

**CLASSIFICATION APPEAL DECISION
U.S. OFFICE OF PERSONNEL MANAGEMENT
CHICAGO OVERSIGHT DIVISION**

INCUMBENT:	[Appellant]
POSITION NUMBER:	1792
AGENCY CLASSIFICATION:	Psychology Technician, GS-181-7
POSITION LOCATION:	Department of Veterans Affairs Veterans Health Administration [Installation] [City, State]
OFFICE OF PERSONNEL MANAGEMENT DECISION:	GS-181-7 Title discretionary with agency
OPM decision number:	C-0181-07-01

This appellate decision constitutes a certificate that is mandatory and binding on administrative, certifying, payroll, and accounting offices of the Government. It is the final administrative decision on the classification of the position, not subject to further appeal. It is subject to discretionary review only under the conditions and time limits specified in Part 511, Subpart F, of Title 5, U.S. Code of Federal Regulations.

/s/

FREDERICK J. BOLAND
CLASSIFICATION APPEALS OFFICER

November 26, 1996

DATE

Information Considered

- ▶ Appellant's letter dated July 11, 1996, earlier correspondence, and representative's response dated September 10, 1996.
- ▶ Copy of the official description of the appellant's position, number 1792.
- ▶ Copy of the classifier's evaluation statement.
- ▶ Copy of the official description of the appellant's supervisor's position.
- ▶ Copy of the appellant's performance standards.
- ▶ Copy of the organization chart and statement of functions for the [activity].
- ▶ Telephone discussion of duties with appellant on October 21, 1996, and with her supervisor on November 14, 1996.

Evaluation Criteria

OPM Series Definition for *Psychology Aid and Technician* Series, GS-181, dated October 1990.

OPM position classification standards for *Social Services* Series, GS-187, dated February 1965.

Introduction

The appellant contests her agency's classification decision. She is assigned to position number 1792, classified June 3, 1996, as Psychology Technician, GS-181-7. She believes her position description accurately lists her major duties but feels a higher grade is warranted because, among other things, she has psychology training, a master's degree, interprets assessment data, works with patients having serious problems, and conducts sessions with groups of patients alone.

Job Information

The appellant is one of a staff of about ten in the [activity]. Other positions in her organization include: a GS-14 Chief of Psychology, a GS-13 Psychologist, a Clinical Nurse, a GS-11 Social Worker, three GS-9 Addiction Therapists, a Secretary, and a Medical Clerk.

The appellant assists the GS-13 Psychologist and works under his direction, but reports to the Chief of Psychology. In assisting the Psychologist, she:

- administers and scores various psychological tests,
- conducts face-to-face interviews with patients to obtain data that will be used by the treatment team members in arriving at a diagnosis and/or determining the correct referral,
- counsels patients and their families and serves as primary counselor for patients in the assessment phase,

- presents program information to the patients on the Substance Abuse Treatment Program, and
- updates clinical records detailing the participation and progress of patients.

She also uses a computer for inputting and retrieving patient data and occasionally performs other such duties as needed.

Analysis and Findings

Series and Title Determination

The appellant's duties fall within the type of work covered by the *Psychology Aid and Technician*, GS-181, series. This series includes positions involving the performance of nonprofessional technical work in connection with a program of research or direct services in psychology. These positions, like the appellant's, assist professionals in their more routine tasks and require a practical understanding of some of the principles, methods, and techniques of psychology, but not the rigorous training a formal education in psychology provides.

The series classification of a position is governed by requirements of the assigned duties rather than the qualifications of its incumbent. The duties outlined in the official position description demand practical, rather than professional, knowledge. However, the position description's suggestion that a degree is required and its occasional use of the term "professional" in reference to the work is inconsistent with the actual assignments and the position's purpose, which is to relieve professional staff of routine but time consuming tasks. Accordingly, our letter transmitting this decision to the agency advises that it correct the position description so that it is consistent with our findings.

The GS-181 series has no prescribed position titles. Agencies may designate the official title of positions in such cases. The *Psychology Technician* title used by the agency is consistent with instructions on constructing official titles appearing in the *Introduction to the Position Classification Standards*, Section III, H, 2.

Grade Determination

The GS-181 series has no grade level criteria of its own. Consequently, grade level determinations are made by comparison with a standard for a closely related kind of work. The *Social Services*, GS-187, standard is in the same occupational family as the appellant's position and provides grade level criteria for evaluating work traditionally assigned to professionals, but that can be performed by non-professional staff with suitable training. Though not a perfect match, since it emphasizes administrative versus technical tasks, it is one of the few standards adaptable to GS-181 work and the closest in occupation. The standard prescribes two factors for differentiating among grade levels, *Nature and Range of Assigned Cases* and *Level of Responsibility*, which are defined below.

Factor 1: Nature and Range of Assigned Cases

This factor recognizes differences that are related to the range of cases assigned, the skills and knowledges required to perform the work, the difficulty of personal contacts involved, and the guidelines available in policies and regulations.

