

**U.S. Office of Personnel Management**  
**Office of Merit Systems Oversight and Effectiveness**  
**Classification Appeals and ELSA Programs**



**Atlanta Oversight Division**  
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**Atlanta, Georgia 30303-3109**

**Classification Appeal Decision**  
**Under Section 5112 of Title 5, United States Code**

**Appellant:** [Appellants]

**Agency classification:** Military Personnel Clerk (OA)  
GS-204-5

**Organization:** U.S. Department of Army

**OPM decision:** Military Personnel Clerk (OA)  
GS-204-5

**OPM decision number:** C-0204-05-03

\_\_\_\_\_  
Kathy W. Day  
Classification Appeals Officer

7/13/98

\_\_\_\_\_  
Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

### **Decision sent to:**

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## **Introduction**

On March 18, 1998, the Atlanta Oversight Division, Office of Personnel Management (OPM), accepted a classification appeal for the position of Military Personnel Clerk, GS-204-5, [organizational location, Department of the Army]. The appellants are requesting that OPM determine the proper classification of their position.

This appeal has been accepted and processed under section 5112(b) of title 5, United States Code (U.S.C.). This is the final administrative decision on the classification of the position subject to discretionary review only under the limited conditions and time outlined in part 511, subpart F, of title 5, Code of Federal Regulations (CFR).

## **General issues**

The appellants make various statements concerning the agency and its evaluation of their position. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of their position. By law, we must make that decision solely by comparing the current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Therefore, we have considered the appellants' statements only insofar as they are relevant to making that comparison.

The appellants furnished a copy of a former position description to support their belief that the complexity of the work has significantly increased over a period of time. Under 5 U.S.C. 5112, OPM can consider only current duties and responsibilities in classifying positions. The class, grade or pay system of a position to which the employee is not officially assigned by an official personnel action is neither appealable nor reviewable by OPM (5 CFR 511.607).

There are several employees assigned to the appealed position description. One of the duties in the position description is to serve as the alternate functional administrator for the Installation System Module TRANSPROC II. The appellants believe the duties associated with this assignment are not properly evaluated. The alternate functional administrator duties are only performed in the administrator's absence. Duties performed in the absence of another employee cannot be considered in determining the grade level of a position (chapter 5, Classifiers Handbook).

The appellants used the illustrative examples and excerpts from the grading criteria in the Military Personnel Clerk and Technician Series, GS-204, to rebut the agency's grade determination. The examples included in the level descriptions are intended only to be illustrative of the concept of the grade level. The evaluation of individual positions requires careful attention to both similarities and differences in the nature and scope of work assignments, delegations of authority and responsibility, and the organizational setting of the position being evaluated in relation to the concept of the levels expressed in this standard. Therefore, the position must be evaluated in terms of the entire grade level criteria.

To help decide the appeal, the Atlanta Oversight Division representative conducted telephone audits of the appellants' position on June 12, 1998, and June 17-19, 1998, and requested additional

organizational and workload data. The audits included interviews with the appellants, the immediate supervisor and the deputy manager. In reaching our decision, we considered the audit findings and all the information furnished by the appellants and the agency, including the official position description of record.

### **Position information**

The appellants are assigned to position description number [#]. The appellants, supervisor and agency have certified the accuracy of the position description.

The appellants process a variety of retirement actions and provide assistance and counseling to retired soldiers and their spouses. They conduct one-on-one and group briefings to soldiers and their dependents on retirement rights and benefits, Survivor Benefit Plan (SBP) options and pre-separation procedures. They prepare retirement itineraries and process retirement applications and orders, DD Form 214s, certificates of Release or Discharge from active duty, SBP documents, Officer/Warrant Officer Service Computation Sheets and other retirement documents. They also provide assistance and advice on Veterans Administration (VA) benefits, transportation procedures, medical issues, access to the Defense Eligibility Enrollment Retirement system, pay and other issues.

