

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

Philadelphia Oversight Division  
600 Arch Street, Room 3400  
Philadelphia, PA 19106-1596

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

**Appellant:** [appellant's name]

**Agency classification:** Program Support Assistant (OA)  
GS-303-6

**Organization:** Community Care  
Geriatric and Long Term Care  
Service Line  
VA [name] Health Care System  
Department of Veterans Affairs  
[name] Division  
[location]

**OPM decision:** title at agency discretion (OA)  
GS-303-6

**OPM decision number:** C-0303-06-05

/s/ Robert D. Hendler

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Robert D. Hendler  
Classification Appeals Officer

October 1, 2002

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Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), 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:**

PERSONAL

[appellant's name]

[appellant's address]

Human Resources Officer  
VA [name] Health Care System  
Department of Veterans Affairs  
[name] Division  
[location]

Deputy Assistant Secretary for  
Human Resources Management (05)  
Department of Veterans Affairs  
810 Vermont Avenue, NW, Room 206  
Washington, DC 20420

## **Introduction**

On June 21, 2002, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. We received the complete appeal administrative report on July 11, 2002. Her position is currently classified as Program Support Assistant (OA), GS-303-6. The appellant believes the classification should be Management Assistant, GS-344-7. The position is in the Community Care, Geriatric and Long Term Care Service Line, VA [name] Health Care System ([acronym]), Department of Veterans Affairs, [name] Division, [location]. We have accepted and decided her appeal under section 5112 of title 5, United States Code (U.S.C.).

## **General issues**

The appellant included a copy of a position description (PD) and an automated evaluation statement produced by the COHO automated classification system classified as Management Assistant, GS-344-7, in the appeal forwarded by the appellant's agency to OPM. The documents referring to that PD were signed by the appellant and her first- and second-level supervisors as part of a process seeking to promote the appellant. However, this PD is not the same PD of record ([number]) certified as current and accurate by the appellant and her first-level supervisor and provided by the agency as part of the appeal administrative report.

The appellant stressed the increase of her workload and new functions that she performs. She disagreed with how her agency evaluated her position and said that her work is not controlled by a position at the Baltimore Division (Administrative Support Assistant, GS-303-7, PD [number]). She also stated that another position at the Baltimore Division (Program Support Assistant (OA), GS-303-6, PD [number]) was improperly credited with support for the Community Nursing Home (CNH) program for which the appellant is responsible. She provided copies of these PD's in her appeal request.

The appellant's rationale points to the description of work in her proposed PD. However, agency management and the appellant have certified that the PD of record is accurate. A PD is the official record of the major duties and responsibilities assigned to a position by an official with the authority to assign work. A position is the duties and responsibilities that make up the work performed by an employee. Position classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities assigned by management and performed by the employee. An OPM appeal decision grades a real operating position and not simply the PD. Therefore, this decision is based on the actual work assigned to and performed by the appellant.

By law, we must classify positions based 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, such as comparison to positions that may or may not have been properly classified or comparing the work that the appellant currently performs with the work that she previously performed. The quantity of work performed is not germane to the classification process. Because our decision sets aside all previous agency decisions, the appellant's concerns regarding her agency's classification review process are not germane to this decision.

Implicit in the appellant's rationale is a concern that her position is classified inconsistently with other positions. Like OPM, the appellant's agency must classify positions based on comparison to OPM PCS's and guidelines. Section 511.612 of 5 CFR, requires that agencies review their own classification decisions for identical, similar, or related positions to ensure consistency with OPM certificates. Thus, the agency has the primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions.

PD #[number] contains duties that are substantially different from those listed in the appellant's PD of record, e.g., "primary administrative support to the Program Manager and staff for all Community Care programs." The appellant has called into question the accuracy of the PD #[number]. If the appellant believes that her position is classified inconsistently with those positions, she may pursue this matter by writing to her agency headquarters human resources office. In so doing, she should specify the duties and responsibilities of the positions in question. The agency should explain to her the differences between her position and the others, or grade those positions in accordance with this appeal decision.

### **Position information**

The appellant provides administrative and program support to the Contract Adult Day Health Care (CADHC) for the [acronym]. Vendors provide services on a contract basis. She tracks program expenditures, provides current and projected budget reports to her supervisor for program planning purposes, and certifies monthly invoices submitted by contract facilities providing services for payment. She works closely with other [acronym] components to resolve problems and ensure smooth operations. The appellant answers questions on eligibility. She deals directly with her supervisor on requests for services, arranges for social workers to conduct contract facility inspections, and performs other related support duties.

