

**OPM decision number:** C-0102-05-01, 9/3/96

PH:OD:96-16

PERSONAL  
[Appellant]  
[Address]

Dear [Appellant]:

This is our decision on the classification appeal filed with our office, which we accepted under the authority contained in section 5112(b) of title 5, United States Code.

This appellate decision constitutes a classification certificate which is mandatory and binding on administrative, certifying, payroll, disbursing, and accounting officials of the Government. It is the final administrative decision on the classification of this position, and is not subject to further appeal. It is subject to review only at the discretion of the Classification Appeals Office in Washington, D.C., and only under the limited conditions and time limits specified in 5 Code of Federal Regulations (CFR) 511.603 and 511.613 and the Introduction to the Position Classification Standards, Appendix 4. It must be implemented in accordance with the requirements contained in 5 CFR 511.612.

Position Information:

Appellant : [Appellant]

Current Classification : Readjustment Counseling Aid (Office Automation),  
GS-102-5

Position Description No. : [Number]

Requested Classification : Readjustment Counseling Assistant (Office  
Automation), GS-102-6

OPM Classification : Title Optional (Office Automation), GS-102-5

Organizational Information : Department of Veterans Affairs (DVA)  
Medical Center  
Readjustment Counseling Service (RSC)  
Veterans Center  
[Location]

### Analysis and Decision

In considering your appeal, we carefully reviewed all of the information that was submitted by you or on your behalf; information obtained during a telephone audit with you on August 15, 1996, and subsequent discussions with you and your supervisor, on August 23, 1996; and, other pertinent position classification information provided by your employing activity at our request.

It is our decision that the proper classification of your position is (Title Optional with the parenthetical Office Automation), GS-102-5. Accordingly, your appeal is denied.

In your appeal letter of May 28, 1996, you raised the following issues: (1) that the DVA Human Resource Management Service personnel assigned to perform the required consistency review, from which your position was downgraded, had no experience with a non-traditional medical setting and, therefore, was unqualified to conduct the review; (2) that you should not be penalized for lack of an updated position description (PD) or a hastily put together one; (3) that the "office manager" positions are not secretaries and that the positions are invaluable to the RSC; and (4) that classification of the "office manager" positions is still not consistent across VA Centers to your knowledge. In a supplemental letter of July 11, 1996, you requested that due consideration be given to your duties involving supervision of Social Work interns at the Center.

These submissions have raised several procedural questions which warrant clarification. All positions subject to the Classification Law contained in title 5, U.S. Code, must be classified in conformance with published position classification standards (PCS's) of the Office of Personnel Management (OPM) or, if there are no directly applicable standards, consistently with published standards for related kinds of work.

Your opinions concerning the competency of your servicing personnel office and the treatment you have received in attempting to resolve the proper classification of your position are not germane to the classification appeal process. This is because the classification appeal process is a **de novo** review that includes an official determination as to the duties and responsibilities assigned to your position and performed properly by you. The appeal decision constitutes the proper application of published Position Classification Standards (PCS's) to those duties and responsibilities.

Based on our audit, your official PD of record prepared by your supervisor and submitted incident to this appeal is representative of the duties and responsibilities

of your position. It is not, however, adequate for classification purposes. Although it is arranged in the Factor Evaluation System (FES) format, which is necessary in order to apply FES PCS's to a position, most of the factor descriptions do not address the criteria of the factors. Rather, they merely describe the duties and responsibilities of the position. These should be delineated in a separate section of the PD. Factor level descriptions (FLDs) should provide position information related to the factor sufficient to determine the appropriate level attributable for that factor for the work performed. Perhaps this confusion over the FLDs resulted from the haste in preparing the PD to which you alluded. A complete set of FLDs for your position is contained below. Incident to this appeal, we will be tasking your activity with providing you a current, accurate PD, properly prepared in the FES format. In addition, consideration of your duties and responsibilities in supervising the Social Work interns will be discussed in our evaluation of your position.

Your value and the value of your position to the organization are not in question under the classification appeal process. The classification of a position is based on work that is performed properly. This classification principle is enunciated in the Introduction to the Position Classification Standards, Appendix 3, Primary Standard, under Factor 5, Scope and Effect, which states that "only the **effect of properly performed work**" is to be considered in assigning a level of the factor. The perceived value of a position to the organization, the quantity of the work produced, and the quality of work performance are not classification factors. They are matters typically dealt with under the performance management program regulations and procedures.

As noted above, positions must be classified in accordance with OPM PCS's, or published standards for related kinds of work. Hence, other methods or factors of evaluation, such as comparison to other positions which may or may not be classified correctly, including those cited in your correspondence, are not authorized for use in determining the classification of a position. We are aware, however, that your appeal stems from classification action initiated by this agency which resulted in a consistency review of similar positions in the DVA. Any specific questions you have on your agency's implementation of the consistency review should be directed to the DVA, Director, Position Management and Classification Service, 810 Vermont Avenue, NW, Washington, DC 20420.

Our audit found that one of your two major functions is providing administrative support for office operations, which occupies approximately half of your time and covers your personal computer (PC) operations. You provide the full range of administrative support services for a staff of three full time employees and one part time employee in the office. Your administrative support functions include typing

correspondence, letters, counseling reports, memoranda, forms, etc., which require the use of several computer software packages.

Other administrative and clerical support functions that you perform include: (1) mail and file support; (2) ordering supplies, furniture, and equipment required by the Center; (3) checking bills received, e.g., utilities, rent; (4) developing annual financial data, based on historical information for fund control areas (General Operations for running the Center, approximately \$63,000 annually; contracting primarily for counseling services, approximately \$102,000 annually; personnel, consisting of salaries and benefits for the Center's five staff members; and, travel which is limited in amount in that it usually is for staff training); (5) establishing and maintaining the Center's accounts and reviewing charges against funds control points for propriety and accuracy; (6) screening correspondence, referring program and personal correspondence to the appropriate staff member; (7) processing information release forms and extracting patient data and other controlled information from files for release; (8) maintaining an appointment schedule for supervisor; (9) filing and maintaining program policy and program instruction binders; and, (10) participating in monthly administrative support staff meetings to discuss administrative program issues and to provide input to the next meeting agenda. You are authorized to sign routine correspondence and purchasing and billing authorizations.

