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Classification Appeal Decision
Under section 5112 of title 5, United States Code

Appellant: [appellant's name]

Agency classification: Program Support Assistant (OA)
GS-303-5

Organization: Compensation and Pension
Examination Section
Customer Service Unit
Outpatient Care Center
[name] Veterans Affairs Medical
and Regional Office Center
Department of Veterans Affairs
[location]

OPM decision: Title Optional (OA)
GS-303-5

OPM decision number: C-0303-05-12

/s/

Robert D. Hendler
Classification Appeals Officer

12/26/00

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* (PCS's), appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[appellant's name]
[appellant's address]

[name]
Patient Support Center Leader
Department of Veterans Affairs
Medical and Regional Office Center
[address]
[location]

Ms. Ventris C. Gibson
Deputy Assistant Secretary for
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Department of Veterans Affairs
810 Vermont Avenue, NW
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Introduction

On October 6, 2000, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant's name]. Her position is currently classified as Program Support Assistant (Office Automation (OA)), GS-303-5. She believes the classification should be Administrative Support Assistant (OA), GS-303-7. The appellant works in the Compensation and Pension Examination Section, Customer Service Unit, Outpatient Care Center, [name] Veterans Affairs Medical and Regional Center (Center), Department of Veterans Affairs, [location]. We accepted and decided this appeal under section 5112(b) of title 5, United States Code (U.S.C.).

General issues

In her October 4, 2000, appeal letter, the appellant stresses the complexity of the subject matter that she must deal with in her compensation and pension program work. She says that she is regarded as the expert source for program procedures and practices. Her work requires independent judgment, and she adapts guidelines to cover new and unusual conditions.

The October 30, 2000, agency administrative report included a memorandum supporting the upgrade from the appellant's first level supervisor, [name]. He states that the agency's analysis of the position did not address several major duties that affect the position's classification. He implied that positions of similar difficulty and complexity occupied by other employees are classified at higher grade levels.

These statements raise procedural issues that must be addressed. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM PCS's and guidelines (5 U.S.C. 5106, 5107, and 5112). Other methods or factors of evaluation are not authorized for use in determining the classification of a position, e.g., comparisons to the duties and responsibilities of other positions that may or may not be classified correctly. Our decision sets aside all previous agency decisions regarding the classification of the position in question. Information contained in the agency administrative report and comments by people knowledgeable of the appellant's work are relevant only insofar as they clarify the duties and responsibilities assigned to and performed by the appellant.

Position information

On October 20, 2000, the appellant and her immediate supervisor certified that her position description (PD) of record ([PD number]) is current and accurate. Based on our November 28, 2000, on-site audit of the position with the appellant, our December 14, 2000, interview with a Veteran's Benefits Administration (VBA) rating specialist who has frequent contact with the appellant, and our December 15, 2000, interview with her first level supervisor, we find that the PD of record contains the major duties and responsibilities assigned to and performed by the appellant. The PD implies that the appellant oversees and coordinates the work performed by a multi-person staff. For example, the PD states that the appellant is responsible for the "Administration Coordination of Compensation and Pension Examination Section," distributes the workload equitably, instructs the staff in tasks and job techniques, and performs the Section's

secretarial work. However, the appellant is the only full time Section employee. Another Unit member devotes approximately 85 to 90 percent of her time managing the daily clinic schedule (profile) for veterans receiving compensation and pension examinations. This includes checking patients in and escorting them to their appointments. That staff member fills in for the appellant when she is absent.

The appellant supports the compensation and pension (C&P) examination function. The Center conducts medical examinations and provides medical opinions on claims for veterans benefits. Center medical staff and/or fee basis physicians conduct the examinations. These services are provided to VBA regional offices in [location], [location], [location] and [location]. Under a memorandum of understanding, she provides similar support for [name] Air Force Base, [state] retiring and separating service members who are expected to or might file claims for service-connected disability for VA compensation prior to their discharge. The appellant coordinates C&P specialty examination requests, e.g., audiology, from the VA Center in [location].

