

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

Washington Oversight Division
1900 E Street, NW., Room 7675
Washington, DC 20415-6000

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

Appellant: [name]

Agency classification: Community Supervision Assistant
GS-303-7

Organization: [division]
[agency]
Washington, DC

OPM decision: GS-303-4
(Title at agency discretion)

OPM decision number: C-0303-04-04

 //s//
Linda J. Kazinetz
Classification Appeals Officer

 July 29, 2002
Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a classification 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 the conditions and time limits specified in title 5, Code of Federal Regulations, sections 511.605, 511.613, and 511.614, as cited in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

Since this decision changes the grade of the appealed position, it is to be effective no later than the beginning of the sixth 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 the corrected position description and 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.

The personnel office must also determine if the appellant is entitled to grade or pay retention, or both, under 5 U.S.C. 5362 and 5363 and 5 CFR 536. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented.

Decision sent to:

[appellant]

[servicing human resources officer]

Introduction

On March 28, 2002, the Washington Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who is employed as a Community Supervision Assistant, GS-303-7, in the [division], [agency] in [city and State]. The appellant requested that her position be classified as Management Analyst or Program Analyst, GS-343-9. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code.

A desk audit was conducted by a Washington Oversight Division representative on June 27, 2002, and subsequent telephone interviews with [name], Deputy Associate Director, on July 15, 2002, and with the appellant's supervisor, [name], on July 16, 2002. This appeal was decided by considering the audit findings and all information of record furnished by the appellant and her agency, including her official position description, [number], and other material submitted in the agency administrative report on May 23, 2002.

General Issues

The appellant believes that her position description is not accurate because it depicts her work as clerical rather than analytical in nature. We based our evaluation on information provided in the desk audit as to the duties she performs and the manner in which she performs them. However, we consequently found that her position description is a complete and accurate representation of her work.

Position Information

The appellant updates the records of individual offenders in a computer database by entering data to reflect changes in their parole status based on actions taken by the U.S. Parole Commission or the Bureau of Prisons. This information is received on a "Notice of Action" form that includes identifying information and a short narrative description of the parole action. The appellant also creates automated records in the database for new parolees in connection with the office's intake function; retrieves information on individual parolees upon request; and compiles manual reports of intake cases on a monthly basis.

Series Determination

The appellant believes that her position should be classified to the two-grade interval Management and Program Analysis Series, GS-343, rather than the one-grade interval Miscellaneous Clerk and Assistant Series, GS-303. Guidance on distinguishing between work properly classified in two-grade interval administrative series and that classified in one-grade interval support series is contained in both the Introduction to the Position Classification Standards and the Classifier's Handbook.

The one-grade interval series represent clerical or support work. Work of this nature involves general office or program support duties such as preparing, receiving, reviewing, and verifying documents; processing transactions; maintaining office records; locating and compiling data or information from files; and *storing or manipulating information in databases*. Support work usually involves proficiency in certain limited phases of a specified program. Employees who

perform support work follow established methods and procedures. Support work can be performed based on a *practical* knowledge of the purpose, operation, procedures, techniques, and guidelines of the specific program area or functional assignment.

Two-grade interval administrative work, on the other hand, requires a *high order* of analytical ability combined with a *substantial* body of knowledge related to the principles, concepts, and practices applicable to an administrative or management field. It requires comprehensive knowledge of the methods used to gather, analyze, and evaluate information, skill in problem solving techniques, and skill in communicating effectively both orally and in writing. Administrative positions do not require specialized education, but they do involve the types of skills (analysis, research, writing, judgment) typically gained through college level education or through progressively responsible experience. Administrative work involves such functions as planning for and developing systems, functions, and services; formulating, developing, recommending, and establishing policies, operating methods, or procedures; and adapting established policy to the unique requirements of a particular program. The primary skill requirements are not the ability to carry out established procedures and processes, but rather to analyze a given issue or case assignment both to ascertain the facts *and* to determine the actions necessary to achieve the required results; to conduct research for the purposes of gathering additional information, identifying options, and determining regulatory requirements; to prepare written products including findings and conclusions; and to explain, defend, or promote the results of the work to others.