She provides similar support services for the Homemaker/Home Health Aide (H/HHA) program. The appellant receives referrals from physicians, social workers, and nurses authorizing care and, in conjunction with her supervisor, establishes the number of hours of care authorized based on the diagnosis and care needed. Financial and contract program functions are similar to the CADHC program. She follows up on family member complaints on the quality of care and, after sharing her findings with her supervisor, may arrange for services from a different provider.

The appellant performs similar work for the CNH program. Based on referral information from care authorizers, she ascertains level of care and determines proper per diem rate and proper rates for additional types of care, e.g., ulcer care, infusion therapy, tube feeding, and medication. The appellant assures that lengths of placement are correct based on percentage of service connected disability and that other program requirements are met. She discusses eligibility and service limitations with patients' families. As necessary, she arranges for bed holds for patients that are sent to private hospitals for treatment.

She provides more limited support services for the [name] Community Residential Care (CRC) program. The appellant manages the flow of referrals, tracks program information, and generates monthly reports. She does not provide program budget support.

The appellant prepares reports and correspondence for the CNH, CRC, H/HHH and CADHC programs. She monitors educational requirements for the staff of approximately six to eight employees who report to her supervisor. She uses International Merchant Purchase Authorization Cards to purchase supplies for the program.

We conducted a telephone audit with the appellant on August 29, 2002, and a telephone interview with her supervisor, [name], on September 3. To clarify information in the record, we conducted telephone interviews with the appellant's second level supervisor, [name], on September 19, and on September 23 with [name], VISN Business Manager for the Geriatrics and Long Term Care Line. The PD of record contains the major duties and responsibilities assigned by management and performed by the appellant. In deciding this appeal, we fully considered the audit and interview findings and all information of record furnished by the appellant and her agency, including her official PD which we incorporate by reference into this decision.

### **Series, title, and guide determination**

The agency has classified the position in the Miscellaneous Clerk and Assistant Series, GS-303, titled it Program Support Assistant (OA) because it requires competitive keyboard skills, and determined that it is properly graded by application of the Grade Level Guide for Clerical and Assistance Work (Guide). The appellant believes that she is performing Management Assistant, GS-344, work classified by application of the Management and Program Clerical and Assistance Series, GS-344 PCS. In support of her appeal, she states that planning for the number of patients that can be supported in each program area and other program monitoring constitutes program analysis.

The GS-344 series includes positions that support management and program analysis. Management and program analysis are staff functions. The purposes of those programs are to evaluate and improve the efficiency, effectiveness, and productivity of organizations and programs. GS-344 work requires a practical knowledge of the purposes, methods, and techniques of management and/or program analysis and the structures, functions, processes, objectives, products, services, resource requirements, and similar features of Government programs and organizations.

The appellant does not work in a staff office supporting staff management and/or program analysis functions. She provides technical and administrative support to a VAMHC operating function; i.e., Community Care. Therefore, her position is covered under Exclusion #1 in the GS-344 PCS which excludes positions that perform clerical or technical support work in various administrative services essential to the management, direction, and operation of an organization, e.g., travel, procurement, budget, personnel, safety, security, and property and facility management.

The appellant's position is covered by the GS-303 series. This series includes positions that perform clerical, assistant, or technical work for which no other series is appropriate. The work requires knowledge of the procedures and techniques involved in carrying out the work of the organization and involves applying procedures and practices within the framework of established guidelines. Typical of this series, the appellant's work requires knowledge of various community care program and related budget practices and procedures, and general administrative

support procedures including purchase card procurement, and using office automation (OA) software packages.

There are no published grade-level criteria for the GS-303 series. The *Introduction to the PCS's* states that when there is no directly applicable PCS, a position should be classified using criteria that are comparable in scope and difficulty and that describe similar subject matter and functions. We find that the appellant's work is best evaluated by application of the grading criteria in the Guide for grade level analysis of her program work. Administrative program support work of the kind described in the Guide is performed in offices, shops, laboratories, hospitals, and numerous other settings in all Federal agencies. 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 PCS's* using the parenthetical OA to reflect the qualification requirement.

### **Grade determination**

The Guide describes the general characteristics of each grade level from GS-1 through GS-7 and uses two evaluation factors 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).