She assures that dictation transcripts contain the C&P Examination Request, VA Form 2507, information requested by VBA rating specialists. The appellant assures that medical providers add the necessary information before finalizing the transcripts, e.g., required tests were completed and the results interpreted. She monitors examination and opinion requests for timeliness and quality; i.e., assuring VBA requested information is in the report. The appellant enters and extracts data from computer systems that track program timeliness and produce reports. She uses a communications software package to transfer transcription files typed by a contractor. The PD contains more information about her duties and responsibilities and how they are performed and is incorporated by reference into this decision.

Series, title, and standard determination

The agency has placed the appellant's position in the Miscellaneous Clerk and Assistance Series, GS-303, and titled it Program Support Assistant (OA). The appellant agreed with the series determination, with the agency's use of the Grade Level Guide for Clerical and Assistance Work (Guide) for grade level analysis of her program work, and the Office Automation Grade Evaluation Guide (OAGEG) to evaluate her computer support work. We concur with these determinations.

The appellant requested titling as Administrative Support Assistant (OA) but did not provide a supporting rationale. Only specific titles authorized in a published OPM PCS can be appealed. Because the GS-303 PCS does not have published titles, the agency may construct a descriptive title using the titling practices in the *Introduction to the Position Classification Standards*. Therefore, the title constructed by the agency must include the parenthetical OA to reflect that qualification requirement. The appellant may grieve the constructed title using the appropriate negotiated or administrative grievance procedure.

Grade determination

The Guide provides general criteria for use in determining the grade level of nonsupervisory clerical and assistance work. Administrative support of the kind described in the Guide is performed in offices, shops, laboratories, hospitals, and numerous other settings in all Federal agencies. The Guide describes the general characteristics of each grade level from GS-1 through GS-7 and uses two criteria for grading purposes: *Nature of assignment* (which includes the knowledge required and complexity of the work) and *Level of responsibility* (which includes supervisory controls, guidelines, and contacts).

The *Introduction to the Position Classification Standards* states that when the highest level of work is performed less than a majority of time, it may be grade controlling only if the work is officially assigned to the position on a regular and continuing basis, occupies at least 25 percent of the appellant's time, and requires knowledge and skills that would be needed in recruiting for the position if it became vacant. We must apply these criteria in our analysis of the appellant's position.

Nature of assignment

As at the GS-5 grade level, the appellant performs a full range of standard and nonstandard clerical assignments and resolves a variety of nonrecurring problems in the C&P program. She receives a variety of assignments that involve different and unrelated steps, processes, or methods, e.g., determining examination requirements, scheduling examination appointments, and assuring that veterans receive proper travel reimbursements for those appointments. The appellant assures that examinations meet VBA claims adjudication informational requirements and processing timeframes. As at the GS-5 grade level, she must identify and understand the issues involved in each assignment and determine what steps and procedures are necessary and the order of their performance. The appellant schedules examinations based on the type of information requested, e.g., whether limited orthopedic information requested in a re-examination can be referred to a general practitioner rather than a specialist. She refers these requests based on her knowledge of available Center staff skills. If processing timeframes are short, she may suggest using the fee basis physician if Center staff is not available. Reviewing examination transcripts, she contacts the examination provider over conflicting or missing information, e.g., the report does not address test(s) and/or diagnostic issues stipulated on the VA Form 2507.

Characteristic of the GS-5 grade level, each transaction typically involves selecting a course of action from a number of possibilities. For example, the appellant accommodates the needs of homeless veterans by blocking medical appointments together. She works with the Homeless Coordinator to assure that transportation, food, and shelter are in place to support the medical appointments. Typical of the GS-5 grade level, the work requires extensive knowledge of an organization's rules, procedures, operations, or business practices to perform the more complex, interrelated, or one-of-a kind clerical processing procedures, e.g., processing complex Court of Veterans Appeals remand cases. These cases require full folder review. The appellant highlights and tabs pertinent portions of the original examinations and closely reviews completed reports to assure that specific remand requirements are satisfied.