The PD lists a number of other duties, e.g., (1) providing travel support to the staff; (2) "designing and organizing. . .filing systems"; (3) making arrangements for meetings/conferences; (4) "responsible for selection and training of work-study employees and volunteers and supervises them in their daily assignments." Some of these duties are infrequent; e.g., staff travel, or imply a level of responsibility beyond the scope of your position; i.e., interns and work study selections are made by team leader. The training that you provide is predominantly on office procedures and administrative processes.

Our fact finding revealed that you devote approximately one half of your time to program support functions which include: (1) greeting clients and establishing their eligibility for services based on a review of their DD-214 Form or a query against the DVA data base; (2) explaining the Center program to clients and/or family members, including program processes and services; (3) obtaining a brief client history which is entered on a form; (4) recognizing potential crisis situations (you estimated that potential suicidal or homicidal incidents occur several times each year, and that intoxicated people are encountered approximately a third of the time, and angry and anxious people come in daily); (5) acting as a listener for clients and/or family members, and obtaining a release from the client, as necessary, in order to pass the information onto a counselor; (6) providing information and/or directly refer people

for services provided by other organizations, e.g., emergency food and shelter, medical services and other DVA benefits; (7) responding to inquiries pertaining to clients, e.g., providing information to schools concerning client eligibility; (8) maintaining program records, ranging from client contact data entry to retrieving required standardized reports from the program data bases; and (9) monitoring service contract usage and making recommendations for proposed changes.

Based on our review of the entire appeal record, we find the following FLD's appropriate to your position:

### **Factor 1, Knowledge Required by the Position**

Knowledge of office automation sufficient to perform a variety of functions using word processing, data base management, spread sheet, and communications software packages; knowledge of office administrative support processes and procedures, including budget, supply and equipment, and travel; knowledge of veterans benefits and readjustment counseling program services sufficient to provide and process program information and refer clients to other organizations for appropriate services; and skill in dealing with people in a social service setting, including the ability to recognize unusual behavior requiring immediate staff referral.

### **Factor 2, Supervisory Controls**

Continuing assignments are performed within ongoing program objectives, priorities and deadlines. Problems are handled in accordance with established program practices and procedures for which guidance is available from the supervisor or program staff at the Medical Center or Regional Office. Completed work is reviewed in terms of results achieved and technical adequacy.

### **Factor 3, Guidelines**

Guidelines consist of ADP software manuals and documentation; fiscal and budget program procedures; dictionaries; style manuals; counseling program policies and procedures; Medical Center policy manuals on patient care; crisis intervention manual, and related program manuals. Guidelines are applicable and specific to most situations. Judgment must be applied in determining the appropriate guide or instruction to fit the circumstances, and in determining what information is required in order to perform the processes.

**Factor 4, Complexity**

Assignments involve gathering and processing information required to support the counseling program. The activities performed recur regularly, and the facts dealt with for each function are clear, closely related to each other, and are from a limited number of sources, e.g., determining benefit eligibility, determining whether immediate counselor referral is appropriate, and determining whether the cost is billable to the program. Decisions must be made regarding what type of action to take based on established procedures and the facts specific to the situation, e.g., providing factual information on counseling program policies and procedures, referring clients to appropriate community or DVA organizations, searching files and/or data bases for required duplication or extraction for standardized report development.

**Factor 5, Scope and Effect**

The work involves the application of guides, processes, and procedures to provide factual information, refer people to appropriate social services and/or immediate counselor action, apply proper data entry and manipulation procedures, and related program and administrative support functions. The work performed affects the accuracy and effectiveness of further processes in support of programs clients, e.g., obtaining the full scope of services for which the clients are in need of and for which they are eligible.

**Factor 6, Personal Contacts**

Contacts primarily are with office staff; clients/potential clients and their families; and employees of organizations providing parallel client services, e.g., community agencies; other DVA components who are aware of continuing client problems and needs, as well as program support needs, e.g., program billing. Frequent contacts are with clients who are anxious or agitated. Occasional contacts are with congressional offices, and other organizations interested in specific client issues and problems.

**Factor 7, Purpose of Contacts**

Contacts primarily are for the purpose of exchanging and/or providing information on such matters as program processes and procedures, software system problems, and data release requests, as well as to coordinate office support services. Tact is required in order to deal with agitated and anxious clients, which occurs frequently as well as with more serious situations which occur occasionally.

**Factor 8, Physical Demands**

Regular work is performed at a desk, and the work requires the walking, bending, and lifting associated with files, papers, and the handling of other office materials.

**Factor 9, Work Environment**

Regular work is performed under normal office conditions involving the everyday risks and discomforts of that environment.

Series and Title Determination

Position classification is a multi-step process in which each determination affects each following step in the process. The first step is to determine the proper pay plan of a position. Your agency has determined that your position is covered by the General Schedule with which you have not disagreed. We concur with this conclusion.

The next step in the process is to determine the proper series allocation. This determination normally is based on identifying the primary work of the position, the highest level of work performed, and the paramount qualifications required to perform that work. The position classification process requires that the full intent of PCS's be discerned and applied in order to classify a position properly. Care must be exercised to assure that portions of published PCS's are not taken out of context.

A key concern in your appeal is the scope of your responsibilities involved in office management. You stated that you had been a secretary before and that the duties and responsibilities of this position far exceed those in your secretarial positions. In your role as "office manager"; i.e., as the sole administrative support for the Service Center, you provide a full range of functions which facilitate the operations of the Center. These functions are, however, consistent with the range of duties and responsibilities typically performed by secretarial positions. The OPM PCS for Secretary Series, GS-318, describes such work:

“. . .the duties of which are to assist one individual, and in some cases the subordinate staff of that individual, by performing general office work auxiliary to the work of the organization. . . . A position must be the principal office clerical or administrative support position in the office . . . . The duties require a knowledge of clerical and administrative procedures and requirements; various office skills; and

the ability to apply such skills in a way that increases the effectiveness of others. . . .”

Typical duties of secretaries entail providing telephone and receptionist services; maintaining records of leave and attendance; requisitioning office supplies, repairs on office equipment, and printing services; reserving rooms for meetings; filing material and maintaining office filing systems; reviewing outgoing correspondence, reports, etc., for format, grammar, and punctuation, and removing typographical errors; locating and assembling information for various reports, briefings, conferences, etc.; and following up with staff members to insure that various commitments made at conferences and meetings are met.

