

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

Appellant: [appellant]

Agency classification: Purchasing Agent
GS-1105-7

Organization: Pharmacy Service
[installation]
U.S. Department of Veterans Affairs
[location]

OPM decision: Supply Technician
GS-2005-6

OPM decision number: C-2005-06-06

Jeffrey E. Sumberg
Deputy Associate Director
Center for Merit System Accountability

1/4/08

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 this decision lowers 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 applicable provisions of parts 351, 432, 536, and 752 of 5 CFR must be followed in implementing the decision. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented. The servicing human resources office (HRO) 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 to the U.S. Office of Personnel Management (OPM) office that accepted the appeal.

Decision sent to:

[appellant's name]
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Introduction

On April 25, 2007, the Philadelphia Oversight and Accountability Group, formerly the Philadelphia Field Services Group, of OPM accepted a classification appeal from [appellant's name]. Her position is currently classified as Purchasing Agent, GS-1105-7, which the appellant believes should be classified as Inventory Management Specialist (IMS), GS-2010-9. The appellant's position is located in the Pharmacy Service at the [installation], U.S. Department of Veterans Affairs (VA), in [location]. We received the agency administrative report (AAR) on June 6, 2007. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C).

We conducted on-site interviews with the appellant and her immediate supervisor on August 8, 2007. In reaching our classification decision, we have carefully considered all of the information gained from the interviews, as well as the written information furnished by the appellant and her agency, including the position description (PD) of record.

Background

The appellant and her supervisor state the appellant's assigned duties and responsibilities have substantially increased over the past few years. The appellant's supervisor submitted a GS-2010 IMS PD to the local servicing HRO in September 2005 to upgrade the appellant's position to the GS-9 grade level. The HRO audited the appellant's work in July 2006, and later provided a modified PD which incorporated the new duties but was still classified Purchasing Agent, GS-1105-7. In December 2006, the appellant filed an appeal with the agency requesting her position be reclassified as IMS, GS-2010-9. The agency issued a final decision on February 20, 2007, finding the position to be a combination of GS-2005, Supply Technician and GS-1105, Purchasing Agent work properly classified as Purchasing Agent, GS-1105-7. The appellant then filed this appeal with OPM.

The agency requested the appellant and her immediate supervisor certify her PD of record as an accurate statement of the duties and responsibilities currently assigned to and performed by her for the AAR. Both declined to do so asserting the previously submitted IMS, GS-2010-9 PD accurately describes her work. To further support her assertion the work warrants classification at the GS-9 grade level, the appellant refers in her appeal request to GS-9 grade level positions at two other VAMCs which she states perform work very similar to her own.

During our on-site audit, the appellant stated the decision to seek classification of her position to the GS-2010 Inventory Management series had been a matter of discussion with her counterparts at other VAMCs on their common VA email group site. She also stated a GS-2010-9 PD from another had been shared on-line by the group as an example.

General issues

The appellant makes various statements about her agency's review and evaluation of her position and compares her position to GS-9 grade level positions at other VAMCs which she states perform similar work. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of her position. We cannot compare the appellant's position to others as a

basis for deciding her appeal. Since our decision sets aside any previously issued agency decision, any actions previously taken by the agency in their review of the appellant's position are not germane to this classification appeal process.

A PD is the official record of the major duties and responsibilities assigned to a position or job by an official with the authority to assign work. A position is the work made up of the duties and responsibilities performed by an employee. Position classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities assigned by management and performed by the employee (5 CFR 511.607(a)(1) and 609). An OPM appeal decision classifies a real operating position, and not simply the PD. Therefore, this decision is based on the actual work assigned to and performed by the appellant.

Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring its positions are classified consistently with OPM appeal decisions. If the appellant considers her position so similar to others that they all warrant the same classification, she may pursue the matter by writing to her agency headquarters HRO. In doing so, she should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same as hers, the agency must correct its classification to be consistent with this appeal decision. Otherwise, the agency should explain to her the differences between her position and the others.

Both the appellant and her supervisor stress the high quality and consistency of the appellant's work and that their VAMC is rated #1 nationally for drug cost containment due to her efforts. In adjudicating an appeal, the quality of work is not germane to the classification process since the classification analysis of a position is based on the assumption that the assigned work is properly performed (*Introduction to the Position Classification Standards (PCSs)*, appendix 3, Factor 5). Therefore, issues raised regarding the effectiveness of the appellant's work may not be considered in the classification of her position. Rather, they are properly considered as part of the performance management process. The appellant also mentioned the large amount of work she performs. However, volume of work cannot be considered in determining the grade of a position (*The Classifier's Handbook*, chapter 5).

Position information

The [location] VAMC is a general medical and surgical (GM&S) facility with 78 beds which provides a full range of primary care services to its serviced population. It provides nursing home geriatric and extended care programs; respite, hospice, rehabilitation, and home-based care; geriatric evaluation and management services; and individual and group counseling, post-traumatic stress disorder (PTSD), substance abuse, and chronically mentally ill treatment in an outpatient behavioral health clinic. The VAMC also offers local community-based health care services at five community-based outpatient clinics CBOCs.

The appellant points to changes in her work due to the introduction of Prime Vendor (PV) contract purchases, direct vendor delivery, reduced warehouse operations, and the implementation of a variety of new initiatives and technological improvements. She stresses that she currently manages the VAMC's emergency drug cache; orders narcotics electronically (using the Drug Enforcement Administration's (DEA's) Controlled Substance Ordering System (CSOS)); ensures drug accountability and prepares reports; returns expired drugs for credit;

manages/coordinates drug recalls; manages the VAMC's State Home PV program; tracks funds usage and manages the pharmacy budget; evaluates usage trends for pharmacy items and recommends/implements procedural changes to improve operations; implements and maintains "floor" stock for intravenous (IV) solutions; directs/coordinates the work of Pennsylvania Higher Education Assistance Agency (PHEAA) student aids, pharmacy technicians while assisting with the generic inventory package (GIP) process, and trains floor nurse staff regarding proper procedures to document and maintain on-site floor stock levels of IV supplies; supports the provision of pharmacy supplies for CBOCs, at-home IV programs, and pharmacy robotic automation devices; processes payments for after-hour pharmacy services; and serves as backup pharmacy automated data processing application coordinator (ADPAC) and timekeeper. In addition, she has completed contract officer technical representative (COTR) training and contracting officer (CO) training which allows her to purchase up to \$10,000 on one order using her Government provided International Merchant Procurement and Accounting Card (IMPAC).