#### *Nature of assignment*

The appellant's rationale stresses the increased difficulty and complexity of her budget and related work. She states that until 2000 each program was allotted a set amount of money each month and that her work was limited to dealing with increases and decreases. However, since that time she compiles this information for budget estimates, reconciles the budget, creates spreadsheets monthly for statistical analysis, and reconciles the invoices for each program monthly. The appellant says that she is asked to create estimates for the next year's budget, determine the impact of new or updated contracts on the budget, compile contract information for each program and distribute the information to appropriate staff members who use each program. The appellant's rationale paraphrases selected portions of the Guide's description of the GS-7 work. For example, she says that she evaluates the appropriateness of justifications for changes in clerical staffing levels. Our fact-finding revealed that the appellant equates determining the number of day care placements that she can make within program resources with determining changes in staffing work load. She says that she must create her own guidelines for each program and adapt any new changes to meet current guidelines and that implementing a decision to decrease the maximum number of hours of home health care due to a budget shortfall reflects interpreting guidelines as defined at the GS-7 grade level.

As at the GS-6 grade level, the appellant's work requires considerable evaluative judgment within well-defined, commonly occurring aspects of an administrative program or function. She performs continuing CRC, H/HHA, CADHC, and CNH program processes based on direct application of established policies, practices, and criteria. For example, current year H/HHA services provide for up to 10 hours of services per patient each week. Based on the diagnosis and medical care needed, the appellant works with her supervisor to determine the number of hours to authorize. The supervisor retains approval authority. Typical of the GS-6 grade level, the appellant identifies issues, problems, or conditions and seeks alternative solutions based on

evaluation of the intent of applicable rules, regulations, and procedures. For example, patients are accepted on a first-come, first-serve basis. However, the appellant assures that authorized deviations to that procedure are handled properly, e.g., providing services to seriously ill patients who likely will remain in the program a short time.

Although her assignments involve a full range of case situations, they are themselves part of a single specialized program; i.e., Community Care, within the broader function of Geriatrics and Long Term Care. As at the GS-6 grade level, the assignments requiring evaluative judgment are narrowly focused, address a single product or action, are relatively clear cut, and resemble past problems or situations, e.g., screening CNH cases to determine whether the level of care will be light, moderate, or heavy; responding to complaints about H/HHA provider personnel; and reconciling funds monthly to identify potential trends. Typical of this grade level, work often involves problems or situations where there is not one absolutely correct solution, only a best or most appropriate one, e.g. determining the number of H/HHA hours to provide based on diagnosis and care need. The work requires practical knowledge of guidelines and precedent case actions relating to each program area acquired through considerable work experience, and requires skill to recognize the dimensions of a problem and express ideas in writing, e.g., using spreadsheet information to project funds use based on current and projected patient population.

The budget and related functions performed by the appellant compare closely with those in the Guide's GS-6 grade level illustration. The illustration describes a position that runs a statistical reporting and records systems for a major division of a regional office. The division is a relatively stable organization that does not have widely diverse functions. The employee consolidates annual funding estimates from subordinate offices into a complete budget request for the division; organizes estimates by appropriation, object class, and line item following current budget instructions; and prepares required supporting documentation for expenditures such as employee travel, training, and office equipment and supplies. Funding requirements for the division are relatively stable from year to year. The work requires an in-depth practical knowledge of the division's activities, operations, and established guidelines relating to work measurement functions, statistical reporting and records systems, and the budget process. The work also requires skill to compile and summarize information and data, identify inaccuracies or anomalies in the information, and make written recommendations to resolve discrepancies based on interpretation of applicable regulations and procedures. The employee must extract and analyze a considerable volume of information to arrive at an end product. Although the appellant does not compile budget requests from subordinate offices, her review of monthly, year-to-date expenditures to project rest-of-year status, and her use of historical information to project the next funding year's needs present equivalent analytical demands.

The appellant's work does not meet the GS-7 grade level which consists of specialized duties with continuing responsibility for projects, questions, or problems that arise within an area of a program or functional specialty as defined by management. Assignments involve a wide variety of problems or situations common to the segment of the program or function for which the employee is responsible. Each assignment typically consists of a series of related actions or decisions prior to final completion based on the development and evaluation of information that comes from various sources. The work involves identifying and studying factors or conditions and determining their interrelationships and taking or recommending actions that are consistent with the objectives and requirements of the program or functions. The work requires knowledge

and skill to recognize the dimensions of the problems involved, collect the necessary information, establish the facts, and take or recommend action based upon application or interpretation of established guidelines and practical knowledge of the operations, regulations, principles, and peculiarities of the assigned program, function, or activity.

