

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

**Chicago Oversight Division  
230 South Dearborn Street, DPN 30-6  
Chicago, Illinois 60604**

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

**Appellants:** Appellants' Names

**Agency Classification:** Account Records Clerk  
GS-503-4

**Representative:** Representative's Name

**Organization:** Department of Treasury  
[Name of Bureau]  
[Name of] Operations Office  
Division of Accounts and Reconcilements  
[Name of] Branch  
Search and Correspondence Section  
[City, State]

**OPM decision:** **GS-503-4**  
(Title at agency's discretion)

**OPM decision number:** C- 0503-04-01

/s/

\_\_\_\_\_  
Frederick J. Boland  
Classification Appeals Officer

October 20, 1998

\_\_\_\_\_  
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:**

[name and address of appellants' representative]

[name and address of appellants' servicing personnel office]

Mr. Robert Breivis  
Director of Personnel Policy  
U.S. Department of Treasury  
Room 4164-ANX  
Washington, DC 20220

## INTRODUCTION

The appellants are assigned to position number 97661, which the agency classified as Account Records Clerk, GS-503-4, on August 20, 1997. The appellants believe that they deserve more credit for the independence with which they work, the guidelines they apply, and the complexity of the work itself (Factors 2, 3, and 4 of the classification standard).

The appellants also state that their position should be higher graded because:

The criteria for meeting deadlines is met in the PD as approximately 98 percent of the work completed by the incumbent falls into [Bureau's] initiative to respond to the [security]owner within established deadlines. Also, the incumbent adheres to regulations and cutoff dates regarding withholding of interest in the month preceding an interest payment, changes of address, direct deposit requests and to insure that computer-generated and manually-prepared data are correctly entered into the [Name of] automated system. Work is performed to meet deadlines.

In regard to completed products being evaluated for effectiveness in meeting goals, all work is tracked and reported to the organization to adhere to the [Bureau's] initiative of the "out the door in four" to respond to the [security]owner within established deadlines. Incumbent is responsible to meet that goal as this goal has been directed from the Executive level of the agency.

Not considered in determining the grade level of a position are such issues as work deadlines, volume, or quality. Other areas of the personnel management system take these considerations into account. For example, performance and incentive awards and periodic step increases recognize work load and experience issues not addressed in position classification standards.

## POSITION INFORMATION

The appellants work in the Search and Correspondence Section, [Name of] Branch, Division of Accounts and Reconcilements, [Name of] Operations Office, Bureau [Name], Department of Treasury, [City, State]. The section is comprised of approximately 51 persons, including a GS-12 Supervisory Accounting Assistant, 2 GS-10 Supervisory Accounting Assistants, 2 GS-8 Lead Accounting Assistants, 19 GS-7 Accounting Assistants, a GS-6 Lead Office Automation Assistant, 5 GS-5 Office Automation Assistants, 4 GS-5 Accounting Assistants, 9 GS-4 Office Automation Clerks, 7 GS-4 Account Records Clerks, and one GS-3 Clerk.

The appellants perform a variety of tasks clustered around maintaining the accounts of individual [security] holders. They establish, split, adjust, and consolidate accounts. They withhold, release, and redirect interest on accounts, calculating the amount of money for release or redirection. They review and verify financial documents and process financial transactions that result in interest being paid to [security]holders from their [security] accounts. They ensure that guardianship papers are prepared according to federal regulations for [name of securities] and that those requesting interest payments from accounts where [security]owners have died are actually entitled to payment. They call [security]owners, their representatives, and financial institutions to obtain particulars such as mailing addresses, social security numbers, deposit account numbers, dates of death, and estate information.

The appellants respond to inquiries from the general public pertaining to updating [name] income [security] accounts; releasing funds from undeliverable accounts, receiving notification of nonreceipt

of funds and initiating stop payments or instructions for the redirection of funds; placing holds on interest accounts; consolidating accounts of similar registration and maintaining Automated Clearing House (ACH) and change-of-address files. They also search microfilm records and computer files to retrieve addresses, social security numbers, or other information that will allow them to update a [security]holder's account.

