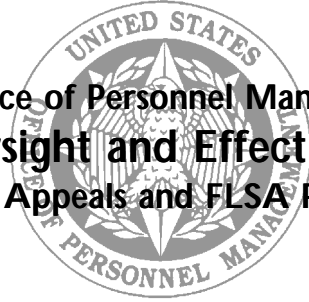


U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA Programs



San Francisco Oversight Division
120 Howard Street, Room 760
San Francisco, CA 94105

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

Appellant:	[The appellant]
Agency classification:	Corpsmember Clerk GS-303-4
Organization:	[The appellant's installation] U.S. Forest Service U.S. Department of Agriculture
OPM decision:	GS-303-4 title at agency discretion
OPM decision number:	C-0303-04-03

Carlos A. Torrico
Classification Appeals Officer

July 26, 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).

Decision sent to:

[The appellant's address]

[The appellant's servicing personnel office]
U.S. Forest Service
U.S. Department of Agriculture

Ms. Linda D. Goodman
Director

[The appellant's agency]
U.S. Forest Service
U.S. Department of Agriculture
P.O. Box 25127
Lakewood, CO 80225-0127

Personnel Director
U.S. Forest Service
U.S. Department of Agriculture
P.O. Box 96001
Washington, D.C. 20013-6090

Director
Office of Human Resources Management
U.S. Department of Agriculture
J.L. Whitten Building, Room 320W
1400 Independence Avenue, SW
Washington, D.C. 20250

Introduction

On January 19, 1999, the San Francisco Oversight Division of the U.S. Office of Personnel Management (OPM) received a classification appeal from [the appellant]. Her position is currently classified as Corpsmember Clerk, GS-303-4. However, [the appellant] believes that the position should be classified at the GS-5 grade level. Prior to appealing to OPM, [the appellant] appealed the classification of her position to her agency. In an appeal decision to her from the Forest Service, [the appellant's agency], dated October 30, 1998, the agency sustained the current classification. The appellant works in the [the appellant's installation]. We have accepted and decided her appeal under section 5112 of title 5, United States Code (U.S.C.)

General issues

This appeal decision is based on careful review of all information submitted by the appellant and her agency, as well as telephone interviews with the appellant and her supervisor. Both the appellant and her immediate supervisor have certified to the accuracy of the appellant's official position description (number 51071718) dated January 7, 1998.

In her appeal letter to OPM, the appellant made reference to performing specific duties as listed in a Corpsmember Clerk, GS-303-5, position as the basis for her agency appeal. Even though the appellant said that she was no longer making a direct comparison to the position she referenced, it is important to note that other methods or factors of evaluation, such as comparison to other positions, are not authorized for use in determining the classification of a position. Such positions may or may not be classified correctly, or may differ significantly from the appealed position, even if apparently similar in some ways. In addition, in her appeal to OPM the appellant compares her student accountability duties to another center's Standards Officer at the GS-7 level, who is responsible for tracking students for attendance purposes. As stated above, we must classify positions solely by comparing the appellant's duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding her appeal.

The appellant discusses several issues regarding the efficient way in which she carries out her duties and the accuracy of her work. The Classifier's Handbook, which is dated August 1991 and serves as official guidance on the use of the position classification standards, lists several factors which should not be considered in determining the grade level of a position. Included in this list on page 47 of the Handbook are issues such as volume of work, quality of work and efficiency of performance. The Handbook goes on to indicate that other areas of the personnel management system take these considerations into account and tools, such as performance and incentive awards, are used to deal with issues not properly resolved through the classification of positions.

Position information

The appellant is responsible for receiving student information, processing and inputting student pay and personnel data into automated files, and arranging for student travel to the Center. [The appellant] interviews new enrollees for verification of information received from various admissions sources and for any additional information not received, e.g., date of birth, next of kin, vaccination information. She also prepares student identification cards and residential living cards using a digital camera system. The appellant maintains student attendance accountability records and funds control information on student clothing allowance and the student's performance incentive program. The Center receives approximately 350 new enrollees each year. Ten to fifteen new enrollees are received every two weeks for pay and personnel processing.

The results of our interviews, the position description, and other material of record provide additional information about the duties and responsibilities of this position and how they are carried out.

