

U.S. Office of Personnel Management
Division for Human Capital Leadership & Merit System Accountability
Classification Appeals Program

Dallas Field Services Group
1100 Commerce Street, Room 441
Dallas, TX 75242

Classification Appeal Decision
Under section 5112 of title 5, United States Code

Appellant: [appellant]

Agency classification: Supervisory Personnel Management
Specialist
GS-201-13

Organization: Division of Human Resources
Office of Administrative Support
[name] Area Office
Indian Health Service
U.S. Department of Health and Human
Services
[location]

OPM decision: Human Resources Officer
GS-201-13

OPM decision number: C-0201-13-05

/s/ Judith L. Frenzel

Judith L. Frenzel
Classification Appeals Officer

November 4, 2003

Date

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

Since the decision changes the title of the appealed position, it is to be effective no later than the beginning of the fourth pay period after the date of this decision, as permitted by 5 CFR 511.702. The servicing personnel office must submit a compliance report containing a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

Decision sent to:

[appellant's name and address]

Director, Human Resources
Indian Health Service
U.S. Department of Health and Human Services
12300 Twinbrook Parkway, Suite 230
Rockville, Maryland 20852

Deputy Assistant Secretary for Human Resources
Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, SW., Room 536E
Washington, DC 20201

Introduction

On June 6, 2003, the Dallas Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. We received the agency's administrative report on August 8, 2003. The appellant's position is currently classified as Supervisory Personnel Management Specialist, GS-201-13, and is located in the Division of Human Resources, Office of Administrative Support, [name] Area Office, Indian Health Service (IHS), U.S. Department of Health and Human Services (HHS), in [location]. The appellant does not dispute the series of his position, but believes it should be titled as Human Resources Officer and classified at the GS-14 grade level. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

Background

The appellant and immediate supervisor certified to the accuracy of the duties described in the position description (PD) of record, number [number]. In October 2001, the appellant requested an evaluation of his position's classification through IHS headquarters, which has classification authority for supervisory positions in field personnel offices. No action was taken on this request and the appellant subsequently filed an appeal with OPM. In doing so, the appellant submitted an evaluation statement for his position proposing the classification of the position to the GS-14 grade level.

In response to the appellant's filing a classification appeal with our office, IHS headquarters prepared an official evaluation statement applying the Job Family Position Classification Standard for Administrative Work in the Human Resources Management Group, GS-200, and the General Schedule Supervisory Guide (GSSG). Their evaluation, dated July 21, 2003, determined that the position was appropriately classified as Human Resources Officer, GS-201-13. The position's official title, however, currently remains Supervisory Personnel Management Specialist.

To help decide this appeal, we conducted telephone audits with the appellant on October 8 and 10, 2003, a follow-up discussion with him on October 24 and November 4, and a telephone interview with the appellant's first-level supervisor on October 16. In addition, we conducted separate telephone interviews with the individuals occupying the three subordinate Human Resources Specialist, GS-201-12, positions on October 24, and follow-up discussions on October 28 and November 4. In deciding this appeal, we fully considered the audit findings and all information of record provided by the appellant and his agency.

General issues

The appellant believes he is performing work similar to other positions classified at the GS-14 grade level. Like OPM, the appellant's agency must classify positions based on comparison to OPM's position classification standards and guidelines. In accordance with 5 CFR 511.612, agencies are required to review their own classification decisions for identical, similar, or related positions to ensure consistency with OPM certificates. The agency, therefore, has the primary responsibility for ensuring that its positions are classified consistently with OPM appeal

decisions. If the appellant believes his position is classified inconsistently with another, then he may pursue this matter by writing to his agency headquarters' human resources office. He should specify the precise organizational location, series, title, grade, duties, and responsibilities of the positions in question. The agency should explain to him the differences between his position and the others, or grade those positions in accordance with this appeal decision.

In a memo, dated August 15, 2003, the subordinate GS-12 Human Resources (HR) Specialist (Classification) makes various statements to dispute the IHS Headquarter's evaluation of the appellant's position. In adjudicating the appeal, our only concern is to make our own independent decision on the proper classification of the appellant's position. Therefore, we have considered these statements only insofar as they are relevant to making that comparison.