The record shows the appellant gathers information and determines order/reorder requirements one and a half to two hours each day. She organized the pharmacy into three storage areas for supplies (inpatient, outpatient and IV and injectables), each with a log book in which pharmacy staff make notations when stock is getting low or items are needed. She also set up a box for outpatient needs where pharmacy staff place requests for non-stocked items and established a process whereby each floor's nursing unit has an area to stock non-refrigerated IV items used on a regular and recurring basis. Each day the appellant gathers information from the logs, does a "walk-through" of the pharmacy and checks the special requests box. In addition, someone (typically a Pennsylvania Higher Education Assistance Agency (PHEAA) student, a pharmacy technician or the appellant) visits each floor daily to take a count of available stock and assess needs.

All stocked pharmacy items are bar-code labeled in accordance with the VA's generic inventory package (GIP) program requirements. Determining reorder requirements during a pharmacy walk-through or nursing floor IV stock assessment involves using a hand-held bar-code reader (i.e., bar code gun) to scan available stock. The reader compares the coded item and quantities against pre-established "par levels" for the items (i.e., required on-hand quantities) and provides information on daily requirements. Par levels are established based on specified Inspector General (IG) requirements; VA, VISN, or VAMC management decisions; requests from medical staff; and in response to noted shifts in recurring needs for particular items. The appellant programs and maintains/adjusts data stored in the bar-code gun and associated computer system for the VAMC. She adds or deletes items and maintains the GIP system at the VAMC ensuring all items are properly coded and labeled.

The appellant assigns tasks, provides instruction and ensures work done by PHEAA student aids assigned to the pharmacy is done correctly. She trains PHEAA aids and pharmacy technicians on GIP operations and instructs floor nurses on proper procedures to document and maintain floor stock levels of on-site IV supplies.

Based on work experience and daily processing, the appellant identifies patterns and trends regarding changes in item usage and makes or recommends adjustments to stock levels/purchases to meet evolving VAMC operational requirements. Such changes are also made to deal with seasonal variations in drug usage and/or to accommodate new initiatives, formulary changes, etc. She also identifies and implements or recommends practical procedural improvements to pharmacy operations associated with her assigned duties and responsibilities.

The appellant makes purchases on a weekly rotational basis as follows: on Mondays, she purchases ophthalmic, inhalers and topical items, pharmacy log books and “special purchase box” items; on Tuesdays all injectibles, non-formulary and refrigerated items, log book, and box items; on Wednesdays all ward (floor nursing station) stocked items, inpatient items, logbook, and box items; and on Thursdays and Fridays she purchases outpatient “fast moving” items, log book, and box items. Orders are typically shipped overnight.

The appellant places purchase orders (POs) under the PV program for recurring needs one and a half hours a day. Information on required items and quantities is downloaded from the bar code reader to the appellant’s personal computer (PC) to generate the required purchase orders. The appellant reviews POs to check for out-of-stock items, substitutions of generic drugs and/or less costly generic equivalent/substitute drugs. The PV system provides information on available generics and suppliers; and the appellant decides which vendor to order from based on cost and past experience with vendors (the quality of their products, feedback from medical staff and/or patients, service provided, delivery, reliability, etc.). If problems are identified with a particular PV supplier, the appellant seeks alternative sources within the PV program. If unavailable, which occurs a couple of times a year, she asks for an exception to the PV program to allow her to purchase the item elsewhere which requires filing an exception request with headquarters through the on-site contracting office.

At the time of the audit, there were 123 patients for which special orders are placed by the pharmacy with one designated contractor. Special orders are typically shipped directly to the customer/patient, and a separate order is needed for each drug or item. The appellant places orders on the contractor’s automated ordering system process and also generates a separate VISTA system entry for each order. This work takes one to one and a half hours a day.

Non-PV and non-special order purchases occupy one and a half hours per day and involve a wide variety of miscellaneous items such as pharmacy mailing supplies (various size boxes and containers, refrigerated mailing bags, ice packs, etc.), medical supplies, and some non PV drugs. The appellant solicits bids from three to four vendors before making a purchase primarily based on price. Ninety percent are for regular and recurring needs while the remaining 10 percent involve unique requests or new items requiring more of a search for vendors and/or questioning the requesting staff member to clarify the purpose for the item and to get more specific information prior to soliciting bids. Three or four times a year a buy requires filling out an order request form (2237 form) which is submitted to the VAMC Contracting Office to make the purchase. All other purchases are made using the appellant’s IMPAC card. Some items, such as diapers, gauze pads, bed pads, tapes, office supplies, and some IV solutions are still available and purchased from the on-site warehouse. Orders placed with private sector providers are typically received within seven to ten days unless payment for overnight shipment is necessary due to an immediate need for the item(s).

The appellant purchases drugs in support of the State-run Soldiers and Sailors Home (S&SH) a half an hour a day. She processes these orders (drug purchase orders prepared by S&SH and sent to the appellant electronically) in accordance with established procedures and submits them to the PV for direct delivery to the S&SH. The S&SH provides copies of its invoices to the appellant on a weekly basis which the appellant pays using a separate IMPAC card account. She manually tracks all orders placed and monies expended for the S&SH on a separate budget sheet which she later compares to the IMPAC monthly billing statement to reconcile the balances

and/or resolve any problems. Issues involving disputed balances are resolved in accordance with the contractually established IMPAC dispute resolution process.

The S&SH provides two weekly system-generated reports, one for Aid and Assistance(A&A), typically for wheelchair bound veterans whose primary medical conditions are service-related) and one for non-A&A patients which show drug information per patient including quantity, cost, formulary, or non-formulary. The appellant monitors this information to identify non-formulary ordering trends then coordinates with a VA clinical pharmacist to determine if acceptable generic (formulary) medications exist to bring the S&SH back into formulary compliance thereby reducing costs. The VA pays for all A&A patient drugs while the S&SH is responsible for paying all non-A&A patient drug orders. The appellant's contacts with the S&SH concerning such matters are cooperative because cost savings directly benefit them and they typically cannot purchase the items at a lower cost themselves. The appellant generates a biweekly bill for non-A&A purchases which is certified by her supervisor prior to submission to the VAMC's finance office for coordination with/payment by the S&SH. The S&SH occasionally requests non-A&A patients be reclassified as A&A by the VA due to a change in their medical condition. If approved, this typically results in a request for retroactive repayment to the S&SH for all drug purchases made for the patient during the approval process. The appellant processes these requests by providing credit for the patient on future drug purchases. Toward the end of the fiscal year, if the S&SH available appropriated funds are running low, it may ask the appellant to bill them on a weekly rather than biweekly basis to help with its temporary funding difficulties, and the appellant/VAMC will usually accommodate S&SH's request.

