

**OPM decision number:** C-0105-11-01, 5/14/97

PH:OD:97-5

[Appellant]  
[Address]

Dear [Appellant]:

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

This appellate decision constitutes a certificate that 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 under the limited conditions and time limits specified in title 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 according to the provisions contained in 5 CFR 511.612.

Position Information:

Appellants:	[Appellants]
Current Classification:	Social Insurance Specialist (Training Instructor), GS-105-11
Requested Classification:	Social Insurance Specialist (Training Instructor), GS-105-12
OPM Decision:	Social Insurance Specialist (Instructor), GS-105-11
Organizational Information:	Social Security Administration [Location]

### Analysis and Decision

In considering your appeal, we carefully reviewed all of the information submitted by you and your co-appellants or on your behalf; information obtained during a telephone interview with you on May 1, 1997; information obtained during telephone interviews on April 30, 1997 with your previous supervisor, on May 5, 1997, with your present team leader, and on May 6, 1997, with your current supervisor of record; and, other pertinent position classification information provided by you and your employing activity at our request.

It is our decision that the proper classification of your position is Social Insurance Specialist (Instructor), GS-105-11. Accordingly, your appeal is denied.

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 U.S. Office of Personnel Management (OPM) or, if there are no directly applicable PCS's, consistently with published PCS's for related kinds of work. Therefore, other methods or factors of evaluation, such as comparison to other positions that may or may not be classified correctly, are not authorized for use in determining the classification of a position, e.g., the field office instructors you are mentoring currently. The classification appeals process is a de novo review that includes a determination as to the actual duties and responsibilities assigned by management and performed by the appellant. This includes establishing the difficulty and complexity of work performed by the incumbent over a representative work cycle typical of the occupation.

The position classification process recognizes that positions may perform different kinds and levels of work that, 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;

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- 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.

Work performed when on detail does not meet those criteria, e.g., the short course you developed on domestic violence was performed during your detail to another position.

You and your co-appellants stipulated your current Position Description (PD) is current and accurate. Your PD shows your work entails the following major duties: you instruct complete technical training courses for claims representatives, service representatives, etc., being responsible for teaching programmatic topics of varying complexity; independently plan and develop curricula specifically designed to meet the unique technical training requirements of SSA employees in the Region's field offices, program service center and teleservice centers; evaluate and revise existing training programs, courses, materials, aids, schedules, lesson outlines, methods, plans, etc., for basic recruit training, retraining existing employees in new jobs, training work force on legislative and program changes, and managerial, supervisory and professional staff training; work with field office management to establish on-the-job training objectives and trainees' activities; review trainees' work for completeness and accuracy; conduct audits of trainees' interviews and discuss results; plan and develop training curriculum regarding SSA's mission, internal structure, history, objectives, and policies; and develop and implement technical training courses and activities to meet identified needs, e.g., because of changes in the Social Security Act.

The instructor functions you perform include the following:

- Approximately 45 percent of your time is spent on a group of four courses, designed primarily to train new employees, most of whom are at the GS-7 level. The courses, comparable to GS-9 level instruction of basic undergraduate courses, but with constant updating, range from 9 to 14 weeks duration and are: Title 2 Claims Representative Course (14 weeks), Title 16

Claims Representative Course (13 weeks), Service Representative Course (9 weeks), and Teleservice Representative (9 weeks). These courses are prepared by your headquarters but require constant updating to remain current with legislative and policy changes and modifying training materials to improve instructional effectiveness.

- Approximately 25 percent of your time is spent on advanced (“post-pool”) courses of 6 to 10 days duration given one or two days per week for claims representatives and service representatives, most of whom are at the GS-9 level. These courses are designed for those who have completed the previously discussed 9 to 14 week courses and, at the requests of former participants or supervisors or managers, you expand on the materials previously covered, and update those materials, to cover topics of Social Security law, policy or procedures not included in the 9 to 14 week courses. Approximately 80 percent of the 25 percent of your time spent on these courses is devoted to the development and update of materials for these courses based on both extant and new information available to you. Fundamental to your appeal rationale is that this work is equivalent to developing and delivering upper division undergraduate courses.