The appellant discusses the large amount of work his organization performs. This situation is aggravated by their inability to fill six HR Specialist vacancies located at the service units in the area office's geographic jurisdiction. Because of the HHS initiative aimed at reorganizing and consolidating IHS's HR functions, there is no expectation to fill these vacancies in the near future. Volume of work, however, cannot be considered in determining the grade of a position (*The Classifier's Handbook*, chapter 5).

In a memo, dated May 23, 2003, the appellant alludes to instances of merit system principle violations. These actions are not reviewable under the classification appeals process. The appellant may wish to pursue these concerns with the U.S. Office of Special Counsel which receives and investigates allegations of prohibited personnel practices. He may also wish to contact his agency's Inspector General who is responsible for investigating fraud, waste, and abuse within the agency.

Position information

The appellant is responsible for the overall management, administration, implementation, and delivery of a variety of HR functions to a workforce of approximately 1,400 employees located in the area office and six service units scattered throughout [two states]. The service units are, in turn, composed of various hospitals, clinics, health centers, and health stations. The service units generally have similar and well-defined missions, with staff consisting of mostly medical, administrative, maintenance, and support functions. The appellant works under the supervision of the Health Systems Administrator, GS-670-15, who serves as the Area Associate Director, Office of Administrative Support.

The appellant supervises three GS-201-12 HR Specialists, who are each responsible for a functional area. The areas include position classification and position management; recruitment and placement; and employee and labor relations. The two GS-12 HR Specialists responsible for the position classification and position management and the employee and labor relations functions, each provide technical and administrative oversight to an HR Assistant, GS-203-8. The GS-12 HR Specialist responsible for the recruitment and placement functions provides technical and administrative supervision to three HR Specialists, GS-201-11, and one HR Assistant, GS-203-7.

The appellant's unit provides a wide variety of HR services to employees not only under title 5 authorities, but also for systems established under separate statutory authorities, such as title 38 and the Public Health Service (PHS) Commissioned Corp. The Commissioned Corp, HHS's uniformed service arm, is a specialized career system designed to provide highly trained and mobile health professionals. Their HR system is administered centrally at the Division of Commissioned Personnel in Rockville, Maryland. The appellant's staff provides a limited range of HR functions for these Commissioned Corp employees including, but not limited to, making initial qualification determinations, processing orders, and facilitating enrollment in benefits and dental programs. The appellant may also remove Commissioned officers for unsatisfactory performance or misconduct if the three-year probationary period has not yet been completed. Approximately 100 officers are currently assigned within the area office's geographic jurisdiction.

The appellant's PD and other material of record furnish much more information about his duties and responsibilities and how they are performed. While the position description may be somewhat overstated, we find that it contains the major duties and responsibilities performed by the appellant which are incorporated into this decision.

Series, title, and standard determination

The appellant's position is properly assigned to the Human Resources Management Series, GS-201. Neither the appellant nor the agency disagrees. The authorized title for positions with responsibility for directing a human resources management program is Human Resources Officer. Although the position is currently titled Supervisory Personnel Management Specialist, both the appellant and the agency submitted separate evaluation statements affirming the position's title as Human Resources Officer. The Job Family Position Classification Standard for Administrative Work in the Human Resources Management Group, GS-200, clarifies that the GSSG is to be applied when classifying Human Resources Officer positions.

Grade determination

The majority of the appellant's work time is devoted to managing and administering a human resources management program and activities through the performance of supervisory work. The grade level for supervisory positions is determined through application of the criteria in the GSSG. This cross-series guide uses a factor-point method that assesses six factors common to supervisory General Schedule positions. Evaluators assign a point value to each factor based on a comparison of the position's duties with the factor-level descriptions. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position factor to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails to meet a particular factor level description in any significant aspect, the point value for the next lower factor level must be assigned. If an equally important aspect that meets a higher level balances the deficiency, however, the next higher level is assigned. The points total assigned is then converted to a grade using the conversion table in the standard.