The appellant purchases drugs and supplies in support of two on-site robotic medication dispensing machines, one for inpatient and the other for outpatient medications. The machines have 400 separate cassettes each calibrated to dispense a particular pill based on size and shape. The appellant ensures drugs purchased for use in the dispensing machines meet established pill size and shape parameters because recalibration of the equipment costs about \$300 per cassette. She also purchases magnetic tapes, cans of compressed air, lint-free rags, and other operating and basic maintenance supplies for the equipment. The appellant coordinated the installation of the equipment in the pharmacy and the initial set-up for the cassettes. However, this work is currently performed on a routine maintenance basis which may occasionally involve arranging for recalibration of a cassette.

The appellant coordinated implementation of the Controlled Substance Ordering System (CSOS) at the VAMC. A vendor offered the option of using this Drug Enforcement Administration (DEA) program to allow for electronic ordering of narcotic substances. The supervisor indicated the VAMC may be the only one currently authorized to order such drugs on-line under CSOS because the appellant worked with the vendor, PV and DEA to set up the process at the VAMC. In order to place orders under CSOS the supervisor was officially delegated Attorney in Fact and the appellant Power of Attorney. This involved completing established program paperwork requirements, having them signed by the VAMC Chief and submitting the notarized documents to the DEA for approval. The appellant currently uses CSOC to order narcotics and the supervisor electronically certifies all such orders.

When orders are received she verifies items received against orders placed, unpacks and stores supplies as appropriate, and takes appropriate actions to resolve and document any discrepancies. Approximately 10 to 15 times a year the appellant encounters problems resulting in the need to file complaints with the American Medical Association (AMA), following their standardized

process, regarding a particular shipment (e.g., received short shipment, packaging, or quality control problems relating to a particular lot number).

The appellant prepares a weekly High Cost Drug Report which takes one hour. This involves reviewing drug purchases for which the amount paid seems higher than it should be to validate price; identify trends/patterns, correct obvious errors (typos, cost per cycle/per pill, etc.); identify alternatives and/or resolve issues relating to excessive costs when possible to reduce the cost of pharmaceutical purchases. She also enters information on every drug ordered every day into the VISTA drug accountability system, which is separate from the ordering process, and generates a daily report which her supervisor certifies on-line each day. This takes about a half hour a day.

Each VAMC is required to maintain an Emergency Drug Cache (EMC) in support of contingency plans established after September 11, 2001, to deal with a variety of potential emergency situations. The VAMC has locking carts and a refrigerated storage for the necessary EMC drugs and supplies which the appellant maintains. She checks the temperature in the storage room and refrigerator daily and checks all locks weekly. When notified to do so, she updates drug labels to indicate approved extended drug expiration dates and/or pulls and replaces old expired drugs which are returned to the manufacturer/supplier for re-credit.

The appellant collects and returns expired drugs for re-credit. Each drug is assigned a national drug code number for tracking purposes and the manufacturer and/or PV guarantees returns for credit. A private sector company picks up all expired drugs from the pharmacy quarterly, documents what has been collected and notifies the appellant of credits to be provided by the PV or manufacturer. Credits appear on her IMPAC card monthly statements. The appellant manually tracks returns and compares them to her monthly statements to ensure returns are properly reimbursed.

In the past, as expired drugs were found in stock by the appellant and/or other pharmacy personnel they were placed in a designated collection area and she would spend three to four hours every quarter compiling information on returns, validating the accuracy of credits and resolving occasional discrepancies. Recent IG findings require returned drugs be locked up and tracked as they are collected using manual reports to ensure against loss or misuse. The appellant is responsible for this process and is expected to occupy a minimal amount of additional time in comparison to the current procedure. Similar procedures apply to notifications of drug recalls received from the VISN, VA, and/or Food and Drug Administration. The appellant gathers the stock on hand of recalled items and returns them for credit ensuring actions are properly documented in accordance with established procedures.

A number of VAMC patients living in and around a particular portion of the VAMC's serviced area do not have reasonable access to either the Center or CBOC pharmacy services. Because of this situation, the Contracting Office established a contract with an accessible pharmacy to provide an emergency three-to-four day re-supply of essential medications to this patient population. The appellant receives four to five bills a month from this pharmacy for payment under the terms of the contract which she pays using her IMPAC card.

To ensure all prescribed medications are reviewed by a pharmacist prior to being filled, the VAMC Contracting Office established an "after-hour pharmacy" service contract with a local pharmacy to review essential prescriptions issued by VAMC doctors when a VAMC pharmacist is unavailable to meet this requirement. The appellant spends one to one and a half hours a

month reviewing bills received for these services to ensure they are correct and resolves any questions regarding charges by discussing them with one of the VAMC's pharmacists. Money is set aside annually with the finance center in [location] to cover these expenses. Once the bills have been cleared, the appellant notifies the finance center to pay the bill for the month using the allocated funds.

The appellant coordinates with home health service organizations providing contractual in-home services to VAMC patients to allow for the replacement of IV solutions used by them out of available VAMC stock. She ensures sufficient IV supplies are on hand to accommodate home health care needs as well as VAMC requirements.

The appellant works independently resolving most non-clinical (i.e., transactional and procedural) issues on her own and informing the supervisor of any significant issues that arise. The supervisor signs off on all orders for controlled substances, S&SH purchases, and all IMPAC card transactions/purchases other than those involving the on-site warehouse. The VA Pharmacy Benefits Management (PBM) office also monitors each VAMC's purchases and stock management activities and provides reports to the supervisor. The supervisor is a member of the VISN pharmacy group and receiving updates on a monthly basis from Pharmacy and Therapy; Pharmacy Utilization Management; and PBM. The appellant is informed of any updates affecting her work and how VISN 4 has decided to handle the matters. The appellant also receives such information as a member of the VA pharmacy purchasing email group.

