

**CLASSIFICATION APPEAL DECISION
U.S. OFFICE OF PERSONNEL MANAGEMENT
CHICAGO OVERSIGHT DIVISION**

INCUMBENT: **[appellant]**

AGENCY CLASSIFICATION: Administrative Support Assistant (OA)
GS-303-05

POSITION LOCATION: [Organizational location]
General Services Administration

OFFICE OF PERSONNEL **Procurement Technician (OA)**
MANAGEMENT DECISION: **GS-1106-5**

OPM DECISION NUMBER: C-1106-05-01

This appellate decision constitutes a certificate that is mandatory and binding on administrative, certifying, payroll, and accounting offices of the Government. It is the final administrative decision on the classification of the position, not subject to further appeal. It is subject to discretionary review only under the conditions and time limits specified in Part 511, Subpart F, of Title 5, U.S. Code of Federal Regulations.

FREDERICK J. BOLAND
CLASSIFICATION APPEALS OFFICER
CHICAGO OVERSIGHT DIVISION

3/5/96

DATE

Information Considered

- ▶ Appellant's letter of appeal, undated, received August 23, 1995, and subsequent undated letter received November 6, 1995.
- ▶ Copy of the official description of the appellant's position, PC-6-3535.
- ▶ Copy of the classifier's position evaluation statement.
- ▶ Copy of the official description of the appellant's supervisor's position.
- ▶ Copy of the appellant's performance standards.
- ▶ Copy of the organization chart.
- ▶ Audit of the appellant's position by telephone discussion of duties with her on January 26, February 13 and 14, and March 4, 1996, and with her supervisor on February 12, 1996.

EVALUATION CRITERIA

- OPM *Grade Level Guide for Clerical and Assistance Work*, dated June 1989.
- OPM *Office Automation Grade Evaluation Guide*, dated November 1990.
- OPM position classification standard for *Procurement, Clerical, and Technician Series*, GS-1106, dated September 1992.

INTRODUCTION

The appellant contests the General Services Administration classification of her position. She is assigned to position number [#], classified as Administrative Support Assistant (OA), GS-303-5, on June 19, 1995. (Her position had been previously classified as Secretary, GS-318-5.) Her position is located in the General Services Administration. She agrees with the agency series classification, but believes her duties should be higher graded because her monitoring of vehicle usage by her office, which has four vehicles assigned to it, requires her to apply guidelines different from the ones she uses in her contract support work. This, she feels, is equivalent to GS-6 clerical assignments, which the *Grade Level Guide for Clerical and Assistance Work* describes as processing a wide variety of transactions subject to different sets of rules and regulations. She believes her contract related duties are equivalent to GS-6 technical assignments, described in the same guide as performing a segment of the evaluative work of an administrative function, identifying issues or problems and seeking alternative solutions, consistent with applicable regulations. She also cites, among other things, the

independence with which she carries out her duties (“without any control from the Regional office”) to support her appeal.

In submitting her appeal, she refers to higher graded positions, not specifically identified, in her regional office that she believes have less extensive duties than her own. By law, positions are classified based upon their duties, responsibilities, and qualification requirements compared to the criteria specified in the appropriate OPM classification standard or guide. Other methods of evaluation, including comparison to other positions, are not permitted. Agencies are, however, required to apply classification standards and OPM decisions consistently to ensure equal pay for equal work. OPM will require an agency to conduct a consistency review upon showing that specifically identified positions at different grades have identical duties. Accordingly, our letter transmitting this decision to her agency advises that it should respond to this issue, should the appellant specifically identify a position with duties similar to her own.

Job Information

The appellant is the sole support person in the office, which typically includes the appellant, the Lead Construction Manager, two Engineers, and two Construction Representatives who work from various offices. She reports to the Technical Support Branch Chief, a Supervisory Architect, GS-808-14, located in [city]. She provides general office, automation, and specialized support to the office staff. Her *general office support* includes screening incoming calls and correspondence, establishing and maintaining administrative and operational files, keeping time and attendance records, ordering office supplies, maintaining vehicle use and maintenance records, scheduling training, etc. Her *automation support* includes monitoring communications with other offices, generating automated reports and preparing miscellaneous reports, correspondence, and spreadsheets using Word, Excel, Delrina Forms, and cc:Mail. Her *specialized support* involves assisting in the monitoring of contract progress by maintaining contract files, schedules, progress reports, and other records, fielding contractor and customer inquiries and complaints, and following proper procurement procedures.