The agency evaluated the appellant's position at Levels 1-3, 2-2, 3-2c, 4A-3, 4B-3, 5-7, and 6-4. The appellant disagrees specifically with the agency's evaluation of Factors 3 and 6. Based on our review of the record, we agree with and have credited the position at Levels 2-2, 4A-3, 4B-3, and 5-7. Therefore, this decision will primarily address those factors with which the appellant or OPM disagrees; that is Factors 1, 3, and 6.

Factor 1, Program Scope and Effect

This factor assesses the general complexity, breadth, and impact of the program areas and work directed, including its organizational and geographical coverage. It also assesses the impact of the work both within and outside the immediate organization. To credit a particular factor level, the criteria for both scope and effect must be met.

Subfactor 1a: Scope

This element addresses the general complexity and breadth of (1) the program directed; and (2) the work directed, the products produced, or the services delivered. The geographic and organizational coverage of the program within the agency structure is addressed under this element. In evaluating the population affected under this factor, we may only consider the total population serviced directly and significantly by a program.

The levels of this factor describe two situations: agency line programs, e.g., providing services to the public; and support programs, e.g., providing administrative or other complex support services within an agency. For threshold position classification standards, each successively higher factor level description represents additional demands beyond those expressed at the next lower level. The appellant's position falls under the second situation since his organization performs administrative support functions; i.e., it provides HR to IHS line program components

At Level 1-2a, the program segment or work directed is administrative, technical, complex clerical, or comparable in nature. The functions, activities, or services provided have limited geographic coverage and support most of the activities comprising a typical agency field office, an area office, a small to medium military installation, or comparable activities within agency program segments.

At Level 1-3a, the position directs a program segment that performs technical, administrative, protective, investigative, or professional work. The program segment and work directed typically have coverage encompassing a major metropolitan area, a state, or a small region of several states.

The appellant directs an operating HR office that provides administrative services to one of twelve area offices and its associated service units. His responsibility for a segment of IHS's HR program covers employees located primarily in [two states], and totals 1,400 positions. Approximately 100 of these positions are occupied by PHS Commissioned officers who receive only partial services provided by the appellant's unit. Given that the appellant directs work that is administrative or technical in nature that has limited geographic coverage, and the size of the internal population serviced, Factor Level 1-2a is met

The work directed by the appellant falls short of Level 1-3a criteria. Illustrative of administrative work at this level is directing **all** personnel, budget, or similar services for a bureau or major military command headquarters; a large or complex multi-mission military installation, and organization of similar magnitude, or a group of organizations which, as a whole, are comparable. Large is defined as covering a serviced population of 4,000 or more personnel with one or a few major missions and a variety of serviced technical functions. Multi-mission is defined as an installation or group of several activities directly supported by the position under evaluation that have more complex and demanding mission than a large activity but whose population does not fully meet the 4,000 threshold. In contrast, the area office does not meet the definitions of a large or complex multi-mission installation in terms of either their magnitude or complexity. They directly support a population less than half this size. Furthermore, the area office and the service units have one basic mission, i.e., to provide Federal health services to Native Americans and Alaskan Natives. They also lack the scope-broadening complexities that support evaluating multi-mission organizations that do not fully meet the 4,000 population threshold at Level 1-3a, e.g., extensive research, development, testing, and comparable missions.

Level 1-2a is assigned for this element.

Subfactor 1b: Effect

This element addresses the impact of the work on the mission and programs of the customers, the activity, the agency, other agencies, the general public, or others.

At Level 1-2b, the services or products support and significantly affect installation level, area office level, or field office operations and objectives, or comparable program segments; or provide services to a moderate, local or limited population of clients or users comparable to a major portion of a small city or rural county. An example of this kind of effect would be directing budget, staffing, supply, protective, library, payroll, or similar services which support a small Army, Navy, or Air Force base with no extensive research, development, testing, or comparable missions, a typical national park, a hospital, or a non-defense agency field office of moderate size and limited complexity.

