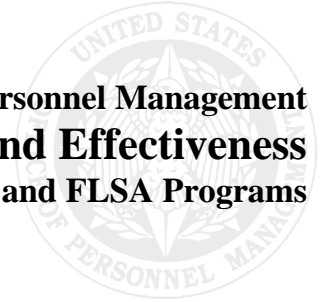


**U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA Programs**



**Chicago Oversight Division
230 South Dearborn Street, DPN 30-6
Chicago, IL 60604**

**Classification Appeal Decision
Under Section 5112 of Title 5, United States Code**

Appellant:	[Appellant]
Agency classification:	Supervisory Medical Administrative Program Specialist, GS-301-9
Organization:	Department of Veterans Affairs Veterans Health Administration [Installation name] Veterans Hospital Medical Administration Service [City, State]
OPM decision:	GS-501-9 title at agency discretion
OPM decision number:	C- 0501-09-01

/s/

Frederick J. Boland
Classification Appeals Officer

10/29/97

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[appellant's name and address]

Mr. Ronald E. Cowles
Deputy Assistant Secretary for Personnel
and Labor Relations (05)
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, D.C. 20420

[name and address of appellant's servicing
personnel office]

Mr. Arnold J. Gerber
Director, Position Management and
Classification Service
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, D.C. 20420

INFORMATION CONSIDERED

- ▶ Appellant's memorandum dated May 14, 1996, concerning the reasons for her appeal, and earlier correspondence.
- ▶ Agency's report dated June 11, 1996, in response to our request for information concerning the position.
- ▶ Appellant's memorandum dated June 19, 1996, commenting on agency's report.
- ▶ Copy of the appellant's official position description, number 1183.
- ▶ Copies of appellant's immediate and second level supervisors' position descriptions.
- ▶ Copies of appellant's subordinates' position descriptions.
- ▶ Work samples submitted by appellant in response to our request.
- ▶ Telephone discussion of duties with the appellant on October 25, 1996, and follow-up telephone calls.
- ▶ Telephone discussion of appellant's duties with her supervisor on February 4, 1997.

EVALUATION CRITERIA

- ▶ OPM *Budget Analysis, GS-560, Series* position classification standard, dated July 1981.
- ▶ OPM *Financial Administration and Program, GS-501, Series* position classification standard, dated July 1982.
- ▶ OPM *General Schedule Supervisory Guide*, dated April 1993.

INTRODUCTION

The appellant contests her agency's decision classifying her position, number 1183, as Supervisory Medical Administration Program Specialist, GS-301-9. The position is located in the Department of Veterans Affairs, Veterans Health Administration, [Installation name] Veterans Hospital, Medical Administration Service, Medical Care Cost Recovery (MCCR) Section, at [City, State]. The appellant believes her position description accurately lists her major duties as the Center's MCCR Coordinator, but feels she exercises greater knowledge and handles more complex work than her agency credited. She feels her work deserves greater credit under all but two of the factors (Factors 8 and 9) addressed in the classification standard. These issues are analyzed under the Grade Determination section of this decision.

The appellant also believes that she shares some of the same responsibilities as higher graded MCCR Coordinator positions at 18 other centers and cites a VA Headquarters Personnel Circular that allows for the creation of higher graded Coordinators. The circular and its prototype position descriptions offer, but do not mandate, possible ways of organizing MCCR work at the clerical, assistant, and

higher levels. The appellant's work is not compared to the prototype descriptions or other Coordinator positions since such comparisons are not legitimate methods for classifying positions. OPM is required by law to classify positions on the basis of their duties, responsibilities, and qualification requirements by comparison to the criteria specified in the appropriate classification standard or guide. Other methods of evaluation are not permitted.

Agencies are, however, required to apply classification standards and OPM decisions consistently to ensure equal pay for equal work. OPM will require an agency to conduct a consistency review upon showing that specifically identified positions at different grades have identical duties. The appellant does not indicate, however, how her major duties are largely the same as higher graded positions, only that other positions nominally share some common responsibilities. Because Coordinator positions are structured differently from center to center, both in their assignments and reporting relationships, we have found some positions emphasize greater accounting or other skills than demanded in the appellant's position. Such differences often account for variances in occupational series and grade level. The appellant, however, may pursue any specific consistency concerns with the agency's Position and Classification Service, as advised in the transmittal letter for this decision.

JOB INFORMATION

The appellant supervises about nine employees including two Accounting Technicians, GS-525-6; six Program Clerks, GS-303-5; and a Medical Records Technician, GS-675-6. These employees are responsible for billing and coding functions, patient accounts follow-up, pre-admission and certification functions, insurance identification and policy benefits, and accounts receivable and accounting technician functions.

(Other positions charged to the MCCR cost center are not under the appellant's supervision, e.g., Pharmacist, Computer Specialist, Accounting Technician, Agent Cashier, Medical Records Technician, and Clinical Nurse positions. While the appellant does not supervise the employees in these positions, she coordinates the MCCR functions that they perform and provides feedback to their supervisors regarding their MCCR relevant assignments.)