Contracts typically involve building modifications (brand new construction and straight demolitions occur infrequently, although one current project is construction of a new courthouse). Of approximately sixty projects under contract (in the design, construction, or substantially-completed phase), nine projects are currently active. The appellant estimates that her specialized work demands 45 percent of her time, general office work 30 percent, and office automation work 25 percent.

Analysis and Findings

Series and Title Determination

The appellant’s personal performance of clerical work facilitates the basic work of various higher graded staff by relieving them of clerical tasks. (Secretary positions, in contrast, coordinate clerical tasks in support of the head of the organization.) Her *general office* work involves the performance of such *nonspecialized* clerical duties as answering the phone, filing, opening and distributing the

mail, carrying out simple and routine mathematical computations, processing documents, forms, or other paperwork, maintaining logs, or similar duties which do not require specialized knowledge, experience, or training. When coupled with *office automation* work, nonspecialized clerical duties are covered by the Office Automation Clerical and Assistance, GS-326, series, which includes all positions the primary duties of which are to perform office automation work, including word processing, either solely or in combination with clerical work. [GS-326 positions require, as does the appellant's position, (1) knowledge of general office automation software, practices, and procedures; (2) competitive level proficiency in typing; and (3) ability to apply these knowledges and skills in the performance of general office support work.]

Clerical positions, however, are classified to a specialized clerical series, rather than to the GS-326 series, regardless of their automation duties, if their primary purpose is to perform the specialized clerical work. The appellant's *specialized* work is similar to that covered by the Procurement Clerical and Technician, GS-1106, series, which includes positions supporting the procurement of supplies, services, and/or construction. GS-1106 positions require, as does the appellant's position, a practical knowledge of procurement procedures to prepare, control, and review procurement documents and reports, verify or abstract information from them, contact vendors to get status of orders and expedite delivery, maintain procurement files, and resolve shipment, payment, or other discrepancies.

The primary purpose of the position is indicated by its knowledge requirements, recruitment source, line of promotion, reason for existence, and the function of the organization to which it belongs. As shown in the Grade Determination section of this decision, procurement knowledge is the highest level knowledge required for the position. It is the most important subject matter knowledge required to do the work and therefore of prime importance when recruiting. The position has no clear line of promotion to indicate its classification. Similarly, its reason for existence (office support) and the function (construction monitoring) of the organization to which it belongs offer little to otherwise sway its classification. Consequently, the primary purpose of the position is best linked to the GS-1106 series.

The prescribed title for GS-5 and above positions classified to the GS-1106 series is *Procurement Technician*. The parenthetical (*OA*) is added to the title because the work also demands office automation knowledge and skill.

Grade Determination

Each of the appellant's three areas of responsibility are graded by separate criteria. Her general office work is properly evaluated against the *Grade Level Guide for Clerical and Assistance Work*, which provides criteria for clerical and assistance work at grades GS-1 through GS-7 that is not covered by more specific standards or guides. (The GS-326 series lacks its own grade level criteria). Because general office work is procedural in nature it will rarely if ever exceed the GS-4 level. Clerical duties that are properly classified at GS-5 or higher nearly always require some kind of identifiable substantive knowledge and are specialized in nature even though sometimes the work may appear to be general office work. The appellant cites her responsibility for standard clerical support as well as

monitoring the usage and maintenance of four vehicles as evidence of her “processing a wide variety of transactions subject to different sets of rules and regulations.” Aside from her assertion, however, she offers no specific work examples of such transactions, which typically would require extended training and experience to execute, involve nonstandard procedures, and a wide range of problems, none of which apply to her general support duties or her monitoring of vehicle usage. Although the office’s general clerical workload may be heavy, it is still accomplished by following set procedures and involves readily made factual determinations requiring virtually no specialized experience. It, therefore, cannot exceed the GS-4 grade level.