Your position also, however, entails performing counseling program support functions which reflect the application of skills and knowledges classifiable to the Social Science Aid and Technician Series, GS-102. This series includes positions that perform nonprofessional work of a technical, specialized, or support nature in one or more of the social sciences or other occupational fields covered by the GS-100 Social Science, Psychology, and Welfare Group, when there is no more appropriate series. GS-102 positions require a practical understanding of the objectives, policies, procedures, or regulatory requirements pertaining to the work and the ability to apply skills or knowledges of the occupation involved not requiring full professional competence or equivalent professional preparation in the theories, principles, and concepts of the field.

The primary and paramount purpose of your position is to provide both program and administrative support to a counseling program which is staffed with positions classified to GS-100 Group positions. Based upon the classification principles contained in the Introduction to the Position Classification Standards on classifying mixed series work and the line of promotion within your immediate organization, we find that your position has evolved to the point where it is appropriately allocated to the Social Science Aid and Technician Series, GS-102.

The parenthetical title *Office Automation* is added to the title of positions when such positions require significant knowledge of office automation systems and a **fully qualified typist** to perform word processing duties. We concur with your agency's determination that you perform office automation duties and that your position warrants the parenthetical title Office Automation.

Based upon our review of the appeal file, and on the basis of our telephone audit and interview, we find that your position is allocated properly as GS-102 with the title at the option of your agency within established titling practices reflecting the parenthetical (Office Automation).



## Grade Level Analysis

Guidance on the theories, principles, practices, methods, and techniques governing classification of General Schedule (GS) positions is contained in the Introduction to the Position Classification Standards and The Classifiers Handbook published by OPM. The position classification process recognizes that positions may perform different kinds and levels of work which, when evaluated in terms of duties, responsibilities, and qualifications required, are at different grade levels. As provided for in the Introduction to the Position Classification Standards, page 23:

The proper grade of such positions is determined by evaluation of the regularly assigned work which is paramount in the position.

In most instances, the highest level work assigned to and performed by the employee for the majority of the time is grade-determining. When the highest level of work is a smaller portion of the job, it may be grade controlling only if:

- The work is officially assigned to the position on a regular and recurring basis;
- It is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time); and
- The higher level knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

Work that is temporary or short-term, carried out only in the absence of another employee, performed under closer than normal supervision, or assigned solely for the purpose of training an employee for higher level work cannot be considered paramount for grade level purposes.

Our analysis of your position must be guided by these established position classification principles.

There is no published PCS with grade-level criteria for the GS-102 series. In determining the grade level of a position involving work in more than one series, the Introduction states that work covered by criteria in a PCS for a specific occupational series must be used to evaluate that work. That is, the GS-318 PCS must be used

to evaluate the administrative support duties of your position and the Office Automation Grade Evaluation Guide (OAGEG) must be used to evaluate the Automated Data Processing (ADP) functions of your position. The Introduction also states that if there are no specific published grade level criteria, then the PCS selected as the basis for comparison should be for a kind of work as similar as possible to the work evaluated with respect to: (1) the kind of work processes, functions, or subject matter of work performed; (2) the qualifications required to do the work; (3) the level of difficulty and responsibility; and (4) the combination of classification factors which have the greatest influence on grade level.

Your position, on the surface, would appear to warrant the application of a variety of one-grade interval subject matter PCS's in order to assess their grade level worth, e.g., fiscal support, procurement and property management, veteran eligibility, file maintenance and control. These sets of duties, however, each occupy a relatively small portion of your time. It is an established classification principle that care must be taken in evaluating duties which occupy a small portion of an employee's time in order not to incorrectly assume that such duties require the full range of work and qualifications necessary to warrant the grade being considered. The work that you perform in these areas is restricted to those actions necessary to support a small work force with limited support needs in each of these areas. These duties do not provide your position with a sufficient range of duties and responsibilities to warrant application of the separate and distinct PCS's covering these established occupational areas, e.g., Budget Clerical and Assistance Series, GS-561, Claims Clerical Series, GS-998, Procurement Clerical and Assistance Series, GS-1106, and the Medical Clerk Series, GS-679.

We find that the GS-318 PCS covers the clerical and administrative support functions that you perform, ranging from file maintenance and control through time and attendance, work load reporting, and the performance of equipment, supply, furniture, billing, budget, and other support duties. As discussed previously, the OAGEG covers your ADP functions. We find that the direct counseling program support functions that you perform are evaluated properly by application of the Equal Opportunity Assistance Series, GS-361 for the reasons discussed below. Our grade level analysis of your position follows. Since your appeal did not contest the agency's evaluation of your office automation duties, we have provided a summary analysis of their grade level worth in the form of an FES summary.

## **Secretary Series, GS-318**

### Factor 1 - Knowledge Required by the Position

This factor measures the nature and extent of information or facts which the secretary must understand to do acceptable work and the nature and extent of the skills needed to apply those knowledges. In addition, the extent of knowledge required is related, in part, to the work situation in which the position is found. Consequently, in order to assign a factor level, our analysis includes the determination of both the Knowledge Type (KT) and the Work Situation (WS).

Critical to the evaluation of this factor is the determination of the WS. The WS is defined by three levels: A, B, and C. This element measures the complexity of the clerical and administrative demands placed on the secretarial position. The PCS states that in WS-A "although the organization may include several subordinate sections or sub-groups, the employee's supervisor directs the staff primarily through face-to-face meetings, and internal procedural and administrative controls are simple and informal." Work Situation B, however, is one that has "a system of formal internal procedures and administrative controls, and formal production or progress reporting system. Coordination among subordinate units is sufficiently complex as to require **continuous** attention."

Also at WS-B are organizations described at WS-A in terms of internal coordination when they have extensive responsibility for coordinating work outside of the organization and the coordination of that work requires procedural and administrative controls equivalent to those typical of WS-B. Interpretive guidance on the GS-318 PCS indicates that organizations which potentially reflect these characteristics include Congressional liaison offices, public affairs offices, and offices of general counsel that have extensive contact outside organizations, and organizations at higher levels within the agency. Due to limited size of your organization which results in simple and informal administrative controls, WS-A is assigned for this aspect of Factor 1.