The supervisor is responsible and accountable for the VAMC's annual pharmacy budget (funds control point (FSC)) of approximately four million dollars and for all the drugs, medical supplies and services purchased using those funds. The appellant tracks and reports on the status of pharmacy funds allocated for the VAMC and its CBOCs, the S&SH, and after hours pharmacy operations. The appellant and supervisor meet on a monthly basis to discuss status and any adjustments needed to the allocation of funds based on projected requirements. The appellant provides monthly reconciliation reports which take about a half hour a month and involve matching expenditures to purchases for running balances. The supervisor signs these certifying to their accuracy. The appellant also provides input and recommendations to assist the supervisor in preparing and justifying the pharmacy's annual budget submission based on her experience with drug and medical supply ordering trends/patterns over the previous year and anticipated future needs.

The pharmacy is required to perform an annual on-site inventory which is carried out under contract. The appellant reviews the final report and resolves any discrepancies prior to submission to the PBM/VISN.

Series, Title, and Standard Determination

The appellant requests her position be classified to the GS-2010, IMS series, which primarily involves analytical work in managing, regulating, coordinating, or otherwise exercising control over supplies, equipment, or other material. She also refers to positions classified to other two-grade interval supply management series where work requires substantive knowledge of supply management concepts, principles, and techniques and the ability to make decisions in cases not specifically covered by substantive guides or precedents as being similar to the work she performs.

The record shows the appellant's work does not require the depth and breadth of supply management concepts, principles and techniques found in two-grade interval supply management positions. Instead, her work primarily involves day-to-day transactions supporting the VAMC's pharmacy operations in accordance with established VA and VISN policies, procedures, practices and system requirements. Her decisions and/or recommendations are based on practical considerations and trends identified through processing actions and information provided by medical personnel or received through official channels. This is reflective of GS-2005 Supply Clerical and Technician Series technical supply support work necessary to ensure the effective operation of ongoing supply activities requiring knowledge of supply program operational requirements and the ability to apply established policies, techniques, regulations or procedures.

The position involves a mixture of one-grade interval purchasing, supply support, and budgetary work and has no clear line of promotion within the pharmacy to use for determining series allocation. According to the appellant's supervisor, the primary and paramount reason for the position's existence is to ensure sufficient inventory of all essential pharmacy items is on-hand and, within budget, to meet the established and evolving needs of the VAMC's serviced population. While our grade evaluation differs from that of the agency, the agency also determined the appellant's GS-2005 work to be higher graded than her purchasing duties. The appellant's clerical budgetary support work does not exceed the GS-4 grade level when compared to the GS-500, Job Family Standard for Clerical and Technical Accounting and Budget Work. Consequently, the position is best classified to the GS-2005, Supply Clerical and Technician series. Supply Technician is the title for all positions at or above the GS-5 grade level.

Grade Determination

We evaluated the appellant's position using the Position Classification Standard (PCS) for Supply Clerical and Technician Series, GS-2005, and the PCS for Purchasing Series, GS-1105. Both use the Factor Evaluation System (FES) method of position classification. Grades are determined by comparing a position's duties, responsibilities, and qualification requirements with the nine FES factors common to non-supervisory positions. A point value is assigned to each factor based on a comparison of the position's duties and responsibilities with the factor-level descriptions (FLD) in the standard. The points assigned to an individual factor level mark the lower end of the range for that factor level. To warrant a given level, the position must fully equate to the overall intent of the FLD. If the position fails in any significant aspect to fully satisfy a particular FLD, the point value for the next lower level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level. The total points assigned are converted to a grade level by use of a grade conversion table in the standard.

Evaluation using the GS-1105 PCS

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts that a worker 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 this knowledge. To be used as a basis for selecting a level under this factor the knowledge must be required and applied.

Work at Level 1-3 requires knowledge of a body of standardized purchasing regulations, policies, and procedures; established commodities and markets; and common business practices to make purchases involving commercial requirements and average complexity. This level includes knowledge of: solicitation and purchase methods such as oral solicitations, and/or priced purchase orders to make (a) noncompetitive open market purchases, (b) purchases under established contracts, or (c) competitive open market purchases when specifications or statements of work are standardized, price and product characteristics are stable, and repeat vendors are used; knowledge of frequently used and easily understood regulations relating to required sources, use of mandatory schedules, and ordering and documentation procedures; basic price evaluation techniques to assess reasonableness using established references and previous history files; basic business mathematics to make simple price comparisons on price, discounts, transportation costs or similar terms; post award procedures to resolve problems with deliverables, differences in price and/or quantity, or recommend no-cost cancellation of POs; automated and manual small purchase systems sufficient to locate, add and retrieve information.

Work at Level 1-4 requires in-depth or broad knowledge of a body of purchasing regulations, methods, procedures, and business practices to make purchases involving (1) specialized requirements and/or (2) commercial requirements that have unstable price or product characteristics, hard-to-locate sources, many critical characteristics, or similar complicating characteristics. This includes knowledge of solicitation or purchasing methods, such as would be acquired through extended training or experience, to make competitive or sole source small purchases that involve, for example, collecting data to determine price reasonableness for new items, preparing detailed written solicitations, tailoring special terms and conditions, or other matters of similar complexity; skill in analyzing descriptions that have unique aspects and many critical characteristics to identify problem areas in specifications or work statements, determine if quotations are responsive, or decide if substitutions are acceptable or should be referred to other personnel for further review; knowledge of price analysis techniques to evaluate prices or costs for requirements with inadequate price history or evaluate allowable charges for requirements involving special cost features (e.g., per diem, lodging rates, and airfare for purchases that require on-site repair service by non-local vendors); knowledge of various acquisition clauses, such as those pertaining to inspection, acceptance, packaging, or testing to select or tailor clauses for purchases that involve special handling; and knowledge of post award procedures to discuss equitable price adjustments for modifications to a purchase order, determine whether to recommend termination of an accepted purchase order for convenience, or perform similar actions.

Illustrative of work at Level 1-4 is purchasing a variety of scientific testing services requiring review of modified equipment or equipment repair services for assigned organization(s). Repairs or modifications involve the use of detailed requests for quotations and selecting or tailoring various purchasing provisions (i.e., clauses stating the value of the item, warranty terms, standby provisions for downtime, and special tests or inspections). Modified equipment may have many parts and involve more than one vendor. Purchasing agents consider factors such as number of parts involved, which part, if any, has to be built first, the need for compatibility of parts, and number of manufacturers involved, to determine lead time for the vendor's performance and coordinative efforts necessary to ensure timely completion. Purchasing agents monitor vendor performance through contacts and review of progress reports. They discuss reasons for delays, testing failures, or price changes. They negotiate for price reductions or other remedies.