The appellants use form letters or standard paragraphs to prepare written responses to inquiries from Federal Reserve Banks, commercial banks, and [security]owners and their attorneys or representatives. They secure information necessary to make changes on accounts or to appropriately pay interest due to a [security]holder. They also send letters to inform [security]holders when holds are placed on their accounts (e.g., as when the Internal Revenue Service advises the Bureau that [security]holders owe delinquent taxes).

## **ANALYSIS AND FINDINGS**

### **Series and Title Determination**

The appellants' duties fall within the type of work covered by the Financial Clerical and Technician Series, GS-503, which includes clerical and assistant work in support of accounting, auditing, budgeting, or financial management functions when no other established series in the Accounting and Budget Group, GS-500, is appropriate.

The appellants update financial records concerning [Security] accounts and process transactions such as releasing, redirecting, or withholding interest due on the accounts and applying back-up tax withholding to accounts. Because their support work is not covered by a more specific standard in the GS-500 occupational family, the GS-503 series applies.

The GS-503 series prescribes no titles, hence the agency may assign a title consistent with the instructions appearing in the *Introduction to the Position Classification Standards*, Section III, H, 2.

### **Grade Determination**

The Office of Personnel Management (OPM) *Job Family Standard for Clerical and Technical Accounting and Budget Work, GS-500*, dated December 1997, is in Factor Evaluation System (FES) format. This system requires that credit levels assigned under each factor relate to only one set of duties and responsibilities. Under FES, work must be fully equivalent to the factor-level described in the standard to warrant credit at that level's point value. If work is not fully equivalent to the overall intent of a particular level described in the standard, a lower level and point value must be assigned, unless the deficiency is balanced by an equally important aspect of the work that meets a higher level.

Work demanding less than a substantial (at least 25 percent) amount of time is not considered in classifying a position. Similarly, acting, temporary, and other responsibilities that are not regular and continuing are not considered in classifying positions. (Temporary assignments of sufficient duration,

though, are sometimes recognized in accordance with agency discretion by temporary promotion if higher graded duties are involved, by formal detail, or by performance awards.)

### **Factor 1: Knowledge Required by the Position**

*This factor measures the nature and extent of information or facts that employees must understand to do acceptable work, (e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts) and the nature and extent of the skills needed to apply these knowledges.*

The appellants state:

... we are required to have extensive knowledge and understanding of the function of computer-generated reports, searching techniques, departmental memoranda and circulars, agency accounting policies, practices, procedures, and regulations governing the release, redirection, or withholding of interest on current income [securities]. To support the fact that we follow accepted practices in resolving nonrecurring problems we refer to the PD which establishes that the incumbents of this position examines and analyzes, a variety of communications; determines type of information needed and takes necessary action to accomplish desired result.

In response to our request for examples of the type of nonrecurring problems the appellants handle, one of the appellants offered illustrations such as their receiving special notices from the Federal Reserve Bank (FRB) regarding name errors and their processing of improperly completed forms. In both these situations (which call for special handling, but nevertheless are recurring problems) and their other routine work, the appellants, like employees at Level 1-3, apply knowledge of a body of standardized regulations, requirements, procedures and operations. They must ensure a match between the information supplied by the FRBs and their own [Security] account records. If the information differs, their unit's standard practice is to allow no alterations to the account. They sometimes receive a request for a change to an account signed outside the designated area of the change form (e.g., where the printed name and signature blocks are inadvertently reversed). In such cases, they follow standard practice and accept minor irregularities in the completion of the form.

The appellants must have knowledge of [security] processing procedures to support standard and recurring transactions such as releasing, redirecting, or withholding interest; applying back-up tax withholding; and establishing, splitting, adjusting and consolidating [security]holder accounts. The appellants resolve such recurring tasks through the application of set procedures. Such work is characteristic of Level 1-3.