The appellant's work does not meet the GS-6 grade level. She does not process a wide variety of transactions for more than one type of assigned activity or functional specialization. Whether original examinations, re-examinations, remands, or requests for opinions not requiring an examination, the appellant's C&P program work is a single functional specialization. The work is covered by a basic set of rules, regulations, and procedures, including related VA travel and scheduling procedures. In contrast, GS-6 grade level assignments typically consist of a wide variety of transactions for more than one type of assigned activity or functional specialization that are subject to different sets of rules, regulations, and procedures. Such issues as dealing with the transcription contractor, Center schedule changes that affect the C&P examination schedule, and arranging off-Center examinations (e.g., Post Traumatic Stress claims that require a social survey) are transferred to the [name] VA Center because it has the capacity to perform the survey, a part of the C&P program process. They do not constitute other functional specializations within the meaning of the Guide.

Unlike the GS-6 grade level where deciding on a course of action has a substantive impact on the outcome of the work, her assignments affect C&P procedural issues, e.g., assuring timely examinations. While the appellant's work requires comprehensive knowledge of rules, regulations, and other guidelines relating to completing assignments in the assigned program similar to the GS-6 grade level, her duties do not involve the increasingly difficult complicated transactions intended to credit that grade level. The appellant's case actions are repetitive in terms of regulations and procedures to be applied and problems to be handled. Her decisions are based on information readily available such as forms, records, and instructions from VBA rating specialists. Her program duties, e.g., tracking case status and timeliness, including program status reports, are for the purpose of assuring that C&P cases, and the Center C&P program, meet established program requirements. Therefore, this factor is credited at the GS-5 grade level.

Level of responsibility

As at the GS-5 grade level, the appellant's supervisor assigns work by defining objectives, priorities, and deadlines and provides guidance on assignments which do not have clear precedents. While the review of her work for conformance with policy and requirements is typical of the GS-6 grade level, the work is covered by extensive guides in the form of instructions, manuals, regulations, and precedents typical of the GS-5 grade level. Many are in the form of unwritten procedures based on discussions with VBA and Center staff, e.g., which orthopedic issues must be handled by a specialist. As at the GS-5 grade level, the number and similarity of guidelines and work situations require the appellant to use judgment in locating and selecting the most appropriate guidelines for application and adapting them according to circumstances of the specific case or transaction. For example, based on her familiarity with body system coverage requirement, the appellant reviews examination reports to assure that they include references to required tests.

Typical of the GS-5 grade level, procedural problems may arise that require interpreting and adapting established guides. For example, she must decide whether the number and type of issues on the VA Form 2507 will require more than the typical one hour examination, and may decide to block examinations for a later date so that the veteran does not have to make multiple

visits to the Center. She must determine which of several alternative guidelines to use, e.g., which travel reimbursement rate applies when a veteran returns for another examination. As at the GS-5 grade level, the appellant's supervisor is available for guidance if existing guidelines and practices do not cover the situation. Typical of this grade level, her contacts with a variety of persons within and outside the agency are to receive or provide information relating to the work or to resolve problems in connection with recurring responsibilities, e.g., scheduling problems.

