

120 Howard Street, Room 760  
San Francisco, CA 94105



**Classification Appeal Decision  
Under Section 5112 of Title 5, U.S. Code**

<b>Appellant:</b>	[appellant]
<b>Position:</b>	Social Insurance Administrator GS-105-12
<b>Organization:</b>	Branch Office Social Security Administration [city, state]
<b>Decision:</b>	Social Insurance Administrator GS-105-12
<b>OPM decision number:</b>	C-0105-12-03

Signed by Denis J. Whitebook  
DENIS J. WHITEBOOK  
CLASSIFICATION APPEALS OFFICER

December 11, 1996  
DATE

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision 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's name and address]

Personnel Officer  
Human Resources Center  
Social Security Administration  
50 United Nations Plaza, Room 102  
San Francisco, CA 94102

[name and address of appellant's representative]

Director  
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Social Security Administration  
6401 Security Boulevard  
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## **Introduction**

On April 4, 1996, 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 Social Insurance Administrator, GS-105-12. However, she believes its classification should be Social Insurance Administrator, GS-105-13. She works in the Branch Office, Social Security Administration (SSA), [city,state]. We have accepted and decided her appeal under 5 U.S. Code 5112.

## **General issues**

To help decide the appeal, a representative of this office conducted a phone interview with the appellant on December 5, 1996, and a brief interview with her supervisor on December 6. In reaching our classification decision, we have carefully reviewed the interview findings and all information of record furnished by the appellant and her agency, including her official position description (PD) 5C426S.

The appellant and her representative make many statements about her agency and its evaluations of her position. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of her position. By law, we must make that decision solely by comparing her current duties and responsibilities to OPM standards and guidelines (5 U.S. Code 5106, 5107, and 5112). Therefore, we have considered the appellant's and representative's statements only insofar as they are relevant to making that comparison.

During our interview, the appellant compared her position to branch manager positions that her agency has upgraded to GS-13. As indicated above, by law we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines. 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.

## **Position information**

As branch manager, the appellant administers all phases of SSA programs for part of [city, state]. This includes the cities or towns of [locations]. The appellant is responsible for program operations and public relations within the geographic area serviced by her branch office. Our interviews indicated that she currently supervises 13 employees. These include a GS-12 subordinate supervisor, seven GS-11 social insurance specialists, one GS-7 social insurance specialist developmental to GS-11, and four GS-8 contact representatives. The appellant also hopes to hire two clerical workers soon, including one stay-in-school employee.

The appellant's PD, the other material of record, and our interview findings furnish much more information about her duties and responsibilities and how they are performed.

### **Series, title, and standard determination**

We find that the appellant's position is best covered by the Social Insurance Administration Series, GS-105, titled Social Insurance Administrator, and graded using the General Schedule Supervisory Guide (GSSG). Neither the appellant nor her agency disagrees.

The appellant's position is also covered by Part II of the GS-105 standard. This could affect grade level only if her position were graded at GS-13 or above by means of Part II. However, the highest grade discussed in Part II for branch manager positions is GS-12 (GS-105 standard, page 51). Therefore, the GS-105 standard cannot affect the grade of the appellant's position, and so will not be applied in this decision.

### **Grade determination**

The GSSG uses six factors: Program scope and effect, Organizational setting, Supervisory and managerial authority exercised, Personal contacts, Difficulty of typical work directed, and Other conditions. Page 8 of the GSSG indicates that if one level of a factor or element is exceeded but the next higher level is not met, the lower level must be credited.

The appellant and her representative do not disagree with the agency's evaluation of factors 2, 3, 5, and 6. We will therefore discuss those factors briefly, while discussing factors 1 and 4 more thoroughly. Our evaluation of the six factors follows.

#### *Factor 1, Program scope and effect*

This factor contains two elements: Scope and Effect. We discuss each below.

##### *Scope*

At Level 1-3 under Scope, the general factor level criteria discuss in detail the geographic coverage of the work directed. However, the concept of Scope involves more than just geographic coverage. When one considers both the general factor level criteria and the illustrations, a general pattern of analysis emerges. Guidance from our Office of Classification indicates that there is a dynamic at work which deals with the interaction of four aspects implicit in the concept of Scope:

- sweep: the geographic coverage of the program (for instance, city, region, or state);
- magnitude: the total population serviced directly and significantly by the program (for instance, small and confined to an installation, moderate, or large);
- importance: the importance of the program to the agency and its mission (whether line or staff, whether involving service to higher agency levels, other agencies, or the general public); and

- complexity: the complexity of the products or services provided (for instance, routine or complicated).