KT-II is defined as knowledge of an extensive body of rules, procedures, or operations applied to clerical assignments, and knowledge of the organization and functions of the office in order to perform the procedural work of the office. This includes knowledge to carry out and coordinate, in a timely and effective manner, many different procedures, each of which might have numerous steps, such as all of those needed to: (1) obtain and monitor a full range of office support services such as printing, maintenance, and supply and contract services; (2) request various types

of personnel training actions or services; and, (3) prepare a wide variety of recurring reports and documents from information obtained from staff, files, and other sources.

KT-III is defined as a level of knowledge which includes all of the knowledge included in KT-II with the additional requirement that the incumbent possess knowledge of duties, priorities, commitments, policies, and program goals of the staff sufficient to perform non-routine assignments such as: independently noting and following-up on commitments made at meetings and conferences by staff members; shifting clerical staff in subordinate offices to take care of fluctuating workloads; or locating and summarizing information from files and documents when this requires recognizing which information is or is not relevant to the problem at hand.

The appeal record indicates that you predominantly apply knowledges similar to that found at KT-II, including maintaining, controlling, and initiating repair of office equipment; preparing all types of documents and forms incident to office personnel administration, including time and attendance; maintaining the office record system in accordance with DVA requirements; preparing a wide variety of recurring reports by extracting information from the patient tracking and fiscal systems; assuring that administrative procedures are disseminated to and followed by the staff; ordering supplies, equipment, and other office support materials; and maintaining records for all RSC Fund Control Point activity, including counseling service contracts.

You also perform some duties reflective of the exercise of KT-III. These include your searching data bases for information necessary for you to develop administrative reports based on knowledge of relevant information; and external coordination with other offices, e.g., on budget, computer, and related matters. We find, however, that the reports which you are expected to prepare are predominantly recurring internal reports typical of KT-II. Your review of documents for correct billing, including your support for the eight contract service accounts, is typical of the range of support services found at KT-II. You do not, as at KT-III, routinely follow-up on commitments made by staff members at meetings and conferences, since conferences are rare. While you maintain the team leader's calendar, it is not equivalent to following up on the program commitments envisioned at KT-III. The limited size of the staff supported and the specific reporting and other requirements controlled at echelons above your own in DVA, e.g., the Medical Center and Regional Office further limit the opportunity for your position to perform the range of non-routine assignments with the frequency required for evaluation at KT-III.

Based on the information developed during the appeal adjudication process, we find that your position is not engaged for a sufficient portion of the work time, in accordance with classification mixed grade principles, to meet the minimum

requirement for evaluation at KT-III. The routine assignments typical of KT-II, including calendar and suspense system maintenance, preparation of correspondence and administrative forms, time and attendance, equipment ordering and maintenance, occupy a preponderant amount of time which you devote to work evaluable by the GS-318 PCS. Assignments supportive of KT-III are performed on a sporadic basis for substantially less than 25 percent of your work time and, thus, may not control the allocation of this factor.

With the combination of KT-II and WS-A, your position is credited properly at Level 1-3 which is allocated 350 points. It should be noted that should your duties related to KT-III be increased, this will not affect the credited level. A combination of KT-III and WS-A is also creditable at Level 1-3.

#### Factor 2 - Supervisory Controls

This factor encompasses how your work is assigned to you, what your responsibilities are for carrying out your work, and how your work is reviewed.

You receive general supervision from the Team Leader. You independently plan, coordinate, and carry out assignments and resolve conflicts in terms of established objectives, program policies, and procedures. Your completed work is reviewed in terms of results achieved and technical adequacy.

The supervision you receive compares closely with Level 2-3. At that level, work is planned and accomplished in conformance with the established instructions, priorities, policies, commitments and program goals of the supervisor, and accepted practices of the occupation. The methods used by the employee are almost never reviewed in detail, and completed work is reviewed for "adequacy, appropriateness, and conformance to established policy." At this level, the secretary personally takes care of many matters and questions including answering substantive questions, compiling information from records based on a knowledge of the organization, and preparing and signing routine correspondence of a nontechnical nature; i.e., that does not entail performing the technical work of the staff supported. This level of work is reflected in such assignments as your controlling the flow of work within the office based on established areas of staff responsibility, preparing periodic reports based on established program needs, and signing routine administrative correspondence or purchase or billing documents for the Team Leader.

Your position does not meet Level 2-4. At this level the supervisor and secretary **consult** on developing deadlines and the work to be done. The secretary handles a wide variety of situations and conflicts "likely to be found in organizations of such

size and scope that many complex office problems arise which cannot be brought to the attention of the supervisor," and that "completed work is reviewed **only** for overall effectiveness." For example, the secretary informs the staff of commitments made by the supervisor at meetings, and arranges for the staff to implement them; reviews correspondence for the supervisor's signature and attempts to resolve any conflicts before the matter is presented to the supervisor; arranges for subordinates to represent the supervisor as conferences based on knowledge of the supervisor's views; searches for information that is difficult to locate dealing with subject matter that is "generally specialized and not a matter of widespread knowledge or is complicated because it is scattered in numerous documents or only in the memories of a few employees"; and, preparing administrative and procedural notices or instructions to the staff.

The limited size of the staff that you support does not reflect the opportunity for your position to deal with the depth of problems or the breadth of complex independent administrative support decisions found at Level 2-4. Much of the work received has established deadlines. The Team Leader adjusts those deadlines as necessary. The staff functions on a face-to-face basis; there are no complex matters for you to relay to staff members or follow-up on as a result of commitments made at meetings. Your position does not involve the extensive review of correspondence produced at lower levels in the organization typical of Level 2-4, and the small size of the staff does not lend itself to the formal instructions and issuances typical at Level 2-4 for a large staff, e.g., instructions for subordinate offices on timekeeping, review and approval of travel documents, coordination and scheduling of leave. The ongoing contacts between you and your supervisor, and the review of technical papers before release; e.g., releases of patient information, entails a level review and feedback on the work performed more intensive than the review for "overall effectiveness" found at Level 2-4 on administrative support matters found at that level. Consequently, your position is evaluated properly at Level 2-3 and is credited with 275 points.

### Factor 3 - Guidelines

This factor encompasses the nature of the guidelines that you use to accomplish your work and the judgment that you need to apply those guidelines.