Illustrative of such work is advising the manager of a single-function field office on the practical and technical aspects of office administration including budgeting, purchasing, supply management, personnel administration, data processing, and files management and performing staff support work in each of these areas. The employee collects data for the office operating budget, reviews submissions of office staff assistants for proper format and compliance with agency budget requirements, and consolidates material into an annual office budget; sets up controls to monitor expenses during the year; and recommends budget adjustments including restructuring budget allocations or work plans to deal with changing situations such as varying costs for equipment parts, or services, and changes in the availability of funds. The employee updates the office's supply sources catalogues; purchases supplies, equipment, and services through open market purchase by blanket agreement, cash or field purchase order, or similar methods; processes and tracks purchase documents; completes requests for personnel actions and writes PD's; and distributes forms and instructions for annual performance ratings and ensures timely and proper completion. The work includes conducting local recruitment and holding new employee orientation sessions and maintaining and revising the office filing system. The employee collects program information from technical specialists, enters it into electronic or manual information systems, and searches for it as requested; schedules use and maintenance of computer equipment; enters and retrieves information from a variety of systems; and helps field office employees use the various computer systems.

The employee maintains and transfers funds between several unrelated appropriated fund accounts and several revolving fund accounts. The accounts are subject to different regulations and procedures. The work also involves initiating personnel actions and tracking virtually all financial, personnel, supply, and other administrative transactions as the documentation flows through the office in both electronic form and on paper. The work requires general knowledge of the mission and functions of the field office and an understanding of how the office's various administrative services relate to one another and how they relate to the office's mission. The work also requires broad understanding and detailed procedural knowledge of budget, purchasing, personnel, and information processing functions of the field office to recognize the dimensions of the problems involved, collect the necessary information, establish the facts, and take or recommend action based upon application or interpretation of established guidelines and practical knowledge of the operations, regulations, principles, and peculiarities of the assigned program, function, or activity.

As discussed previously, the appellant's program support functions, from entitlement advice and review to screening of CNH invoices for proper charges, involve applying similar practices and procedures for each patient service program. Her budget functions do not involve supporting the wide range of program functions covered by separate appropriations, a mix of appropriated and revolving fund accounts working under different financial regulations and procedures, or budget consolidation and reprogramming analysis and recommendations found at the GS-7 grade level. Instead, higher level program and business management staff analyze and make decisions on reprogramming based on the appellant's projections on anticipated expenditures of projected



client load and usage. The appellant implements those changes and assures that they are communicated to [acronym] personnel who authorize patient services. Although the appellant processes and tracks virtually all financial, personnel, supply, and other administrative transactions for the office, those functions are for an organization substantially more limited in administrative complexity than illustrated at the GS-7 grade level. Her duties do not include the more demanding administrative functions illustrated in the Guide, e.g., conducting local recruitment, holding formal employee orientation sessions, and helping field office employees use various computer systems. Arranging for home health care visits is not equivalent to analyzing workload and determining the need for additional clerical staff to provide administrative support in a multi-component field office. Implementing changes in hours of services and per diem rates and tracking their impact on funds usage is not equivalent to budget analysis and reprogramming for the more complex administrative support functions illustrated at the GS-7 grade level. The appellant's decisions on home health visits, calculation of proper payments based on contract per diem and other charges specific to each patient, providing information on and ascertaining entitlement to services, projecting budget status based on anticipated patient use and similar work functions do not involve the more demanding problems, questions, and issues and their greater analytical demands found at the GS-7 grade level. Accordingly, this factor is evaluated at the GS-6 grade level.

#### *Level of responsibility*

The appellant works with the freedom from supervision typical of the GS-6 grade level. As at that grade level, the appellant's supervisor assists with precedent assignments by interpreting policy, e.g., program changes that result in an increase or decrease of hours of care that may be authorized for patients and changes in contract rates. Completed work is evaluated for appropriateness and effectiveness in meeting goals. Guidelines such as regulations, instructions, evaluation criteria, and prior case or action files are available, but they are often not completely applicable to the assignment or have gaps in specificity. The appellant uses judgment in interpreting and adapting guidelines for application to specific cases or problems, e.g., screening CNH cases to determine level of care and additional medical services that need to be funded. The appellant bases her decisions and recommendations on facts and conventional interpretations of guidelines rather than on theory or opinion. She contacts others to provide, receive, or develop information in order to identify problems, needs or issues, and/or to coordinate work efforts or resolve problems, e.g., contacting her supervisor when a facility reports that a patient requires a change in level of care.