In addition to directing her staff, the appellant establishes and oversees program controls for identifying, billing, and recovering costs; monitors program vulnerability and budget issues; and develops or refines data, surveys, and reports. She is the recognized local authority on MCCR related issues and develops and carries out MCCR program briefings for hospital managers, employees, and patients. She provides survey and audit information relative to the development of MCCR policy locally and in support of the program at regional and national levels. She collects productivity data for reporting on various aspects of the program. She compiles and analyzes program data, performance criteria, and surveys for participation in hospital utilization reviews. These reviews provide her supervisor as well as top management with MCCR program status.

The appellant ensures that the MCCR operations are conducted efficiently and effectively through coordination of the program activities with other organizations throughout the hospital. She provides regular feedback to service chiefs regarding MCCR-funded positions and responsibilities to ensure program goals are accomplished effectively. She develops and maintains control of the MCCR

budget, compiles its quarterly adjustments, coordinates the Requirement Analysis Report and maintains the Consolidated Memoranda Receipt as it applies to the MCCR.

The appellant has responsibility for the accuracy of all billing and collection activities for the MCCR. She is responsible for activities including insurance identification; recertification of continual stay clinical reviews; claim generation for reimbursable insurance and numerous other categories of payments; claims follow-up; and collection of claim generated monies. She controls various financial functions such as request for waiver of bills; write-off of patient accounts; referral of patient accounts for offset; probate requests; cancellation of erroneous prescription co-pay bills; processing patient refunds; etc. (Some of these actions require the additional control of the Center's Fiscal Officer.) She establishes internal controls to monitor fiscal vulnerability with respect to self-pay debts, third party claims, assignment of benefit, and collection activities. She is responsible for identifying and reporting problems relative to the MCCR program to appropriate hospital officials.

SERIES AND TITLE DETERMINATION

The appellant exercises supervisory authorities and responsibilities meeting the criteria for coverage under the *General Schedule Supervisory Guide* (GSSG); i.e., her duties require accomplishment of work through combined technical and administrative direction of others, constitute a major duty requiring at least 25 percent of the position's time, and meet at least the minimum level of Factor 3 in the guide. She does not contest assignment of her position to the Miscellaneous Administration and Program Series, GS-301, which includes positions the duties of which are to perform, supervise, or manage non-professional, two-grade interval work for which no other series is appropriate. However, the work she personally performs is, in fact, appropriately covered by another series. Her work demands more specialized skills than the general analytical, research, writing, and judgment skills common to general administrative positions. Her primary duties and responsibilities involve coordination of the MCCR billing and collection process and require specialized knowledge of fund control management and cost containment, regulations governing fiscal appropriations and cost transfers, financial terminology, billing and collection procedures, and fiscal guidelines, laws, regulations, policies, and precedents such as decisions issued by the Comptroller General, General Accounting Office (GAO), Department of Treasury, and the Office of Management and Budget (OMB). These specialized knowledges are characteristic of the Accounting and Budget, GS-500, occupational group (which includes accounting, budget administration, related financial management, or similar work) and are more demanding qualification requirements for the position than general administrative knowledge.

The position does not demand professional knowledge (e.g., of accounting) and matches no particular occupational series within the GS-500 group (e.g., Budget Analysis or Financial Management). Finance and accounting related positions for which no specific GS-500 series is appropriate are classified to the Financial Administration and Program, GS-501, series, which covers work, like the appellant's, involving analytical, forecasting, and interpretive functions associated with the management and control of resources or funds, tracking and control of funds for special programs, or analytical or program work pertaining to cash control or benefit systems. The GS-501 series better reflects the analytical and fiscal nature of the appellant's work.

The GS-501 series has no prescribed position titles. Agencies may designate the official title of positions in such cases, consistent with instructions on title construction appearing in the *Introduction to the Position Classification Standards*, Section III, H, 2.

GRADE DETERMINATION

The appellant's supervisory and non-supervisory work must be evaluated separately because the same classification criteria do not apply to both. The overall grade of the position is the higher level of either the supervisory or non-supervisory work. Work demanding less than a substantial (at least 25 percent) amount of time is not considered in classifying a position.

SUPERVISORY WORK

The GSSG uses a point-factor evaluation approach where the points assigned under each factor must be fully equivalent to the factor-level described in the guide. If a factor is not equivalent in all respects to the overall intent of a particular level described in the guide, a lower level point value must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

The appellant does not specifically dispute the factor levels her agency credited under the GSSG.

FACTOR 1: PROGRAM SCOPE AND EFFECT

This factor measures the general complexity, breadth, and impact of the program areas and work directed, including its organizational and geographic coverage. It also assesses the effect of the work both within and outside the immediate organization. All work for which the supervisor is both technically and administratively responsible, including work accomplished through subordinates or contractors, is considered. To receive credit for a given level, the separate criteria specified for both scope and effect must be met at that factor level.