The appellants review and verify personnel actions relative to retirement and ensure they are in accordance with established regulations and guidelines. They locate missing information and determine eligibility for retirement pay and active and inactive federal service and may reconstruct service history to ensure the accuracy of service computations. They determine approval authority for each application, make a final review and forward completed retirement cases to the appropriate authority. They also maintain files in accordance with agency guidelines and process data sheets to alert the Department of the Army of pending retirements.

The appellants conduct training for new employees, civilian and military, on retirement processing and the use of the Installation Support Module (IMS) TRANSPROC II. They use a word processor or personal computer to compose correspondence. The position requires a qualified typist.

The appellants work under the general direction of a military supervisor. The supervisor outlines mission and objectives for successful operations of the complete retirement services process and is available to provide guidance on policy and procedural changes or unusually difficult cases. Counseling and other duties are performed in accordance with established guidelines, procedures and training. Work is evaluated for efficiency and quality of services rendered as reflected by error rating, inspection results, quality audit of work presented and higher headquarter's inquiries.

### **Series determination**

The agency placed the position in the Military Personnel Clerk and Technician Series, GS-204. The appellants state that they perform counseling, training, and computer troubleshooting duties which

they believe cross several occupational series and are not covered within the Military Personnel Clerk and Technician Series, GS-204.

The GS-204 series includes positions which perform or supervise clerical or technical military personnel work when such work requires a substantial knowledge of the characteristics, requirements and procedures of military personnel programs and operations and the legislative, regulatory, policy and procedural requirements applicable to military personnel transactions and activities. While the official position description of record does include duties associated with counseling, training and responsibility as an alternate Functional Administrator for the ISM TRANSPROC II, based on our findings, the primary duties of the position involve a variety of clerical tasks associated with processing military retirement transactions which are properly covered in the GS-204 series.

### **Title determination**

In accordance with the titling practices outlined in the standard, the position is properly classified as Military Personnel Clerk, GS-204. The parenthetical title, *Office Automation (OA)*, is added to reflect the office automation requirements of the position.

The appropriate title for this position is Military Personnel Clerk (OA).

### **Standard determination**

Military Personnel Clerk and Technician Series, GS-204, June 1967.  
Office Automation Grade Evaluation Guide, August 1991.

### **Grade determination**

The GS-204 series uses three fundamental classification criteria which, taken together, provide a means for measurement of the relative grade value of the work. These are: *Nature of Assignment*, which measures those elements of scope and technical complexity inherent in the assignment; *Level of Responsibility*, which evaluates the effect of various degrees of control over the work, including consideration of the amount and kind of supervision received and the extent to which guidelines are appropriate to (and govern the conduct of) the work; and *Knowledge and Skill Requirements*, which considers the breadth and depth of specialized regulatory, procedural, or program knowledges required to do the work and the personal attributes and skills required for its successful performance.

The position is evaluated as follows:

#### *Nature of Assignment*

At GS-5, assignments involve the independent processing of military personnel transactions which present complex and unusual procedural or substantive issues or the review of completed transactions of the type described at the preceding level. For example, the GS-5 serves as final clerical reviewer

prior to action officer signature or other general organizational approval of military personnel transactions of the type described at the preceding level. Serves as an “authoritative source” in the interpretation of rules and regulations as applied to specific sets of circumstances to which they are not directly applicable. Assignments are complicated by the necessity to reconstruct and verify a wide variety of facts relating to the transaction and to select and apply a variety of rules, regulations, procedures and precedents many of which are inherently complicated, difficult to interpret and not widely or frequently applied. Personal contacts are distinguished from those at GS-4 by the nature of the question or problems dealt with and the degree of authority which is attributed to the procedural or regulatory information supplied. Advice and opinions provided frequently serve as the basis for personal decisions and actions by military personnel or officials in matters having substantial career consequences.

