

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

Dallas Oversight Division
1100 Commerce Street, Room 4C22
Dallas, TX 75242-9968

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

Appellant: [appellant's name]

Agency classification: Loan Servicing Assistant (OA)
GS-1101-7

Organization: [appellant's] District Office
[region]
Small Business Administration
[location]

OPM decision: GS-1101-5
Title at agency discretion, to include (OA)

OPM decision number: C-1101-05-02

/s/ Bonnie J. Brandon

Bonnie J. Brandon
Classification Appeals Officer

May 18, 2001

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).

Since this decision lowers the grade of the appealed position, it is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The servicing personnel office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

The personnel office must also determine if the appellant is entitled to grade or pay retention, or both, under 5 U.S.C. 5362 and 5363 and 5 CFR 536. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented.

Decision sent to:

[appellant's name and address]

[servicing human resources office]

Assistant Administrator for Personnel
Small Business Administration
Washington, DC 20416

Introduction

On January 16, 2001, the Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [the appellant]. Her position is currently classified as Loan Servicing Assistant (OA), GS-1101-7. She believes the position should be upgraded. The appellant works in [a District Office in a Region], Small Business Administration (SBA), [location]. We have accepted and decided this appeal under section 5112(b) of title 5, United States Code.

In preparing for the appeal to OPM, the appellant and her supervisor recently updated and certified the position description. The appellant was reassigned to the current position description [number] on March 11, 2001. To help decide this appeal, we conducted a telephone audit with the appellant and interviewed her first-level supervisor and agency human resource specialists by telephone. On May 9, 2001, an OPM representative conducted an on-site audit with the appellant and an interview with her first-level supervisor. Our audits confirmed that the appellant's current position description is accurate. In reaching our classification decision, we reviewed the audit findings and all information of record provided by the appellant and her agency, including her official position description.

Position information

The appellant works in [a district office]. She is involved with work that supports the District's loan processing and loan servicing/liquidation. The appellant's work specifically supports the work of two GS-12 Loan Specialists in the office, one who works in loan processing and one who works in loan servicing/liquidation. The appellant performs a variety of work, such as ensuring that proper documentation is included in initial loan application packages, requesting credit reports and character investigations, entering and tracking information in automated systems, preparing loan authorization documents, contacting lenders about disbursement issues, preparing for lenders lists of required closing documents, reviewing documents for discrepancies, updating conditions to loans, working with lenders to collect delinquent guarantee fees and servicing expenses, updating and correcting loan information in monthly reports, requesting payment for servicing and liquidation expenses, closing out "paid in full" cases, providing information to the public about the SBA loan programs, and solving various problems. The appellant is supervised by the GS-14 Assistant District Director for [the appellant's organization].

Series and title determination

The appellant's position is appropriately placed in the GS-1101 General Business and Industry Series. This series covers work classified in the GS-1100 Group when there is no other specific series established for that work. The appellant performs work in support of loan processing and loan servicing/liquidation. This kind of work is covered in the GS-1100 Group. The GS-1101 series does not have published titles. Therefore, the agency may use its discretion in titling the position, in accordance with the titling instructions in the *Introduction to the Position Classification Standards*. Since the appellant's work requires the services of a qualified typist and the use of office automation systems, the title of her position will include the parenthetical title *Office Automation*.

Standard and grade determination

We evaluated the appellant's office automation duties against the Office Automation Grade Evaluation Guide. These duties equate to the GS-4 level and do not have an impact on the overall grade of the appellant's position. Therefore, these duties are not discussed any further.

The GS-1101 series does not have grade level criteria to use in evaluating positions. The agency used the standard for the GS-1165 Loan Specialist Series to grade the appellant's position. We found that the appellant's position lacked the analytical work that is described at the lower levels of this two-grade interval series. The knowledge and skill required for the appellant's position also differ from that required for GS-1165 work. Therefore, it is inappropriate to use the GS-1165 grading criteria for the appellant's position. The appellant's work is one-grade interval, support work. The Grade Level Guide for Clerical and Assistance Work provides general criteria to use in determining the grade level of nonsupervisory clerical and assistance work. The Guide describes administrative support work performed in offices, shops, laboratories, hospitals, and other settings in Federal agencies. We found that this Guide is appropriate for the appellant's support work and thus used it to determine the grade level. The Guide describes the general characteristics of each grade level from GS-1 through GS-7. It uses two grading criteria: nature of assignment (which includes the knowledge required and complexity of the work) and level of responsibility (which includes supervisory controls, guidelines, and contacts).

Nature of assignment

At the GS-5 level, work consists of performing a full range of standard and nonstandard clerical assignments and resolving a variety of nonrecurring problems. Work includes a variety of assignments involving different and unrelated steps, processes, or methods. The employee must identify and understand the issues involved in each assignment and determine what steps and procedures are necessary and the order of their performance. Completion of each transaction typically involves selecting a course of action from a number of possibilities. 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.