In deciding whether a position meets a factor level, one must consider each of these implicit aspects and how they interact. No one aspect is necessarily predominant. We consider these aspects for the appellant's position below.

With respect to sweep, the appellant's position meets Level 1-3. Both the appellant and her agency agree with this finding. The general factor level criteria at Level 1-3 show that some programs at this level cover a geographic area equal in size to a major metropolitan area. The Level 1-3 illustration at the top of page 12 shows that other programs at this level cover a geographic area of several rural counties, a small city, or a portion of a larger metropolitan area. As discussed earlier, the appellant's branch office services part of [location]. We judge that the geographic area serviced covers at least as much territory as a small city, and is roughly equal in size to a portion of a larger metropolitan area.

With respect to magnitude, the general factor level criteria at Level 1-3 indicate that when most of an area's taxpayers are covered, work directed typically has coverage comparable to a small city. Further, the Level 1-3 illustration at the top of page 12 indicates that the size of the population serviced by the position may be equivalent to a group of citizens in a small city. The appellant's representative believes that this criterion is met because the total population in the area serviced by the appellant exceeds that of a small city. He makes many points supporting this viewpoint. For instance, he maintains that SSA, unlike most other agencies, actually services virtually the whole population of a given area.

We agree that the total population for the appellant's service area exceeds that of a small city. Specifically, the agency estimates that the total population in the area serviced by the appellant is about 215,000 based on updated census data, whereas the appellant's representative believes that it exceeds 270,000 based on Chamber of Commerce information. In either case, this population exceeds that of many small cities. For instance, small cities such as Albany, New York; Boise, Idaho; and Lansing, Michigan, have populations of roughly 100,000 to 125,000. In addition, we judge that the appellant's branch office at some point may provide some degree of service to much of the population in the area serviced. For instance, the office may provide frequent complex decisions on benefits or eligibility for some people. It may provide enumeration at birth but little other service in a lifetime for others. It might provide no service at all to someone who moved into the area after birth and did not work or did not work under covered employment.

However, we cannot agree that the appellant's position meets Level 1-3 with respect to magnitude. The discussions of Effect and the illustrations at different factor levels all indicate that in evaluating magnitude, one may consider only the total population serviced *directly and significantly* by a program. One cannot simply count the total population in the geographic area covered by the program, even if much of that population is provided some degree of service at some point in time. This is because only the population serviced directly and significantly has a major and direct effect

on the difficulty of the supervisor's job. A person who is provided no service or a few clerical services in his or her lifetime does not have such a major and direct effect. Several previous OPM decisions and advisory opinions from our Office of Classification support this interpretation of the GSSG.

The agency states that the appellant's branch office processed 16,765 claims and postentitlement actions in fiscal year 1995. This counts all work categories on the District Office Workload Report except for seven that are considered mainly clerical. It is appropriate to exclude clerical service in determining the population serviced directly and significantly, since such service would not meet Level 1-3 with respect to complexity, and we must consider how magnitude interacts with complexity in evaluating the appellant's position. The agency indicates that the 16,765 figure is an inexact but probably roughly correct measure of population serviced directly and significantly for two related reasons. First, some postentitlement work counted may include noncomplex clerical actions. On the other hand, some of the excluded seven categories may involve actions that turned out to be complex cases. The appellant's representative, using a different approach, indicates that the appellant's office provides direct and significant service to over 5,300 persons in a given year. He further indicates that her office annually has over 20,000 routine and other contacts with persons that result in measurable cases. Given all these points, we judge that the appellant's office has furnished direct and significant nonclerical services to fewer than 20,000 people in the past year. This population is far smaller than envisioned at Level 1-3. That level envisions a population comparable to most taxpayers or citizens in a small city. By contrast, this population of fewer than 20,000 meets the criteria for Level 1-2. The second illustration under that level discusses a serviced population that is the equivalent of all citizens in a portion of a small city.

The appellant's representative cites the principle of Occam's razor in support of his interpretation of the GSSG. We agree with this principle. In our judgment, it basically means that one should choose the simplest theory or interpretation that fits all relevant facts. The representative's interpretation of the guide does not fully fit three relevant points discussed above: that the discussions of Effect and the illustrations at different factor levels indicate that one should consider only the total population serviced directly and significantly in evaluating magnitude, that only the population serviced directly and significantly has a major and direct effect on the difficulty of the supervisor's job, and that several previous OPM decisions and advisory opinions support our interpretation of the GSSG.