At GS-6, the work involves either clerical or technical assignments in one or more of the three broad areas of military personnel administration. In either situation, the work typically is “case-oriented” and usually involves final decisions (or recommendations which are tantamount thereto) in matters of major career or service significance. For example, serves as final clerical reviewer or as “action officer” in the final review and approval of military personnel transactions of the type described at the preceding level. Also serves as an “authoritative source” in the interpretation of rules and regulations as applied to specific sets of circumstances involving complexities of the type described above. Assignments may be essentially the same as to kind. Differences are manifest primarily in the way in which assignments are approached and carried out. Clerical positions typically are concerned with the correct “literal” interpretation and application of rules, regulations, policies, procedures and precedents to the case at hand. Technicians, on the other hand, are concerned with the exploration of alternative solutions to the problems presented by the case in terms of the intent and spirit of the regulations or of regulatory or procedurally appropriate alternatives. They employ the insights developed through extensive practical knowledge of, and experience with, the particular program area involved and the interpretations given to regulatory requirements and precedents. Personal work contacts at this level are frequent and important. They usually involve the explanation or interpretation of rules or regulations, or the exploration of alternatives relating to highly important or sensitive cases. Assignments are distinguished by the inherent complexity and the career consequences involved in the case and by the “finality” of action inherent in decisions or recommendations made by the incumbents of positions at this level.

The GS-5 level is met. The appellants furnished five samples of service computations which they state represent the typical type of work they perform on a daily basis. While service computations are only a portion of their retirement processing work, the appellants believe the overall complexity of the work is demonstrated in the following samples.

- ▶ Case No. 1 involved a routine computation for a soldier transferring from a reserve unit program into the military service with no break in service. The soldier only had enlisted service with active and inactive service periods computed to determine the total service period.

- ▶ Case No. 2 involved the computation of the total service time for a soldier who was drafted into the armed forces, separated, went to college, completed 3 months of active duty, separated again and then re-entered active duty up to the date of retirement. Based on a thorough analysis of the soldier's 201 file, service microfiche records and other documents, and an in-depth knowledge of the laws, regulations and policies governing service credit, the appellants reconstructed the service record and found that the soldier's ROTC service was incorrectly credited toward active duty time making him appear to be eligible for mandatory retirement. The error was corrected and the retirement request withdrawn. The ROTC service was properly counted for pay purposes which increased the percentage of retirement pay. The additional years of active duty allowed him three additional opportunities for promotion consideration.
- ▶ Case No. 3 involved the computation of brief periods of active reserve duty time towards the total service period for retirement pay purposes. The work involved researching and verifying dates of service from service microfiche, prior DD 214's and a reserve computation sheet to compute the total points that were accrued. Three months of creditable time were found and counted toward his total service for military retirement pay purposes.
- ▶ Case No 4. involved the computation of the total service time for a soldier who had served as a warrant officer in the National Guard, as well as a reserve warrant officer and had breaks in service in between. The dates of service on the reserve personnel form contradicted the dates on the DD 214. The appellants had to review, reconstruct and verify service periods from several service microfiche, numerous orders, and pay vouchers. As a result of the review, additional points for military retirement pay purposes were discovered that resulted in an increase of more than a year of service counted towards the soldier's retirement pay percentage.
- ▶ Case No 5. involved the audit of a reserve service computation and the associated documents to compute the soldier's total reserve service period. The work required auditing the soldier's 201 file, orders and pay vouchers to locate the error. An additional 2 month period of service was found. The documents were returned to the reserve center who amended the retirement orders and awarded the additional service.

The illustrated cases required the application and interpretation of different regulations, rules and statutes, the review and verification of different documents and records relating to service requirements, and the ability to reconstruct and validate periods of service prepared in-house and by other agency components for accuracy prior to the supervisor's signatory approval. Although the supervisor performs a cursory review of completed documents, he does not perform an in-depth technical review of the calculations. The appellants are accountable for the accuracy of the work and perform a quality assurance review of completed work by the staff, as well as service computations completed by other agencies or offices prior to the supervisor's approval. The review and processing of retirement transactions equates to GS-5.