The appellant's work is comparable to the GS-5 level. She performs a range of assignments that involve different steps, processes, and methods. For example, she ensures that proper documentation is included in loan application packages before they go to the loan specialist for processing; inputs and tracks loan information in a database system called the Loan Application Tracking System (LATS); prepares letters to lenders listing the required closing documents necessary for the loan; tracks and follows up on loan disbursement dates; tracks and collects delinquent guarantee fees and servicing and liquidation fees; prepares loan authorization documents based on the loan specialist's report and the loan application file; updates and inputs in LATS various modifications to loan conditions; resolves discrepancies and errors in lender loan reports; requests from another SBA office payment for various loan servicing/liquidation expenses; closes out "paid in full" cases and sends them to the Federal records center; provides general information to the public about the agency's loan programs; and produces monthly, quarterly, and annual reports from LATS. The appellant's work requires that she understand the various issues and requirements involved in each assignment and that she decide which course of

action to take to best accomplish the work. She must be able to find and identify information from various sources, including the loan application package, lender documents and reports, loan specialist reports, and data elements in LATS. The appellant does her work based on an extensive knowledge of the agency's loan procedures, programs, and practices and a full understanding of the terminology, practices, and requirements associated with loan processing and loan servicing/liquidation.

At the GS-6 level, work typically entails processing a wide variety of transactions for more than one type of assigned activity or functional specialization. Assignments are subject to different sets of rules, regulations, and procedures. The employee's decision on a course of action has substantive impact on the outcome of the assignment. Work requires comprehensive knowledge of rules, regulations, and other guidelines relating to completing assignments in the program area assigned. This knowledge is usually attained through extensive, increasingly difficult, and practical experience and training in the subject matter field. The work also requires ability to interpret and apply regulatory and procedural requirements to process unusually difficult and complicated transactions.

The appellant's work does not meet the GS-6 level. Although the appellant performs work that supports the two areas of loan processing and loan servicing/liquidation, she does not perform a *wide* variety of work or substantially different kinds of work in each of these areas. The work does not require a knowledge of regulations or the ability to interpret and apply regulations. Rather, the appellant is required to have a knowledge of more straightforward procedures, practices, programs, and requirements. The appellant's work is more routine than the "unusually difficult and complicated" kind of work described at the GS-6 level. The appellant refers these kinds of complex issues to the loan specialists or to the supervisor.

Level of responsibility

At the GS-5 level, the supervisor assigns work by defining objectives, priorities, and deadlines and provides guidance on assignments which do not have clear precedents. The employee works in accordance with accepted practices, and completed work is evaluated for technical soundness, appropriateness, and effectiveness in meeting goals. Extensive guides in the form of instructions, manuals, regulations, and precedents apply to the work. The number and similarity of guidelines and work situations require the employee 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. A number of procedural problems may arise which also require interpretation and adaptation of established guides. Often, the employee must determine which of several alternative guidelines to use. If existing guidelines cannot be applied, the employee refers the matter to the supervisor. Contacts are with a variety of persons within and outside the agency for the purpose of receiving or providing information relating to the work or for the purpose of resolving operating problems in connection with recurring responsibilities.

The appellant's level of responsibility meets the GS-5 level. The supervisor establishes the work priorities, objectives, and timeframes. The appellant performs her work independently, but she refers unusual, technical, or complex issues to the loan specialists or to the supervisor. For example, the appellant acts on routine modifications to loan conditions, but she refers to the loan specialist the more technical kinds of modifications. The supervisor reviews the appellant's

work for technical accuracy, appropriateness, and timeliness. For example, the supervisor reviews for accuracy the data entered by the appellant into LATS. The appellant's work is covered by extensive guidelines, such as standard operating procedures, LATS instructions, and other special written instructions. The guidelines apply to the work; but because of the volume, the appellant must use judgment in locating and selecting the relevant portions. She interprets and adapts the guidelines according to the circumstances at hand. For example, she interprets the guidance and the issues involved in a case when resolving discrepancies and errors in a lender's loan report. Issues that are not covered by the guidelines are referred to the specialists or to the supervisor. The appellant has contact with individuals in the agency, lenders, and the public. She works with lenders to obtain information and to resolve problems. She shares with the public general information about the agency's loan programs.

At the GS-6 level, the supervisor reviews completed work for conformance with policy and requirements. The employee is recognized as an authority on processing transactions or completing assignments within a complicated framework of established procedures and guidelines, often when there are no clear precedents. This recognition typically extends beyond the immediate office or work unit to the overall organization or, in some cases, outside the organization. The employee is regarded as an expert source of information on regulatory requirements for the various transactions and is frequently called upon to provide accurate information rapidly on short notice. Guidelines for the work are numerous and varied, making it difficult for the employee to choose the most appropriate instruction and decide how the various transactions are to be completed. Guidelines often do not apply directly, requiring the employee to make adaptations to cover new and unusual work situations. This may involve deviating from established procedures to process transactions which cannot be completed through regular channels or involve actions where guidelines are conflicting or unusable. Contacts are with employees in the agency or in other agencies or with management officials, users, or providers of agency services. The employee provides information, explains the application of regulations, or resolves problems relating to the assignment.

The appellant's level of responsibility does not meet the GS-6 level. The supervisor provides a closer review than just for conformance with policy and requirements. As previously mentioned, some of the appellant's work is reviewed for accuracy. The appellant's guidelines are more clear-cut, detailed, and applicable to the work than are the complicated and conflicting ones described at GS-6. Unlike the GS-6 level, clear precedents exist for the appellant's work. Since the nature of the appellant's work does not meet the GS-6 level, accordingly, the contacts she makes in accomplishing that work are also not equivalent to the GS-6 level.

Since the nature of work and the level of responsibility are both evaluated at the GS-5 grade level, the overall evaluation of the appellant's work is GS-5.

Decision

The appellant's position is properly classified as GS-1101-5. The title is at the discretion of the agency and includes the parenthetical title *Office Automation*.