Your PD shows you also perform instructional specialist duties such as: independently planning and developing curricula; initiating and conducting surveys of needs and recommending improvements; and developing new and innovative training programs, such as: interviewing skills workshop, train the trainer, team building, interviewing skills, and domestic violence awareness. This work occupies approximately 30 percent of your work time.

We will not address in detail the other functions or aspects of your position contained in your PD of record that we hereby incorporate by reference into this decision.

#### Series and Title Determination

Your agency determined your position is classified properly to the Social Insurance Administration Series, GS-105 and is titled Social Insurance Specialist (Training Instructor) according to the titling practices contained in the Social Insurance Administration Series, GS-105 PCS. You have not disagreed with these determinations. The duties described in your PD of record and confirmed during our fact-finding support the conclusion that your position is covered by the Social Insurance Administration Series, GS-105. This series includes positions that include performing work concerned with the administration and operation of national social insurance programs, including preparing training materials and providing training to staff. The GS-105 position classification standard (PCS) directs that when

instructional work is grade controlling, GS-105 positions are evaluated by applying the Grade-Level Guide for Instructional Work (Guide). The Guide stipulates subject matter positions, e.g., positions classified to a specific subject matter series such as the GS-105, are evaluated by application of the Guide, the parenthetical title “(Instructor)” may be added to the proper subject matter title. Accordingly, your position is allocated properly as Social Insurance Specialist (Instructor), GS-105.

### Grade Level Determination

The grade-controlling duties of your position are instructional in nature and, as discussed previously, the Guide is used for grade level determination. The Guide uses two classification factors: Nature of Assignment and Level of Responsibility. Part I of the Guide covers instructional work involving such activities as preparing daily work plans based on general course outlines and established learning objectives; training in traditional classroom situations or in self-paced learning programs; and evaluating the progress of students and advising and assisting them to improve their performance. Part II of the Guide covers instructional work such as ascertaining training needs through surveys or job analysis; determining the objectives and scope of courses, the subjects to be covered, and the criteria for evaluation; developing, revising, or adapting courses and instructional materials and guides; and evaluating education and training programs and recommending needed changes and improvements. We have used both Parts I and II in evaluating your position because, as discussed above, you devote approximately 70 percent of your time to work covered by Part I and approximately 30 percent of your time to work covered by Part II.

### **PART I: Instructor Work**

#### **Nature of Assignment:**

The nature of assignment for the instructor functions of your position exceed the GS-9 level in that the courses taught are frequently above the secondary through basic undergraduate levels and do not have ample appropriate training materials, thereby requiring the addition or modification of the existing course structure and materials. Although the subject matter taught is well-established, as at the GS-9 level, GS-11 level instructors typically are responsible for the overall maintenance of their assigned courses and determine the need for and initiate changes in course content, and participate substantially in course development or modification. Also typical of the GS-11 level is the requirement for instructors to adapt or revise their courses because of subject-matter problems resulting from new developments or technological changes in the field requiring frequent updating of knowledge and course content.

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Your instructor duties match the GS-11 level as described in the Guide. As at the GS-11 level, your courses cover advanced technical systems or subject matter comparable to the upper-division undergraduate level; i.e., the social insurance claims adjudication and related programs constituting the core mission of your agency. These courses are not in standardized or prestructured form, and they typically have source materials problems (e.g., source materials may be excessively numerous, difficult to locate, or difficult to adapt). As is typical of GS-11 level instructors, you are responsible for overall maintenance of your assigned courses and determine the need for and initiate changes/updates in course content. You participate substantially in course development or modification. The subject matter problems requiring changes, updates, and modifications result from technological developments in the field and require frequent updating of knowledge and course content by instructors.

The nature of your assignment does not meet the GS-12 level described in the Guide. Courses at this level, in addition to being at the level and complexity of upper-division undergraduate courses, require the instructor to take a primary role in developing specific course content for the complete course. Although the instructor functions of your position require significant changes, updates, and modifications of existing courses, they do not require the primary developmental role indicated at the GS-12 level. These functions are vested in higher echelon components of SSA. Your work does not require, as does the GS-12 level, the extensive fact finding in a new or changing field where little research has been done and source information and training materials are lacking. Your work entails conducting technical training for a variety of SSA field positions where the material to be taught is well-established. Modifying standard established courses, including developing workshops or reconfiguring some lessons to meet the needs of specific audiences is not full course development and, therefore, may not be credited at the GS-12 level. These functions are not equivalent to dealing with the major gaps in available literature or unsatisfactory materials for well-established courses envisioned at the GS-12 level. Rather, your course modifications reflect the revision of course materials geared toward enhancing delivery effectiveness typical of the GS-11 level.