SUBFACTOR 1A: SCOPE

Scope addresses complexity and breadth of the program or work directed, including the geographic and organizational coverage within the agency structure. It has two elements: (a) the program (or program segment) directed and (b) the work directed, the products produced, or the services delivered. Scope includes the geographic and organizational coverage of the program or program segment.

Level 1-2 of the guide covers the direction of administrative, technical, complex clerical, or comparable work that has limited geographic coverage and supports most of the activities of a typical agency field office, a small to medium sized military installation, or comparable activities within agency program segments. Directing budget, supply, or payroll services that support a small military base is typical of this level.

Level 1-3 covers the direction of a program segment performing administrative, technical, or professional work where the program segment and work directed encompass a major metropolitan

area, a state, or a small region of several states; or when most of an area's taxpayers or businesses are covered, coverage comparable to a small city. Providing complex administrative, technical, or professional services directly affecting a large or complex multi-mission military installation, or of an organization of similar magnitude, is also characteristic of this level.

The MCCR section collects money from outside parties for medical care provided by the Center. The section reviews, develops, and maintains records, files, and data on billings and collections involving allied beneficiary, automobile accident, category C veteran, Department of Defense, ineligible care, workers' compensation, personal violence, reimbursable insurance, tort, and prescription co-payment cases. As at Level 1-2, the section's work supports most of the medical activities of the Center by helping them recover costs rightfully shared or borne by others. As noted under Factor 5 and the Job Information section of this decision, the work the appellant directs is higher level clerical and lower level technical work, rather than the complex administrative or technical work that Level 1-3 demands.

We evaluate Scope at Level 1-2.

SUBFACTOR 1B: EFFECT

Effect addresses impact of programs, products, or correctly performed work both within and outside the agency.

At Level 1-2, services support and significantly affect installation level, area office level, or field office operations and objectives, or are delivered to a moderate, local or limited population of clients or users comparable to a major portion of a small city or rural county. (Directing budget, supply, protective, or similar services for a small base without extensive research, testing, or similar missions meets this level.)

At Level 1-3, activities, functions, or services directly and significantly affect a wide range of agency activities, the work of other agencies, the operations of outside interests, or the general public. At the field activity level (involving large, complex, multi-mission organizations and/or very large serviced populations) the work directly involves or substantially impacts the provision of essential support services or products to numerous, varied, and complex technical, professional, or administrative functions.

As at Level 1-2, the MCCR section's work significantly affects the Center's cost recovery objectives. Unlike Level 1-3, it does not directly and significantly affect a wide range of agency activities or the operations of organizations comparable in magnitude to those illustrated in the guide at Level 1-3 (e.g., a bureau or large military installation).

We evaluate Effect at Level 1-2.

Work must meet both the scope and effect of the factor level to receive credit. The appellant's work meets Level 1-2 in both respects. Therefore, we evaluate this factor at Level 1-2 and credit 350 points.

FACTOR 2: ORGANIZATIONAL SETTING

This factor considers the organizational position of the supervisor in relation to higher levels of management (the rank of the person to whom the supervisor reports for direction and appraisal).

Under this factor, if the position being classified reports directly to a Senior Executive, flag officer, or the equivalent, it receives Level 2-3 credit. If not, but the second level supervisor of the position being classified is a Senior Executive, flag officer, or the equivalent, it receives Level 2-2 credit. In all other cases, the position being classified receives minimum credit, Level 2-1. Full deputies are treated as being at the same level as the deputy's chief for this factor. A position reporting to more than one individual is considered to report to the individual who appraises performance.

The appellant's performance is rated by the GS-12 Assistant Chief, MAS and reviewed by the GS-13 Chief, MAS. Therefore, we evaluate this factor at Level 2-1 and credit 100 points.

FACTOR 3: SUPERVISORY AND MANAGERIAL AUTHORITY

This factor covers the delegated supervisory and managerial authorities that are exercised on a recurring basis.

Level 3-2 provides three alternative sets of criteria. The third of these options (cited in paragraph 3-2c of the guide) specifies ten authorities and responsibilities characteristic of supervisors functioning at this level. The appellant exercises nearly all these authorities and thereby meets Level 3-2.

Level 3-3 specifies two alternative sets of criteria. The first of these, Level 3-3a, essentially concerns managerial positions closely involved with high level program officials in the development of overall goals and objectives. Managers at this level typically direct the development of data to track program goals, secure legal opinions, prepare position papers or legislative proposals, and execute comparable activities. Though the appellant provides input for some of these activities, she lacks significant responsibility in these areas. Such responsibilities belong to higher level positions than her own.

The second set of criteria, Level 3-3b, describes 15 supervisory authorities that exceed in complexity and responsibility the 10 depicted under paragraph 3-2c. Under this alternate provision, a position can be credited at Level 3-3b if, *in addition* to exercising all or nearly all the Level 3-2c authorities, it also exercises at least 8 of the 15 supervisory authorities specified at Level 3-3b. The appellant does not significantly exercise the required majority, clearly lacking numbers 1, 3, 4, 5, 8, 10, 11, and 12, listed on pages 17 to 18 of the guide.