Unlike Level 1-4, their work does not require knowledge of non-standard financial or accounting procedures, or a broad knowledge of financial management regulations, practices, procedures, and policies, such as would be applied to unusually complicated transactions or to the systematic review and analysis of clerical procedures and errors. Unlike Level 1-4, their work does not demand knowledge of a wide variety of interrelated steps, conditions, and procedures or processes such as those required to assemble, review, and maintain complex fiscal transactions (e.g., adjusting accounts or processing applications involving numerous supporting documents; reconciling accounts in systems involving extensive subdivision of accounts, frequent and varied adjustments to accounts, or extensive balancing and reconciling of detailed summary accounts; or resolving problems in balancing accounts, adjusting discrepancies, and developing control records).

We evaluate this factor at level 1-3 and credit 350 points.

## **Factor 2: Supervisory Controls**

*This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work. Controls are exercised by the supervisor in the way assignments are made, instructions are given to the employee, priorities and deadlines are set, and objectives and boundaries are defined. Responsibility of the employee depends upon the extent to which the employee is expected to develop the sequence and timing of various aspects of the work, to modify or recommend modification of instructions, and to participate in establishing priorities and defining objectives. The degree of review of completed work depends upon the nature and extent of the review, e.g., close and detailed review of each phase of the assignment, detailed review of the finished assignment, spot-check of finished work for accuracy, or review only for adherence to policy.*

The appellants state:

We plan our work, resolves routine problems in accordance with instructions policies and accepted practices. Process more difficult cases by applying General Waiver and determining sources of information necessary to complete transaction. For complex or unique situations, we are responsible for accurately analyzing and presenting situation for technical assistance or instruction.

As noted under Factor 1, the appellants process routine updates and changes to accounts following standard procedures and practices. Even when such changes involve minor exceptions to the rule, the procedures for handling such exceptions are clear and specific. They are not free to deviate from these standard operating procedures without consulting their supervisor or a work leader.

Routine or standardized work may appear to be performed with a high level of independence when, in fact, it is the work itself that is closely defined and prescribed. In such cases, employees, like the appellants, do not have an opportunity to perform under less than general supervision. Consequently, Level 2-2 is the most common level of independence and responsibility for clerical and assistant work in grade levels GS-3 thru GS-6.

As at Level 2-2, standing instructions cover the tasks the appellants perform when updating account information, researching names and addresses, processing transactions, etc. These instructions cover what is to be done, applicable policies, procedures and methods to follow, data and information required, the quality and quantity of work expected, the priority of assignments, and the deadlines that apply. The appellants resolve routine problems without supervisory intervention and refer situations not covered by instructions or precedents to their supervisor or a work leader for specific instructions regarding how they should be handled.

Even with special projects, such as "319 holds", where the appellants may be given a batch of 150 undeliverable interest checks to reconcile, standard procedures apply. (The Postal Service only forwards letters for up to one year and since interest checks are only mailed out every six months, checks are often returned as undeliverable.) The appellants search for new addresses, mindful of deadlines for the next mailing and the need to place holds on related accounts (e.g., same [security]owner, same undeliverable address), until a good address is found.

Unlike Level 2-3, the appellants do not independently perform the most difficult procedural and technical tasks. Such tasks, unlike the appellants', involve the independent application of non-standard procedures to unusual situations. The appellants' work, as previously noted, largely concerns recurring types of problems. Unlike the appellants, Level 2-3 employees have the flexibility to independently deviate from standard procedures in order to accommodate unexpected deficiencies, irregularities, varying priorities, etc. The appellants must refer such situations to their supervisor or a work leader for resolution.

We evaluate this factor at Level 2-2 and credit 125 points.

