

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

**Atlanta Oversight Division
75 Spring Street, SW., Room 972
Atlanta, GA 30303**

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

Appellant:	[appellant]
Agency classification:	Administrative Officer GS-341-12
Organization:	Department of Veterans Affairs Medical Center
OPM decision:	Administrative Officer GS-341-12
OPM decision number:	C-0341-12-03

Kathy W. Day
Classification Appeals Officer

10/14/99

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:

[appellant]

[appellant's agency]

Deputy Assistant Secretary for
Human Resources Management
Department of Veterans Affairs
Washington, DC 20420

Introduction

On August 26, 1999, the Atlanta Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. Her position is currently classified as Administrative Officer, GS-341-12, Department of Veterans Affairs (VA) Medical Center, [city/state]. However, she believes her position should be graded at the GS-13 level.

The appeal has been accepted and processed under section 5112(b) of title 5, United States Code. 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.

General issues

The appellant states that the position she occupies was previously classified at the GS-13 level. She also states that other administrative officer positions at lower organizational levels within the medical center are graded at the GS-13 level, and she believes her position should be graded consistently with those positions. She also makes various statements about the agency's evaluation of the position.

By law, OPM must make classification determinations solely by comparing the current duties and responsibilities of the position to OPM standards and guidelines (5 U.S.C. 5106, 5107, 5112). Since comparison to standards, not other positions, is the intended and exclusive method for classifying positions, we may not consider the classification of other positions as a basis for deciding an appeal. In addition, OPM's decisions are independent of any agency evaluations. Therefore, we have considered the appellant's statements concerning the agency evaluation only insofar as they are relevant to our decision.

To help decide the appeal, the Classification Appeals Officer conducted telephone audits of the appellant's position on September 24 and 29, and October 6, 1999. The audits included interviews with the appellant and her immediate supervisor, as well as the servicing classifier. In reaching our classification decision, we considered the audit findings and all the information furnished by the appellant and the agency, including the official position description of record.

Position information

The appellant is assigned to position description number 0276. The appellant, supervisor and agency have certified the accuracy of the position description.

The appellant serves as the Administrative Officer in the Office of the Chief of Staff in a general medical and surgical hospital with approximately 520 beds and 300 long term care beds. The

Chief of Staff is responsible for all clinical services; medical education, training and research; the Quality Management Program; and the Women Veterans Program. The appellant's responsibilities include a variety of management services such as providing administrative support and program analysis; acting as a coordinator, trouble shooter, and liaison providing advice and assistance to other administrative officers in the clinical services; conducting studies of manpower, space, budget and equipment utilization; representing the Chief of Staff on top management teams; identifying problem areas based on review of hospital activity; maintaining medical center By-Laws, Rules, and Regulations; and functioning as a resource person for the Chief of Staff and Medical Center Director during long-range planning and in the formation of hospital policy. She reviews reports and identifies trends and out-of-line situations requiring management attention including investigating the situation and making recommendations for correction or further review. She also analyzes workload, cost and productivity data in order to advise and assist the Chief of Staff in determining appropriate distribution of resources. She reviews requests for resources and returns those that are inadequate or not in compliance with VA or hospital policy. The appellant is responsible for the day-to-day supervision of the credentialing and privileging program and assists Quality Management with preparation for accreditation surveys. She is responsible as the control point for the consulting/attending program and the fee-basis program which requires accounting for monies spent and documenting unexpected expenses. In addition, she oversees preparation and updating of policy memoranda, prepares position descriptions for forwarding to the personnel office, and serves as chairman of the Controlled Substance Inspection team.

The appellant is under the general supervision of the Chief of Staff and performs her duties and responsibilities without technical supervision and review. Decisions and recommendations require substantial experience and sound judgment. She has the authority to represent the Chief of Staff in various meetings and other situations.

Series determination

The agency determined that the appellant's position is properly placed in the GS-341, Administrative Officer, series. We agree with that determination.

The GS-341 series includes positions in which the employees are responsible for providing or obtaining a variety of management services essential to the direction and operation of an organization. The paramount qualifications required are extensive knowledge and understanding of management principles, practices, methods and techniques, and skill in integrating management services with the general management of an organization.

Title determination

The title *Administrative Officer* is established for all nontrainee positions in this series.

Standard determination

Administrative Officer Series, GS-341, dated August 1966 and February 1968.
Administrative Analysis Grade Evaluation Guide, dated August 1990.

