

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: Business Management Assistant (Office
Automation (OA))
GS-303-5

Organization: [activity name]
Forest Service
U.S. Department of Agriculture
[location]

OPM decision: Title at the agency's discretion with
parenthetical title "OA"
GS-303-5

OPM decision number: C-0303-05-15

/s/ Robert D. Hendler

Robert D. Hendler
Classification Appeals Officer

June 18, 2002

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:

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

[name]
Human Resources Specialist
U.S. Department of Agriculture
Forest Service
[activity]
[address]
[location]

Mr. Joseph V. Colantuoni
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Introduction

On February 13, 2002, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant's name]. We received the complete appeal administrative report on March 8, 2002. Her position was downgraded by her agency from GS-6 to GS-5 as the result of a review that it conducted at her request seeking to upgrade it to the GS-7 grade level. Her position currently is classified as Business Management Assistant (OA), GS-303-5. The appellant requested that her position be upgraded to GS-6 or GS-7. The appellant works in the [activity], Forest Service, U.S. Department of Agriculture, [location]. We have accepted and decided this appeal under section 5112(b) of title 5, United States Code (U.S.C.).

General issues

In her appeal letter, the appellant makes various statements about the adequacy of the agency's evaluation of her position. She says that her agency did not fully recognize that she (1) analyzes and interprets guidelines and regulations in order to advise scientists on how to proceed administratively, (2) works independently and is liaison with various administrative units, (3) processes, researches, orders and advises the entire staff within the research unit on purchasing activity, (4) provides support to the entire staff of the research unit, (5) organizes work and establishes priorities, (6) is responsible for accurately accounting for expenditures of funds, and (7) is bilingual in English and Spanish.

The appellant's rationale largely relies on the description of work in her position description (PD) of record ([number]). 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.

In her contacts with OPM, the appellant stated that her current PD is the same as the PD she previously occupied at the GS-6 grade level. She emphasized the dollar value of her purchases. 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, such as comparison to positions that may or may not have been classified properly. Dollar value of work may only be considered to the extent that it affects the difficulty and complexity of work performed. 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.

We conducted a telephone audit with the appellant on April 22, 2002, and a telephone interview with her supervisor, [name], on April 22. We held follow-up conversations with the appellant and her supervisor on May 2. To clarify information provided during those conversations, we conducted telephone interviews with the Head of the Library, Ms. Gisel Reyes, the Grants Specialist, [name], and a Staff Scientist, [name], on April 23. We interviewed Accounting

Technician, [name] on May 2, 2002. In order to gain a better understanding of the appellant's work, we conducted an on-site audit with the appellant on May 28 and 29, and on-site interviews on May 29 with [supervisor's name], [Grants Specialist], [Accounting Technician], and [name]. On June 2, we conducted a telephone interview with [Staff Scientist]'s assistant, [name]. We carefully considered all of the information of record and work samples that she provided at our request.

Position Information

The appellant coordinates the clerical and administrative support duties for the Research Unit in the [activity], which is comprised of approximately 37 employees. The appellant is under the immediate supervision of the Project Team Leader for the [name] Unit.

The appellant uses a government credit card to purchase a variety of services, equipment, and supplies for both the research unit and the library within her overall \$25,000 purchasing authority, ensuring each transaction does not exceed the allowed \$2,500 limitation. Using the automated Purchasing Card Management System, the appellant reviews the accuracy of the expenses charged to the Government credit card and enters appropriate budgetary information. The appellant spends approximately 40 percent of her time on duties associated with purchasing goods and services.

The appellant spends approximately 30 percent of her time preparing travel vouchers for staff within the research unit. She spends the remaining time performing a variety of both clerical duties and administrative duties such as composing non-technical correspondences and inputting data into three databases. One contains all the transactions generated by her credit card, one captures all travel claims processed for Research employees, and one contains employee salaries. She makes arrangements for travel and support of staff on field trips and reserves meeting rooms, maintains office filing systems, keeps abreast of various procedural requirements, such as those pertaining to travel and requests for personnel actions, distributes budget reports, prepares requests for personnel action, reviews, enters, and electronically transmits time and attendance records.

Our interviews with the appellant and her supervisor confirmed that while the PD of record contains many of the major duties and responsibilities performed by the appellant, it also lists duties that imply a higher level of difficulty and complexity than she performs. For example, the appellant is not required to have the knowledge of and skill in applying accounting principles and budgeting procedures of the Forest Service. Her financial resource support duties are limited to tracking and providing timely and accurate expenditure information to her supervisor and unit scientists. More complex financial functions are assigned to and performed by other employees in the Institute.