Series, title, and standard determination

The appellant's work primarily involves one-grade interval clerical work for which no other series is appropriate. We find that the appellant's position is best placed in the Miscellaneous Clerk and Assistant Series, GS-303. According to page 4 of the GS-303 standard (dated January 1979), OPM has prescribed no titles for positions in the GS-303 series. Therefore the title of the appellant's position is at the discretion of the agency. Neither the appellant nor the agency disagrees with either the series or title determination.

The standard for the GS-303 series contains no grade level criteria. We find that the work of the appellant's position is best graded by means of the Grade Level Guide for Clerical and Assistance Work, dated June 1989. Neither the agency nor the appellant disagrees.

Grade determination

The Clerical Guide uses two classification factors to evaluate the work of positions: Nature of Assignment and Level of Responsibility. Our evaluation by reference to those factors follows.

Nature of Assignment

As indicated on page 11 of the Guide, work at the GS-4 level consists of performing a full range of standard clerical assignments and resolving recurring problems. We find that the appellant has comparable work assignments. The record indicates several standard clerical assignments, such as receiving electronically new student records and making travel arrangements using the Outreach and Admissions Student Information System (OASIS), inputting and maintaining student records in the Electronic Incentive (ELCID) student data base, and maintaining student accountability and performance records in the Student Pay Allotment Management Information System (SPAMIS).

The appellant is responsible for insuring that all documents are present, complete, in proper sequence, and that necessary steps have been followed in processing. The appellant is also required to solve recurring problems. For example, the appellant indicates that she is responsible for database management. She identifies database problems and corrects or reports information to the Region. Similarly, the position description indicates that the appellant is responsible for learning and implementing new programs and software to improve data base. The appellant evokes commands and codes necessary to retrieve student information from data bases, such as ELCID and SPAMIS for specific reports.

The Guide also notes that work at the GS-4 level requires the ability to recognize differences among a variety of recurring situations and that actions to be taken or responses to be made differ in nature and sequence because of differences in the particular characteristics of each case. The appellant's position favorably compares to that criteria. For example, the record indicates that the appellant is responsible for gathering information from new and current students who are sometimes hostile, apprehensive and possess limited language and communication skills. In addition, as the first contact for new enrollees, the appellant must work through initial problems which each student's case presents. The appellant believes that the uniqueness of each student, parent's contacts and student record changes are the nonrecurring nature of her position. We did not find this to be supportable. While each student at the Center has unique sets of information and different circumstances and needs, the data record requirements remain the same. In addition, the appellant's duties are structured, following predictable and/or prescribed steps, e.g., gathering information, contacting the parent or legal guardian in an emergency involving a minor, referring hostile students to Center management.

According to the Guide, in addition to knowledge of how to carry out procedures, GS-4 level work requires some subject-matter knowledge of an organization's programs and operations, and a body of standardized rules, processes or operations. We find that the appellant's position requires similar knowledge. As discussed above, she is the first representative at the Center to have contact with new enrollees. As such, she needs subject-matter knowledge to answer processing and program questions and to present a "positive" image of the Center. This also includes an operational knowledge on the handling of confidential information and processing of this information in accordance with Center policy, and Forest Service and Department of Labor requirements.

Pages 12-14 of the Guide describe and provide an example of GS-5 level clerical work. The work at that level consists of performing a full range of standard and nonstandard clerical assignments and resolving a variety of nonrecurring problems. The record shows that the appellant is responsible for fielding questions from concerned parents, law enforcement officials, the courts and other outside agencies. The purpose of these contacts is mainly to exchange information and to deal with parent concerns regarding student problems and issues, e.g., student unhappiness with enrollment at the Center, student desires to leave, no mail delivery, etc. We find that the appellant is responsive to routine questions where a simple remedy or answer exists, and that the focus of her work is on carrying out standard clerical assignments. All persistent and difficult

issues and problems are referred to the counselors on their onsite arrival, or to the Center's Director or Deputy Director, if an emergency exists or an immediate resolution is necessary.