We evaluate this factor at Level 3-2c and credit 450 points.

FACTOR 4: NATURE AND PURPOSE OF CONTACTS

This is a two-part factor that assesses the nature and purpose of personal contacts related to supervisory and managerial responsibilities. The contacts used to determine credit level under one subfactor must be the same used to determine credit under the other subfactor.

SUBFACTOR 4A: NATURE OF CONTACTS

This subfactor covers the organizational relationships, authority or influence level, setting, and preparation difficulty involved in the supervisor's work. To be credited, contacts must be direct and recurring, contribute to the successful performance of the work, and have a demonstrable impact on the difficulty and responsibility of the position.

At Level 4A-2, contacts are with members of the business community, the general public, higher ranking managers, supervisors, or staff of program, administrative, or other work units and activities throughout the installation. These contacts sometimes require special preparation.

The appellant's typical contacts are with management officials, medical and administrative staff at the Center and other VA facilities, VA regional and headquarters levels, attorneys for the hospital, and representatives from insurance companies, which sometimes require special preparation on her part, as required at Level 4A-2.

Unlike Level 4A-3, her contacts do not often require, among other things, extensive preparation of briefing materials or up-to-date technical familiarity with complex subject matter.

We evaluate this subfactor at Level 4A-2 and credit 50 points.

SUBFACTOR 4B: PURPOSE OF CONTACTS

This subfactor includes the advisory, representational, negotiating, and commitment responsibilities related to the supervisor's contacts credited under the previous subfactor.

At Level 4B-2, the purpose of contacts is to ensure that information provided to outside parties is accurate and consistent; to plan and coordinate the work directed with that of others outside the subordinate organization; and/or to resolve differences of opinion among managers, supervisors, employees, contractors, or others.

At Level 4B-3, the purpose of contacts is to justify, defend, or negotiate in representing the project, program segment(s), or organizational unit(s) directed, in obtaining or committing resources, and in gaining compliance with established policies, regulations, or contracts. Contacts at this level typically involve active participation in conferences, meetings, hearings, or presentations involving problems or issues of considerable consequence or importance to the program or program segment(s) managed.

As at Level 4B-2, the purpose of the appellant's contacts as a supervisor is to coordinate her section's work with other organizations and to resolve billing or collection inconsistencies. The contacts do not involve skilled negotiation or defense of matters of considerable consequence requiring a high level of persuasive ability or negotiation skill, as required, among other things, for Level 4B-3 credit.

We evaluate this subfactor at Level 4B-2 and credit 75 points.

FACTOR 5: DIFFICULTY OF TYPICAL WORK DIRECTED

This factor covers the difficulty and complexity of the basic work most typical of the organization directed, as well as other line, staff, or contracted work for which the supervisor has technical or oversight responsibility (either directly or through subordinate supervisors, team leaders, or others).

The level credited for this factor normally must constitute at least 25 percent of the workload of the organization supervised. Excluded from consideration are:

- ▶ work of lower level positions that primarily support the basic work of the unit,
- ▶ work that is graded based upon the supervisory or leader guides,
- ▶ work that is graded higher than normal because of extraordinary independence from supervision, and
- ▶ work not fully under the supervisor's authority and responsibility as defined under Factor 3.

The agency workload analysis indicates that at least 25 percent of the MCCR section's mission related work is at the GS-5/6 level. The appellant lacks supervisory authority over any higher graded work. Consequently, GS-5/6 is the highest grade level work characteristic of the organization. A GS-5/6 base level of work equates to Factor Level 5-3, according to the conversion table on page 24 of the guide.

We evaluate this factor at Level 5-3 and credit 340 points.

FACTOR 6: OTHER CONDITIONS

This factor measures the extent to which various conditions add to the difficulty of supervision. For credit, the condition must be present and dealt with on a regular basis. Positions at Level 6-3 or below are boosted one level if they also meet at least three of the eight special situations described in the guide.

At Level 6-2, the work supervised or overseen involves technician and/or support work comparable in difficulty to GS-7 or GS-8, or work at the GS-4, 5, or 6 level where the supervisor has full and final technical authority over the work (i.e., is responsible for all technical determinations arising from the work, without technical advice or assistance on even the more difficult and unusual problems, and without further review except from an administrative or program evaluation standpoint).

As noted under Factor 5, the appellant directs GS-5/6 work. Although she makes day-to-day operating decisions independently, guidance and advice on particularly difficult and out-of-the-ordinary technical problems arising from the work processed by her subordinates is available from her supervisor, who reviews such cases and the Chief, MAS, who is held fully responsible for the action taken, rather than the appellant.

Special Situations

When Level 6-2 is selected, a single additional level may be credited if the position meets three or more of eight *Special Situations* described on pages 29 - 30 of the guide. The appellant's position clearly does not meet situations two through eight. Consequently no additional credit is warranted.