### **Factor 3: Guidelines**

*This factor covers the nature of guidelines and the judgment needed to apply them.*

The appellants state:

Many times because established guidelines do not apply to a specific transaction, the incumbent must use judgment in soliciting, interpreting and applying the appropriate procedure or regulation. (as each transaction is as individual as the [security]owner this in its self supports the fact that the work is not routine and recurring.)

Because of the varied duties involved different processes and approaches are necessary. Because of variations, the incumbent must exercise care and judgment when associating the information to the proper account. Changing regulations and requirements and the need to satisfy the [security]owner add to the complexity of the position.

When asked about precedents that the appellants must research, one of the appellants indicated that the type of precedents they use are memoranda from the Division of Transactions and Rulings (DTR) such as those containing instructions regarding exceptions to sending interest checks in a [security]owner's married name instead of following the prior practice of having to send it in the former name, in care of the new married name (known as the General Waiver).

As at Level 3-2, the appellants have detailed and specific guidelines that are clearly applicable to the full range of situations they typically encounter. For example, they have reference manuals and other guidelines to determine who has the right to know certain details concerning [security]owner accounts, regulations regarding the registration of [securities] and how trusts must be worded to be acceptable as payees of the [security] interest.

Unlike Level 3-3, the appellants do not process complex transactions or perform other tasks lacking specific instructions. Unlike Level 3-3, their assignments do not require interpretation of guidelines and the adaptation of procedures to resolve non-routine problems (e.g., problems referred by other clerks for lack of specific instruction). Rather, they require judgment in selecting the correct processing procedure from established alternatives, as at Level 3-2.

We evaluate this factor at Level 3-2 and credit 125 points.

#### **Factor 4: Complexity**

*This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.*

The appellants state they:

Apply General Waiver when necessary, research precedents or (in) unique or unusually complex situation that guidelines or reference material does not cover, we analyze the case and send it to lead or supervisor for advice.

As noted under Factor 3, the appellants typically follow standard operating procedures to update accounts and records, even when the updates involve exceptions. They offer no specific examples of work beyond the complexity level with which they are already credited. As at Level 4-2, their decisions and actions follow established instructions and practices governing the maintenance of accounts. The actions they take are similar and well established, although the specific procedures differ depending on the circumstances involved. For example, the appellants handle some transactions, such as FIN wires, differently from others. Some accounts require that interest on [securities] earned after a certain date be direct deposited. The appellants must determine if these accounts must be split, depending on whether some of the interest was earned prior to the required date and some after. These transactions, however, and the factual determinations the appellants make concerning them, are governed by clear and specific procedures.

The appellants' work does not require the judgment and evaluation characteristic of Level 4-3. For example, unlike employees at Level 4-3, they do not analyze guidelines and manuals to discern how troublesome transactions or complex discrepancies differ from the routine and determine the manner in which they should be handled. They do not process transactions that are interrelated with other systems and that require extensive coordination with other personnel prior to posting. They do not reconcile various types of transactions involving multiple funds or a number of different control accounts, or numerous modifications to contracts, or perform work of an equivalent nature.

We evaluate this factor at Level 4-2 and credit 75 points.

#### **Factor 5: Scope and Effect**

*This factor covers the relationship between the nature of the work (i.e., the purpose, breadth, and depth of the assignment) and the effect of work products or services both within and outside the organization. Only the effect of properly performed work is to be considered.*

##### **Scope**

As at level 5-2, the purpose of the appellants' work is to apply well-defined and specific program procedures and regulations to processing a full range of routine account maintenance tasks. Unlike Level 5-3, their work does not demand investigating and analyzing a variety of problems such as reconciling complex record discrepancies, processing nonstandard transactions, providing advice to other accounting clerks on probable sources of errors and correction procedures, etc., where the solutions are not always covered by established or standardized procedures.



We evaluate Scope at Level 5-2.

### **Effect**

As at Level 5-2, the appellants' work affects the accuracy of further processes performed by other accounting personnel and the reliability of the Bureau's financial services provided to its customers. Their timely and accurate entries, correction of record data, calculation of interest, etc., ensure customers receive interest checks on time.