The appellant's representative suggests that no first- or second-level supervisory positions would meet Level 1-3 for magnitude given our interpretation of the guide. However, the record indicates that a number of district manager positions would meet Level 1-3 for this aspect of Scope.

With respect to importance, the appellant's position warrants Level 1-3. Both the appellant and agency agree with this finding. The Level 1-3 illustration at the top of page 12 shows that some offices at this level furnish a significant portion of an agency's line program to the general public. The appellant's branch office does not provide some Social Security line functions, such as hearing decisions furnished by the Office of Hearings and Appeals. However, as is typical at Level 1-3, her office provides much of her agency's line program to the public.

With respect to complexity, the appellant's position again meets Level 1-3. Again, both the appellant and agency agree with this conclusion. As envisioned in the first sentence under Scope at Level 1-3, the appellant's subordinates perform moderately complex technical and administrative work. This includes, for instance, deciding and authorizing for payment, without later review, claims for benefits and eligibility for all SSA programs; disallowing without later review a wide range of SSA claims; and making final reconsideration decisions on disability insurance and disabled widows' cases not involving medical issues.

In sum, the appellant's position meets Level 1-3 with respect to sweep, importance, and complexity. With respect to magnitude, the position falls short of Level 1-3 but meets Level 1-2. As noted earlier, none of these four aspects is necessarily predominant. However, considering all four aspects, how they interact, and the extent to which the appellant's position falls short of Level 1-3 for magnitude, the appellant's position must be evaluated at Level 1-2 for Scope.

### *Effect*

The appellant's position is properly evaluated at Level 1-2 for Effect. That level involves providing services to a moderate, local, or limited population of clients or users comparable to a major portion of a small city or rural county. As discussed earlier, the appellant's branch office has directly provided significant administrative or technical services to fewer than 20,000 people in the past year. Therefore, her office has furnished such services to a population of clients comparable to a portion of a small city.

The appellant's position falls short of Level 1-3. At this level, activities, functions, or services directly and significantly impact a wide range of agency activities, the work of other agencies, the operations of outside interests, or the general public. The appellant's services do not fully meet these criteria, for four main reasons:

- The appellant's services are significant to her agency. However, they do not directly and significantly affect a wide range of activities throughout SSA, as envisioned at Level 1-3.
- The appellant's representative notes that her work affects other agencies, including the Immigration and Naturalization Service (INS), the U.S. Attorney's Office, state offices, those of Ventura County, and local law enforcement offices. For example, he indicates that the appellant must sometimes deal with with INS personnel when that agency has information that her office needs or vice versa. However, the appellant's services do not affect the work of other agencies as directly and significantly as intended at Level 1-3. As an example of work that would meet this level, OPM's activities sometimes affect the work of other agencies directly and significantly. This is because OPM oversees agency personnel programs, can require agencies to make major changes in those programs, and can delegate or take away agency personnel authorities.

- The appellant's representative gives examples of how the appellant's work affects outside interests. For instance, he observes that the appellant works with large area employers to make them aware of issues involved in switching their employees from primary health care coverage under the employer's plan to primary coverage under Medicare Part B. However, Level 1-3 envisions activities equivalent to requiring businesses comprising a segment of an industry to change their practices to comply with agency regulations. For instance, a Federal Aviation Administration office might require airlines in its jurisdiction to change unsafe practices in compliance with agency regulations. The appellant's work does not affect the work of outside interests this directly and significantly.
- The appellant's services affect the general public. However, Level 1-3 contemplates activities, functions, or services that directly and significantly affect members of the general public comparable in number to most taxpayers or citizens in a small city. As discussed earlier, the appellant's services do not fully meet this criterion.

Since the appellant's position warrants Level 1-2 for both Scope and Effect, 1-2 is the proper level for Factor 1 overall.

*Factor 2, Organizational setting*

The appellant's position is properly evaluated at Level 2-1. As discussed at that level, her position is accountable to a position that is two or more levels below the lowest SES position in the direct supervisory chain. Specifically, the appellant reports to a district manager who reports to an area director. The area director in turn reports to a regional commissioner. This last position is the lowest SES level in the supervisory chain.