The appellant's duties consist of one-grade interval support work as it is characterized above. Her work is directly identified with the maintenance of the parole database, and its performance is based on a practical knowledge of the procedures used in recording the data and a general familiarity with parole terminology and practices. She follows established methods and procedures in the sense that her assignments are recurring and the various tasks associated with the work can be accomplished by essentially repeating the same processes in the same sequence. Her work can be learned through on-the-job training without any prior education or work experience.

The appellant's duties do not constitute two-grade interval administrative work. Her work does not require a high order of analytical ability, substantial knowledge of an administrative or management field, highly-developed writing skills, or the ability to evaluate information. The primary purpose of her position is to enter information into a database. In order to accomplish that function, she must read a short narrative statement of the parole action taken and match it with the appropriate corresponding action on a list in the database. She must also type into the database any special parole conditions specified and correct any omissions or discrepancies in the data. Reading written material in order to extract basic information or to ensure data consistency is not synonymous with *analyzing* that material. The appellant does not read material for the purposes of, for example, defining problems and developing solutions, determining what actions should be taken in response to the stated circumstances, or gathering information to identify trends or patterns. She is not required to understand the basis or implications of the parole actions described in the material in order to do the work beyond the limited purpose of identifying obvious discrepancies in their sequence or conditions. She basically *records* the information in automated format without using it for any other purposes. She does not analyze or evaluate the information, produce any written products, or resolve any substantive problems.

The Management and Program Analysis Series, GS-343, is a two-grade interval series that includes positions that serve primarily as staff analysts and advisors to management on the effectiveness and efficiency of program operations. The primary purpose of work in this series is to provide line managers with objectively based information for making decisions on the administrative and programmatic aspects of agency operations and management. The types of work performed by positions in this series may include such functions as: performing cost benefit or economic analyses of programs; analyzing new or proposed legislation or regulations for program impact; conducting productivity studies and recommending changes in organization, staffing, and work methods; identifying resources required to support varied levels of program operations; and developing specifications for new management information systems. The appellant's duties bear no resemblance to GS-343 work.

The appellant's position is properly assigned to the Miscellaneous Clerk and Assistant Series, GS-303, which includes positions involved in performing clerical, assistant, or technician work for which no other series is appropriate.

Title Determination

Since there are no titles prescribed for the GS-303 series, the position may be titled at the agency's discretion.

Grade Determination

There are no published grade-level criteria for the GS-303 series. The standard instructs that positions classified to this series be evaluated by the General Grade-Evaluation Guide for Nonsupervisory Clerical Positions. This guide was superseded by the Grade Level Guide for Clerical and Assistance Work (dated June 1989), which is used as a source of grade level guidance for work that is not covered by more specific grade level criteria in other guides or standards.

In the appellant's case, since the primary function of her job is data entry, we first applied the position classification standard for the Data Transcribing Series, GS-356. This standard addresses data entry work which is directly related to the appellant's duties, i.e., transcribing data from source documents into an automated system and correcting errors or omissions in the system. Since it only provides grade-level criteria through the GS-4 level, however, we also applied the Job Family Position Classification Standard for Assistance Work in the Human Resources Management Group, GS-200. This standard addresses analogous work involving entering and extracting data on individual employees in automated information systems.

Evaluation Using the GS-356 Standard

This standard is written in a narrative format, with grade-level criteria expressed in terms of two factors, Nature of Assignments and Mental Demands.