The appellant uses automation to better accomplish her general and specialized support duties. The grade level value of her automation support is assessed separately from her other duties and is properly evaluated against the *Office Automation Grade Evaluation Guide*. This is done in a separate section following the grade determination of her specialized duties, which are properly evaluated against the *Procurement Clerical and Technician* standard, since they require a practical knowledge of procurement procedures. Although she feels her specialized support meets the GS-6 grade level criteria given in the *Grade Level Guide for Clerical and Assistance Work*, it is, as she notes, contract related and properly graded by the GS-1106 standard. The GS-1106 standard contains criteria specific to her specialized support work, while the guide she cites is intended only for work not covered by more specific standards or guides.

The *Procurement Clerical and Technician* position classification standard is in Factor Evaluation System format. This requires a factor-by-factor analysis of the position in light of the standard. Under the Factor Evaluation System, a position factor must be fully equivalent to the factor-level described in the standard to warrant credit at that level and the associated point value. If a position factor is not fully equivalent to the overall intent of a particular level described in the standard, a lower level and point value must be assigned.

Factor 1: Knowledge Required by the Position

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

Level 1-3 requires knowledge of a body of standardized procurement regulations, procedures, and operations related to one or more procurement phases or functions. (This knowledge is typically acquired through considerable training and experience and is applied to the full range of standard clerical assignments and to resolve recurring problems.)

Level 1-4 requires in-depth or broad knowledge of a body of procurement regulations, procedures, and policies related to one or more procurement phases or functions. (This knowledge is typically acquired through extended training and experience and applied to a wide variety of nonstandard procedural assignments and to resolve a wide range of problems.)

As at Level 1-3, the appellant's contract related support work requires that she respond to recurring non-technical questions from contractors, construction office representatives, agency personnel, and others regarding matters covered by clearly stated procedures and regulations that she frequently uses. Answers require, for example, checking or verifying information in the project files maintained by the appellant, determining the need to reschedule weekly meetings, asking about information needed to fulfill paperwork requirements, etc. She employs knowledge of the various steps and procedures required to monitor recurring construction contracts, arrange pre-construction conferences, monitor progress as measured by percentage of project completed, process contract modifications, maintain contract files, and review and submit requests for payment.

Unlike Level 1-4, her contract related support work does not regularly involve *nonstandard* transactions, complaints, or discrepancies such as might be involved in:

- monitoring work progress and status by discussing such with contractors, obtaining reasons for delays, and making recommendations to the contracting officer on extending completion dates, charging penalties, withholding payments, or terminating contracts *based upon an evaluation of individual circumstances*, or
- reviewing and reconstructing complex contract files, *evaluating* conflicting records, conducting extensive searches for missing information, contacting a wide variety of personnel to obtain written verifications, determining reasons for discrepancies, and preparing the necessary forms and letters to initiate corrective action.

We evaluate this factor at Level 1-3 and credit 350 points.

Factor 2: Supervisory Controls

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

At Level 2-2, work is governed by standard operating procedures and instructions. Additional guidance is provided on new or difficult assignments. Procurement Technicians at this level use their own initiative to perform recurring assignments and resolve recurring problems. Their work is reviewed for accuracy and adequacy through various indicators, like the nature and frequency of complaints.

At Level 2-3, the supervisor provides guidance for unusually involved situations. Procurement Technicians at this level plan and carry out successive steps necessary to accomplish their work and to resolve problems and deviations where standard operating procedures do not apply because of the specialized nature of the problem, conflicting documentation, or similar conditions. Work is reviewed for technical soundness, appropriateness, and conformity to policy and requirements.