We evaluate the overall level for this factor at 6-1 and credit 310 points.

FACTOR LEVEL POINT SUMMARY

Factor	Level	Points
1	1-2	350
2	2-1	100
3	3-2c	450
4A	4A-2	50
4B	4B-2	75
5	5-3	340
6	6-1	310
	Total:	1675

The above table summarizes our evaluation of the appellant's supervisory work. As shown on page 31 of the guide, a total of 1675 points equates to the GS-8 grade range (1605 to 1850 points).

PERSONALLY PERFORMED WORK

The GS-501 standard contains no grade level criteria of its own to evaluate the appellant's personally performed work. Consequently, the grade level determination must be made by comparison with a standard for a closely related kind of work, i.e., involving analogous knowledge and skills.

The Budget Analysis Series, GS-560, standard addresses work in the same occupational family as the appellant's position. It provides grade level criteria for evaluating two-grade interval work in a fiscal environment loosely related to the appellant's. Though not a perfect match, since it focuses largely on budget functions, it is one of the few standards addressing non-professional fiscal work and the specialized knowledge requirements fiscal work demands. These specialized requirements are not contemplated, for example, in general standards like the Administrative Analysis Grade Evaluation Guide, which is unsuitable for evaluating most of the appellant's work. Indeed, the guide specifically excludes:

Positions involving financial or other specialized administrative duties and responsibilities which are more thoroughly covered by criteria in specific occupational standards (e.g., Financial Management Series, GS-505; the Accounting Series, GS-510; the Auditing Series, GS-511; or the Budget Analysis Series, GS-560). Such positions should be evaluated through reference to the appropriate subject-matter standard.

The appellant's most demanding work is analogous to that of GS-560 analysts who advise management on effective and efficient means for acquiring and using funds to support agency programs and activities. The GS-560 grading criteria address such work along with other specialized work, similar to the appellant's, that concerns the accuracy, validity, and technical treatment of fiscal data in forms, schedules, and reports, or the legality and propriety of using funds for specific purposes.

The GS-560 standard is written in the Factor Evaluation System (FES) format. This system requires that credit levels assigned under each factor relate to only one set of duties and responsibilities. Under FES, work must be fully equivalent to the factor level described in the standard to warrant credit at that level's point value. If work is not fully equivalent to the overall intent of a particular level described in the standard, a lower level and point value must be assigned, unless the deficiency is balanced by an equally important aspect of the work that meets a higher level.

FACTOR 1: KNOWLEDGE REQUIRED BY THE POSITION

This factor assesses the nature and extent of information or facts that employees must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts) and the nature and extent of the skills needed to apply those knowledges.

The appellant feels her work deserves higher credit because of the analyses she performs. To support her claim, she cites, among other things, her analysis of MCCR-funded staffing, budget, productivity, and transition activities, her analysis of reimbursement claims, her performance of a variety of functions normally assigned to others in the Medical Administration (MAS) and Fiscal Services, particularly her responsibility for preparing and controlling:

. . . . the MCCR budget which totals approximately \$600,000 with seven separate control points for overhead expenses, personal salary costs, ADP equipment, other hospital equipment, maintenance and repair contracts, employee training/travel, and "all other" which includes general office supplies and mailing costs.

At Level 1-6, she is already credited with a good knowledge of commonly used fiscal principles, concepts, methods, practices, and procedures as well as the regulations, precedents, policies, and other guides that specifically apply to the MCCR program. This level of knowledge is equivalent to the expanded knowledge gained through directly related graduate education or experience in budget and financial areas applying conventional factfinding, analytical, and problem solving methods. It entails the knowledge and skill to analyze facts, identify problems, report findings, make conclusions, and recommend corrective or other appropriate action in carrying out routine analytical assignments.

The GS-560 classification standard recognizes a full performance level of knowledge at Level 1-6, such as that exercised in analyzing the budgetary requirements of an organizational component below which there are no subordinate budget offices. The appellant's work situation, likewise, is at the

lowest tier of the MCCR structure. Her work requires knowledge comparable to Level 1-6's full performance analyst, i.e., a good practical knowledge of the missions, functions, goals, objectives, work processes, and sources of funding of assigned activities in order to relate budget and program goals and accomplishments to anticipated and actual dollar figures. Like the appellant, analysts at this level employ factual information for data processing reports, work reports, or inventory and sales data. They interpret source information and apply it to the goals and budget for a program.