Grade determination

The Administrative Analysis Grade Evaluation Guide provides grade level criteria for nonsupervisory staff administrative analytical, planning, and evaluative work, at grade GS-9 and above. Typical positions covered by this guide require knowledge of (1) the overall mission, functions, and organization of the agency or component; (2) the principles, functions, and processes of management and the organization of work; (3) agency program operations, processes, goals, and objectives; and (4) evaluative, planning, and analytical processes and techniques. Knowledge is applied in a staff advisory capacity to line management in support of planning, development, and execution of agency programs; the administrative management of agencies and their component organizations; or the performance of related functions. The standard is written in the Factor Evaluation System (FES) format. Under the FES, positions are placed in grades on the basis of their duties, responsibilities, and the qualifications required as evaluated in terms of nine factors common to nonsupervisory General Schedule positions.

A point value is assigned to each factor based on a comparison of the position's duties with the factor-level descriptions in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position factor to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails in any significant aspect to meet a particular factor-level description in the standard, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect which meets a higher level. The total points assigned are converted to a grade by use of the grade conversion table in the standard.

Under FES, positions which significantly exceed the highest factor level or fail to meet the lowest factor level described in a classification standard must be evaluated by reference to the Primary Standard, contained in Appendix 3 of the Introduction to the Position Classification Standards. The Primary Standard is the "standard-for-standards" for FES.

The appellant contests the agency evaluation of Factors 1 and 2 only. We have reviewed the remaining factors and agree with the agency evaluation. Therefore, only Factors 1 and 2 will be addressed in this decision.

Factor 1 - Knowledge Required By The Position:

This factor measures the nature and extent of information or facts that a worker must understand to do acceptable work, such as the steps, procedures, practices, rules, policies, theories, principles, and concepts; and the nature and extent of the skills needed to apply this knowledge. The agency credited this factor with Level 1-7. The appellant believes Level 1-8 is appropriate.

At Level 1-7, in addition to the knowledge of the previous level, assignments require knowledge and skill in applying analytical and evaluative methods and techniques to issues or studies concerning the efficiency and effectiveness of program operations carried out by administrative or professional personnel, or substantive administrative support functions (i.e., internal activities or functions such as supply, budget, procurement, or personnel which serve to facilitate program operations). This level includes knowledge of pertinent laws, regulations, policies, and precedents which affect the use of program and related support resources in the area studied. Projects and studies typically require knowledge of the major issues, program goals and objectives, work processes, and administrative operations of the organization. Knowledge is used to plan, schedule, and conduct projects and studies to evaluate and recommend ways to improve the effectiveness and efficiency of work operations in a program or support setting. The assignments require knowledge and skill in adapting analytical techniques and evaluation criteria to the measurement and improvement of program effectiveness and/or organizational productivity. Knowledge is applied in developing new or modified work methods, organizational structures, records and files, management processes, staffing patterns, procedures for administering program services, guidelines and procedures, and automating work processes for the conduct of administrative support functions or program operations. Knowledge may also be applied in analyzing and making recommendations concerning the centralization or decentralization of operations.

Level 1-7 is met. The appellant is the Administrative Officer responsible for a wide range of duties in support of the Chief of Staff Office such as analyzing information regarding manpower, space, programs, equipment, etc., and recommending actions to ensure efficient use of resources; investigating staff situations or problems to identify issues to be resolved; participating on numerous committees to assess needs, provide information on pertinent laws, policies, and regulations, and present recommendations; and providing advice and assistance to services concerning their administrative responsibilities, as well as coordinating work efforts in some instances. She also reviews and evaluates proposed policy; administers the budget control points for the consultant/attending and fee-basis programs; assists with long-range planning; oversees the credentialing and privileging programs; and acts as a liaison and trouble shooter with other organizations within the medical center. These duties require knowledge and skill in analyzing and evaluating criteria; knowledge of organizational structures and laws, regulations, and policies applicable to the medical center; and ability to develop recommendations concerning programs, procedures, work methods, organizational structures, etc.

Level 1-8 is the level of the expert analyst who has mastered the application of a wide range of qualitative and/or quantitative methods for the assessment and improvement of program effectiveness or the improvement of complex management processes and systems. In addition to knowledge of the next lower level, this level requires comprehensive knowledge of the range of administrative laws, policies, regulations, and precedents applicable to the administration of one or more important public programs. Typically, this includes knowledge of agency program goals and objectives, the sequence and timing of key program events and milestones, and methods of evaluating the worth of program accomplishments. Work requires knowledge of relationships

with other programs and key administrative support functions within the employing agency or in other agencies. Knowledge characteristic of this level are applied in a variety of ways. For example, knowledge is applied to the design and conduct of comprehensive management studies where the boundaries of the studies are extremely broad and difficult to determine in advance. Study objectives are to identify and propose solutions to management problems which are characterized by their breadth, importance, and severity, and for which previous studies and established management techniques are frequently inadequate. For other assignments, knowledge may be applied in preparing recommendations for legislation to change the way programs are carried out; in evaluating the content of new or modified legislation for projected impact upon agency programs and resources; and/or in translating basic legislation into program goals, actions, and services. Also included at this level is skill to plan, organize, and direct team study work and to negotiate effectively with management to accept and implement recommendations, where the proposals involve substantial agency resources, require extensive changes in established procedures, or may be in conflict with the desires of the activity studied.