The appeal record indicates that the guidelines which you use for your secretarial and related work consist of fiscal and budget program procedures; dictionaries; style manuals; counseling program policies and procedures; Medical Center policy manuals on patient care; crisis intervention manual, and related program manuals. Guidelines are applicable and specific to most situations. Judgment must be applied

in determining the appropriate guide or instruction to fit the circumstances, and in determining what information is required in order to perform the processes.

At Level 3-2 the typical guidelines used in secretarial work are dictionaries, style manuals, agency instructions, and operating policies of the supervisor or organization served. They are located and selected by the secretary because of the appropriateness to the situation. The secretary, at this level, refers situations to which the existing guidelines are not applicable to the supervisor, and also may determine which of the established alternatives to use. Your work compares favorably with Level 3-2. As at that level, you work with similar manuals, instructions, and operating procedures and policies to accomplish your work.

Your work does not meet Level 3-3. That level entails using a large body of unwritten policies, precedents, and practices which are not completely applicable to the work or are not specific and which deal with matters relating to judgment, efficiency, and relative priorities rather than with procedural concerns. The secretary applies and adapts guidelines, such as regulations or the supervisor's policies, to specific problems for which the guidelines are not clearly applicable. These types of guidelines are not the type that you use in your position as discussed above. The small staff and program that you support do not reflect the scope of operations in which a large body of unwritten policies, practices, and procedures would exist that would require the independent adaptation envisioned at Level 3-3. Furthermore, the face-to-face operations of the staff, and the involvement of your supervisor in any significant program changes, e.g., major counseling program administrative changes, do not reflect the independence of judgment exercised at Level 3-3.

Therefore, your position is evaluated properly at Level 3-2 which equates to 125 points.

#### Factor 4 - Complexity of Work

This factor includes 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 appeal record indicates that your assignments involve gathering and processing information required to support the counseling program. The activities performed recur regularly, and the facts dealt with for each function are clear, closely related to each other, and are from a limited number of sources, e.g., determining whether the cost is billable to the program. Decisions must be made regarding what type of action to take based on established procedures and the facts specific to the situation,

e.g., providing factual information on counseling program administrative policies and procedures, searching files and/or data bases for required duplication or extraction for standardized report development.

At Level 4-2 work consists of a full range of procedural duties in support of an office, including requisitioning supplies, printing, or maintenance service; filling out various travel forms for staff members; arranging for meeting rooms; and preparing scheduled reports from information readily available in the files. Decisions regarding what needs to be done involve choices that require recognizing the existence of differences among clearly recognizable situations. The actions or responses differ in such things as the sources of information, the kinds of transactions or entries, or other readily verifiable differences. Decisions are based on a knowledge of the procedural requirements of the work coupled with an awareness of the specific functions and staff assignments of the office.

In contrast, Level 4-3 work includes assorted duties involving dissimilar and unrelated processes and methods, e.g., preparing one-of-a-kind reports from information in various documents that requires reading correspondence and reports to justify relevant items, and when decisions are based on a familiarity with the issues involved and the relationships between the various types of information; and, setting up conferences requiring the planning and arranging of travel and hotel accommodations for conference participants when this is based on a knowledge of the schedules and commitments of the participants. The secretary's knowledge is used to decide what needs to be done and how to accomplish tasks by analysis of the subject, phase or issue involved; the chosen courses are selected from many alternatives.

Your position is not one which includes dissimilar and unrelated processes within the meaning of the PCS; it includes tasks which are step related. For example, you prepare recurring reports, and extract information from files and/or data bases based on specific information provided to you by the requestor, staff member, or established reporting requirement. Your work does not regularly require the depth of reading and fact finding or the depth of analysis of information intended at Level 4-3. You do not routinely prepare one-of-a-kind reports or perform equivalent assignments 25 percent or more of your time. Any such work would be infrequent and could be expected to entail regular supervisory involvement. You do not regularly arrange conferences or meetings of the scope or intent of this level.

Thus, we find your position is evaluated properly at Level 4-2 and credited with 75 points.



### Factor 5 - Scope and Effect

This factor measures the purpose of work and the impact of the work product on both within and outside your organization. This factor in the GS-318 PCS measures, for example, whether the work facilitates the work of others. This factor **only** takes into account the **properly** performed work.

The appeal record indicates that your work involves the application of guides, processes, and procedures to provide factual information, refer people to appropriate social services and/or immediate counselor action, apply proper data entry and manipulation procedures, and related program and administrative support functions. The work performed affects the accuracy and effectiveness of further processes in support of program clients, e.g., obtaining the full scope of services for which the clients are in need of and for which they are eligible.

We find that the scope and purpose of the clerical and administrative **support** work you perform compares closely to Level 5-2. As at Level 5-2, the work performed affects the accuracy and reliability of further processes accomplished by the staff. In addition to the routine processes supported Level 5-1, e.g., timekeeping, preparing correspondence, referring callers, maintaining files, and other functions that you perform a significant portion of the time, e.g., records management, patient information pulls, and reviewing bills for propriety, reflect the performance of a wide range of routine administrative support and clerical work supporting the accuracy and reliability of further processes evaluable at Level 5-2.

Your position does not meet Level 5-3 in that your work does not require that you "modify and devise methods and procedures that significantly and consistently affect the accomplishment of the mission of the office." As discussed above, your work is preponderantly performed within the parameters of defined methods, procedures, and internal policies. Additionally, your position is not required, on a regular and recurring basis and for a sufficient portion of the time for classification purposes, to "identify and resolve various problems and situations that affect the orderly and efficient flow of work in transactions with parties outside the organization." For example, the data bases that you work with facilitate other work in your office in that they help to track documents and/or assignments. This work does not entail the depth and breadth of problem solving and similarly significant mission impact found at Level 5-3. Consequently, your position is evaluated at Level 5-2 and is credited with 75 points.

### Factor 6 - Personal Contacts

This factor includes those contacts which are either face-to-face or telephonically. Additionally, this factor takes into account the difficulty in making contacts and the setting in which the contacts take place.

The appeal record indicates that your contacts primarily are with office staff; clients/potential clients and their families; and employees of organizations providing parallel client services, e.g., contract counseling services, community agencies, other DVA components who are aware of continuing client problems and needs, as well as program support needs, e.g., program billing. Frequent contacts are with clients who are anxious or agitated. Occasional contacts are with congressional offices, and other organizations interested in specific client issues and problems.