In response to our request for specific work examples, the appellant provided several analyses relevant to special surveys and reviews she has done. For instance, in one work sample she provided the Chief, MAS with a vulnerability assessment for the MCCR program as required by a VA directive. The memorandum lists the applicable functions and management controls with brief findings describing how the controls are accomplished. The analysis assesses procedural steps, follow-up, tracking, and review performed for the MCCR. In another example, she responds to the Needs Assessment Survey for the Ambulatory Data Capture Project requested by the MCCR Program Office, Washington, D.C., through the Chief, MAS. In it, the appellant recommends the acquisition of scanning equipment. Her analysis shows the expected usage frequency of scanners, arranged by clinic and activity to support her recommendation. Other work samples exhibit a similar level of analysis: identifying and reporting problems and taking corrective action for the VA's right to bill for a payment; establishing local goals and objectives for the MCCR program and furthering goals by initiating or recommending appropriate job assignments (e.g., by summarizing the MCCR staff and functions needed locally, indicating grade levels, full time equivalency, and approximate costs along with notes to explain the rationale for some of the determinations; and analyzing the effectiveness of work methods in functions such as co-payment billing of research patients). These analyses do not exceed Level 1-6 because they use readily acquired fiscal data and common analytical techniques.

Though the appellant's analytical work is very important to the smooth functioning of the Center's MCCR program, little of it compares in program breadth or depth of knowledge to that required at Level 1-7. Analysts at this higher level apply knowledge of methods and techniques for analyzing and evaluating the effects of continuing changes in program plans and funding on the accomplishment of more complex organizations' budget and program milestones (e.g., using cost-benefit analysis, planning-programing-budgeting, program evaluation review technique, management by objectives, decision theory, probability theory, linear programing, and inventory replacement theory). They also analyze relationships and develop recommendations for actions (e.g., requesting allotments, or reprogramming funds among object classes) under conditions of time pressure and uncertainty due to short and rapidly changing program and budgetary deadlines and objectives, gaps and conflicts in program and budgetary information, lack of predictive data, conflicting program and budgetary objectives, and changing guidelines for the work.

Even though some parts of the MCCR activities are assigned and located within other hospital services, the appellant does not have a comparable need to interpret the range of financial, statistical, and budgetary data envisioned at Level 1-7. Instead of the varied analyses and full range of difficult and complex assignments analysts at this level regularly encounter, the appellant's analyses focus on local MCCR initiatives and demand knowledge of a narrower range of techniques and data than

characteristic of Level 1-7. She compiles information through studies for the Regional MCCR, but that information is consolidated and analyzed by higher level staff in the program to determine the regional and national implications. She develops local reports concerning the impact of billing and collection activities upon the MCCR program and its functions, but without the constraints, the considerable volume of data, conflicting information, etc., characteristic of Level 1-7.

We evaluate this factor at Level 1-6 and credit 950 points.

FACTOR 2: SUPERVISORY CONTROLS

This factor covers the nature and extent of direct and indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work. Controls are exercised by the supervisor in the way assignments are made, instructions are given to the employee, priorities and deadlines are set, and objectives and boundaries are defined. Responsibility of the employee depends upon the extent to which the employee is expected to develop the sequence and timing of various aspects of the work, to modify or recommend modification of instructions, and to participate in establishing priorities and defining objectives. The degree of review of completed work depends upon the nature and extent of the review, e.g., close and detailed review of each phase of the assignment, detailed review of the finished assignment, spot-check of finished work for accuracy, or review only for adherence to policy.

The appellant feels that the autonomy of her position and the uniqueness of the MCCR program are more accurately reflected at Level 2-4. She believes she exercises a wide latitude of authority due to the nature of the MCCR program and her responsibilities, decisions, and recommendations. She notes that she routinely answers outside requests for information or coordinates the response for the hospital Director's signature. She cites the reports and surveys that she independently initiates and states:

Numerous reports and information are requested directly of the MCCR Coordinator by other VA agencies such as IRM field offices, regional offices, VA headquarters, Office of the Inspector General (IG), and staff at other VA medical centers. Also, staff from private agencies, such as the State Insurance Commissioner's Office, attorney's offices, insurance carriers, veterans' organizations, and private hospitals, contact the MCCR Coordinator for the expertise offered regarding cost recovery issues in the VA. Information concerning such requests is routinely provided, independently, by the MCCR Coordinator, and/or coordinated for the hospital director's signature. Following are several surveys which I have recently coordinated and prepared as the MCCR Coordinator indicative of this: Debt Collection Survey Regarding Improperly Billed Veterans requested by the Office of the Inspector General; Survey Regarding Outpatient Coding requested by the MCCR program office; Replacement of MCCR Equipment (involved information for other services, as well as MCCR Section) requested by the MCCR regional office; Survey Regarding Effectiveness of Income Verification Match (IVM) requested by the IVM Center in Atlanta, Georgia; Survey Regarding Medical Care Appropriation Billing Activities requested by the MCCR regional office; Survey regarding MCCR FTE Resource Needs requested by the MCCR regional office; Electronic Data Interchange surveys requested by both the MCCR regional office and the MCCR program office; MCCR Rate Alternatives Technical Evaluation Study Survey requested by the VA Center for Health Services Research and Development; Survey Regarding Consolidation of MCCR Co-payment Processing requested by the MCCR program office; Survey Regarding Transfer of Certain MCCR Insurance Review Activities to Quality Management requested by VA headquarters; Survey Regarding Implementation of the Automated Information Collection System (AICS) using scanning equipment.

