

Current Classification: File Clerk (OA), GS-305-3

Requested Classification: File Clerk, GS-305-4

OPM Decision: File Clerk, GS-305-3

Organizational Information: [Organizational location]
U.S. Department of Veteran Affairs

OPM decision number: C-0305-03-01, 7/21/97

Analysis and Decision

In considering your appeal, we carefully reviewed all of the information submitted either directly to this office or [the Section], by you or on your behalf; information obtained during a telephone audit with you and your co-appellants and an interview with your supervisor, on April 8, 1997; additional discussions with [others] on April 24, 1997; and other pertinent classification information provided by your employing activity at our request. [Appellant] was removed from the list of appellants since we have been advised she no longer occupies the appealed position. All of your remaining co-appellants, except, [an appellant] attended the telephone audit on April 8, 1997, although only [an appellant] spoke for the appellants at that time.

It is our decision that your position is classified properly as File Clerk, GS-305-3. Accordingly, your appeal is denied for the reasons discussed below.

In your appeal to the Director, VAMC, dated August 1996, you stated your position was classified improperly because the computerized tracking system you now use “had altered the dimensions of the File Clerk Position drastically,” and that your local position classification office “. . . denied the connection between the position and File Clerks who are delivering these improvements.” You also claimed all of the Veterans Integrated Service Network’s (VISN) three facilities and your neighboring facilities in [another] Region had already reclassified their file clerk positions to grade GS-4 and that, except for [another agency], none of the facilities within your VISN “assumes any greater range or more demanding tasks” than you do at [agency]. You believe the volume of medical record activity at [agency] shows that [agency] ranks as a “major Medical Center.”

In your appeal to us dated December 16, 1996, you added to your basis of appeal that you have been led to believe Federal classification standards dictate the classification of your position at the GS-4 level. You stated you believe the position classification standards, i.e., the position classification standard (PCS) for the Mail and File Clerk Series, GS-305, support the classification of your position at the GS-4 level, but you believe the PCS’s were “disregarded” by the Human Resources Management Service. To support your claim, you provided a listing

2.

of 34 duties and responsibilities assigned to your position. Duties 1-25 in the listing are identified in your current position description. You also provided a listing of 22 VAMC facilities in [another] Region. The list shows 18 of the facilities identified had established the GS-4 as the “entry grade” level for file clerks. You provided a bar graph identifying the number of chart requests per pull list (advance notice) for each facility, highlighting those you believe have established the GS-4 as the entry grade for their file clerk position. You also provided an analysis to support your claim that, in classifying your position, three classification factors were rated one level below the appropriate level: Factor 3, Guidelines; Factor 5, Scope and Effect; and, Factor 7, Purpose of Contacts.

Your appeal rationale has raised several procedural issues warranting clarification given your concern regarding the similarities of your position to other positions in the same occupational series classified at higher grade levels. We believe there is some misunderstanding concerning the basis of classifying a position. A **position description** (PD) is the official record of the major duties and responsibilities assigned to a position by a responsible management official, i.e., a person with authority to assign work to a position. A **position** is the combined duties and responsibilities that make up the work performed by an employee. Title 5, U.S. Code, section 5106 prescribes the use of these duties and responsibilities, and the qualifications required by these duties and responsibilities, as the basis for determining the classification of a position. The Introduction further provides that "As a rule, a position is classified on the basis of the duties actually performed." Additionally, 5 CFR 511.607(a)(1), in discussing PD accuracy issues, provides that OPM will decide classification appeals based on the actual duties and responsibilities assigned by management **and** performed by the employee. The point here is that it is a real operating position that is classified, and not simply the PD. The duties classified must be assigned to the position and performed by its occupant(s).

All positions subject to the Classification Law contained in title 5, U.S. Code, must be classified in conformance with the published position classification standards issued by the OPM or, if there are no directly applicable PCS's, consistently with PCS's for related work. Therefore, other methods or factors of evaluation, such as comparison to other positions that may or may not be classified correctly, are not authorized for use in determining the classification of a position. The classification appeals process is a de novo review that includes a determination as to these duties and responsibilities. Thus, the classification review methodology and conclusions drawn by your agency previously have no bearing on our adjudication of your appeal.

Our fact-finding revealed that your PD of record accurately reflects the major duties and responsibilities assigned to your position and performed by you and your co-appellants. Therefore, we hereby incorporate your PD of record by reference into this decision. You maintain patient charts, sort and/or file documents in the charts, purge expired charts and transfer inactive ones. You also account for assigned files by posting patient and chart

3.

information to a computerized tracking system. When charts and related documentation are requested, you query the tracking system to determine chart locations, and deliver the files to the requestor.