The appellant stresses that she works independently and that her supervisor's location in another city heightens this independence. However, as noted under Factor 1, her specialized work involves mostly routine and standardized tasks associated with the day-to-day contract support, rather than unusual situations lacking clear precedents, which is typical of Level 2-3. She deals with standard, recurring problems by following accepted practices, previous experience, and work policies. Although standardized work such as hers may appear to be performed with a high level of independence, it is the work itself that is closely defined and prescribed. Whether or not her supervisor is present to observe her work, the quantity, quality, and deadlines applicable to it and the specific procedures and work methods that she uses are still controlled by standard operating procedures and previous supervisory instructions. Regardless of her knowledge of program objectives, alternatives, local priorities, and operating policies, the appellant may not normally deviate from standard operating procedures on any significant matter without supervisory approval. The manner in which she works is essentially dictated by instructions and guidelines that leave virtually no room for regularly exercising significantly more than Level 2-2 independence. Procurement support work permitting greater independence typically involves less specific procedures and guidelines than available to the appellant.

We evaluate this factor at Level 2-2 and credit 125 points.

Factor 3: Guidelines

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

At Level 3-2, a number of established procedures and specific guidelines are available and apply to work assignments. Procurement Technicians at this level use judgment to select the most appropriate guidelines, precedents, or procedures to apply or adapt, when minor deviations are required. Situations requiring significant deviations or judgement are referred to the supervisor or others for guidance.

At Level 3-3, guidelines are not completely applicable to many aspects of the work because of the unique or complicating nature of the requirements or circumstances. Technicians at this level use judgment to interpret guidelines, adapt procedures, decide approaches, and resolve specific problems. They analyze the results of guideline application and recommend changes.

The appellant follows established procedures, precedent cases, manuals and specific acquisition regulations in the form of a Procedural Manual (primarily, detailed guidance for filling out forms), Procurement and Administration of Design and Construction manual (a comprehensive reference),

Technical Analysis handbook (specific guidance on standard forms), Project Management for Public Buildings Service (required reports, handling closeouts, etc.), and Federal Acquisition Regulations. Appellant needs to be familiar with the above to answer questions in the absence of the Lead Construction Manager or Construction Office Representatives. For instance, when a contractor calls to notify GSA payment hasn't been received, appellant checks the FAR to determine if prompt payment requirements apply, and also calls the Kansas City Regional office to learn the status of the payment request. As at Level 3-2, she must decide which precedents or guidelines are most pertinent and use some judgement and initiative in situations not completely covered by guidance. Unlike Level 3-3, she does not regularly treat problems or situations where she must rely on analysis and judgement rather than specific guides and precedents to reconstruct files, identify sources of information, determine what transpired, etc.

We evaluate this factor at Level 3-2 and credit 125 points.

Factor 4: Complexity

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

At Level 4-2, Procurement Technicians perform related procedural duties and make factual determinations and decisions, choosing from among clearly recognizable alternatives. They must consider factors such as appropriate format, content, or processing requirements.

At Level 4-3, Procurement Technicians use different and unrelated procedures and methods. They analyze issues or problems and obtain additional information where necessary in order to determine the appropriate course of action where many alternatives apply.

As at Level 4-2, the appellant locates and assembles information for the 20 some contract files that she maintains, examines format and content of documents, applies routine processing requirements, and corrects errors in files based on clear precedent from specific guidelines and similar cases. She maintains delivery schedule records and reviews nontechnical information to make determinations that sometimes exceed Level 4-2's factual and clearly recognizable criteria, but do not require Level 4-3's analysis and discernment of interrelationships, e.g., as reconciling incompatible information, evaluating reasons for delinquencies, abstracting bids, etc., would when many alternatives, explanations, or choices exist.

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

Factor 5: Scope and Effect

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

At Level 5-2, the purpose of work is to perform a range of procurement support tasks that are covered by well-defined and precise program procedures and regulations. The work affects the accuracy and reliability of further processes or services rendered by others.

At Level 5-3, the purpose is to apply conventional practices to treat a variety of conventional problems. Work results in recommendations or reports that directly affect customer or contractor relations or operations.