*Factor 3, Supervisory and managerial authority exercised*

The appellant's authority is properly evaluated at Level 3-2c. Supervisors at this level must carry out at least three of the first four, and a total of six or more of the 10 responsibilities listed on pages 16 and 17 of the GSSG. The appellant carries out responsibilities 1 through 9. For instance, she exercises responsibilities 3 and 4, since she evaluates subordinates' work performance and gives them advice and instruction on both work and administrative matters.

The appellant's authority falls short of Level 3-3. For example, at Level 3-3b a supervisor must exercise all or nearly all the supervisory responsibilities described at Level 3-2c, plus at least 8 of the 15 responsibilities listed under Level 3-3b on pages 17 and 18 of the GSSG. As indicated above, the appellant exercises nearly all the supervisory responsibilities described at Level 3-2c. However, she does not exercise at least 8 of the responsibilities listed under Level 3-3b. For instance, she does not exercise responsibilities 1, 5, 6, and 8. Previous OPM appeal decisions and central office guidance show that these four responsibilities are intended to credit only supervisors who direct at least two or three persons who are officially recognized as subordinate supervisors, leaders, or comparable personnel. Further, the supervisor's subordinate organization must be so large and its work so



complex that it requires using those two or more subordinate supervisors or comparable personnel. Since the appellant supervises just one person officially recognized as a subordinate supervisor, her position cannot receive credit for these four responsibilities.

#### *Factor 4, Personal contacts*

This factor contains two subfactors: Nature of contacts and Purpose of contacts. We discuss each subfactor below.

##### *Subfactor 4A, Nature of contacts*

The nature of the appellant's contacts is properly evaluated at Level 4A-2. For instance, as discussed at that level, the appellant has contacts with the general public, representatives of local public interest groups, staff in congressional district offices, and technical or operating level employees of state or local governments.

The appellant's contacts do not fully meet Level 4A-3, for seven main reasons:

- Some supervisors at Level 4A-3 have frequent contacts with personnel in other Federal agencies who are comparable to high-ranking managers, supervisors, and technical staff at the bureau and major organization levels of an agency, or to agency headquarters administrative support staff. The appellant has contacts with personnel in other Federal agencies. However, our interviews indicated that these contacts did not fully meet Level 4A-3 criteria. For instance, the appellant noted that in the past year she has had contacts with a General Services Administration building manager, with a person in charge of public relations in a regional office of the Health Care Financing Administration, and with INS, Department of Housing and Urban Development, Railroad Retirement Board, and Peruvian consulate personnel in Southern California. However, none of these contacts were with persons fully equivalent to high-ranking managers, supervisors, or technical staff at the bureau or major organization levels of an agency, or to agency headquarters staff.
- At Level 4A-3, some supervisors have frequent contacts with key staff of public interest groups, usually in formal briefings, with significant political influence or media coverage. The appellant has contacts with public interest groups, such as Senior Concerns and Grey Law. Further, she noted during our interview that part of her job is to prevent unhappy individuals from contacting the media. We agree that this is true, but are still unable to credit these contacts. Our interview indicated that the appellant's contacts with public interest groups in the past year have involved neither as much political influence nor as much media coverage as intended at Level 4A-3. For example, the appellant indicated that both Senior Concerns and Grey Law had political impact largely within the [location] area, and that neither group involved significant media coverage.