Series, title, and standard determination

The agency placed the appellant's position in the Miscellaneous Clerk and Assistant Series, GS-303, for which there is a published PCS. The appellant does not disagree with the series of her position and the addition of the parenthetical title "OA" to the position title.

As discussed in the **Grade determination** section of this decision, the appellant's grade controlling work is covered by the Voucher Examining Series, GS-540. However, the primary and paramount purpose of the position is to provide a broad range of administrative support work classifiable to several different series. Therefore, we find that the position is properly placed in the GS-303 series.

The agency has titled the appellant's position as Business Management Assistant (OA). No titles are specified for positions classified in the GS-303 series. Although the title is at the agency's discretion, it must follow the titling guidance discussed in the *Introduction to the Position Classification Standards* in constructing the title.

The GS-303 PCS does not include grade-level criteria. The PCS instructs that positions in that series be evaluated by reference to other standards for analogous knowledge and skills. The appellant's duties associated with making small purchases occupy 40 percent of her work time and will be evaluated against the Purchasing Series standard, GS-1105, PCS. Her travel voucher and related duties occupy 30 percent of her work time and will be evaluated against the Job Family Standard (JFS) for Clerical and Technical Accounting and Budget Work, GS-500C. Because the duties covered by the GS-500C JFS are the grade controlling duties, there is no need to apply the Grade Level Guide for Clerical and Assistance Work (Guide) to her position.

Grade determination

Positions that perform different kinds of work, when evaluated in terms of duties, responsibilities, and qualifications required, may be at different grade levels. The highest level work assigned to and performed by the employee for the majority of the time is grade-determining. If work assigned and performed at a higher grade is only a minority of the time, it may be grade controlling only if it is officially assigned to the position on a regular and recurring basis; occupies at least 25 percent of the employee's time; and that the higher level knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

Evaluation using the GS-1105 PCS

The GS-1105 PCS is in Factor Evaluation System (FES) format. Under the FES, positions are evaluated by comparing the duties, responsibilities, and qualifications required with nine factors common to nonsupervisory General Schedule positions. A point value is assigned to each factor in accordance with the factor-level descriptions. For each factor, the full intent of the level must be met to credit the points for that level. The total points assigned for the nine factors are converted to a grade by reference to the grade conversion table in the PCS. Our analysis of the work follows.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts a worker must understand in order to do acceptable work and the nature and extent of skills needed to apply these knowledges.

The appellant's position fully meets Level 1-3, where knowledge of standardized regulations and procedures are required to make purchases involving commercial requirements and average complexity. The position does not meet Level 1-4, which requires a broad knowledge of purchasing regulations and procedures to make purchases involving specialized and/or commercial requirements that have unstable price or product characteristics, hard-to-locate sources, or similar complicating factors. Items purchased do not have these characteristics and the appellant is limited to sources that she routinely uses or that are provided by the requestor, e.g., the sole source cylinder gas supplier.

Level 1-3 is credited for this factor and 350 points are assigned.

Factor 2, Supervisory Controls

This factor considers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

The appellant's position meets Level 2-2, where the employee uses initiative to make purchases for recurring requirements independently. The employee refers situations not covered by instructions or practice to the supervisor for decision or review. Typical of some positions at Level 2-2, there is little review of the appellant's work because of her familiarity with pertinent purchasing methods and procedures.

At Level 2-3, the employee works within standard objectives, priorities, and deadlines and receives instructions. The employee negotiates prices with sole source vendors, persuades reluctant vendors to bid, and collects data to determine price reasonableness for requirements not acquired previously or recently. Completed assignments are not reviewed in detail. The employee independently suggests revisions or additions to ensure information pertaining to the contractor's obligation is clear and adequate. While the appellant performs her work independently, the types of purchases that she makes do not require the technical judgments on the types of purchases handled at Level 2-3 or the range of tasks in making those purchases, e.g., responding to protests from nonselected vendors and identifying loopholes in specifications or statements of work that are very lengthy, detailed, or otherwise difficult to understand.

Level 2-2 and 125 points are assigned.

Factor 3 - Guidelines

This factor covers the nature of the guidelines used and the judgment needed to apply them.

The appellant's position meets Level 3- 2. At this level, there may be minor gaps in guidelines but the employee uses judgment and initiative in resolving aspects of the work not fully covered by instructions. The employee refers situations that require significant deviations to the supervisor or others for guidance or resolution. The appellant uses equivalent judgment in resolving billing discrepancies, using small purchase procedures and reconciling credit card payments in the automated purchase card system.