Your position meets the intent of Level 6-3 which includes contacts with individuals or groups from outside the employing organization in a moderately unstructured setting, e.g., contacts are not established on a routine basis requiring the secretary to identify and locate the appropriate person to contact. The purpose and extent of each contact are different and the role and authority of each party must be identified and developed during the course of the contacts, e.g., attorneys, contractors, etc., when the office deals with them on a variety of issues. Your work entails such contacts on a regular and recurring basis on the full variety of office matters based on your knowledge of the program processes and procedures and cases assigned to each staff member.

Your position does not, however, meet Level 6-4 which includes national or international level contacts, e.g., Members of Congress, representatives of foreign governments, presidents of large, national or international firms, nationally recognized representatives of the news media, presidents of national unions, State governors, or mayors of large cities. Contacts are in highly unstructured settings, characterized by such problems as contacting relatively inaccessible officials; arrangements may have to be made for accompanying staff members; appointments may have to be made well in advance; each party may be very unclear as to the role and authority of the other; each contact may be conducted under different ground rules. Your work does not entail this level of contacts or difficulty in making them. Therefore, Level 6-3 is assigned and is credited with 60 points.

### Factor 7 - Purpose of Contacts

This factor measures the purpose of the contacts made with the contacts discussed in Factor 6. The purpose of personal contacts can range from simple exchanges of factual information to resolving problems affecting the efficient operation of the office.

The appeal record reflects that the primary purpose of your contacts is for the purpose of exchanging and/or providing information on such matters as program processes and procedures, software system problems, and data release requests, as well as to coordinate office support services. Tact is required in order to deal with agitated and anxious clients, as well as with more serious situations which occur occasionally. This fully meets, but does not exceed, Level 7-2 which is the highest level described in the GS-318 PCS. Accordingly, your position is evaluated properly at Level 7-2 and is credited with 50 points.

### Factor 8 - Physical Demands

This factor covers the requirements and physical demands placed on the employee by the work assignment; to include both the physical characteristics and abilities as well as the physical exertion involved in the work.

Your position meets Level 8-1, the only level described in the PCS, which covers demands typical of an office setting including some walking, standing, bending, and carrying light items. Your position, therefore, is evaluated properly at Level 8-1 and is credited with 5 points.

### Factor 9 - Work Environment

This factor describes the physical surroundings in which the employee works and any special safety regulations or precautions that the employee must observe to avoid mishaps or discomfort.

Your work fully meets Level 9-1, the only level described in the PCS, which covers work in an office setting and involves minimal risks and observance of safety precautions typical of office settings. Your position, therefore, is evaluated properly at Level 9-1 and is credited with 5 points.

Summary of Secretary Series, GS-318

In summary, we have credited your position as follows:

<u>Factor</u>	<u>Level</u>	<u>Points</u>
1	WS A, KT II 1-3	350
2	2-3	275
3	3-2	125
4	4-2	75
5	5-2	75
6	6-3	60
7	7-2	50
8	8-1	5
9	9-1	<u>5</u>
		1,020 Total Points

The total of 1,020 points falls within the GS-5 grade level point range of 855-1,100 points on the Grade Conversion Table in the GS-318 PCS.

**Office Automation Grade Evaluation Guide**Summary of Office Automation Grade Evaluation Guide

In summary, we have credited your position as follows:

<u>Factor</u>	<u>Level</u>	<u>Points</u>
1	1-3	350
2	2-2	125
3	3-2	125
4	4-2	75
5	5-1	25
6&7	1-A	30
8	8-1	5
9	9-1	<u>5</u>
		740 Total Points

The total of 740 points falls within the GS-4 grade level point range of 655-850 points on the Grade Conversion Table in the Office Automation Grade Evaluation Guide.

### **Equal Opportunity Assistance Series, GS-361**

As discussed above, since there are no published grade-level evaluation criteria for the GS-102 series, your counseling support work is evaluated properly by the GS-361 PCS which is in FES format. This series covers positions that support equal opportunity and civil rights programs or activities for which the paramount requirement is a practical knowledge of the methods, procedures, regulations, and purposes of the program function supported. Typical of the work performed is interviewing persons and obtaining routine factual information; providing procedural information on the EEO complaint process; reviewing and summarizing factual information from files; collecting, computing, and summarizing statistical data in chart and narrative form; interviewing witnesses to obtain factual information; and, performing similar program support functions. You perform similar substantive program support functions in your interviewing of clients and in your providing the other direct client support services as discussed previously in this decision.

#### **Factor 1 - Knowledge Required by the Position**

At Level 1-3, work requires the application of a body of standardized administrative, clerical or technical procedures including general knowledge of the sequence of steps in performing the major functions of the office and detailed knowledge of the procedures, rules, and operations to carry out a variety of support tasks; knowledge of grammar and specialized program vocabulary; skill in writing routine letters, memoranda and simple narrative reports; skill in oral expression to explain procedural matters to persons from outside the employing office; skill in routine fact finding and analysis to interview persons, to obtain facts, to search files for relevant information, and to logically organize and report the collected information.

In contrast, Level 1-4 entails work that requires a detailed knowledge of a body of **technical** EEO regulations and the ability to apply them in a wide variety of situations. This level is typically characterized by an intensive knowledge of rules, operating procedures, and practices within the program, and the ability to apply this knowledge to many different conditions or factual situations. This knowledge is used to identify relevant factual information during fact finding to compare to a given set of facts to broader principles as part of an analysis, to advise or assist complainants on the procedural aspects of a complaint, to counsel a Federal employee during the informal stages of a complaint, or perform similar work.

We find that your interviewing of clients in order to obtain routine factual information; explaining program procedures and processes to clients and their families; referring clients to other DVA and/or community resources for assistance outside the scope

of the counseling program; and your extraction of program data and developing of program activity and similar reports reflect the application of counseling program support skills and knowledge which compares favorably with Level 1-3. You indicated, and your supervisor confirmed, that you are not engaged in counseling clients, limited aspects of which are reflective of Level 1-4 work. Rather, you must be able to recognize factual situations, e.g., intoxication, agitation, changed behavior, that warrants immediate referral to technical program employees. In addition, your "supervision" of social work interns involves providing them exclusively procedural information related to their counseling assignments. All technical assistance and guidance come from the team leader or other counselors. Accordingly, this factor is evaluated properly at Level 1-3 and is credited with 350 points.