- Contacts at Level 4A-3 may be with journalists representing influential city or county newspapers or comparable radio or television coverage. Examples of such influential media would be the Los Angeles Times, or the Los Angeles affiliates of the three major television networks. The appellant said during our interview that she has had contacts with the editor of the Daily News--[location], and with radio station KCLU located at California Lutheran University. Neither of these media outlets are as influential as envisioned at Level 4A-3.
- Level 4A-3 contacts may be with congressional committee and subcommittee staff assistants below staff director or chief counsel levels. The appellant observed during our interview that she has ongoing contacts with local congressional office managers and staffers. These contacts are typically to discuss constituents who are requesting help with a Social Security issue, or to provide information concerning new laws, regulations, or policies that relate to SSA. However, we judge that these contacts are not fully equivalent to those with staff assistants for congressional committees and subcommittees.
- Some supervisors at Level 4A-3 have frequent contacts with contracting officials and high level technical staff of large industrial firms. Our interviews indicated that the appellant has not had frequent contact with such individuals in the past year.
- Supervisors at Level 4A-3 may have frequent contacts with local officers of regional or national trade associations, public action groups, or professional organizations. Our interviews indicated that the appellant has not had frequent contacts with local officers of regional or national trade associations or professional organizations in the past year. As discussed earlier, she has had contacts with public interest or action groups such as Senior Concerns and Grey Law. However, to be credited at Level 4A-3, these latter contacts would have had to be frequent, would have had to be with local officers of regional or national groups, and also would have typically involved extensive preparation of briefing materials or up-to-date familiarity with complex Social Security technical subject matter. Our interviews did not indicate that the appellant's contacts with public action groups fully met all three criteria.
- At Level 4A-3, some supervisors have frequent contact with state and local government managers doing business with the agency. The appellant has contacts with state and local government personnel. However, our interviews indicated that these contacts did not fully meet Level 4A-3 criteria. For example, the appellant noted that she has had roughly two contacts in the past year with a manager in the California Department of Health Services, roughly two contacts in the past six months (though more near the start of 1996) with the manager of the QMB (Qualified Medicare Beneficiary) program for Public Social Services in Oxnard, and roughly six contacts in the past year with the director of [location] GAIN Program. These contacts are not frequent, as required at Level 4A-3. The appellant indicated that she has also had contacts with the one-person [location] office of the California Employment Development Department, with a technical liaison for Disability Determination Services, with office managers for the District Attorney of [location] County, and with

eligibility workers' supervisors in the [location] office of the Director of Public Social Services. However, none of these persons are true managers in the sense envisioned at Level 4A-3. The appellant has had roughly two contacts with the city manager of [location] concerning whether there should be a homeless shelter in the appellant's building, roughly two contacts with the city manager of [location] to obtain statistics, and about three contacts in the last six months (though more early in 1996) with the manager of the Department of Motor Vehicles office in [location] concerning Social Security numbers that people must provide when they apply for or renew driver's licenses. None of these last contacts were frequent, as intended at Level 4A-3. Further, though the appellant often uses her familiarity with complex Social Security subject matter, none of these last contacts required such familiarity to the extent envisioned at Level 4A-3.

*Subfactor 4B, Purpose of contacts*

The purpose of the appellant's contacts meets Level 4B-2. For instance, as described at that level, the appellant ensures that information provided to outside parties is accurate and consistent, plans and coordinates the work directed with that of others outside her branch office, and resolves differences of opinion among managers, supervisors, employees, or others.

At Level 4B-3, the purpose of contacts is to justify, defend, or negotiate (1) in representing the organizational unit directed, (2) in obtaining or committing resources, and (3) in gaining compliance with established policies, regulations, or contracts. Previous OPM decisions and guidance show that all three conditions must be met to award Level 4B-3. Further, a position must have the necessary level of authority to commit resources and to gain compliance with established policies of the organization. To represent the organization in program defense or negotiations, a supervisor must have the requisite control over resources and the authority needed to gain compliance and support on policy matters. Finally, contacts at Level 4B-3 usually involve active participation in conferences, meetings, hearings, or presentations involving problems or issues of considerable consequence or importance to the program or program segment managed.

The purpose of the appellant's contacts does not fully meet condition (1) above. Supervisors whose positions meet this condition regularly participate actively in conferences, meetings, hearings, or presentations where their primary purpose is to justify, defend, or negotiate in representing their organizational unit. The appellant noted during our interview that she conducts preretirement seminars and makes public speeches. At these and other events such as a yearly Senior Fair and Expo, she must justify or defend Social Security in answering questions from her students or audience. Further, she has justified and defended her branch office in a 1996 letter to the editor of the Daily News--[location]. Also, she observed that because she is the visible presence of SSA in her service area and because whatever she does reflects on her agency, she must engage in an ongoing effort to justify and defend her agency. However, her position still falls short of condition (1). This is because our interview indicated that in the past year, she has not regularly participated actively in conferences, meetings, hearings, or presentations where her primary purpose was to justify, defend, or negotiate in representing her branch office. For instance, her primary purpose in conducting

preretirement seminars is not to justify or defend her agency, but to provide information to seminar participants.

The purpose of the appellant's contacts also falls short of condition (2). Supervisors whose positions meet this condition regularly participate actively in conferences, meetings, hearings, or presentations to justify, defend, or negotiate in obtaining or committing resources of considerable consequence or importance. The appellant observed during our interview that in the past year, she has negotiated with the GAIN Program to obtain clerical help for her office, with [location] Youth Services to obtain summer clerical help, and with four banks to encourage them to commit resources to support direct deposit of Social Security checks. However, she estimated that she was negotiating with the GAIN Program for roughly .75 staff years of clerical help, with [location] Youth Services for roughly .25 staff years of clerical assistance, and with banks to ask tellers to wear appropriate buttons and tell customers about direct deposit. This does not fully meet condition (2), which envisions regular negotiations to obtain or commit considerably greater resources than those described above.