Though the appellant is responsible for independently planning and carrying out analyses, the Chief, MAS, is actually designated formal responsibility for management of the MCCR program and is the principle person responsible for the administration of the MCCR program. The appellant works independently on day to day matters involving common analytical problems, as is typical for the Level 2-3. As noted under Factor 1, these problems, while difficult, complex, and important, are conventional and do not entail the more advanced techniques or demand the wider range of knowledges encountered with the wider range of data and uncertainties that accompany more complex organizations and broader fiscal responsibility. Because she lacks the greater responsibility inherent to more difficult work assignments, Level 2-4 is inappropriate for her work. Level 2-4 demands a corresponding increase in the difficulty of work to accompany increased independence. Consequently, even though she may enjoy increased independence because of ample experience, it is without the necessary increase in responsibility.

We evaluate this factor at Level 2-3 and credit 275 points.

FACTOR 3: GUIDELINES

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

The appellant states that she should receive credit for Level 3-4 because of the relative infancy of the MCCR program, the scrutiny it receives from Congressional review, and because rapidly changing methods of operation do not allow timely publication of guidelines.

Over the past decade, the agency's broad program goals and objectives for the MCCR program have been refined. Ten years ago, the guidelines for the program were fewer. The appellant revises and updates local guidance to reflect program changes in accordance with higher level guidance. She accomplishes this as described at Level 3-3, i.e., using standard approaches and judgment to interpret and adapt broader guidelines to local circumstances. Unlike Level 3-4, the problems she must resolve do not require deviation from conventional methods and approaches. When she encounters situations for which guidelines or precedents are unclear or not completely appropriate, she resolves them in accordance with general directions, previous training, accepted techniques, and organizational practices, as is characteristic of Level 3-3.

We evaluate this factor at Level 3-3 and credit 275 points.

FACTOR 4: COMPLEXITY

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

The appellant believes she is due higher level credit for providing technical direction to others and for waiver and other authorities she has been delegated. In addition, she states that indicative of the complex nature of her position is work such as the implementation of the Ambulatory Care Data Capture (ACDC) program, which focuses on the accurate outpatient coding of patient visits. She states that although she is not the immediate supervisor of several different MCCR funded positions,

she does have direct input into performance related issues for each of them and provides training relative to their assigned MCCR functions.

The appellant's program and work direction responsibilities received full credit in our analysis of her supervisory duties under the GSSG. Having signatory or waiver authority generally affects certain responsibilities of the position; however, such authority is not, by itself, grade determining. The grade of a position must be evaluated in terms of the factor level descriptions, e.g., the extent of review, the complexity of the analyses, the scope of the work, and other relevant factors detailed in the classification standard.

At Level 4-3, the appellant is already credited with compiling, analyzing, and summarizing fiscal information, considering alternative methods of obtaining and distributing funds, and making recommendations or adjustments based upon factual considerations and the relationships among organizational needs and objectives, costs, obligations, revenues, expenses, etc. Work at this level typically involves developing cost data, forecasting funding needs through use of current and historical cost data, estimating overhead charges, reviewing requests for allotments, etc. The appellant's work is similar to Level 4-3, where duties characteristically include providing advice on the applicability of installation or component regulations, developing data for alternate work plans, forecasting funding needs for continuing support activities through extrapolation and interpolation of current and historical data, and determining the reasons for trends in the cost of accomplishing specific work objectives such as processing benefit claims.

In contrast, at Level 4-4, duties involve, among other things, a wide variety of analytical and technical functions. Work is complicated by the presence of conflicting program and fiscal data and involves analyzing trends and recommending alternate courses of action to managers concerning the amount, purpose, source, and timing of funding actions by making use of more sophisticated analytical techniques such as cost-benefit analysis, amortization, and the like. The appellant's work lacks the greater variety of analytical and technical demands that more complicated organizations and techniques pose. Sophisticated analytical techniques, evaluations of conflicting budgetary data, etc., typical of higher level work, are largely absent from her assignments.

We evaluate this factor at Level 4-3 and credit 150 points.

FACTOR 5: SCOPE AND EFFECT

This factor covers the relationship between the nature of the work (i.e., the purpose, breadth, and depth of the assignment) and the effect of work products or services both within and outside the organization. Only the effect of properly performed work is considered.

The appellant states:

Information previously outlined herein substantiating the other evaluation factors also apply to this factor. Again, however, allocation of MCCR resources; the MCCR budget analysis; the measurement of meaningful productivity information; actions taken to ensure a realistic program goal; reevaluating and initiating program decisions and policy statements; coordinating and responding to survey requests from various sources; the management of a fiscally-sound debt collection program; and the impact of responsibilities on future healthcare issues, all substantiate the validity of a higher level rating.

The purpose of the appellant's work is to coordinate, monitor, and analyze the Center's cost recovery operations. As at Level 5-3, she encounters a variety of conventional analytical problems and addresses them using standard methods and practices. Unlike Level 5-4, the purpose of her work is not to resolve unusual analytical problems like those encountered in formulating or monitoring long-range detailed budget forecasts for programs significantly more complicated than hers.