Where you do have the primary role in developing specific course content for the complete course, e.g., “post-pool” courses, the additional requirements for the GS-12 level are not present in that extensive fact-finding in a new or changing field where little research has been done is not demanded nor is source information lacking. SSA program offices routinely provide technical program updates, e.g., notices on changes in legislation and court decisions that affect line program work processes, and modifications to program manuals used in claim adjudication. While your “post-pool” courses deal with topics in greater depth than the four major courses you teach,

the more limited scope; i.e., specialized topics and content, and relatively short duration do not reflect the sweep and complexity of an upper division undergraduate course as you claim in your appeal rationale. You emphasized your view that “post-pool” courses are not just extensions to the four major courses you teach. The close connection of the “post-pool” course subject matter to these four major courses, and their additive subject matter effect, require us to assess their grade level worth within the same context of those courses under Part I of the Guide. Therefore, this factor is credited at the GS-11 level.

### **Level of Responsibility:**

Your level of responsibility exceeds the GS-9 level, which requires that recommendations for course actions receive review for consistency with overall course material, for technical accuracy, and for educational adequacy, and that the instructors are audited and evaluated periodically by higher level instructors. As at the GS-11 level, you implement course actions you deem appropriate without review other than discussion with peers involved in conducting the course or courses in question. You are not audited and evaluated periodically by higher level instructors. As is typical of the GS-11 level, you receive course assignments with the course objectives, topics to be covered, and general content in a prescribed form. You also typically participate in original course content development, by providing comments to SSA headquarters and on subsequent modifications of the course. Typical of the GS-11 level, you work within the framework of approved course objectives and topics to be covered, using methods you believe will be most effective and develop or adapt new or revised training materials for formal course use.

Your work does not meet the GS-12 level in that you do not independently develop total course content, based on received defined course objectives, for upper-division undergraduate courses or courses in advanced technical systems (such as complete courses in advanced principles and techniques of electronics, or management operations for an entire mode of transportation). It is necessary that all of the preceding conditions be met to satisfy the GS-12 level. Although you develop some course content for the upper-division undergraduate courses you conduct, you do not develop total course content. Those courses for which you do develop total course content based on received course objectives, such as curricula regarding the organization’s mission and policy, changes in the Social Security Act, A101 adjudication, etc., as indicated in the position de-scription, are not at the upper-division undergraduate level or advanced technical systems described at the GS-12 level of responsibility. Rather, these shorter courses expand upon the established SSA-wide basic and advanced training courses controlled at SSA headquarters and, as such, fall short of the breadth and depth of full courses envisioned at the GS-12 level. Therefore, this factor is credited at the GS-11 level.

We have evaluated both the Nature of Assignment and Level of Responsibility under Part I at the GS-11 level. Consequently, we find your instructor duties are credited properly at the GS-11 level.

## **PART II: Instructional Specialist Work**

Part II covers instructional specialist work such as: (1) ascertaining needs for training, usually through surveys or job analyses; (2) determining the objectives and scope of courses and the subjects to be covered; (3) developing, revising, or adapting courses and instructional materials and guides; and, (4) evaluating education and training programs and recommending needed changes and improvements.

Your PD identifies some of the above functions, such as: independently planning and developing curricula; initiating and conducting surveys of needs and recommending improvements; and developing new and innovative training programs, such as: interviewing skills workshop, train the trainer, team building, interviewing skills, and domestic violence awareness. As discussed previously, our fact-finding revealed these functions constitute approximately 30 percent of your time, and include your outreach work with [city] on Supplemental Security Income eligibility.