Level 1-8 is not met. This level addresses positions with much broader program responsibilities than the appellant's. At this level, programs and decisions significantly change, interpret, or develop important public policies or deal with extremely complex problems requiring the application of theoretical concepts. The appellant's program responsibilities are confined to the medical center and associated clinics and do not have the far reaching impact or complexity envisioned at this level.

Level 1-7 is credited for this factor for 1250 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 for carrying out assignments, and how completed work is reviewed. The agency determined that Level 2-4 is correct for this factor. The appellant believes Level 2-5 should be credited.

At Level 2-4, within a framework of priorities, funding, and overall project objectives, the employee and supervisor develop a mutually acceptable project plan which typically includes identification of the work to be done, the scope of the project, and deadlines for its completion. Within the parameters of the approved project plan, the employee is responsible for planning and organizing the study, estimating costs, coordinating with staff and line management personnel, and conducting all phases of the project. This frequently involves the definitive interpretation of regulations and study procedures, and the initial application of new methods. The employee informs the supervisor of potentially controversial findings, issues, or problems with widespread impact. Completed projects, evaluations, reports, or recommendations are reviewed by the supervisor for compatibility with organizational goals, guidelines, and effectiveness in achieving intended objectives. Completed work is also reviewed critically outside the employee's

immediate office by staff and line management officials whose programs and employees would be affected by implementation of the recommendations.

Level 2-4 is met. Similar to this level, the appellant receives her assignments in broad terms and is expected to plan and carry out those assignments without further supervisory assistance. She is responsible for interpreting and applying a number of regulations, evaluating numerous programs and issues, and making recommendations to the Chief of Staff, the Medical Center Director, and various committees which ultimately impact the medical center staff and patients. Level 2-4 involves a high degree of independence, expertise, and program responsibility, and thus, fully recognizes the level of responsibility vested in the appellant's position.

At Level 2-5, as a recognized authority in the analysis and evaluation of programs and issues, the employee is subject only to administrative and policy direction concerning overall project priorities and objectives. At this level, the employee is typically delegated complete responsibility and authority to plan, schedule, and carry out major projects concerned with the analysis and evaluation of programs or organizational effectiveness. The employee typically exercises discretion and judgment in determining whether to broaden or narrow the scope of projects or studies. Analyses, evaluations, and recommendations developed by the employee are normally reviewed by management officials only for potential influence on broad agency policy objectives and program goals. Findings and recommendations are normally accepted without significant change.

Level 2-5 is not met. This level reflects administrative supervision only, with full technical authority delegated to the employee. Such responsibility, however, cannot be viewed in isolation but must be considered within the context of the significance of the program or function and how much control is really left to the employee's discretion. While the appellant has significant responsibility for numerous programs and functions, the Chief of Staff is ultimately responsible for the administration of the clinical services and education, research, Quality Management, and Women Veterans programs and handles issues the appellant is unable to resolve. The appellant conducts her work within the objectives, policies, regulations, and procedures established by the VA, her medical center, and various medical and regulatory organizations. Her assignments consist of more than overall policy direction. In addition, although she represents the Chief of Staff Office on numerous medical center committees, she is providing information and recommendations for final decisions which are then made by someone else.

Level 2-4 is credited for this factor for 450 points.

SUMMARY		
FACTOR	LEVEL	POINTS
1. Knowledge Required By The Position	1-7	1250
2. Supervisory Controls	2-4	450
3. Guidelines	3-4	450
4. Complexity	4-4	225
5. Scope and Effect	5-4	225
6. Personal Contacts and 7. Purpose of Contacts	3c	180
8. Physical Demands	8-1	5
9. Work Environment	9-1	5
	TOTAL	2790

A total of 2790 points falls within the range for a GS-12, 2755 to 3150 points, according to the Grade Conversion Table in the Administrative Analysis Grade Evaluation Guide.

Decision

The position is correctly classified as Administrative Officer, GS-341-12.