Finally, the purpose of the appellant's contacts does not fully meet condition (3). Our interviews indicated that unlike supervisors where this condition is met, the appellant did not regularly participate actively in conferences, meetings, hearings, or presentations in the past year where her primary purpose was to justify, defend, or negotiate in gaining compliance with established policies, regulations, or contracts. For instance, the appellant's representative indicates that the appellant deals with INS personnel when that agency has information that her office needs or vice versa. However, the appellant indicated during our interview that her office must accept INS interpretations of its laws, regulations, and policies; she cannot formally negotiate with INS on these matters. The appellant mentioned that she negotiates with a technical liaison for Disability Determination Services if that organization makes a decision in conflict with SSA policies. However, she estimated that this has occurred roughly four to six times in the past year, too seldom to consider regular and recurring.

In sum, the purpose of the appellant's contacts meets Level 4B-2, but does not fully meet condition (1), (2), or (3) at Level 4B-3. As noted earlier, all three conditions must be met to award the higher level. The appellant's position must therefore be evaluated at Level 4B-2.

We note that even if we had evaluated the appellant's contacts at Levels 4A-3 and 4B-3, this would not have affected the grade of her position.

#### *Factor 5, Difficulty of typical work directed*

To determine difficulty of typical work directed, we must determine the highest graded work that constitutes 25 percent or more of the organization's workload. In making this determination, we must credit developmental work at full performance levels, exclude subordinate work that is graded using the GSSG, and also exclude work of lower level positions that primarily support or facilitate the organization's basic work (GSSG, page 23).

The appellant currently supervises 13 employees: a GS-12 subordinate supervisor, seven GS-11 social insurance specialists, one GS-7 social insurance specialist developmental to GS-11, and four GS-8 contact representatives. For purposes of this evaluation, we accept the agency's classification of these positions. Given instructions in the preceding paragraph, we credit the work of the GS-7 employee at GS-11. We also exclude from consideration the work of the GS-12 subordinate supervisor. The record indicates that if the GS-7 employee were working at full performance level, the resulting eight GS-11 employees would spend over 40 percent of their time performing GS-11 work. All this indicates that GS-11 is the highest graded work that comprises 25 percent or more of the organization's workload. Therefore, in accordance with page 24 of the GSSG, the highest level of base work is GS-11, and the appellant's position warrants Level 5-6.

*Factor 6, Other conditions*

The appellant's position is properly evaluated at Level 6-4a. For instance, as discussed at that level, she supervises administrative work of GS-11 difficulty. Her position also meets several of the examples listed at Level 6-4a. For instance, as discussed in the first example, she identifies and integrates internal and external program issues affecting her branch office. Similar to the supervisor envisioned in the fifth example, she reviews and approves the substance of case documents to assure that they accurately reflect her agency's policies and positions.

The appellant's position falls short of Level 6-5. It meets neither Level 6-5a nor 6-5b. These levels assume that the difficulty of typical work directed as determined in Factor 5 is GS-12 or GS-13. By contrast, the difficulty of typical work directed by the appellant is GS-11. Her position also does not meet Level 6-5c. This level can be awarded only for supervisors who manage work through at least two subordinate supervisors or contractors. The appellant has only one subordinate supervisor.

*Summary*

In sum, we have evaluated the appellant's position as follows:

<b>Factor</b>	<b>Level</b>	<b>Points</b>
1. Program scope and effect	1-2	350
2. Organizational setting	2-1	100
3. Supervisory and managerial authority exercised	3-2c	450
4. Personal contacts		
4A. Nature of contacts	4A-2	50
4B. Purpose of contacts	4B-2	75
5. Difficulty of typical work directed	5-6	800
6. Other conditions	6-4a	<u>1120</u>
Total points:		2945

The 2945 total points fall within the GS-12 range of the point-to-grade conversion chart on page 31 of the GSSG. The adjustment conditions on page 32 do not apply. Therefore, the final grade for the appellant's position is GS-12.

**Decision**

The appellant's position is properly classified as Social Insurance Administrator, GS-105-12.