[Appellant] stated, and your supervisor confirmed, that the predominant duties of your position involve maintaining, pulling and delivering charts to clinics to service prescheduled appointments and patients who walk in without appointments. You noted in your workload bar chart that [agency] patient support requires a pull of approximately 900-1,000 charts each day. During our fact-finding, we found that each day you and your co-appellants spend: (1) approximately two hours loading trucks and delivering charts for scheduled appointments; (2) 45 to 90 minutes performing pulls related to unscheduled visits; and, (3) and approximately two hours sorting new documents and filing them in the charts, and returning charts to files. In addition, each week you spend: (1) one full day, and an additional intermittent one to one-and-one-half hours, working at the customer service desk responding to calls, e.g., extracting information from a file; (2) two hours handling the transfer of records; and, (3) four to six hours securing documents from clinics for filing in patient records. Your other daily duties include: (1) charging out 900 to 1,000 files in the Decentralized Hospital Computer Program (DCHP); (2) performing telephone tracking of approximately 440 charts, and flagging those not found by calling the last office to which the chart was assigned; and, (3) scanning at least 500 returned charts to determine if they are on the daily pull before they are refiled.

Your other regularly recurring file clerk duties include: (1) locating and verifying patient information for billing; (2) going to clinics to obtain specific documents requested by doctors that are missing from files; (3) auditing your assigned block of files to ensure correct filing (blocks are assigned to each of you by social security number); (4) performing maintenance on damaged and worn charts; (5) providing statistical data related to loose filing and files previously and currently unaccounted for; (6) destroying files that are no longer needed when directed; (7) forwarding files to the Federal Records Center when they are inactive; and, (8) reactivating files that were inactivated if the patient returns for treatment.

Our fact-finding revealed that conducting extensive file searches are the primary and paramount duty of six employees who occupy File Clerk, GS-4 “expediter” positions at the VAMC. We also found that the extensive physical searches used by your activity to support a higher grade level for those positions are performed for approximately 40-45 records each day at the VAMC. Each search takes approximately 10 to 15 minutes. This accounts for no more than 25 percent of the workday for the six expeditors.

The crux of your appeal is that you perform extensive searches for files for which the location is not identified correctly in the computer system. Typically these searches must be expedited because the files must be located and delivered to a VAMC location so that immediate patient services can be provided. Due to the facts discussed above, it appears that you lack the time

needed to conduct these searches and your organization does not need man-hours beyond those of the expeditors to accomplish them. We did not find credible your claim that you and your co-appellants are performing complex records searches for a sufficient portion of your work time to potentially control the classification of your position as discussed below.

Series and Title Determination

Your agency has determined your position is classified properly to the Mail and File Clerk Series, GS-305, with which you have not disagreed, and with which we concur. The Mail and File Series, GS-305 is defined as including positions that administer, supervise or perform clerical work relating to the processing of incoming or outgoing mail and/or the systematic arrangement of records for storage or reference purposes, the scheduled disposition of records, and the performance of related work. Such duties require the application of established mail or file methods and procedures, knowledge of prescribed systems for governing the flow and control of communications, and/or filing or storage and retrieval of records, and knowledge of the organization and functions of the operating unit or units serviced.

Your position also requires knowledge of general office automation software, practices, and procedures sufficient to post file locations to the DCHP file tracking system. Your agency determined your position warranted the parenthetical title Office Automation because “your position contains the requirement for an individual qualified in the use of various office machines and equipment, including desk top computers, laser pens, scanning guns, etc.” The Office Automation Clerical and Assistance Series, GS-326 PCS stipulates that the parenthetical position title Office Automation is added to titles when such positions require “significant knowledge of office automation systems and a fully qualified typist [a minimum of 40 words per minute] to perform word processing duties.” Your position does not require you to develop textual documents with a variety of contents and varying formats, nor does your work involve the extent of keyboard use that would require the skills of a fully qualified typist. There-fore, because your position does not require both a significant knowledge of office automation and competitive level typing proficiency, it is allocated properly as File Clerk, GS-305.

Grade Level Determination

Guidance on the theories, principles, practices, methods and techniques governing classification of General Schedule (GS) positions is contained in the Introduction and the Classifiers Handbook published by OPM. The position classification process recognizes that positions may perform different kinds and levels of work that, when evaluated in terms of the duties, responsibilities and qualifications required, are at different grade levels. As provided in the Introduction, page 23:

The proper grade of such positions is determined by evaluation of the regularly assigned work which is paramount in the position.

In most instances, the highest level work assigned to and per-formed by the employee for the majority of the time is grade-determining. When the highest level of work is a smaller portion of the job, it may be grade controlling only if:

- The work is officially assigned to the position on a regular and recurring basis;
- It is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time); and,
- The higher level knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

Work that is temporary or short-term, carried out only in the absence of another employee, performed under closer than normal supervision, or assigned solely for the purpose of training an employee for higher level work cannot be considered paramount for grade level purposes.