The standard indicates that GS-5 level work also requires extensive knowledge of an organization's rules, procedures, operations, or business practices to perform more complex, interrelated, or one-of-a-kind clerical processing procedures. The example given in the standard involves the use of extensive knowledge including knowledge of the Tariff Act, (Customs) Inspectors Manual, and other guides, to perform not only standard, recurring tasks, but nonstandard, complex ones, such as discerning whether entries require further analysis by inspectors because of possible fraud, controlled substances, and prohibited cargo. The record provides no evidence that the appellant regularly uses knowledge as extensive as that described as typical of the GS-5 level for the purposes discussed above.

The appellant notes that there is no one in the entire Center that has the knowledge of the PhotoImpact - digital images system. She has had to learn the use of the PhotoImpact system on her own and on the job. She also mentions her use of the internet and her training of others to use the internet to support her higher graded duties. For the reasons discussed in the preceding paragraphs, we find that these assignments are most comparable to the GS-4 level.

Level of Responsibility

The appellant's responsibilities are most similar to the GS-4 level described on page 11 of the Guide. For example, the standard indicates that GS-4 level employees use initiative to complete work in accordance with accepted practices. Similarly, the appellant's position description indicates that she is responsible for keeping student attendance records and for tracking students during the day, and accounting for student absences in the schedule. She posts students' records for home leave, medical leave, day leave and absent without approval. She also searches for and locates students on the Center to inquire about their reasons for their absence, sometimes talking to hostile students. She also ensures that student records are accurate and complete. Similar to the GS-4 level, her supervisor provides little assistance with recurring assignments. However, unusual problems or assignments not previously encountered are discussed with the supervisor.

The standard indicates that the procedures for the work of the GS-4 level employee have been established, and a number of specific guidelines are available. We find that the guidelines used by the appellant meet this level. For example, the position description indicates that procedures for student input, student records and mail are well established in Forest Service, Department of Labor and Center guidelines. In addition, handbooks and user's manuals are available for computer programs.

The appellant notes that there are situations where policies are developed by the Region without implementation guidance from the Region. In that regard, she cites as an example her development of an implementation program for the Center's application of the "Dress For Success" program. However, the record indicates that a local committee developed the specific

standards and the appellant was responsible for implementing a process by which the standards were to be accomplished, i.e., contacting and establishing a vendor in town to purchase clothes for students, notifying the department store prior to a shopping visit and informing the students of acceptable clothing choices and expenditures. Program objectives and specific parameters, including specified spending amounts were clearly prescribed. Her responsibilities in this process would not exceed the GS-4 level.

Contacts at the GS-4 level involve co-workers, and others outside the organization to exchange information, and in some cases, to resolve problems in connection with the immediate assignment. We find that the appellant's contacts as indicated in her position description are comparable to the GS-4 level. We note that the purpose of the appellant's contacts is to exchange information relative to students' folders, status, pay and for new-input, which is comparable to the GS-4 level. The appellant mentioned that she was responsible for providing counseling to students. However, we find that her contacts with students as described in the record are solely to exchange information, e.g., to complete new student records, to update current student records, or to record and account for the students' movements during the day. Problems requiring counseling are referred to a counselor and/or the Center Director. The GS-4 level is met.

The level of responsibility of the appellant's position fails to meet the GS-5 level (page 13) where the supervisor assigns work by defining objectives, priorities, and deadlines, and where completed assignments are evaluated for technical soundness, appropriateness, and effectiveness in meeting goals. In addition, at the GS-5 level due to the number and similarity of guidelines and work situations, the employee uses judgement to locate, select and adapt the most appropriate guides. In contrast, similar to the GS-4 level the appellant independently plans and performs recurring work in accordance with accepted practices and within overall objectives and priorities, resolving normal conflicts according to established procedures and previous experience, and occasionally making only minor deviations from guidelines. Like the GS-4 level only unusual or complex assignments may require assistance from the supervisor. The record provides no evidence that the appellant regularly receives assignments that require the kind of direction and review typical of the GS-5 level, or routinely adapts guides to the extent envisioned in the Guide at the GS-5 level.

Since both classification factors of the Guide have been evaluated at the GS-4 level, the appellant's position is properly graded at that level.

Decision

The appellant's position is properly covered by the Miscellaneous Clerk and Assistant Series, GS-303, graded at the GS-4 level and titled at the agency's discretion.