The appellant applies standard procedures to maintaining and monitoring contract files for her office. In addition she treats a variety of conventional problems that arise during the life of each contract, similar to Level 5-3. This includes requests to expedite schedules, to modify contract specifications, to obtain explanations for delays, and to rectify noise, dust or other complaints concerning contractor performance. Following standard procedures or higher graded staff instructions on nonstandard problems, she contacts the appropriate parties and follows through to ensure customer satisfaction. As at Level 5-3, her actions directly affect customer or vendor relations or operations.

We evaluate this factor at level 5-3 and credit 150 points.

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

The Procurement Clerical and Technician standard treats Factors 6 and 7 together. Contacts credited under Personal Contacts must be the same contacts considered under Purpose of Contacts.

Personal Contacts (Levels 1 to 2) include face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. Levels are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place (e.g., the degree to which the employee and those contacted recognize their relative roles and authorities).

Purpose of Contacts (Levels A to B) addresses the purpose of personal contacts, which may range from factual exchange of information to situations involving significant or controversial issues and differing viewpoints or objectives.

Level 1 contacts are with workers in the immediate organizational unit or closely related support units. They may also involve vendors or others outside the organization in very highly structured situations. Level 2 contacts are with employees outside the immediate organization. They may also involve outsiders in moderately structured settings. The appellant's regular and recurring personal

contacts include contractors and outside agency customers when obtaining information or answering inquiries or complaints. As at Level 2, these contacts occur in a moderately structured setting: the contacts are generally routine, at her workplace, and the purpose and roles of the parties involved may at first be unclear, e.g., as in responding to complaints or seeking explanations for delays. Her regular and recurring contacts do not involve unstructured settings or exceed those described at Level 2.

We evaluate Personal Contacts at Level 2.

The purpose of Level A contacts is to obtain, clarify, or provide information. The purpose of Level B contacts is to plan and coordinate actions to correct or prevent delays, errors, or other complications. As at Level B, the purpose of the appellant's regular and recurring contacts with contractors and agency customers includes coordinating her work efforts with these others and seeking their cooperation in resolving delays, misunderstandings, and complaints. The purpose of her contacts does not include settling disputes and explaining decisions through negotiation and persuasion, typical of higher levels.

We evaluate Purpose of Contacts at Level B.

We evaluate these factors at Level 2-B and credit 75 points.

Factor 8: Physical Demands

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

Level 8-1 work is sedentary and presents no special physical demands. Appellant's work is sedentary and free of special physical demands. It does not involve considerable walking, stooping, bending, and climbing typical of higher levels.

We evaluate this factor at Level 8-1 and credit 5 points.

Factor 9: Work Environment

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

Level 9-1 work is in an office setting. Appellant's work is performed in an office setting and requires no special safety precautions as is typical of higher levels..

We evaluate this factor at Level 9-1 and credit 5 points.

FACTOR LEVEL POINT SUMMARY

Factor	Level	Points
1	1-3	350
2	2-2	125
3	3-2	125
4	4-2	75
5	5-3	150
6 & 7	2-B	75
8	8-1	5
9	9-1	5
	Total:	910

The table above summarizes our evaluation of the appellant's work. As shown on page seven of the standard, a total of 910 points converts to grade GS-5 (855-1100).

Office Automation Work

Office automation work is evaluated using the *Office Automation Grade Evaluation Guide*, which, like the *Procurement Clerical and Technician* standard, is in FES format. In order for the appellant's office automation work to be higher graded than her procurement support, her automation duties must demand Level 1-4 knowledge, which they do not. The appellant uses knowledge of word-processing and spreadsheet software to generate progress and statistical reports for engineers, construction office representatives, and project managers. Level 1-4 office automation knowledge requires application of advanced functions of more than one type of software to a wide variety of nonstandard problems or assignments. The appellant uses more than one software type (word processing, spreadsheet, and database software) to produce fairly standard reports by direct application of the software instructions. Her duties do not regularly require her to resolve nonstandard office automation problems, e.g., producing macros incorporating a variety of commands to speed data or word processing. Consequently, her automation support can be no higher graded than her procurement support work.

Decision

The appellant's procurement support work equates to the GS-5 grade level. None of her other support work is higher graded. Consequently, the proper classification of her position is Procurement Technician, GS-1106-5.