Nature of Assignments

The appellant's work is creditable at the GS-4 level, which covers data transcribing work that includes at least three of the complicating conditions described in the standard at that level. In the appellant's case, her position includes the following conditions: working from unedited and uncoded source documents; correcting errors or referring the document to others for correction based on a substantive knowledge of the data; and performing assignments to retrieve and change existing records as well as to enter records in the system. The appellant reads a short (one-paragraph) narrative description of the parole action taken, selects the corresponding action from an established list in the database, and types in any special conditions of parole specified in the document. She identifies actions that do not appear to match any of the selections on the list and refers them to the supervisor, and she identifies and corrects data inconsistencies and omissions in the database. She updates existing records as well as creates new records for first-time parolees.

Mental Demands

The demands of the appellant's work are adequately expressed at the GS-4 level, where employees receive instructions only for the most complicated assignments and must be alert to data items that require variations in procedures. The appellant performs data entry with no supervisory instructions, and must be able to identify special parole conditions that are not covered by the established list in the database and thus must be typed in separately.

Evaluation Using the GS-200 Standard

This standard is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade conversion table provided in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position 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 in any significant aspect to meet a particular factor level description, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of information an employee must understand in order to do the work, and the skills needed to apply that knowledge.

The knowledge required by the appellant's position matches Level 1-2, where work requires knowledge of basic procedures and operations sufficient to perform such work as using a personal computer, terminal, and office software programs to enter data, complete forms, and correct errors and omissions in documents, files, and records. Correspondingly, the appellant enters information into a database to update records, complete missing information, and correct discrepancies.

The position does not meet Level 1-3, where work requires knowledge of a standardized body of procedures and operations sufficient to use personal computers and software programs to extract, revise, or sort information from files, records, or databases. An illustration provided in the

standard of Level 1-3 knowledge requirements is an assignment that requires skill in using an automated system to process a full range of personnel actions involving different types of appointments and pay schedules. The appellant does not perform any work comparable to this. The knowledge required by her position is fairly limited, relating to a general understanding of the various types of parole actions sufficient to match them with a corresponding list in the database and to recognize inconsistencies in an offender's records. She does not process a wide range of actions but rather inputs the same basic information relating to parole actions taken on individual offenders. She does not produce automated reports from the database or make substantial revisions to the content of information in the database.

Level 1-2 is credited.

200 points

Factor 2, Supervisory Controls

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

The level of responsibility under which the appellant works is comparable to Level 2-2. At that level, the supervisor provides continuing assignments indicating generally what is to be done, deadlines, quantities, and priorities. The employee works independently in carrying out recurring assignments such as obtaining, inserting, and correcting missing and incorrect data in an automated system. Recurring assignments are reviewed through quality control procedures, such as spot-checking. The appellant receives Notice of Action forms as part of the normal workflow of the office and enters the information directly into the database. Because the work is repetitive, there is no supervisory review except for occasional spot-checks.

The position does not meet Level 2-3. At that level, the supervisor makes assignments by outlining and discussing issues and defining objectives, priorities, and deadlines. The employee independently plans the work, resolves problems, carries out the successive steps, recommends alternative actions, and refers new or controversial issues to the supervisor for direction. Work products (such as job vacancy announcements, ranking factors, position descriptions, job evaluation statements, recommendations for disciplinary action) are reviewed for technical soundness, appropriateness, and conformity to policies and requirements.

This level is predicated on the performance of more difficult technical assignments comparable to the examples provided above. Work of this nature would require such supervisory input as discussing issues and objectives and reviewing written products, and it would involve employee responsibility for planning the work and handling problems. The appellant's work, in contrast, consists of a limited number of processes that require virtually no intervention by the supervisor or any planning or problem resolution by the appellant. She produces no written products that would be susceptible to the type of supervisory review addressed at this level.

Level 2-2 is credited.

125 points

Factor 3, Guidelines

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

The guidelines used by the appellant match Level 3-2. At that level, the employee uses a number of established procedural guidelines such as work samples and operating manuals, and applies judgment in selecting procedures for application to specific cases. The appellant uses established procedures in entering data, but must use judgment in making the appropriate selections to indicate the parole action taken.