The appellant purchases a wide variety of formulary and non-formulary pharmaceuticals, including controlled substances; medical supplies and devices available in a wide range of configurations to meet particular medical applications; operating supplies for pill dispensing machines and office supplies typical of commercial items handled at Level 1-3. The PCS identifies these as commercial items as they "...are described in industry terminology, sold in their respective industries, stocked by specialized distribution, and are available from local or non-local sources" or are available to the general public at catalog or market prices. Most purchases are for recurring needs. When non-formulary drugs are requested, the appellant looks for less costly approved generic medications. If unavailable, she consults medical professionals to verify the non-formulary drug is required for patient care to justify cost. Similarly, she may consult with medical staff regarding requests for unique medical treatment devices and/or configurations to ensure the items are purchased to meet patient needs at the lowest possible cost. As described previously, she typically applies standardized simplified purchase procedures to acquire the items under the PV contract or solicits three to four quotes from available sources and/or makes buys using her IMPAC card after considering price and contractor/vendor reliability. The appellant occasionally encounters more difficult purchases involving: high cost, emergency/essential needs, items for therapeutic trials, unique handling/shipping requirements, and limited sources of supply or out of stock issues. Payment and delivery problems are resolved in accordance with established procedures/practices and documented appropriately. The commercial items she purchases do not involve complicating factors similar to those at Level 1-4, and they are not specialized items "made to order" to Government specifications with limited sources of supply handled at that level. The appellant's position meets but does not exceed Level 1-3. Therefore, Level 1-3 is credited.

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 how the work is reviewed or controlled. 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.

At Level 2-3, the supervisor assigns work with standing instructions on objectives, priorities, and deadlines and indicates special considerations or unusual requirements. The employee plans and carries out the steps necessary to make purchases using accepted practices or procedures to resolve problems and deviations. Problems and deviations include, for example, requirements that fluctuate in price and item characteristics, are sole source, are urgently needed, or are new to the market. The employee independently performs tasks such as negotiating price with a sole source vendor, persuading reluctant vendors to bid, and collecting data to determine price reasonableness for requirements not acquired previously or recently. The supervisor periodically evaluates completed work for results achieved and effectiveness in meeting requirements within the legal and regulatory constraints, but does not typically review methods used by the employee in performance of the work.

Typical of Level 2-3, the appellant works under the immediate supervision of the Pharmacy Chief who assigns the work in terms of specified objectives, responsibilities, deadlines, and

priorities. The appellant performs her day-to-day work independently in accordance with established purchasing regulations, policies and procedures and under terms specified in established contractual agreements; resolves most non-clinical problems herself; and keeps the supervisor apprised of potential problems and/or significant issues. The appellant independently plans purchases, places orders within her IMPAC card limit, determines appropriate processes/methods for purchases and meets established manual and systems documentation requirements. The supervisor signs off on all purchases other than those from the warehouse; reviews the work for overall cost effectiveness/containment and timeliness; and reviews PBM reports concerning the appellant's purchase and stock management activities. On-site Contracting Office personnel are available for technical contracting advice, assistance, and direction if needed. The appellant operates with a significant amount of independence in deciding when, how much, and how to best acquire needed items; resolving recurring purchase and post purchase problems and coordinating her work with others within and outside the VAMC. The appellant's position meets Level 2-3 as described previously. It does not meet Level 2-4 where employees exercise considerable latitude to commit the agency to a course of action, may not have access to higher level procurement expertise and interpret policy on their own initiative to meet objectives. Furthermore, the appellant does not deal with the types of conflicts requiring this level of discretion and judgment such as dealing with protests, claims, and terminations for convenience found at Level 2-4. Therefore, Level 2-3 is credited.

Factor 3, Guidelines

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

At Level 3-2, a number of established procedures and specific guidelines are available and apply to work assignments including procurement history files, Federal Supply Schedules, or other established contracts, standard operating procedures, and regulations governing small purchases and delivery orders. Guidelines cover required and optional sources of supply, types and use of purchase orders, maximum ordering limitations, forms to use and when to use them, when documentation is required and how to account for the use of funds. Employees use judgment in selecting and applying appropriate guidance, procedures, forms and documentation for particular purchase requirements. There may be minor gaps in available guidance requiring the employee to use judgment and initiative to resolve aspects of the work not fully covered by instructions (e.g., determining if quotes are for equal items or suggesting item substitutions). Employees refer situations involving significant deviations to the supervisor or others for guidance or resolution.

At Level 3-3 employees interpret guidelines, adapt procedures, decide approaches, and resolve specific problems in situations where guidelines are available but not completely applicable to *many* aspects of the work because of the unique or complicated nature of the requirements or circumstances. Examples of work at this level include ensuring the adequacy of specialized purchase requirement descriptions where there are no directly related references; reviewing detailed nonstandardized statements of work for adequacy; developing technical ranking factors for award determination; and negotiating terminations for convenience or default.

As described previously, the appellant's work is covered by and is performed in accordance with established Federal and VA purchasing regulations, Veterans Health Administration (VHA) automated systems, regulations, policies, procedures and practices. A wide variety of published guidance is available for use by the appellant including: VA directives, VHA handbooks,

General Services Administration (GSA) catalogs, the American Drug Index, Physicians Desk Reference Red Book, Blue Book, Facts and Comparisons, U.S. Pharmacopoeia, Food and Drug Administration Approved Prescription Drug Products, and American Hospital Formulary Service. Typical of Level 3-2, she selects and applies appropriate guidance to meet particular needs, applies judgment in determining how best to make purchases at the lowest possible cost while ensuring items meet identified needs, and refers clinical issues to the supervisor or other pharmacist for resolution or direction. When necessary, technical procurement assistance/direction is available through contacts with counterparts at other VAMCs, from on-site contracting personnel or through other official channels. Unlike Level 3-3, established guidelines are applicable to virtually all of her work. Therefore Level 3-2 is credited.

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.

At Level 4-2 work involves using primarily simple noncompetitive purchase methods such as orders placed against single award Federal supply schedules, using imprest fund, or credit card accounts. Employees decide whether to seek additional sources or questions prices based on knowledge of basics procedures and previous purchase history and select method of purchase based on consideration of price, available sources and urgency. Award determinations are primarily based on price.