#### Factor 2 - Supervisory Controls

You receive general supervision from the Team Leader. You independently plan, coordinate, and carry out assignments and resolve conflicts in terms of established objectives, program policies, and procedures. Your completed work is reviewed in terms of results achieved and technical adequacy.

At Level 2-3, the highest level described in the PCS, the supervisor makes assignments by defining objectives and setting deadlines, and assists with unusual problems which do not have clear precedents. The employee plans and carries out the successive steps, handles routine problems and deviations in the work assignment in accordance with instructions, policies, previous training, or accepted practices in the office. Completed work is reviewed in terms of results achieved, technical soundness of recommendations, and the effect of the work in facilitating the objectives of the employing office.

Your position meets, but does not exceed, Level 2-3, due to your controlling the flow of work within the office based on established areas of staff responsibility, independently preparing periodic reports based on established program needs, recognizing client behavior that requires immediate referral, and, independently arranging for client referral for other community and/or DVA services. As at Level 2-3, you are held responsible for the ongoing functions assigned to your position; work with independence in planning and performing that work; and the review of your work primarily is limited to how well it contributes to the client service functions of the organization. Accordingly, your position is evaluated properly at Level 2-3 and is credited with 275 points.

### Factor 3 - Guidelines

At Level 3-2, guidelines consist of numerous oral and written office procedural guides that tell what and how to do a job and are clearly applicable to most situations. Judgment must be used in selecting the appropriate guide or instruction to fit the circumstances, selecting alternative means of locating missing information, e.g., in investigative files, determining what to ask to get answers to specific questions, e.g., in processing a complaint, or to solve similar problems.

In contrast, Level 3-3 guidelines consist of oral and written office procedural manuals, technical manuals, e.g., investigation manual, and a variety of technical instructions governing the civil rights or EEO program. The guides usually are general in nature or do not cover many of the areas of work performed by the employee. Judgment is required to decide which guide applies to a particular situation or to apply general principles to specific factual situations. Discretion is used in deciding on the appropriate courses of action during interviews of complainants or witnesses, or during similar meetings. This on-the-spot judgment may limit or expand the scope of the assignment.

The appeal record indicates that the guidelines which you use for your counseling support functions include counseling program policies and procedures; Medical Center policy manuals on patient care; crisis intervention manual, and related program manuals. Guidelines are applicable and specific to most situations. Judgment must be applied in determining the appropriate guide or instruction to fit the circumstances, and in determining what information is required in order to perform the processes.

Your work compares favorably with Level 3-2. As at that level, you work with similar manuals, instructions, and operating procedures and policies to accomplish your work. Your work does not meet Level 3-3. That level entails using policies, precedents, and practices which are not completely applicable to the work or are not specific and which deal with matters relating to judgment and relative priorities rather than with procedural concerns as would be the case in extensive interviewing of clients/patients. These types of guidelines are not the type that you use in your position as discussed above. Rather, your client interviews are to elicit specific factual information, and the crisis actions that you are authorized to take if a counselor is not available, e.g., calling the police to remove an intoxicated visitor, are clear cut and covered by established office policies and practices. Therefore, your position is evaluated properly at Level 3-2 and is credited with 125 points.

#### Factor 4 - Complexity of Work

At Level 4-2, assignments are to solve routine problems of limited complexity, gather and provide factual information, or perform tasks in support of higher level specialists. Problems are of limited complexity because the facts are few in number, clear, undisputed, closely related to one another, and obtain-able from a few sources. Problems are routine in that similar analyses and conclusions are performed regularly in the same or similar offices. Decisions regarding what needs to be done involve choices that require a simple analysis such as organizing facts in narrative or logical order, and comparing them to past solutions in similar cases or to clearly applicable criteria. Actions to be taken or responses to be made, such as advice to a complainant or the organization of an investigative file, differ from assignment to assignment depending on the facts of the situation or the type of transaction to be made.

Illustrative Level 4-2 assignments include interviewing parties to a discrimination complaint to obtain routine factual information; searching files and records for relevant documentary information; analyzing employment statistics and preparing narrative summaries; writing replies to correspondence; preparing short papers based on information obtained from office files or standard references; or answering questions of the general public, complainants, or respondents concerning program objectives, jurisdiction, and procedures.

In contrast, Level 4-3 work includes complete assignments or segments of large projects involving dissimilar and unrelated processes and methods. Assignments typically are to solve complex problems having some or all of the following characteristics: (1) interrelated facts; (2) facts obtainable from a wide variety of sources; (3) some disputed facts or ambiguous conditions; and, (4) one or more related issues or questions such as failure to hire because of race or sex. At Level 4-3, decisions on what needs to be done require the employee to determine the relevance and importance of a large number of facts or questions and to make generalizations based on facts, conditions and program requirements. These decisions depend on the type of assignment, phase of assignment, or the subject dealt with. The course of action must be chosen from **many** alternatives, e.g., determining the sources of information, deciding when the facts collected are sufficient to arrive at a conclusion, making onsite decisions concerning the relevance of data, and deciding on the sequence in which to perform the assigned tasks. Work conditions and elements must be analyzed to clearly define interrelationships. The employee applies a variety of accepted fact finding techniques, analytical methods, and EEO principles and selects the correct criteria for evaluating the facts. Illustrative of such work is investigating and preparing a report on a charge of



discrimination involving a single respondent with one or a few simple issues such as failure to hire or failure to rent an apartment because of race.

The appeal record indicates that your assignments involve the routine gathering and processing of information required to support the counseling program found at Level 4-2. The activities performed recur regularly, and the facts dealt with for each function are clear, closely related to each other, and are from a limited number of sources, e.g., developing specified factual client information during interviews, and ascertaining unusual behavior that warrants immediate intervention. Decisions must be made regarding what type of action to take based on established procedures and the facts specific to the situation, e.g., providing factual information on counseling program coverage, policies and procedures, searching files and/or data bases for required patient record information or extracting program data for standardized report development.

Your position is not one which includes the different and unrelated processes and methods within the meaning of the PCS at Level 4-3; it includes tasks which are step related. For example, you prepare recurring reports, and extract information from files and/or data bases based on specific information provided to you by the requestor, staff member, or established reporting requirement. Your work does not regularly require the depth of fact finding or the depth of analysis of information intended at Level 4-3. You do not routinely solve interrelated counseling issues; these are tasks vested in the counseling staff positions that you support.

