

**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

Agency Classification: Medical Administration Assistant
GS-301-8

Organization: Department of Veterans Affairs
VA Medical Center
address
city and state

OPM decision: GS-303
Title at agency discretion

OPM decision number: C-0303-00-01

Jon M. Sebastian

Frederick J. Boland
Classification Appeals Officer

May 21, 1999

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).

The certificate must be implemented no later than the beginning of the sixth pay period following the date of the decision, but not earlier than the date of the decision.

Decision sent to:

Appellants
VAMC Admissions
4801 8th Street North
St. Cloud, Minnesota 56303

Supervisory Personnel Management
Specialist
VA Medical Center
address
city and state

Mr. Ronald E. Cowles
Deputy Assistant Secretary for Human
Resources Management
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, D.C. 20420

Introduction

The appellants are assigned to position number 3621A, classified as Medical Administration Assistant, GS-301-8. The position is located in the branch of the VA Medical Center, city and state. The appellants believe their position description is accurate, but feel it deserves more credit than their agency allowed when it applied the Administrative Analysis Grade Evaluation Guide.

The appellants believe that their position is similar to a higher graded prototype position referenced in VHA Directive ###-### and Personnel Circular Letter No. ##-##-##-#. The circular suggests, but does not mandate, possible ways medical centers may organize work. The prototype description is one way of organizing work in an area related to the appellants' work. However, by law, positions are classified based on their duties, responsibilities, and qualification requirements by comparison to the criteria specified in the appropriate Office of Personnel Management (OPM) classification standard or guide. Other methods of evaluation, such as comparison to other positions or prototype positions, are not permitted.

The appellants also voice a general concern about higher graded positions at the city and state and city and state Medical Centers. Agencies must apply classification standards and OPM decisions consistently to ensure equal pay for equal work. OPM will require an agency to conduct a consistency review upon showing that specifically identified positions at different grades have identical duties. Accordingly, our letter transmitting this decision requests that the agency further respond to this issue, which it generally addressed in earlier correspondence with the appellants, should the appellants identify the title, series, grade, and organizational location of a specific higher graded position and the duties they believe to be the same.

Position Information

The appellants are part of the approximately 16 member staff of the branch, which includes, in addition to the 5 appellants, 5 GS-5 Claims Clerks, 2 GS-6 Voucher Examiners, 2 GS-5 Program Support Clerks, and a GS- 4 Information Receptionist who report to a GS-303-11 Supervisory Clerk.

The appellants provide a range of medical administrative support services in order to ensure that procedural, regulatory, and administrative requirements are met as they relate to the care, treatment, and handling of patients. Their duties include processing admissions of patients, determining eligibility for benefits and services, and responding to telephone inquiries regarding services and other administrative matters. They coordinate with the Medical Officer of the Day (MOD) to resolve patient or family complaints, arrange patient transfers to and from the Medical Center, and advise on related administrative matters. The appellants also process forms resulting from patient deaths or elopements (unauthorized absences), respond to incidents that require immediate action, e.g., search for missing patients, fires or other emergencies, and perform various other duties such as completing daily report logs and entering daily gains and losses into a computer.

Analysis and Findings

Series Determination

The appellants' primary responsibility is to apply established policies, procedures, and practices to resolve a wide range of recurring administrative issues and problems. Their work does not require knowledge of general management principles, inherent in two-grade interval administrative work, like the Miscellaneous Administration and Program, GS-301, series, but rather knowledge of an extensive body of rules, procedures, and practices that govern the Medical Center's daily operation.

Unlike the appellants' work, two-grade interval administrative work requires a high degree of analytical ability combined with a comprehensive knowledge of the functions, processes, theories and principles of management, and the methods used to gather, analyze, and evaluate information. Such work typically involves planning for and developing systems, functions, and services; formulating, developing, recommending, and establishing policies, operating methods, or procedures; and adapting established policy to the unique requirements of a particular program.

In contrast, the appellants typically follow detailed (usually written) procedures that require program knowledge and practical experience to apply, rather than knowledge of management or administrative principles. Program knowledge and practical experience govern their decisions and written procedures provide guidance when admitting patients, determining eligibility for medical care, providing patient transportation, safeguarding patients' clothing and valuables, providing emergency services to veterans, etc.

Though their position description states that they conduct analytical studies of problem areas, investigations, and systemic reviews (work that two-grade interval Specialists perform), we found little to support the statement. In response to our request for specific work examples of such studies, the appellants described narrow assignments emphasizing a practical approach to resolving singular issues. One example cited was establishing the proper paper work to meet the legal requirements of transporting bodies for autopsies. Another example was establishing a procedure appropriately coding the placement of veterans from the Nursing Home Care Unit or Domicile into observation status at the Medical Center. Neither of these problems involved the broader scope and analyses common to Specialist work, where detailed analyses of administrative procedures, work processes, work distribution, or equivalent areas require skill in preparing written reports to brief managers on the interpretations and judgment underlying the Specialist's findings and recommendations.

In contrast to appellants' work, Specialist work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives. The appellants do not perform studies of the depth and breadth typically assigned to two-grade interval Specialists, e.g., broader studies of Medical Center systems, procedures, program effectiveness, or organizational structure. Although two-grade interval administrative work does not require specialized education, it does require the types of skills (analytical, research, writing, judgment) typically gained through a college education or through progressively

responsible equivalent experience. Administrative work entails analyzing, evaluating, modifying, and developing the basic programs, policies, and procedures that facilitate the work of Federal agencies and their programs. Specialists apply knowledge of administrative analysis, theory, and principles in adapting practices to the unique requirements of a particular program.

Like other one-grade interval Assistants, the appellants carry out their duties based on the application of established methods and procedures. They apply practical knowledge of the purpose, operation, procedures, techniques and guidelines of the specific program or functional requirement. Like other Assistants, they typically learn their work on the job and attend specific training courses related to their work. Consequently, the appellants' position is properly classified to a one-grade interval line of work, rather than to the GS-301 series.

As noted above, their work consists of a variety of intermingled administrative and technical support functions, ranging from advising on patient eligibility to implementing emergency plan procedures. Specialized program knowledge is required in each of these functional areas, with none of them predominant. Because there is no single series specifically covering these specialized functions, the appellants' work is classified to the Miscellaneous Clerk and Assistant, GS-303 series. The GS-303 series covers one-grade interval work not classifiable elsewhere. It includes positions like the appellants' where the duties are to perform technician, assistant, or clerical work requiring knowledge of the procedures and techniques involved in carrying out the work of an organization within the framework of established guidelines.

The GS-303 series prescribes no specific 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.

Decision

The proper series classification of the appellants' position is GS-303, with the title at the discretion of the agency.

Positions classified to the GS-303 series are graded by application of the Grade Level Guide for Clerical and Assistance Work, unless another one-grade interval guide or standard contains more appropriate grade level criteria for evaluating the work. The agency has first level classification authority and the responsibility for determining the grade by applying the appropriate criteria, which differs from that originally used. Once the agency has done so, the appellants may pursue their appeal if dissatisfied with the results.