### **Nature of Assignment**

The requirements for GS-11 are met in that you produce complete, self-contained, training products for changing or new circumstances that affect specific situations and require adjustments in methods or approaches different from existing ones. Specifically,

- Approximately 20 percent of your time is spent on courses developed completely by you in response to requests from the Regional Office or field offices of SSA in your region. These courses are developed by you primarily for administration by other staff and include an instructor's manual, participant's manual, and various handouts and visuals. These courses are generally fairly brief, ranging from one to five days in duration, and designed for GS-5 or GS-7 level staff who are either new hires and need the specific information about the law, regulation, or procedure on which they will be concentrating (such as new legislation dealing with aliens on Supplemental Security Income training), or new procedures (such as changed criteria for determining when a child is considered disabled), which need to be taught to both new and existing staff.



- Approximately 10 percent of your time is spent developing nontechnical courses ranging from a few hours duration (such as a course on domestic violence given to all employees), to 1 to 2- day skills workshops, to a 4- day train-the-trainer course for new trainers.

At the GS-11 level, instructional specialists develop full courses that are equivalent in difficulty and complexity to those delivered by GS-9 instructors whose work is covered under Part I of the Guide. As described above, your courses are fairly brief and are geared toward subject matter that does not exceed a course in the fundamentals and skills of a technical occupation or a basic undergraduate course; i.e., introductory material for GS-5 and GS-7 employees, and updates on changes in law, regulation, or new procedures that supplement and/or change current program procedures. That is, they are equivalent to developing portions of the programs, which were discussed under the Part I grade determination, that constitute approximately 70 percent of your time and are equivalent to those typically conducted by GS-11 instructors.

The requirements for GS-12 are not met in that your assignments are not characterized by such complications as changing situations that outdate established guideline material. Our fact-finding revealed you regularly receive updated guideline material to incorporate in the training products you develop. Also, your work does not require frequent dealing with matters which are controversial, unconventional, or novel, which is a characteristic of the GS-12 level. As previously indicated, the nature of your work assignments do not exceed the GS-11 grade level due to the subject-matter content and breadth and depth of the courses you instruct. Although you make course content decisions and obtain subject-matter material independently, they are determinations made on courses that do not reflect the breadth or complexity in content or instructional difficulty envisioned at the GS-12 grade level. Accordingly, this factor is credited properly at the GS-11 level.

### **Level of Responsibility:**

As at the GS-11 level, you develop complete courses in an established subject field for use by other instructors. The courses you develop are comparable to typical course assignments of GS-9 instructors. Typical course assignments of GS-9 instructors include courses in the fundamentals and basic skills of an occupation such as computer operation or engineering drafting, which frequently require translation of theoretical explanations and analyses into simpler explanations, and basic undergraduate courses. As at the GS-11 level, the course requestors define the problems or subjects needing attention, and you independently develop the course to meet those requirements.

The requirements for the GS-12 level are not met in that the complete courses you develop are not comparable to typical courses taught by GS-11 instructors. Typical course assignments of GS-11 instructors include, for example, a complete course in advanced theoretical principles and techniques of electronics for use in diagnosing and adjusting malfunctions in complex and frequently changing electronic equipment, such as special purpose computers or complex radar equipment. As discussed previously, courses of this nature are developed and controlled at SSA headquarters, and your work does not entail the extensive development of course information; dealing with controversial, unconventional, or novel matters; or equivalent content and methodological issues implicit in GS-12 level course development. Accordingly, this factor is credited properly at the GS-11 level.

### **Summary**

In summary, we have evaluated both the Nature of Assignment and Level of Responsibility under Parts I and II of the Guide meet, but do not exceed, the GS-11 level. Therefore, we find your position is classified properly as Social Insurance Specialist (Instructor), GS-105-11. This decision represents the current facts regarding the duties, responsibilities and qualification requirements of the position and is the basis for its classification.

This decision constitutes a classification certificate under the authority of section 5112(b) of title 5, U.S. Code. This certificate is mandatory and binding on all administrative, certifying, payroll, disbursing and accounting officials of the Government. According to 5 CFR 511.702, it must be implemented no later than the beginning of the sixth pay period following the date of this decision. The servicing personnel office must submit a compliance report containing copies of the action taken with respect to the appellants, e.g., SF 50. The compliance report must be submitted to this office no later than 30 days following the effective date of the SF 50. You and your co-appellants may contact your servicing personnel office for information about the implementation 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 comparison with the appropriate position classification standard.

Please inform your co-appellants of our decision.

Sincerely,  
5/14/97  
Robert D. Hendler  
Classification Appeals Officer