We evaluate Scope at Level 5-3.

As at Level 5-3, her work affects the accuracy of the Center's budget forecasts and compliance with legal and regulatory requirements. Unlike Level 5-4, her recommendations and technical interpretations directly and significantly affect the Center's cost recovery efforts, rather than a wide range of agency activities.

We evaluate Effect at Level 5-3.

We evaluate both the Scope and Effect of this factor at Level 5-3 and credit 150 points.

FACTOR 6: PERSONAL CONTACTS

Factor 6 includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. Levels of this factor are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place (e.g., the degree to which the employee and those contacted recognize their relative roles and authorities). Contacts credited under Factor 6 must be the same contacts credited under Factor 7.

In support of her claim to higher credit under this factor, the appellant states, among other things:

. . . I also chair a multidisciplinary committee with membership from staff in other services, involved with the MCCR program. . . I have participated in the Consumer Affairs functions at this hospital, and am included in a "speakers' bureau" organized to travel outside the hospital to community organizations such as veterans' functions, health fairs, etc. . . My recent Team Leader responsibilities with the Ambulatory Data Capture program have also led to various presentations within the hospital for both clinical and administrative staff. . . . Association with similar career organizations in the private sector, such as the American Guild of Patient Account Management (AGPAM), also enhances the management of the MCCR Program. In the past few years, I have attended the following national conferences in my capacity as the MCCR Coordinator: "MCCR: The Future in Focus" held in San Antonio, Texas; "Focus on Performance" held in San Antonio, Texas; "Managing the MCCR Program" held in Washington, D.C.; "Supervisory Skills for the MCCR Manager" held in Portland, Oregon; the MCCR National Conference held in LaJolla, California; an Accounts Receivable Management conference in Washington, D.C. in December 1995; the MCCR National Conference in Miami, Florida in January 1996; and the Ambulatory Care Data Capture Conference in Houston, Texas in March 1996.

The appellant's additional contacts are with veterans, employees, computer systems specialists, management and program officials in the hospital and at other medical centers, program officials at higher level offices, representatives of insurance carriers, contractors for services, and attorneys representing the agency in debt collection cases, and the like. Many of her regular contacts equate to Level 6-2, which may be within the agency but outside the immediate organization, or external with the public, contractors, or others where the roles and relative authorities of all parties involved are explicitly clear.

The appellant's contacts are more routine and structured than those at Level 6-3, where the purpose and extent of each contact is different and the role and authority of each party is established during the course of the contact. Her contacts typically involve non-controversial matters, where the role and authority of each participant is readily apparent and unquestioned. They do not involve, for example, sensitive or contentious matters, where the role and authority of the parties may at first be uncertain, as when sometimes dealing with attorneys, public action groups, etc.

We evaluate this factor at Level 6-2 and credit 25 points.

FACTOR 7: PURPOSE OF CONTACTS

Factor 7 addresses the purpose of personal contacts, which may range from factual exchange of information to situations involving significant or controversial issues and differing viewpoints or objectives.

The purpose of the appellant's contacts is to coordinate cost recovery activities with other Center organizations, provide advice to managers on cost recovery operations, and resolve associated problems. These equate to Level 7-2, where contacts are made for the purpose of resolving budgetary issues and problems and carrying out budgetary transactions to achieve mutually agreed upon financial and program objectives.

Unlike Level 7-3, the appellant's contacts are not to influence, motivate, or control skeptical or uncooperative persons. At this higher level, persuasion and negotiation are necessary due to the presence of conflicting program objectives that must be resolved. The appellant provides advice on MCCR program issues and concerns to various levels of employees and management who share the common goal of maximizing the Center's cost recovery. Her contacts outside the agency include Level 7-1's purpose, namely, to exchange factual information, including highly technical information, but do not exceed Level 7-2's coordinative role.

We evaluate this factor at Level 7-2 and credit 50 points.

FACTOR 8: PHYSICAL DEMANDS

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

The appellant's work is sedentary and free of special physical demands. We evaluate this factor at Level 8-1 and credit 5 points.

FACTOR 9: WORK ENVIRONMENT

This factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required.

The appellant's work is performed in an office setting and requires no special safety precautions. We evaluate this factor at Level 9-1 and credit 5 points.

FACTOR LEVEL POINT SUMMARY

Factor	Level	Points
1	1-6	950
2	2-3	275
3	3-3	275
4	4-3	150
5	5-3	150
6	6-2	25
7	7-2	50
8	8-1	5
9	9-1	5
	Total:	1885

The table above summarizes our evaluation of the appellant's personally performed work. As shown on page 21 of the standard, a total of 1885 points falls within the GS-9 grade range (1855 to 2100 points).

DECISION:

The appellant's personally performed work and supervisory work equate to the GS-9 and GS-8 grade levels, respectively. The higher level applies when there is a difference between the two. The proper classification of the appellant's position, then, is GS-501-9, with the title at the discretion of the agency.