions are properly classified, this indicates that GS-11 work constitutes at least 25 percent of the nonsupervisory workload in the appellant's organization. In accordance with the instructions on pages 23 and 24, the highest level of base work is GS-11 and Factor Level 5-6 is properly credited to the appellant's position.

#### Factor 6, Other Conditions

The highest level that the appellant's position fully meets is Level 6-4. Like the requirements at Level 6-4, the appellant's position requires substantial coordination and integration of GS-11 administrative work. The appellant's position does not involve either of the conditions to meet Level 6-5, i.e., supervising work above the base level or managing work through subordinate supervisors.

#### Summary of Factors

<u>Factor</u>	<u>Level</u>	<u>Points</u>
1. Program Scope and Effect	1-2	350
2. Organizational Setting	2-1	100
3. Supervisory and Managerial Authority Exercised	3-2	450
4. Personal Contacts		
4A, Nature of Contacts	4A-2	50
4B, Purpose of Contacts	4B-2	75
5. Difficulty of Typical Work Directed	5-6	800
6. Other Conditions	6-4	<u>1120</u>
TOTAL POINTS:		2945

The total of 2945 points falls within the GS-12 range (2755-3150) on the point-to-grade conversion chart provided on page 31 of the GSSG.



DECISION

The appealed position is properly classified as Social Insurance Administrator, GS-105-12.

This decision constitutes a classification certificate issued under the authority of section 5112(b) of title 5, United States Code. This decision is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government. Please note that section 511.612, Title 5, U.S. Code of Federal Regulations, requires agencies to insure that their classification of identical, similar, and related positions is consistent with OPM certificates.

DECISION SIGNED ON NOVEMBER 22, 1996