Work at Level 4-3 involves using different processes and methods. Employees make a variety of sole source or competitive small purchases and/or a variety of purchases against a number of established contracts and agreements. They decide on purchasing strategies including: whether to meet requirements by ordering against established contracts or through open market procedures; how to solicit quotes; clauses to include; necessary lead time; and what terms and conditions to apply. Decisions are made based on analysis of a variety of information such as specifications, FAR requirements, history files, item characteristics or catalogs. Award decisions are made considering price and delivery and may involve analysis of various tradeoffs such as vendor reputation and previous performance, renting versus purchasing, free services included in offers, etc.

Like Level 4-2, the appellant purchases a variety of drugs, medical and office supplies following established simplified procedures and practices primarily using a purchase card. The work does not involve making the number and kinds of substantive procurement decisions described at Level 4-3. Her purchases are made against a limited number of established contracts or by phoning three to four vendors to solicit quotes before making a purchase card order based primarily on price, and in some cases prior experience with particular suppliers. Delivery times typically are based on contractual agreement or follow normal industry practice. Therefore, Level 4-2 is credited.

Factor 5, Scope and effect

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.

At Level 5-2, work involves providing purchasing services covered by well defined and precise procedures and regulations (e.g., repeat orders or commercial requirements). Employees clarify what is needed and when and select proper purchasing methods from a range of available options. The work affects the smooth flow of everyday operations.

At Level 5-3, employees apply conventional practices to resolve a variety of purchasing problems such as inadequate or restrictive specifications, lack of multiple suppliers, urgent need and insufficient price history. Purchasing advice and decisions provided by employees directly affect the ability of serviced programs to conduct business adequately. Examples of work at this level involve ensuring the clarity and completeness of detailed purchase descriptions or specialized equipment or arranging for the timely delivery of urgently needed medical supplies or equipment affecting the adequacy of patient care.

Comparable to Level 5-2, the appellant's work is intended to be primarily proactive ensuring sufficient inventory is on-hand at all times to meet VAMC patient needs through day-to-day stock management and routine replenishment purchases. However, on a regular and recurring basis her work does involve more difficult high cost purchases due to essential unexpected needs, therapeutic trials, unique shipping requirements, out of stock situations and/or limited sources of supply. Resolving such issues to provide the needed items/drugs in a timely manner does affect the adequacy of patient care; therefore, we find the appellant's work exceeds Level 5-2 and minimally meets Level 5-3. Level 5-3 is credited.

Factors 6 and 7, Personal contacts and Purpose of contacts

Personal contacts include face-to-face contacts and telephone contact with persons not in the supervisory chain. Levels described under 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. The factors are interdependent, therefore, the same contacts selected for crediting Factor 6 must be used to evaluate factor 7.

Contacts at Level 6-2 include employees of the same agency or activity but from outside the immediate organization such as personnel in supply, contracting, finance, warehouse, or those in other units. Contacts outside the agency are with commercial suppliers, contractors, and personnel at other agencies such as GSA. In addition to these, at Level 6-3 contacts include technical or legal representatives of firms negotiating substantial purchase order changes or terminations or those protesting their non-selection for awards. The appellant's contacts do not involve the individuals, settings or issues described at Level 6-3. Therefore, Level 6-2 is credited.

Contacts at Level 7-a, are to clarify or exchange information related to purchasing routine requirements; obtain missing information, advise on status of work, and get approval for substitutes or changes in delivery dates, prices, and quantities from customers; and to obtain information on items, prices, discounts, and delivery dates from vendors. In contrast, at Level

7-b contacts are to plan and coordinate actions to prevent, correct, or resolve delays or misunderstanding in the purchasing process; discuss specifications that may be inadequate or too restrictive, realistic lead times or prices, or other avenues for filling needs, such as renting versus purchasing; and/or to clarify requirements and negotiate issues, e.g., establishing adequate price reductions for deviations in product or delivery, modifying certain terms, or waiving penalties for returned items. In some situations a moderate amount of persuasive skill may be needed to encourage reluctant vendors to quote, resolve minor conflicts, or get agreement on changes affecting product, price, or delivery. The purpose of the appellant's contacts meets but does not exceed Level 7-a. She does not routinely deal with issues such as inadequate or restrictive specifications, renting vs. purchasing, establishing price reductions for deviations in product or delivery, waiving penalties or using persuasion to attain agreement on changes affecting product, price or delivery as described at Level 7-b. The position is properly credited at Level 7-a.

The combined factors are credited at Level 2a for a total of 75 points.

Factor 8, Physical demands

This factor covers the requirements and physical demands placed on the employee by the work assignment. At Level 8-1 work requires some physical effort such as standing, walking, bending, and/or sitting, but no special physical demands. Work at Level 8-2 includes working around construction or excavation sites. The appellant's duties typically involve use of a personal computer to process, document, and track actions and access or update information on automated and/or hard copy files and reports within the office. Her purchasing work meets, but does not exceed Level 8-1. Level 8-1 is credited for 5 points.

Factor 9, Work Environment

This factor considers the risks and discomforts in the employee's physical surroundings and the safety precautions required. Work at Level 9-1 is performed in an office setting involving normal safety precautions. At Level 9-2 work involves visiting sites away from the office which may require wearing protective clothing at laboratories or construction sites. The appellant's work space within the pharmacy is equivalent to a normal office setting and is properly evaluated at Level 9-1.

Summary of GS-1105 work

<i>Factors</i>	<i>Level</i>	<i>Points</i>
1. <i>Knowledge required by the position</i>	1-3	350
2. <i>Supervisory controls</i>	2-3	275
3. <i>Guidelines</i>	3-2	125
4. <i>Complexity</i>	4-2	75
5. <i>Scope and effect</i>	5-3	150
6. <i>Personal contacts and 7. Purpose of contacts</i>	2a	45
8. <i>Physical demands</i>	8-1	5
9. <i>Work environment</i>	9-1	<u>5</u>
	Total Points	1030

The appellant's purchasing work falls within the 855 to 1100 point range on the Grade Conversion Table and is correctly classified at the GS-5 grade level.

Evaluation using the GS-2005 PCS:

Factor 1, Knowledge required by the position

Work at Level 1-3 requires knowledge of standardized supply regulations, policies, procedures, or other instructions relating to the specific functions assigned. The majority of positions require familiarity with one or more automated supply data bases to enter, correct, and retrieve recurring reports and to structure and retrieve specialized reports. Employees use a sound working knowledge of the structure of the local supply organizations serviced. Employees use this knowledge and ability to perform a variety of standard clerical assignments and to resolve recurring problems.