At Level 1-3b, the services directly and significantly impact 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 operations to numerous, varied, and complex technical, professional, and administrative functions. An example of this kind of effect could include the level of support provided by the human resources officer or budget officer for a bureau or major military command headquarters, a large or complex multi-mission military installation, or an organization of similar magnitude.

The effect of the appellant's position meets but does not exceed Level 1-2b. His is an administrative position whose direct effect is internal to the organization. The appellant's work significantly affects the employees serviced at the area office and service units. This represents

an operation of moderate complexity and size, comparable to a medium military installation or agency field office illustration under Level 1-2b. The services provided are comparable to the area office-level operations described at Level 1-2b. Unlike Level 1-3b, services provided by the appellant's unit do not directly and significantly impact a wide range of agency activities, the work of other agencies, the operations of outside interests, or the general public. The appellant's work products do not directly support or substantially impact the provision of essential support operations to numerous, varied, and complex technical, professional, and administrative functions of the scope and complexity that would typically exist at a large, complex, multi-mission organization. Therefore, Level 1-2b is assigned for this element.

Level 1-2 is credited for this factor and 350 points are assigned.

Factor 3, Supervisory and managerial authority exercised

This factor considers the delegated supervisory and managerial authorities that are exercised on a recurring basis. To be credited with a level under this factor, a position must meet the authorities and responsibilities to the extent described for the specific level.

To meet Level 3-2c, the position must carry out at least three of the first four, with a total of six or more, of the 10 authorities and responsibilities described for this level in the guide.

Level 3-2c is met. The appellant's delegated supervisory responsibilities include all of the ten required authorities under this level. The appellant is responsible for planning work to be accomplished by subordinates, setting and adjusting short-term priorities, and preparing schedules for completion of work. He assigns work to employees based on priorities, selective consideration of the difficulty and requirements of assignments, and the capabilities of subordinates; evaluates work performance; and provides advice, counsel, or instruction to employees on both work and administrative matters. The appellant also interviews candidates for positions in his unit, recommending appointment, promotion, or reassignment to such positions; and hears and resolves complaints from employees, referring group grievances and more serious unresolved complaints to a higher level supervisor or manager.

At Level 3-2c, supervisors effect minor disciplinary actions and recommend other actions in more serious cases. The other responsibilities the appellant fully meets include identifying developmental and training needs of employees, providing or arranging for needed development and training; developing performance standards; and finding ways to improve production or increase the quality of work directed. For example, the appellant's unit biannually distributes surveys to employees at the area office and the service units, asking them to rate the quality of various human resources services on a scale of one to five. The appellant stated that incorporating the feedback from survey responses, as well as those findings from self-assessments, into their work operations allows them to continually improve the quality of their work.

At Level 3-3, the supervisor must meet one of two conditions spelled out in the guide. To meet the first condition Level 3-3a, the supervisor must exercise delegated managerial authority to set a series of annual, multiyear, or similar types of long-range work plans and schedules for in-

service or contracted work; determine the goals and objectives that need additional emphasis; determine the best approach for resolving budget shortages; and plan for long-range staffing needs. Level 3-3a describes program management work normally delegated to higher levels in the organization, where the position is involved in making decisions related to broad staffing, budgetary, policy, and regulatory matters affecting the overall program on a *national* level. In contrast, the area office's location in IHS's organizational hierarchy precludes the exercise of responsibilities involving high levels of program management and development. Specifically, the appellant provides input to higher levels of management on issues relating to, among other things, resource requirements. Although he also provides vital information on the staffing portion of the budget, e.g., estimating the cost in salary adjustments due to within-grade increases, it is the appellant's immediate supervisor who devotes a considerable amount of time to budget and fiscal management activities, and who is responsible for resolving budget shortages to the extent envisioned at this Level. The appellant's position also fails to meet another significant aspect of the criteria for Level 3-3a in that the position is not involved in planning for long-range staffing needs. As a member of a task force formed to explore quality work environment initiatives, the appellant identifies staffing trends and issues. Yet, because this working group is composed of all area office employees and because not one voice outweighs another, the appellant has no independent authority to make the types of managerial decisions described at this level. Level 3-3a is, therefore, not met.