In addition to processing transactions, the appellants are certified by the installation as retirement counselors. They are trained to provide one-on-one and group counseling sessions and to interpret and explain the regulations, policies, and laws affecting the costs and benefits of the SBP program and its relationship to life insurance, taxes, social security benefits and other areas as it affects the retiree's personal situation. The advice and assistance furnished to retirees and their family members serves as a means by which they can make an informed decision to protect eligible surviving family members against a total loss of retirement income. Similar to the GS-5 level, the work involves the interpretation and explanation of a variety of complex laws, regulations, policies and guidelines relating to SBP which impact the family's ability to maintain financial stability in the case of the retiree's death.

The GS-6 is not met. This level requires responsibility for both final clerical review and approval authority, and the appellant's supervisor retains approval authority for all military transactions. Also, the appellants apply the proper rules and regulations that pertain to each specific case; however, they are dealing with retirement regulations and rules that are very specific. They do not routinely have to explore alternative solutions that stay within the intent of the regulations as typically required of GS-6 level technicians.

This factor is properly evaluated at GS-5.

#### *Level of Responsibility*

At GS-6, within the framework of established office policies and procedures, Military Personnel Clerks and Technicians carry out their individual work assignments with a high degree of independence. Typically, incumbents of GS-6 clerical positions are relied upon to provide "authoritative" recommendations or decisions regarding the interpretation or application of regulations and precedent. These frequently are accepted with little or no supervisory review. Incumbents of clerical positions at this level are held responsible for the technical sufficiency and equity of their decisions in all noncontroversial or nonpolicy matters within their sphere of assignment.

At GS-7, technicians in an "operating" situation generate most of their own work. They work in close consultation with the supervisor in work planning. They discuss the problems involved in, or action to be taken, to implement major changes in legislation, policy, or directives which affect the activity's operations. The basic work is defined in broadly written statements of mission, in established regulations, methods and procedures, and in operating directives some of which are detailed and explicit. However, GS-7 technicians assist in determining the contents of internal directives and instructions to assure consistency and continuity in ongoing program operations. The supervisor ordinarily makes final personnel decisions and approves final actions, but typically accepts the technician's decisions and recommendations with cursory review except in cases involving special qualifications, suitability or similar problems. Military Personnel Technicians at this grade have authority and responsibility for independently carrying out all administrative phases of their assignment including (1) making contacts with field offices, (2) making commitments to provide



services and meet time requirements, and (3) providing authoritative explanations of the regulations, methods, procedures and exceptions involved in individual case actions.

The GS-6 level is met. The appellants believe that their level of responsibility for counseling was not properly evaluated and state that they perform the majority of counseling and sign and finalize most of the SBP packets. The immediate supervisor is a military position with high turnover due to rotational assignments of the incumbents. The appellants state some supervisors were trained and certified to sign SBP packets while others did not meet the rank requirement to sign these packets. There were also former supervisors who were trained and either opted to conduct or not conduct counseling. Still, there were others who were not trained and did not perform counseling services or sign packets. Despite the high turnover rate and the fact that the military supervisors may or may not have received training, the billets for the first line and second line supervisors state that they have overall responsibility for the work. The appellants are responsible for the accuracy and sufficiency of their work. The immediate supervisor provides general supervision but does not perform an in-depth technical review of the work. He ensures counseling is conducted in a professional manner, customers receive good service and that counseling is carried out in accordance with training and established practices. Although the appellants sign SBP packets, their signature is for the purpose of witnessing the retiree's selection options as opposed to a signatory approval. The customer, not the appellant, is the authorizing official in the selection of SBP benefits. The appellants work with an unusual degree of independence. However, the supervisor has ultimate responsibility for the accuracy and timely completion of all retirement orders, survivor benefit briefings, and other completed actions of the organization. He has signatory approval authority for all completed transactions.