The appellant's work situation compares closely to the GS-6 grade level illustration in which the supervisor makes assignments by defining objectives, priorities, and deadlines. The appellant independently gathers data, prepares reports, and makes recommendations consistent with normal practice, using experience in solving problems and handling unusual occurrences, e.g., using a different home health agency in response to a service complaint. Her completed work is evaluated for appropriateness and effectiveness, e.g., the appellant's supervisor makes the final decision on the number of patients that can be supported based on budget projections. The supervisor and users of the data are available to provide advice if significant changes in operations or data requirements occur. Guidelines include manuals on the budget process as well as general guidance on management reporting techniques. The appellant uses judgment in interpreting rather general guidelines to prepare reports, evaluate compliance with work

measurement requirements, and develop findings, recommendations, and justifications, e.g., developing detailed budget estimates based on current and historical patient use. Contacts are with co-workers and users of the information to exchange information, present findings, and improve reporting and budget development methods and are usually cooperative, e.g., contacts with higher level program people to provide and discuss budget projections.

In contrast, at the GS-7 grade level the supervisor makes assignments in terms of objectives, priorities, and deadlines. The employee independently completes assignments using accepted practices and resolves most conflicts that arise. Completed work is evaluated for appropriateness and conformance to policy. The employee encounters a wide variety of problems and situations which require choosing alternative responses. Guides such as regulations, policy statements, and precedent cases tend to be general and descriptive of intent, but do not specifically cover all aspects of the assignments and apply less to specific actions and more to the operational characteristics and procedural requirements of the program or function. The employee must use significant judgment and interpretation to apply the guides to specific cases and adapt or improvise procedures to accommodate unusual or one-of-a-kind situations. He or she serves as a central point of contact to provide authoritative explanations of requirements, regulations, and procedures and to resolve operational problems or disagreements affecting assigned areas.

Illustrative of such work is functioning as the office support advisor previously described when the supervisor makes assignments by defining objectives, priorities, and deadlines. The employee works independently, using a general understanding of the expected outcomes and the scope of the assignments, and draws upon experience in resolving the more difficult situations that occasionally arise. The work is reviewed for technical accuracy, soundness of judgment, and adherence to program requirements and objectives. The employee uses a large number of guidelines covering the various aspects of the job. The work requires judgment in selecting the correct part of the most appropriate guideline to apply to each of a large variety of actions, such as budget estimates, tracking annual spending, and initiating personnel actions. When guidelines change, the employee may obtain assistance, as needed, from staff specialists at a higher echelon. Most of the time, the employee follows procedures, formats, and practices specified in agency supplements to broad, Governmentwide guidelines. However, situations often arise which are not specifically covered by guidelines, requiring the employee to apply general principles to specific situations. Contacts involve developing and exchanging information, resolving operating problems and making recommendations. The contacts are usually cooperative, but there may be disagreements as to the facts in a case, or disagreements on the interpretation or application of regulations and guidelines to specific situations.

Unlike the GS-7 grade level, the appellant preponderantly deals with cases and scheduled developing assignments, e.g., monthly budget spreadsheets, rather than broad program objectives, priorities, and deadlines. Her budget support responsibilities tracking and projecting future current year use based on past history do not involve the extensive reprogramming flowing from changing program situations typical at the GS-7 grade level. Program regulations and policy statements primarily apply to specific actions, e.g., how to determine CNH level of care for a specific patient, rather than to operational characteristics and procedural requirements of the program or function typical at this grade level. Unlike the GS-7 grade level, the appellant's supervisor makes final determinations of service based on her analysis of clinical needs. While the appellant serves as a central point of contact to provide explanations of

requirements, regulations, and procedures to patients and their families, her supervisor is tasked with resolving operational problems or disagreements because they are primarily clinical or equivalent in nature, e.g., authorizing changes in level of care because the patient can no longer feed him or herself or following up on charges that a home health worker stole money from a patient. Accordingly, this factor is evaluated at the GS-6 grade level.

### *Summary*

In summary, since both factors are credited properly at the GS-6 grade level, we find that the appellant's position is properly evaluated at the GS-6 grade level.

### **Decision**

The appellant's position is properly classified as GS-303-6 with the title at the agency's discretion, to include the parenthetical (OA).