The position does not meet Level 3-3. At that level, the employee uses guidelines that are not applicable to all work situations, and must select the most appropriate guideline and decide how to complete the various transactions. For example, this includes such work as devising more efficient methods for procedural processing, gathering and organizing information, and resolving problems referred by others.

The appellant's work is repetitive and the judgment required to perform it is limited. She enters a limited variety of information into a database where the fields are self-explanatory. If she encounters problems, she refers them to her supervisor. She does not develop processing procedures, gather and organize information beyond simple numerical reports, or resolve problems referred by others.

Level 3-2 is credited.

125 points

Factor 4, Complexity

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

The complexity of the appellant's work is comparable to Level 4-2. At that level, work consists of related steps and processes. The employee makes decisions on appropriate actions from various choices and uses information that is factual in nature. The appellant's work consists of a few related processes (i.e., data entry in connection with the intake process or to update records.) She reads basic factual information pertaining to parole actions taken and determines what selections provided in the database best match those actions.

The position does not meet Level 4-3. At that level, the work consists of different and unrelated steps. The employee analyzes factual data, identifies the scope and nature of problems or issues, and determines the appropriate action from among many alternatives.

The appellant's work is limited to extracting information from Notice of Action forms and entering it into a database. Therefore, the work consists of performing essentially the same steps repetitively. The appellant does not analyze data for the purpose of identifying problems and determining the actions that should be taken to resolve them; rather, she reads the information on the forms for the sole purpose of recording it.

Level 4-2 is credited.

75 points

Factor 5, Scope and Effect

This factor covers the relationship between the nature of the work, and the effect of the work products or services both within and outside the organization.

The scope and effect of the appellant's work match Level 5-2. At that level, work involves technical services and practices and applying specific rules or procedures. The work affects the accuracy of records and other data. The appellant carries out specific data entry procedures and her work affects the accuracy of the parole database.

The position does not meet Level 5-3. At that level, work involves treating a variety of routine problems or questions using established procedures, such as rating employees for promotion. The work has a direct effect on the quality and adequacy of employee records, program operations, and services provided.

The purpose of the appellant's work is not to resolve problems that arise within the office but rather to perform data entry. The effect of the work is limited to the accuracy of information contained in the database, rather than broader services and operations carried out in the organization.

Level 5-2 is credited.

75 points

Factor 6, Personal Contacts
and
Factor 7, Purpose of Contacts

These factors include face-to-face and telephone contacts with persons not in the supervisory chain and the purpose of those contacts. The relationship between Factors 6 and 7 presumes that the same contacts will be evaluated under both factors.

The appellant's personal contacts match Level 2 (the highest level described under this factor), where contacts are with employees and managers in the agency and visitors to the office. The appellant has contacts with co-workers and with offenders reporting to the office for intake.

The purpose of the appellant's contacts match Level A, where contacts are for the purposes of acquiring or exchanging facts or information needed to complete assignments. Level B is not met, where contacts are for the purposes of planning and coordinating work or resolving operating problems by persuading others. The appellant's contacts are solely for obtaining information to enter in the database.

Level 2A is credited.

45 points

Factor 8, Physical Demands

This factor covers the requirements and physical demands placed on the employee by the work situation.

The position matches Level 8-1, which covers sedentary work.

Level 8-1 is credited.

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 position matches Level 9-1, which describes a typical office environment.

Level 9-1 is credited.

5 points

Summary

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-2	200
Supervisory Controls	2-2	125
Guidelines	3-2	125
Complexity	4-2	75
Scope and Effect	5-2	75
Personal Contacts/ Purpose of Contacts	2A	45
Physical Demands	8-1	5
Work Environment	9-1	<u>5</u>
Total		655

The total of 655 points falls within the GS-4 range (655-850) on the grade conversion table provided in the standard.

Decision

The appealed position is properly classified as GS-303-4, with the title at agency discretion.