To meet the second condition, Level 3-3b, the supervisor, in addition to exercising the authorities and responsibilities described at Level 3-2c, must meet at least 8 in a list of 15 additional authorities and responsibilities that establish a level of authority significantly higher than Level 3-2c. These include (1) uses subordinate supervisors, leaders, or team chiefs to direct, coordinate, or oversee the work; (2) exercises significant responsibilities in dealing with officials of other units or organizations, or in advising management officials of higher rank; (3) assures reasonable equity of performance standards and rating techniques developed by subordinates; (4) directs a program or major program segment with significant resources; (5) makes decisions on work problems presented by subordinate supervisors; (6) evaluates performance of subordinate supervisors and serves as the reviewing official on evaluations of nonsupervisory employees rated by subordinate supervisors; (7) makes or approves selections for subordinate nonsupervisory positions; (8) recommends selections for subordinate supervisory positions; (9) hears and resolves group grievances or serious employee complaints; (10) reviews and approves serious disciplinary actions involving nonsupervisory subordinates; (11) makes decisions on nonroutine, costly, or controversial training needs and training requests related to employees of the unit; (12) determines whether contractor performed work meets standards of adequacy for authorization of payment; (13) approves expenses comparable to within-grade increases, extensive overtime, and employee travel; (14) recommends awards or bonuses for nonsupervisory personnel and changes in position classification, subject to approval by higher level officials, supervisors, or others; and (15) finds and implements ways to eliminate or reduce significant bottlenecks and barriers to production, promote team building, or improve business practices.

The appellant specifically exercises responsibilities 2, 7, and 14. For instance, he carries out responsibility 2 by serving as the principal human resources management advisor to the Director and the five Associate Directors for the area office. Furthermore, the appellant carries out

responsibility 7, since he approves selections for subordinate non-supervisory positions. The appellant's position is also credited with responsibility 14. He recommends awards or bonuses for his staff and changes in position classification. Similar to the authority described at this level, the appellant's recommendations regarding changes in position classification are subject to approval by IHS headquarters, which retains classification authority for supervisory positions in field personnel offices.

The appellant's position cannot receive credit for responsibilities 1, 3, 4, 5, 6, 8, 9, 10, 11, 12, 13, and 15 for the reasons discussed below.

Responsibilities 1, 3, 5, 6, and 8 refer to situations where work is accomplished through subordinate supervisors, team leaders, or other similar personnel. Supervisors at this level exercise these responsibilities through multiple supervisors or team leaders. Further, the supervisor's organizational workload must be so large and its work so complex that it requires using two or more subordinate supervisors, team leaders, or comparable personnel to direct the work. Absent such conditions, the presence of two or more supervisors or comparable personnel, by itself, is not enough to credit the appellant's position with these responsibilities. In this case, the appellant's unit of nine employees is segmented into three very small program functions. The three GS-12 HR Specialists are designated as a supervisor for the recruitment and placement function, and team leaders for the position classification and position management, and the employee and labor relations functions.

The current PD for the GS-12 HR Specialist (Recruitment and Placement) does not include the performance of supervisory duties. Interviews with the appellant's staff revealed that this is an oversight that will be corrected in the near future. However, her official title remains Supervisory Personnel Staffing Specialist. The agency should determine if that position fully meets the requirements for classification as a supervisor. The two team leaders fall short of the minimum authorities and responsibilities required for coverage of the General Schedule Leader Grade Evaluation Guide. Their team leader responsibilities occupy far less than the 25 percent of time required for coverage under the guide. Consequently, neither the two "leader" nor the one potential supervisor can be credited for the purposes of Level 3-3b.

Responsibility 4 requires direction of a program or major program segment with significant resources, e.g., one at a multimillion dollar level of annual resources. The operating budget for the appellant's unit is approximately 1.3 million dollars. Since the appellant lacks direct control over a multimillion-dollar level of annual resources, responsibility 4 cannot be credited.