Illustrative of such work is performing a combination of tasks concerned with the receipt, storage, issue, and replenishment of a wide variety of supplies, forms, and publications. Items include printed material for use in special programs, as well as technical equipment, office furniture, office machines, and other non-expendable property. The employee examines items received; notes overages, shortages, or any damages incurred in shipping; and prepares detailed reports as required. They inspect storage areas and recommend replenishment of items when quantity appears low, review requisitions and revise quantities ordered based on the number of items on hand, and recommend substitutions when items are not available.

At Level 1-4, the highest level described in the PCS, work requires a thorough knowledge of governing supply regulations, policies, procedures, and instructions applicable to the specific assignment. This knowledge is used by employees to conduct extensive and exhaustive searches for required information; reconstruct records for complex supply transactions; and/or provide supply operations support for activities involving specialized or unique supplies, equipment, and parts such as special purpose laboratory or test equipment, prototypes of technical equipment, parts and equipment requiring unusual degrees of protection in shipment and storage, or others that are unique to the organization's mission or are seldom handled.

As at Level 1-3, the appellant must be knowledgeable about the automated data bases and systems used for ordering inventory replenishment items and tracking delivery and distribution. She monitors the cost accounting for the supply items received and distributed to customers. She searches the appropriate catalogs and manuals to obtain required information on difficult stock items. The appellant makes contact with various suppliers to coordinate the handling and shipping of medical supplies. She manages and retrieves files and records that reflect supply trends and budgetary limitations and assists the supervisor in making decisions regarding purchase and budgetary expenditures. She must maintain confidentiality of patient medical data provided with orders and ensure that costs/expenditures are accurately and appropriately billed. We find the appellant's work compares closely to the previously described illustration for this level. Typical of Level 1-3, she deals with shipment shortages and damages, inspects or arranges for the inspection of storage areas and deals with the replenishment of items when stock appears low, and arranges for substitutions in conjunction with healthcare staff when items are not available.

The appellant's duties do not involve the complexities typical of Level 1-4, e.g., conducting extensive and exhaustive searches for required information; reconstructing records for complex transactions; and/or providing supply support for activities involving specialized or unique supplies, equipment, and parts. While specific items may be needed to meet the particular patient needs, medical/clinical information necessary to make the purchases is provided and supply sources are generally readily available. Illustrations at Level 1-4 describe application of a greater breadth of knowledge in dealing with issues of greater technical complexity than that required by the appellant's position. Level 1-3 is credited.

Factor 2, Supervisory controls

At Level 2-2, work is performed under the technical guidance of a supply technician, supply specialist, or supervisor who issues general work assignments, controls flow of day-to-day work, and explains major changes in regulations or procedures. The supervisor or higher grade employee provides additional specific instructions for new, difficult, or unusual assignments including suggested work methods or advice on source material available.

At Level 2-3, the highest level described in the PCS, assignments are received in terms of defined objectives, priorities, and deadlines; and the supervisor assists the employee with unusual situations that do not have clear precedents. In some circumstances, employees work independently from the supervisor or senior specialists in a remote location and contact with the supervisor is infrequent. Considerable independence is exercised with continuing assignments. Employees plan and carry out successive steps and handle problems and deviations in the work assignment in accordance with instructions, policies, previous training, or accepted practices. Completed work is usually evaluated for technical soundness, appropriateness, and conformity to policy and requirements. The methods used in arriving at the end results are not usually reviewed in detail.

Typical of Level 2-3, the appellant independently tracks and assesses day-to-day needs to ensure sufficient inventory of all essential items is available to meet patient requirements. She decides when and how much to buy and makes purchases up to \$10,000. Although she works near the supervisor in the pharmacy, the appellant operates independently keeping her supervisor apprised of potential problems or sensitive matters and provides monthly budgetary updates. She uses established systems ensuring appropriate documentation of all supply and financial actions. The work meets but does not exceed Level 2-3, which is credited to the position.

Factor 3, Guidelines

At Level 3-2, procedures for doing the work have been established and a number of specific guidelines are available in the form of supply regulations, policies, and procedures. The number and similarity of guidelines and work situations require the employee to use some judgment in locating and selecting the most appropriate guidelines, references, and procedures for application and in making minor deviations to adapt the guidelines in specific cases. At this level, the employee may also determine which of several established alternatives to use. The situations to which the existing guidelines cannot be applied or significant proposed deviations from the guidelines are referred to the supervisor.

At Level 3-3, the highest level described in the PCS, guidelines are similar to the next lower level, but because of the problem solving or case nature of the assignments, they are not

completely applicable or have gaps in specificity. The employee uses judgment in interpreting and adapting guidelines such as policies, regulations, precedents, and work directions for application to specific cases or problems. The employee analyzes the results of applying guidelines and recommends changes.

Comparable to Level 3-3, the appellant applies regulatory guidelines, policies, practices, and procedures to solve problems and make independent decisions requiring a working knowledge of VA pharmacy guidance and recurring and evolving operating needs of the VAMC, CBOCs, in-home patient care and other patient services. She independently makes decisions essential to the maintenance of adequate inventory considering shelf life, stock rotation and storage requirements, and special patient needs. Information is available from journals, circulars, product and equipment fact sheets, health-care providers, and manufacturers' representatives. She uses good judgment in applying guidelines and considers all available information, trends and developing patterns to make substantive decisions affecting purchases and appropriate inventory levels. Typical of this level, she recommends changes based on practical consideration, e.g., CSOS. The appellant's work meets but does not exceed Level 3-3, which is credited to the position.

Factor 4, Complexity

At Level 4-2, work consists of duties that involve related steps, processes, or methods, including work performing routine aspects of technical supply management functions in support of a specialist. The employee must recognize differences between a few easily recognizable situations and conditions to choose a course of action. Actions taken differ in such things as source of information, kind of transactions, or other factual differences.

At Level 4-3, the highest level described in the PCS, the work involves unusually complicated or difficult technical duties involving one or more aspects of supply management or operations. The work at this level is difficult because it involves actions that are not standardized or prescribed; deviates from established procedures; involves new or changing situations; or entails matters for which only general provision can be made in regulations or procedures. This typically involves supply transactions which experienced employees at lower grades have been unable to process or resolve, or which involve special program requirements for urgent, critical-shortage items requiring specialized procedures and efforts to obtain. The employee decides what needs to be done depending on the analysis of the subject, phase, or issues involved in each assignment, and the chosen course of action may have to be selected from many alternatives. Decisions are based largely on the employee's experience, precedent actions, and the priority assigned for resolving the particular problem. The methods and procedures used to resolve each issue vary based on the circumstances of each individual case. The work involves conditions and elements that the employee must identify and analyze to discern interrelationships with other actions, related supply programs, and alternative approaches.