At Level 3-3, guidelines are available but are not completely applicable to many aspects of the work because of the unique or complicating nature of requirements or circumstances. The employee independently uses judgment to interpret guidelines, adapt procedures, decide approaches, and resolve specific problems. This includes, for example, reviewing detailed, nonstandardized statements of work for adequacy, developing technical ranking factors for award determinations, or negotiating determinations for convenience or default. The appellant's purchasing duties do not involve these situations and do not present problems requiring these intensive interpretive demands.

Level 3-2 is credited and 125 points are assigned.

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

The appellant's position fully meets Level 4-2. As at Level 4-2, the appellant's purchasing work involves performing a variety of related tasks using primarily simple noncompetitive purchasing methods, such as credit cards or placing orders against single award Federal Supply Schedules. The appellant makes decisions as to whether to solicit additional sources or question prices based on similar purchases and basic procedures. She uses price and/or delivery as determining factors.

The appellant's position does not meet Level 4-3, at which work involves using different processes and methods to make a variety of competitive or sole source small purchases or make a variety of purchases against various established contracts and agreements such as multiple award schedules, blanket purchase agreements, and requirements contracts. The appellant does not use different solicitation methods, ordering procedures, or purchasing methods. She does not select clauses or provisions depending on the type, quantity, dollar value, or urgency of the requirement, as described at Level 4-3. She prepares requisitions for actions requiring open market solicitation or similar technical demands and refers them to her purchasing contact for action.

Level 4-2 is credited and 75 points are assigned.

Factor 5, Scope and effect

This factor covers the relationship between the nature of the work and the effect of work products or services within and outside the organization.

The appellant's position meets Level 5-2 which involves providing purchasing services that are covered by well-defined and precise procedures and regulations. The appellant clarifies what is needed and when, and selects the method and source to meet those requirements. The appellant's work affects the smooth flow of everyday operations.

The position does not meet Level 5-3. At this level, the purpose of the work is to purchase various commercial and/or specialized requirements. The work involves resolving a variety of purchasing problems such as inadequate or restrictive specifications, lack of multiple suppliers, urgent need, and insufficient price history. The types of equipment and services the appellant purchases do not present these types of problems. The appellant's purchasing decisions do not have a direct affect on the serviced programs' ability to conduct business described at this level in the PCS, e.g., timely delivery of urgently needed medical supplies.

Level 5-2 is credited and 75 points are assigned.

Factor 6, Personal contacts, and Factor 7, Purpose of contacts

These factors include face-to-face contacts and telephone dialogue with persons not in the supervisory chain, and pertain to the reasons the contacts are made.

The appellant's contacts meet Level 2 at which contacts are with internal agency employees outside the immediate organization. Contacts outside the agency are with commercial suppliers or personnel of other Federal agencies. The appellant does not have contacts with technical or legal representatives of firms who are negotiating substantial purchase order changes or terminations for default, or who are protesting the basis for nonselection of award, as described at Level 3.

The purpose of the appellant's contacts meets Level a. At this level, the purpose of the contacts is to clarify or exchange information related to purchases, such as to obtain information on items, prices, discounts, and delivery dates. At Level b, the purpose of the contacts is to plan and coordinate actions to prevent, correct, or resolve delays or misunderstandings in the purchasing process. This includes contacting vendors to clarify requirements and negotiate issues, such as establishing adequate price reductions for deviations in product or delivery, modifying certain terms, or waiving penalties for returned items. The appellant's purchasing duties do not involve the types of issues requiring the purpose of contacts found at Level b.

Level 2a and 45 points are assigned.

Factor 8, Physical demands

This factor covers the requirements and physical demands placed on the employee by the work assignments. This includes physical characteristics and abilities and the physical exertion involved in the work.

The physical requirements involved in the appellant's duties match Level 8-1. The work requires no special physical demands. It may involve some walking, standing, bending, or carrying of light items. The appellant's work does not require the physical agility needed to visit evacuation or construction sites on a regular and recurring basis, as described at Level 8-2.

Level 8-1 is credited and 5 points are assigned.

Factor 9, Work environment

This factor considers the risks and discomforts in the employee's physical surroundings and the safety regulations required. The work environment of the appellant's position compares to Level 9-1. The work is generally performed in an office requiring normal safety precautions against everyday risks or discomforts.

Level 9-1 is credited and 5 points are assigned.

Summary

In summary, we have credited the appellant's 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	5-2	75
6. Personal contacts and 7. Purpose of contacts	2-a	45
8. Physical demands	8-1	5
9. Work environment	9-1	<u>5</u>
	Total Points	805

A total of 805 points falls within the GS-4 grade level point range of 655-855 points on the Grade Conversion Table.