The size of the organization directed precludes the appellant from exercising responsibilities 9, 10, 11, and 15. The authority to carry out supervisory functions that rarely if ever occur, such as hearing and resolving group or serious employee complaints; reviewing and approving serious disciplinary actions; making decisions on nonroutine, costly, or controversial training needs; and finding and implementing ways to eliminate or reduce significant bottlenecks and barriers to production, promote team building, or improve business practices, cannot be credited because the appellant's organization does not require or permit the regular and recurring exercise of that authority. A training budget is allocated to the appellant's unit, which the appellant may use in any fashion. The budget is normally small and is used to provide only essential training and,

whenever possible, utilizes well-known vendors, such as the United States Department of Agriculture Graduate School. Because only the actual requirements of the organization directly *supervised* can be credited, the appellant cannot receive credit for hearing and resolving group grievances or serious employee complaints and reviewing and approving serious disciplinary actions. While five to ten percent of the appellant's time is occupied in handling and resolving employee and group complaints or grievances, these situations do not involve the appellant's immediate subordinates. Instead, they generally involve employees in the geographic area they service. Again, the size of the organization directed precludes the appellant from exercising responsibilities 9 and 10.

Under responsibility 12, a supervisor must determine whether contractor-performed work meets standards of adequacy needed to authorize payment. Contractors conduct background investigations, which are required by Public Law 101-630 for positions with duties and responsibilities that involve regular contact with or control over Indian children. Responsibility 12, however, is intended to credit supervisors who regularly oversee the work of contract employees in a manner comparable to the way in which other supervisors direct the work of subordinate employees. Since the appellant does not oversee the work of contractor employees, this responsibility cannot be credited.

The appellant approves within-grade increases and the minimum travel related to employees' attendance at training events. He does not grant extensive overtime, as any significant financial expenditure requires prior approval from the appellant's immediate supervisor. Because responsibility 13 is not fully met, it may not be credited to the appellant's position.

Since the appellant's position received credit for only three of the 15 responsibilities listed under Level 3-3b, it did not meet that level. Level 3-2c, the highest level met, is credited for this factor and 450 points are assigned.

Factor 5, Difficulty of typical work directed

This factor measures 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. It involves determining the highest grade of basic (mission-oriented) non-supervisory work performed that constitutes 25 percent or more of the workload of the organization.

The appellant has nine subordinate employees to be considered in determining the base level of work directed. They consist of three GS-12 specialists, three GS-11 specialists, two GS-8 assistants, and one GS-7 assistant. Allowing for the exclusion of a minimal amount of time spent by the GS-12 specialist in performance of supervisory work, we will agree with the agency's determination that the GS-12 level is appropriate for this factor.

Level 5-7 is credited for this factor and 930 points are assigned.

Factor 6, Other Conditions

This factor measures the extent to which various conditions contribute to the difficulty and complexity of carrying out supervisory duties, authorities, and responsibilities. The grade level of work credited under factor 5 primarily measures the difficulty of work. Complexity is measured by the level of coordination required. Both aspects must be met fully met to credit a level.

Level 6-4 addresses complications arising from professional, scientific, technical, or administrative work comparable in difficulty to the GS-11 level and requiring substantial coordination and integration of a number of major assignments or projects. Such coordination may involve, e.g., integrating the work of a team or group and/or ensuring compatibility and consistency of policy interpretation and application; and leadership in developing, implementing, and improving processes and procedures to monitor the effectiveness, efficiency, and productivity of the program segment and/or the organization directed.

The appellant's position fully meets Level 6-4. Consistent with this level, the appellant must ensure that actions taken by his subordinates are consistent not only with formal policies and regulations but with established internal practices and precedents, and that individual personnel issues involving similar circumstances are treated in like manner.