The supervisor's memorandum states that the position meets the GS-6 grade level because the appellant is: (1) recognized as an authority on processing transactions or completing assignments within a complicated framework of established procedures and guidelines, often where there are no clear precedents; (2) recognized as an expert, e.g., leading and overseeing her C&P co-worker; (3) responsible for developing and implementing program improvements, e.g., a tracking report for incomplete examinations; and (4) responsible for providing program information on short notice. As discussed previously, the appellant does not work within the complicated framework of established procedures and guidelines found at the GS-6 grade level where there often are no clear precedents. Her co-worker performs a limited range of C&P program work, i.e., monitoring the daily clinic profile and escorting veterans to their appointments. Therefore, questions on these processes do not meet range of case actions and advisory issues intended at the GS-6 grade level. The appellant also does not work with numerous and varied guidelines from which it is difficult to choose the most appropriate instruction and decide how the various transactions are to be completed. As discussed previously, a well-developed body of written and unwritten guidelines and procedures covers C&P work. For example, general medical examinations can be performed by a physician's assistant or nurse practitioner and then countersigned by a physician. Specialists must perform full neurology, audiology, and visual examinations. If clinic openings are not sufficient to examination scheduling performance timeframes, the appellant will suggest calling in the fee basis physician. Therefore, while the appellant must be aware of detailed program processing requirements, she does not deal with the range of interpretive issues or provide the depth of advice envisioned at the GS-6 grade level.

The appellant occasionally adapts guidelines to cover new and unusual work situations and where established procedures to process transactions cannot be completed through regular channels or involve actions where guidelines are conflicting or unusable. For example, she developed a VA Form 2507 tracking report for requests not completed. The report includes the veteran's name, regional office, social security number, date request received, date request returned, and reason. After surveying other Centers to see how they had improved their completion rates, the appellant found that requests were recorded as completed if the veteran failed to show for a scheduled examination. However, she does not perform this type of assignment on a regular and continuing basis within the meaning of the position classification system. Other examples she and her supervisor provided e.g., implementing the procedures for the memorandum of understanding between [name] Air Force Base and the Center for retiring and separating service member physicals, assisting regional office staff in learning how to convert VA Form 2507's to electronic medium as mandated by program directives, assuring that the [name] regional office ended back loading requests to Friday rather than forwarding them throughout the week, reflect the adapting of established guidelines to program issues already

credited at the GS-5 grade level. The appellant's contacts approach those at the GS-6 grade level. They are with employees in the agency, with management, and with users and providers of agency services to provide information, explain the application of regulations, or resolve problems relating to the assignment. However, because the regulatory issues and problems with which the appellant deals are not of GS-6 grade level complexity, this aspect of her work fails to fully meet the GS-6 grade level. Therefore, this factor is credited at the GS-5 grade level.

Since both factors are evaluated at the GS-5 grade level, the work covered by the Guide is credited at the GS-5 grade level.

Evaluation using the OAGEG

The OAGEG is used to evaluate work performed using various software applications to provide office support. The appellant uses various software functions, including word processing. She performs equivalent data entry and extraction functions using VISTA program packages including the Patient Information Management System, the Automated Medical Information Exchange, the Beneficiary Travel package, Patient Care Encounter, and timekeeping software. A breakout of the OA factors and associated points are shown below.

The position falls short of Level 1-4, the highest level described in the OAGEG, in that the work does not, on a regular and continuing basis within the meaning of the position classification system, require integrating the use of different software types, e.g., retrieving data, converting it to graphic form, and incorporating it into the text of reports; using desk-top publishing software to prepare varied news releases, brochures, and reports; or developing spreadsheets and databases of similar complexity. Because the appellant also does not determine what functions should be automated and how that should be done, or make equivalent automation decisions on a regular and continuing basis, we are precluded from crediting higher levels for any of the remaining factors. Given that the OA duties represent lower level work, they do not impact the final grade of the position.

Summary

In summary, we have credited the position as follows:

Factor	Level	Points
1. Knowledge required by the position	1-3	350
2. Supervisory controls	2-2	125
3. Guidelines	3-2	125
4. Complexity	4-2	75
5. Scope and effect	5-1	25
6 & 7. Personal contacts/Purpose of contact	1-a	30
8. Physical demands	8-1	5
9. Work environment	9-1	5
Total points:		<u>740</u>

The total of 740 points falls within the GS-4 grade level point range of 655-850 points in the OAGEG.

Decision

The appellant's position is properly classified as Title Optional (OA), GS-303-5.