Evaluation using the GS-500C Job Family Standard

The appellant spends about 30 percent of her time advising on travel matters and reviewing travel vouchers for the unit's researchers before forwarding for the supervisor's approval. This PCS is in the FES format and is applied in the same manner previously described for the GS-1105 PCS.

Factor 1, Knowledge required by the position

Work at Level 1-3 requires knowledge of a body of standardized regulations, requirements, procedures, and operations associated with clerical and technical duties related to the assigned financial management support function. This includes knowledge of various financial processing procedures to support transactions that involve the use of different forms and the application of different procedures (e.g., knowing how to process an action involving multiple documents such as processing the full range of travel related expenses including the sale of a residence as well as personal transportation and some household freight shipments). The knowledge required by the appellant for her voucher processing work encompasses current and future staff needs. While the travel vouchers the appellant advises on and reviews are not associated with household moves, many involve equivalent complexities that require her to know the need for, structure, and content of various supporting documents, and to check documents for adequacy and

compliance with established travel regulations and rules to determine if a transaction is permitted or to respond to questions from the staff.

For example, the appellant advises on supporting requirements and reviews vouchers and extensive supporting documentation involving complex international travel for scientific research covering a period of weeks or months. The purpose of the travel and the itinerary change frequently during the period of temporary duty because of unanticipated changes in where the research leads. There are often sudden and unanticipated requirements to purchase supplies, day labor, and transportation, which are charged to miscellaneous travel expenses, to support the changes in the research to be performed. This requires the appellant to assure submission of adequate supporting justification and amended authorizations to support claims. Under these circumstances, vouchers are extensive, with many supporting schedules and documents, presenting challenges in assuring that claims are supported by authorizations.

In addition, staff travel is often sponsored by other agencies, universities, or private foundations. This requires the appellant to recognize who is paying for what and whether the sponsor will incur expenses or reimburse the traveler, to advise on and review documentation requirements such as ethics clearances and authorizing letters of invitation to support bills of collection, the use of appropriate accounting codes, and presence of appropriate authorizations and justifications for unexpected expenses. As illustrated at Level 1-3, she assures vouchers are complete and that supporting documents such as authorizations, claims, receipts, airline tickets, etc. are present. She verifies the accuracy of voucher packages by comparing claimant information with per diem rate charts (taking foreign exchange rates into account) and accounting classification.

The work does not require in-depth or broad knowledge of a body of accounting, budget, or other financial management regulations, practices, procedures, and policies related to the specific financial management functions, as illustrated at Level 1-4. At this level, a wide variety of interrelated steps, conditions, and procedures or processes are required to assemble, review, and maintain complex accounting, budget, or other fiscal transactions. For example, employees at this level reconcile accounts in accounting systems involving extensive subdivision of accounts, frequent and varied adjustments to accounts, or extensive balancing and reconciling of detailed summary accounts. This is not characteristic of the appellant's assigned duties.

Level 1-3 is credited and 350 points are assigned.

Factor 2, Supervisory Controls

The appellant's position meets Level 2-2. At this level, there are general standing instructions on recurring assignments indicating what is to be done, applicable policies, procedures and methods to follow, data and information required, quality and quantity of work expected, priority of assignments, and deadlines. A travel office is available to provide additional, specific instructions for new or unusual issues, including suggested procedures. While the appellant receives little day-to-day supervision regarding her support of staff travel, she works within established procedures, precedents, and rules that cover the varied situations she encounters.

The appellant's assignments fall short of Level 2-3, where employees independently process the most difficult procedural and technical actions, handling problems and deviations independently, and determine whether standard techniques, methods, or procedures are appropriate. While she advises on and reviews travel documents, another employee has responsibility for final approval of travel vouchers for payment.

Level 2-2 and 125 points are assigned.

Factor 3, Guidelines

Comparable to Level 3-2, a number of established procedures and specific guidelines in the form of agency policies and procedures, specific related regulations, and precedent actions are readily available for doing the work and are clearly applicable to most transactions the appellant advises on and reviews.

The number and similarity of guidelines and work situations require her to use judgment to identify and select the most appropriate procedures to use, choose from among several established alternatives, or decide which precedent action to follow as a model. There may be omissions in guidelines, and she is expected to use some judgment and initiative to handle aspects of the work not completely covered. In locating, selecting and applying the most appropriate instructions, references, or procedures, the appellant may make minor deviations in guidelines to adapt to specific cases. She refers situations in which the existing guidelines cannot be applied or significant deviations must be made to the supervisor or travel office.