The appellant's routine requirements determinations and replenishment activities do not exceed Level 4-2. On the surface, her responsibility to make adjustments in inventory stock levels may seem to exceed this level. However, these decisions are primarily based on patterns identified through the processing of daily transactions, information from others or historic trends. Her work is not comparable to Level 4-3 where transactions are typically difficult to process or resolve, require analysis of the subject, phase, or issues involved in each assignment or involve special program requirements for urgent, critical-shortage items requiring specialized procedures

and efforts to obtain. Unlike Level 4-3, the chosen courses of action do not require her to select from *many* alternatives, nor do the methods and procedures she applies to resolve particular issues vary based on the circumstances of each individual case. Therefore, Level 4-2 is credited.

Factor 5, Scope and effect

Employees at Level 5-2 execute specific rules, regulations and procedures for work comprising complete segments of broader scope projects typically assigned to higher grade employees. The work affects the accuracy, reliability and acceptability of further processes or services in meeting customer requirements in supported organizations or other supply units.

At Level 5-3, the highest level described in the PCS, work involves dealing with a variety of problem situations either independently or as part of a broader problem solving effort under the control of a specialist. Problems encountered require extensive fact-finding, review of information to coordinate requirements, and recommendations to resolve conditions or change procedures. The employee performs the work in conformance with prescribed procedures and methods. The results of the work affect the adequacy of local supply support operations, or they contribute to improved procedures in support of supply programs and operations.

Level 5-3 is met. The work involves ensuring the availability of a large number of medical supplies and equipment used within the medical center and extension clinics. The appellant conducts periodic inventories to reconcile inventory discrepancies and determines any adjustments needed to the account. She manages and updates the GIP and IFCAP which contains files of items within the inventory that are used by primary and secondary users. She coordinates and works with vendors on orders that have been erroneously charged or delivered and ensures the costs associated with the order in question are corrected in accordance with established procedures. Her work directly affects the operations of the pharmacy, VAMC, and supported activities.

Level 5-3 is credited for 150 points.

Factors 6 and 7, Personal contacts and Purpose of contacts

At Level 2, contacts are with employees in the same agency but outside the immediate organization. Persons contacted generally are engaged in different functions, missions, and kinds of work, such as representatives from various levels within the agency or from other operating offices in the immediate installation. Typical of contacts at this level are employees at approximately the same level of authority in shipping companies, vendor employees concerned with the status of orders or shipments, and others at comparable levels.

At Level 3, contacts are with individuals from outside the employing agency in a moderately unstructured setting (e.g., the contacts are not established on a routine basis, the purpose and extent of each contact is different, and the role and authority of each party is identified and developed during the course of the contact). Typical of contacts at this level are supply employees in other departments or agencies, inventory item managers, contractors, or manufacturers.

Typical of Level 2, the appellant's VA contacts established on a routine basis are with staff within the pharmacy, medical professionals, counterparts at other VAMCs, contracting and

finance office personnel and administrative management officials. The appellant's responsibility for purchases, deliveries and maintaining adequate inventory also requires her to come in contact with vendors and shippers on a routine basis. The work does not require the appellant to *routinely* have contacts of the nature described in Level 3. The appellant's contacts meet Level 2.

At Level b, the highest level described in the PCS for Factor 7, the purpose of contacts is to plan, coordinate, or advise on work efforts or to resolve operating problems by clarifying discrepancies in information submitted by serviced organizations, resolving automated system problems causing erroneous transaction records, or seeking cooperation from others to resolve problem supply actions.

As at Level b, the appellant's primary contacts are to coordinate work and resolve problems to ensure the availability of medical supplies and the proper cost accounting for those supplies.

The combined factors are credited at Level 2b for a total of 75 points.

Factor 8, Physical demands

At Level 8-1, the work is primarily sedentary, and the employee may sit comfortably to do the work. There may be some walking, standing, bending, and carrying of light items such as papers, books, or small parts; but no special physical demands are required. In contrast, work at Level 8-2 requires some physical exertion such as long periods of standing; walking over rough, uneven surfaces; recurring bending, crouching, stooping, stretching, reaching; or similar activities. Regularly performing activities such as tracing misplaced items; conducting physical inventories in warehouses, depots, and other storage areas; or stocking and retrieving items from shelves and cabinets involve such physical demands.

Much of the appellant's work is sedentary and involves using a personal computer to make purchases, maintain inventory information, coordinate her work with that of others, and generate reports. However, on a regular and recurring basis, she lifts, stands, walks, opens, and stocks and assesses available quantities of inventory items in pharmacy storage areas and throughout the VAMC which requires recurring bending, crouching, stooping, stretching, reaching, or similar activities. Therefore, Level 8-2 is credited.

Factor 9, Work environment

At Level 9-1, the employee typically works indoors in an environment involving everyday risks or discomforts requiring observance of normal safety practices with office equipment, avoidance of trips and falls, and observance of fire regulations. Work areas are adequately lighted, heated, and ventilated. In contrast, work at Level 9-2 involves moderate risks or discomforts requiring special safety precautions and/or wearing protective clothing due to working around moving warehouse equipment, carts, or machines.

Most of the appellant's time is spent within the pharmacy with some activities requiring movement throughout the VAMC. Her work does not typically involve direct interaction with patients, special safety precautions or wearing protective clothing as described at Level 9-2, nor are the pharmacy storage areas comparable to a typical warehouse environment. Therefore, Level 9-1 is credited.

Summary of GS-2005 work

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-3	350
2. Supervisory controls	2-3	275
3. Guidelines	3-3	275
4. Complexity	4-2	75
5. Scope and effect	5-3	150
6. & 7. Personal contacts and Purpose of contacts	2b	75
8. Physical demands	8-2	20
9. Work Environment	9-1	<u>5</u>
<i>Total points</i>		1225

The appellant's supply support work falls within the 1105 to 1350 point range on the Grade Conversion Table and is correctly classified at the GS-6 grade level.

Decision

The appellant's position is properly classified as Supply Technician, GS-2005-6.