Some of their work also aids others agencies, e.g., placing holds on accounts when there are debts owed to Internal Revenue Service. However, unlike Level 5-3, their work does not directly and significantly affect the efficiency of internal or external accounting system operations, e.g., as would recommending changes to procedures impacting the integrity of the overall general ledger. Neither does their properly performed work significantly affect the economic well-being of the Bureau's customers.

We evaluate Effect at Level 5-2.

We evaluate this combined factor at 5-2 and credit 75 points.

### **Factor 6: Personal Contacts and Factor 7: Purpose of Contacts**

*The standard treats Factors 6 and 7 together. Factor 6 (Levels 1 to 3) includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. Levels of this factor are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place (e.g., the degree to which the employee and those contacted recognize their relative roles and authorities). Factor 7 (Levels A to C) addresses the purpose of personal contacts, which may range from factual exchange of information to situations involving significant or controversial issues and differing viewpoints or objectives. The contacts credited under Factor 6 must be the same contacts credited under Factor 7.*

### **Personal Contacts**

The appellants' external contacts are with customers, bank personnel (including customer service, trust department, and direct deposit department representatives, and sometimes a vice-president of a bank or other financial institution), representatives from Federal Reserve Banks that call with questions; state, county, and local government officials; and [security]owners or their attorneys and representatives.

As at Level 2, the appellants' contacts occur in a moderately structured setting (i.e., the contacts are generally established on a routine basis, usually at the employee's work place; the exact purpose of the contact is frequently unclear at first to one or more of the parties and one or more of the parties may be uninformed concerning the role and authority of the other participants). Though they sometimes contact attorneys, such contacts do not involve significantly greater difficulty than their other contacts.

The main difference between Level 2 and 3 contacts lies in the greater difficulty of communicating with Level 3 contacts. Level 3 contacts do not follow a routine course and may attract media or political interest. The appellants' communications are significantly more structured than the moderately unstructured communications at Level 3, where attorneys challenging unproven regulations may exercise significant control over agendas and raise novel issues. The appellants' contacts are more circumscribed by the limited information they must obtain and exchange to process their transactions.

We evaluate Personal Contacts at Level 2

### **Purpose of Contacts**

As at Level A, the purpose of the appellants' contacts is to exchange information, ranging from easily understood to more technical information, concerning account assignment, address changes, interest release or redirection, processing procedures, or the advantages of direct deposit. Unlike Level B, the purpose is not to plan or coordinate work efforts (e.g., between work units) or to resolve operating problems (e.g., systemic problems causing erroneous transaction records) or to influence others to cooperate in resolving complicated transactions.

We evaluate these combined factors at Level 2-A and credit 45 points.

### **Factor 8: Physical Demands**

*This factor covers the requirements and physical demands placed upon the employee by the work assignment. This includes physical characteristics and abilities and physical exertion involved in the work.*

As at Level 8-1, the appellants' work is sedentary and free of the special physical demands indicative of higher credit levels, e.g., considerable walking, stooping, bending, and climbing,

We evaluate this factor at Level 8-1 and credit 5 points.

### **Factor 9: Work Environment**

*This factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required.*

As at Level 9-1, the appellants' work is performed in an office setting and, unlike higher credit levels, requires no special safety precautions to counter moderate risks or discomforts.

We evaluate this factor at Level 9-1 and credit 5 points.

**FACTOR LEVEL POINT SUMMARY**

Factor	Level	Points
1	1-3	350
2	2-2	125
3	3-2	125
4	4-2	75
5	5-2	75
6 & 7	2-A	45
8	8-1	5
9	9-1	5
	<b>Total:</b>	<b>805</b>

The table above summarizes our evaluation of the appellants' work. As shown on page 27 of the standard, a total of 805 points converts to grade GS-4 (655-850).

**DECISION**

The position is properly classified as GS-503-4, with the title at the discretion of the agency.