The GS-7 level is not met. The appellants have a wealth of knowledge and experience in processing retirement transactions and training in SBP counseling. They are capable of handling most problems and answering questions. However, the nature of their assignments is clerical. They do not plan or assist in planning the work of the organization and do not perform any duties which involve technical responsibility for the administrative phases of the work performed. Although the appellants provide comments on proposed guidelines, they do not recommend or determine contents of internal directives or instructions. This authority is retained by the supervisor. The supervisor has overall responsibility for the administrative phases of their assignments and the GS-9 Retirement Officer is the installation expert/authoritative source for SBP and retirement programs policy issues.

The factor is evaluated at GS-6.

### *Knowledge and Skills*

At GS-5, military personnel clerks possess and apply clerical expertise in the area of assignment. They bring to the job a background of specialized knowledges and experience that enables them to interpret and apply precedents, and resolve complex procedural and substantive problems in concluding transactions. They are able to recognize the need for implementing or securing rulings

on, or changes in, rules and regulations. They maintain effective work relationships in and outside of the office and are recognized as a primary point of responsible contact for the work involved.

At GS-6, military personnel clerks must possess a comprehensive knowledge of the majority of the laws, rules, regulations, policies, procedures and precedents relating to their particular area of assignment, and the ability to apply this knowledge in the interpretation and application of regulatory and procedural requirements to complex cases. Military personnel technicians at this level are required to exercise a good knowledge of the overall requirements and objectives of their particular program area in evaluating and making recommendations regarding alternative courses of action. Incumbents of positions of both types must possess substantial skill in interpersonal relationships and in written communications.

The GS-5 level is met. The appellants are experts in the processing of military retirement transactions and SBP counseling. The work requires them to apply a variety of laws, rules, regulations, procedures and precedents to process military retirement transactions and to compute active and inactive service for retirement and pay purposes. They must verify, validate and resolve issues associated with eligibility criteria for retirement and research and investigate discrepancies and inconsistencies in a variety of documents, personnel records, official publications, listings and similar documents. The appellants use judgment to select and apply guidelines and precedents applicable to each specific situation and must recognize circumstances where alternatives or exceptions to regulatory or procedural requirements may be appropriate. However, circumstances where alternatives or exceptions may be applicable are referred to higher headquarters for approval. SBP counseling requires a good understanding of the cost and benefits program facts such as the amount of annuity and level of coverage, beneficiary options, spousal concurrence, second tier of annuity at age 62, supplemental SBP and other considerations. Information on these programs is readily available for reference. The appellants must be well-versed in related subjects such as life insurance, Social Security, VA benefits, and pension maximization to assist the retiree in making an informed decision on SBP, but they refer the retiree to the appropriate federal, state or local government agency for more detailed information on complex and unusual issues. They advise on the earned benefits, and how the retiree can get the most out his/her benefits. The nature of the work does not require the appellants to have specialized knowledge to resolve complex substantive problems.

The GS-6 level is not met. Although the appellants have a comprehensive knowledge of retirement processing and SBP, they do not encounter situations or problems that require them to develop alternative courses of actions. Processing functions are carried out in accordance with established procedural guidelines and instructions. Service or eligibility requirements are mandated by law and regulation. Questionable cases are referred to higher headquarters. SBP counseling requires them to advise on available options so that the retiree can make a final decision. The appellants do not recommend alternatives.

This factor is properly evaluated at GS-5.

**Summary**

The *Nature of Assignment* and the *Knowledge and Skill* factors are evaluated at GS-5. The *Level of Responsibility* is evaluated at GS-6. Since two factors equate to the GS-5 level, the overall grade equates to GS-5.

**Decision**

The position is properly classified as a Military Personnel Clerk (OA), GS-204-5.