The appellant's position does not fully meet Level 6-5. At this level, first-level supervision requires significant and extensive coordination and integration of a number of professional, scientific, technical, managerial, or administrative work comparable in difficulty to the GS-12 level. Although the non-supervisory work directed by the appellant is at the GS-12 level, we do not find the work of the position requires making major recommendations that have a direct and substantial effect on the organization and projects managed, as specified for Level 6-5. For example, supervisors at this level make major recommendations in at least three of the areas listed below:

1. Significant internal and external program and policy issues affecting the overall organization, such as those involving political, social, technological, and economic conditions. This is not creditable to the appellant's position. Overall HR policy responsibilities reside at the bureau and department levels. For example, Public Law 93-638, Indian Self-Determination and Education Assistance Act, gave Indian tribes the authority to contract with the Federal government to operate programs serving their tribal members and other eligible persons. The appellant negotiated with tribal officials regarding their proposal to take over the administrative function at one of the service units within the area office's control. Although the authority to make a decision on these proposals has been delegated from the Secretary of HHS to the Area Director, situations with possible impact IHS-wide are normally referred to headquarters. This proposal would have set a precedent and the Office of General Counsel and IHS headquarters were consulted.
2. Restructuring, reorienting, recasting immediate and long range goals, objectives, plans, and schedules to meet substantial changes in legislation, program authority, and/or funding. The work is largely driven by management requests and expectations. While changes in regulations

and delegations of authority may increase or decrease the workload, and changes in funding levels may affect the resources available to carry out the assigned functions, these do not significantly alter the fundamental goals and objectives of the work. Recommendations and decisions on restructuring, reorienting, recasting immediate and long range goals, objectives, plans, and schedules are retained at higher level human resource offices in the agency.

3. Determinations of projects or program segments to be initiated, dropped, or curtailed. The appellant's unit carries out functions that are typically unchanging and are considered necessary to the operation of the organization. Recommendations and decisions on these matters are retained at higher level human resource offices in the agency.

4. Changes in organization structure. This is not applicable, as the small size of the appellant's organization does not lend itself to any significant changes in structure.

5. The optimum mix of reduced operating costs and assurance of program effectiveness, including introduction of labor saving devices, automated processes, and similar methods. The operating costs of the appellant's unit are fairly stable with limited opportunities to introduce technological improvements to reduce manpower needs. Although the appellant's unit adopted a number of automated human resources systems, e.g., the Enterprise Human Resources and Payroll and the Integrated Time and Attendance System, this was an HHS decision. The magnitude or scope was not sufficient to affect staffing requirements.

6. The resources to devote to particular programs (especially when staff-years and a significant portion of an organization's budget are involved). The appellant's immediate supervisor, the Associate Director, Office of Administrative Support, typically resolves those situations involving the organization's budget.

7. Policy formulation and long range planning in connection with prospective changes in functions and programs. Policies and long range planning regarding changes in functions and programs is, again, largely promulgated at the IHS and HHS levels. The area office implements and tailors human resources policies to fit their organization.

None of the elements are applicable to the appellant's position, and Level 6-5a cannot be assigned.

Level 6-5c may also be credited if the position manages work through subordinate supervisors who each direct substantial workloads comparable to the GS-11 grade level, or if the subject position supervises highly technical, professional, or administrative work at or above the GS-13 grade level that involves unusual demands on the supervisor. As discussed in detail under Factor 3, the appellant does not direct the work unit through subordinate supervisors who each direct considerable workloads comparable to the GS-11 grade level. Finally, the appellant does not supervise GS-13 grade level work that is highly technical or administrative involving matters of unusual urgency, controversy, or compatible demands as described at Level 6-5b.

Level 6-4a is credited for this factor and 1,120 points are assigned.

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Program Scope and Effect	1-2	350
2. Organizational Setting	2-2	250
3. Supervisory & Managerial Authority Exercised	3-2c	450
4. Personal Contacts		
A. Nature of Contacts	4A-3	75
B. Purpose of Contacts	4B-3	100
5. Difficulty of Typical Work Directed	5-7	930
6. Other Conditions	6-4	1120
<i>Total</i>		3275

The total of 3,275 points falls within the GS-13 range (3155 – 3600) on the grade conversion table provided in the GSSG.

Decision

The appellant's position is properly classified as Human Resources Officer, GS-201-13.