The appellant has already been credited at the GS-7 level with practical knowledge, such as would be gained from extended training or experience, of standard methods and techniques used in the psychological assessment and counseling of clients, following specific guidelines and procedures, with only minor deviation. To paraphrase the GS-187 standard, she is credited with using such knowledge to:

- develop pertinent, factual information through interviews, correspondence, visits, and the like,
- provide information, advice, and encouragement,
- make initial assessments of overt problems,
- independently recommend routine assistance and services for common problems that have well established treatments, and
- recommend further assessment, assistance, or service for prior approval of her supervisor where problems are more complicated and prescribed treatment less obvious.

The appellant believes more credit is warranted because she:

- makes preliminary interpretations of the validity and significance of the data through psychological interviews where she refers patients to the necessary resources when she determines them to be depressed,
- knows the proper techniques to use in dealing with individual patients, counsels individuals so they can develop the coping skills, and performs case management including all the core functions of a counselor,
- exchanges information with Social Workers, Addiction Therapists, and Psychologists with the primary concern being the welfare of the patient, and
- keeps current in the field by attending conferences on psychology and substance abuse treatment, along with workshops on ethics/confidentiality.

At the GS-8 level, Technicians might use specialized, complicated techniques in assessing clients. The problems they treat are more complicated and have less specific guidelines, requiring greater analysis and judgment than at the GS-7 level. To paraphrase the standard, GS-8 Technicians treat a wide range of less serious cases without prior approval and recommend a treatment for more serious cases based on supporting information they have independently developed.

Examined against such criteria, the appellant's claims fall short of that required. Though her work is important and a valuable part of the diagnosis and treatment of patients, her agency stresses that it is typically limited to gathering relevant information regarding a narrower range of common problems. It does not require interpreting assessment data and diagnosing or treating a wide variety of disorders. Our interview with the appellant supports her agency's contention. The appellant typically is provided an initial diagnosis from a doctor with guidance on what tests to give and what to look for. She administers standard assessment instruments, as noted below, but does not use specialized complicated techniques in her assessment or counseling of patients, as is expected of GS-8 Technicians.

She conducts face-to-face interviews of about 45 minutes duration following a standard format to obtain factual background information on patients. She also administers various standardized tests such as the Wechsler Memory Scale, the Wechsler Adult Intelligence Scale, and the Alcohol Use Inventory. The tests have standard procedures for administration and do not employ complicated techniques. The appellant calculates test scores and records her comments as to the patient's disposition during the test. The test and comments go into a file that the Psychologist reviews, analyzes, and interprets.

The appellant claims that the patients she treats for substance abuse often are distressed due to death of a family member, unemployment, domestic violence, or legal problems and that she counsels them on gaining the coping skills necessary to survive their turmoil in a healthy and productive manner. Her agency agrees that she discusses problems with patients and provides information about how the counseling program works and whom to see for assistance. She helps patients deal with routine and overt problems where treatment procedures are typically well known, specific, and clear. Otherwise she must refer patients with complicated problems or unclear needs to professional staff or seek their guidance.

GS-7 Technicians are expected to know the proper techniques to use when dealing with patients on common problems where the techniques are clear, well precedented, and specific, as is typical of the cases that the appellant independently handles. Her exchange of information with Social Workers, Addiction Therapists, and Psychologists regarding patients she counsels with these types of problems is a normal expectation of GS-7 level work.

Her claims to higher credit because of previous course work and continued training do not support her appeal. As noted in the series determination section of this decision, the requirements of the position determine its classification. The duties she performs do not demand a degree or professional training. Agencies may assign higher graded work and arrange advanced training for staff development without affecting the grade level of positions. Until higher grade assignments become a regular and continuing part of a position, performed with the usual degree of independence, they have no grade impact.

We evaluate this factor at GS-7.

Factor 2: Level of Responsibility

This factor takes into account the kind of supervision and guidance received and the degree of authority to make decisions that affect individuals receiving assistance.

At the GS-7 level, the appellant is already credited with independently recommending action on routine cases and common problems having well known treatments.

The appellant believes more credit is warranted because she:

- counsels substance abuse patients alone,
- cannot refer all counseling questions to higher graded staff due to the “immediacy” of problems that come up and the need to resolve them the best she can, and
- independently refers patients to sources that she deems suitable to the needs she identifies during sessions with the patient.

Though the appellant meets with individuals or groups of patients without higher graded staff present, unlike GS-8 Technicians, she does not have the authority to proceed on her own initiative for a wide variety of cases. She must refer difficult and complicated cases lacking clear and specific treatment guidelines to her supervisor or seek specific guidance on them, rather than developing her own recommendations. As noted in her position description, difficult situations will be clarified and guidance given by professional staff. Her referral of patients to treatment sources is typically limited to those with overt, common problems having accepted and routine treatments.

We evaluate this factor at GS-7.

Decision

To receive GS-8 credit, work must meet the GS-8 level criteria for both factors. The appellant's work meets the GS-7 level instead. Consequently, the proper classification of her position is *GS-181-7*, with such title as the agency finds suitable and consistent with titling guidelines.