The position's duties do not meet Level 3-3 because the guidelines available generally do not lack specificity or frequently change. At this level, the employee may have to rely on experienced judgment, rather than guides, to fill in gaps, identify sources of information, and make working assumptions about what transpired. The appellant also does not typically apply judgment to reconstruct incomplete files, devise more efficient methods for procedural processing, gather and organize information for inquiries, or resolve problems referred by others that could not be resolved at lower levels. She does not routinely analyze the results of applying guidelines and recommend changes to the guidelines themselves.

Level 3-2 and 125 points are assigned.

Factor 4, Complexity

As illustrated at Level 4-3, the appellant's work involves performing travel support duties that use different and unrelated processes, procedures, or methods. The voucher transactions are not completely standardized; itineraries are continually changing, unconventional items and services are charged to travel, requiring supporting justification and amended authorizations, travel is often sponsored by outside entities on a reimbursable basis, requiring appropriate supporting documentation for billing, and is performed in foreign countries, requiring consideration of monetary exchange rates.

Like employees at this level, the appellant decides what needs to be done by identifying the nature and circumstances surrounding the claim, and determining the need for and obtaining additional information through oral or written contacts or by reviewing travel regulations. She may have to consider previous actions and understand how these actions differ from or are similar to the issue at hand before deciding on what documentation is required for support. The appellant makes recommendations or takes actions (e.g., determine eligibility for entitlements, verify factual data) based on a case-by-case review of the pertinent regulations, documents, or issues involved in each assignment or situation.

The appellant's assignments do not meet Level 4-4. They do not require analysis, development or testing of a variety of established techniques and methods to evaluate alternatives and arrive at decisions, conclusions, or recommendations. Neither do they require application of many different and unrelated processes and methods relating to examination or analysis of complex and unusual transactions, requiring substantial research and thorough understanding of a wide variety of transactions and accounts.

Level 4-3 and 150 points are assigned.

Factor 5, Scope and Effect

Comparable to Level 5-2, the purpose of the work is to apply specific rules, regulations, or procedures to perform a full range of voucher examining tasks, duties, and assignments that are covered by well-defined procedures and regulations. As at this level, the appellant completes standard clerical transactions in the functional area by reviewing documents for missing information; searching records and files; verifying and maintaining records of transactions; and answering mostly routine procedural questions.

The work affects the accuracy of further processes performed by related personnel in the administrative support unit and the reliability of the support services provided to the research unit staff.

The appellant's work does not meet Level 5-3 where, for example, the effect of the work ensures the integrity of the overall general ledger, its basic design and the adequacy of the overall operation of the accounting system and various operating programs; the amount and timely availability of money to pay for services; the economic well-being of employees being serviced; or compliance with legal and regulatory requirements. The appellant does not work in a financial management environment, and these duties are assigned elsewhere.

Level 5-2 and 75 points are assigned.

Factor 6 Personal Contacts and Factor 7, Purpose of Contacts

The appellant's travel support work contacts include employees within the immediate work unit, and support personnel in related support units, matching Level 1. She does not typically have contacts with personnel in other functional areas, in other agencies, or with the general public in moderately structured settings as required at Level 2.

The purpose of the appellant's financial support contacts meets Level a. She obtains, clarifies, or provides information related to the unit's budget and travel reimbursement, including providing factual information, interpreting processing procedures, or similar information about a transaction. At Level b, the purpose of the contacts is to plan and coordinate actions to correct or prevent errors, delays, or other complications occurring during the transaction cycle. This may involve obtaining a customer's cooperation in submitting paperwork or other information, requesting other personnel to correct errors in documentation or data entry, or assisting others in locating information. This is not typical of the appellant's duties.

Level 1a and 30 points are assigned.

Factor 8, Physical Demands

The physical requirements match Level 1-8, as the work requires no special demands.

Level 1-8 and 5 points are assigned

Factor 9, Work Environment

The appellant works in an office, matching Level 9-1.

Level 9-1 and 5 points are assigned.

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	4-3	150
5. Scope and effect	5-2	75
6. Personal contacts and 7. Purpose of contacts	1-a	30
8. Physical demands	8-1	5
9. Work environment	9-1	<u>5</u>
	Total Points	865

A total of 865 points falls within the GS-5 grade level point range of 855-1,100 points on the Grade Conversion Table.

Decision

Based on the above analysis, the appellant's position is classified properly to the Miscellaneous Clerical and Assistance Series, GS-303, graded at GS-5, and titled at the discretion of the agency, with the parenthetical (OA) as part of the title.