Thus, we find your position is evaluated properly at Level 4-2 and is credited with 75 points.

#### Factor 5 - Scope and Effect

The appeal record indicates that your work involves the application of guides, processes, and procedures to provide factual information, refer people to appropriate social services and/or immediate counselor action, apply proper data entry and manipulation procedures, and related program and support functions. The work performed affects the accuracy and effectiveness of further processes in support of programs clients, e.g., obtaining factual information necessary to service the clients properly including providing the full scope of services for which the clients are in need of and for which they are eligible.

We find that the scope and purpose of the clerical and program **support** work you perform compare closely to Level 5-2. As at Level 5-2, the work performed affects the accuracy and reliability of further processes accomplished by the staff. In

addition to the routine processes supported Level 5-1, e.g., compiling data, answering specific questions, filing or retrieving documents, the other functions that you perform a significant portion of the time, e.g., conducting full client interviews, program records management, patient information pulls, reflect the performance of a wide range of routine program support and clerical work supporting the accuracy and reliability of further processes evaluable at Level 5-2.

Your position does not meet Level 5-3 in that your work does not require that you deal with a **variety** of problems or situations in conformance with established criteria, e.g., reviewing discrimination complaints of a recurring type where ample precedents exist, conducting fact finding to fill in information gaps, and making recommendations on each case to either close, conduct further investigation, or make a definite finding. These functions, and their attendant significant impact on the Center client population, is vested in the counseling staff positions that you support.

Accordingly, your position is evaluated at Level 5-2 and is credited with 75 points.

#### Factor 6 - Personal Contacts

The appeal record indicates that your contacts primarily are with office staff typical of Level 6-1. You also have frequent contacts with clients/ potential clients and their families, and employees of organizations providing parallel client services, e.g., contract counseling services, community agencies, other DVA components who are aware of continuing client problems and needs, as well as program support needs, e.g., program billing. Frequent contacts are with clients who are anxious or agitated. Occasional contacts are with congressional offices, and other organizations interested in specific client issues and problems.

Your position meets, but does not exceed, the intent of Factor Level 6-3, the highest level described in the PCS, which includes contacts with individuals or groups from outside the employing organization in a moderately unstructured setting, e.g., persons interviewed to obtain information during a compliance review, a civil rights study, or an investigation. The purpose and extent of each contact are different and the role and authority of each party must be identified and developed during the course of the contacts. Your work entails such contacts on a regular and recurring basis in your intervention on behalf of clients in locating community support services as well as making appointments for them, and guiding clients and/or their family members to discuss issues with the counseling staff that they have divulged to you.

Therefore, your position is evaluated properly at Level 6-3 and is credited with 60 points.

### Factor 7 - Purpose of Contacts

At Level 7-2, in addition to exchanging information, contacts are to plan, coordinate, or advise on office procedures, projects, or other work efforts, resolve operating or administrative problems, interview or counsel people, or otherwise influence or motivate individuals or groups whose goals are similar to those of the employee and whose attitudes are basically cooperative.

The appeal record reflects that the primary purpose of your contacts is for the purpose of exchanging and/or providing information on such matters as program processes and procedures, and data release requests, and similar program support services typical of Level 7-1. However, as at Level 7-2 tact and motivation are required regularly in order to deal with agitated and anxious clients, motivate client and/or family members to discuss matters with counselors that they have discussed with you as well as deal with more serious situations which occur occasionally.

At Level 7-3, contacts are to conduct **formal** interviews of witnesses, complainants, respondents, or alleged discriminating officials during complaint investigations; negotiate procedural points during compliance reviews; or to otherwise **resolve** strongly held differences of opinion or persuade others of a particular course of action. The persons contacted may be fearful, skeptical, or uncooperative, requiring the employee to be skillful in conducting the meeting to obtain the desired results. Your referral of clients to raise matters with the counseling staff does not entail the degree of persuasive difficulty to resolve issues envisioned at Level 7-3. The alerting of the counseling staff and the calling of police and/or ambulances also does not entail the intensive interaction in order to enlist cooperation found at Level 7-3.

Accordingly, your position is evaluated properly at Level 7-2 is credited with 50 points.

### Factor 8 - Physical Demands

Your position meets Level 8-1 which covers demands typical of an office setting including some walking, standing, bending, and carrying light items, and is credited with 5 points.

### Factor 9 - Work Environment

Your work fully meets Level 9-1 which covers work in an office setting and involves minimal risks and observance of safety precautions typical of office settings, and is credited with 5 points.

Summary of Equal Opportunity Assistance Series, GS-361

In summary, we have credited your position as follows:

<u>Factor</u>	<u>Level</u>	<u>Points</u>
1	1-3	350
2	2-3	275
3	3-2	125
4	4-2	75
5	5-2	75
6	6-3	60
7	7-2	50
8	8-1	5
9	9-1	<u>5</u>
		1,020 Total Points

The total of 1,020 points falls within the GS-5 grade level point range of 855-1,100 points on the Grade Conversion Table in the GS-318 PCS.

Summary

In summary, we find that both your secretarial and program support duties are evaluated properly at the GS-5 grade level, and occupy a sufficient portion of your work time to be considered grade controlling. Based on the above analysis, it is our decision that the proper classification of your position is (Title Optional with the parenthetical Office Automation), GS-102-5.

This decision represents the current facts regarding the duties, responsibilities and qualification requirements of your position and is the basis for its classification. By copy of this letter, we are directing your activity to correct, in conformance with the standard of adequacy required in the Introduction to the Position Classification Standards (page 14), your PD to properly conform to the requirement of the Factor Evaluation System. Your agency must forward a copy of the corrected PD to this office within 30 days of the date of this decision.

Please be assured that this decision is not intended to reflect on your ability, qualifications, or the quality of your performance. Rather, it reflects our evaluation of your position based on a comparison of your duties and responsibilities with the appropriate standards.

Sincerely,

Signed 9/3/96 by

Robert D. Hendler  
Classification Appeals Officer  
Philadelphia Oversight Division

cc:  
Medical Center Director  
Department of VA Medical Center

Deputy Assistant Secretary for  
Personnel and Labor Relations  
Department of Veterans Affairs  
Washington, DC 20420

Director, Classification Appeals Program  
U.S. Office of Personnel Management  
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