The clerical work you perform is evaluated properly by application of the Mail and File Series, GS-305. However, we cross-referenced the Office Automation Grade Evaluation Guide (Guide) in our analysis to evaluate the grade level worth of the office automation work you perform; i.e., duties that entail using office automation equipment but do not entail the application of competitive level keyboard skills. The Guide and the GS-305 PCS are written in Factor Evaluation System (FES) format. Under the FES, positions are placed in grades based on the duties, responsibilities and qualifications required as evaluated in terms of nine factors. Each factor is assigned a point value based on a comparison of the position's duties and responsibilities with the factor level descriptions and/or benchmarks in the PCS. The factor level descriptions assign point values that mark the lower end of the ranges for the indicated factor levels. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the factor level description. If the position fails in any significant aspect to satisfy a particular factor level description in the PCS, 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 the Grade Conversion Table in the PCS.

Our analysis of your position, within each factor, first addresses our application of the GS-305 PCS to your position and then addresses our application of the Guide to your office automation work.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of information or facts that the 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 these knowledges. To be used as a basis for selecting a level under this factor, a knowledge must be required and applied. The personal qualifications of the position occupant may only be considered to the extent that those skills and knowledges are required to perform the work assigned to the position.

At Level 1-2 (200 points) in the GS-305 PCS, file work requires a knowledge of the functions and structure of the organization serviced. A basic knowledge of the subject matter content of the material being processed is needed to distinguish among materials that require different processing, to classify materials by subject matter when the relevant factors are easily determined, or to perform searches for materials when they are misfiled, in use in serviced units, or have been passed on to someone other than the person to whom charged out, or similar duties.

In contrast, Level 1-3 (350 points) in the GS-305 PCS requires, in addition to the requirements of Level 1-2, using a thorough knowledge of the functions performed within the units serviced, and a thorough knowledge of the subject matter of the material being processed. In addition, this level requires a thorough knowledge of subject or alphabetical classification systems the categories of which are extensively subdivided and cross-indexed, or decimal and alphanumeric classification systems that involve a large volume of material and high level skill on the part of the employee to index, file, and locate materials.

Your position compares closely to Level 1-2 in the GS-305 PCS. You work within a simple file system as defined in the GS-305 PCS; i.e., patient files are not extensively cross-indexed and are controlled by a simple modified numerical system. That is, charts are filed according to the last four digits of the patient's social security number supplemented by the patient's name. The charts contain documents sorted into seven general categories: health summary, mental health, primary care, clinical, x-ray, ambulatory care, and miscellaneous. Your cross indexing is limited to using locator cards to identify the existence of records on patients who were last seen before the computerized tracking system was established. These cards are only referenced once, after which the inactive records are reactivated and posted in the DCHP. You also use inactive file logs to identify records retired and sent to the Federal Records Center. Files are not classified in decimal and alphanumeric systems that are extensively cross-

referenced, or that involve the study of materials the subject matter of which is overlapping or difficult to discern. Your work requires only basic knowledge of the functions performed by the VAMC organizations serviced as these functions relate to filing in and maintaining patient charts and records. You perform housekeeping and storage duties for the file room and dispose of outdated records as directed by the supervisor. To perform the assigned duties successfully, an extended period of training or experience is not required. Your work does not provide the opportunity to use complicated techniques within a complex filing system as required to support assignment of Level 1-3. Accordingly, this factor is credited properly at Level 1-2 (200 points).

At Level 1-2 in the Guide, office automation work involves a few related steps covered by specific instructions. Knowledge of office software is limited at this level, e.g., knowledge sufficient to receive or transmit electronic mail or update an electronic calendar. In contrast, Level 1-3 in the Guide covers work that requires the clerk to apply knowledge of varied and advanced functions of one type of software, and varied functions of more than one type of software. At this level, office automation work involves producing a wide range of documents that often require complex formats.

Your position requires the technical knowledge necessary to operate personal computers and related equipment to record and query patient identification information and chart locations, and print out information. This compares closely to the limited office automation knowledges found at Level 1-2. Your position does not involve producing correspondence or the use of more than one type of software and, therefore, does not meet Level 1-3. Accordingly, this factor is credited properly at Level 1-2 (200 points).

Factor 2, Supervisory Controls

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

At Level 2-2 (125 points) in the GS-305 PCS, the supervisor gives instructions on nonrecurring assignments and changes to procedures, but the clerk works independently according to established procedures and previous experience. The supervisor is consulted when precedents cannot be applied, and spot-checks or samples the work to determine how accurately filing is being completed. In contrast, at Level 2-3 (275 points) the clerk must plan and adjust functions to satisfy the needs of the new, emerging or innovative programs of units serviced which are constantly subject to change. The clerk independently recognizes the need to and takes action to adjust or change procedures, or establish new procedures or systems.

Your work matches Level 2-2. You work according to established procedures, applying knowledge of patient chart handling and content requirements to pull, retrieve, maintain, and

8.

retire charts independently. You are not required to make changes to the existing system for record maintenance, or to establish new systems or procedures. This function and responsibility is vested in your supervisor's position. Accordingly, this factor is credited properly at Level 2-2 (125 points).

At Level 2-1 (25 points) in the Guide, assignment instructions clearly indicate what is required. The work is performed according to detailed procedural instructions on such matters as hardware/software selection; using established databases and spreadsheets; and, format, spacing, and arrangement of information. The employee works as instructed and seeks advice on all matters not specifically covered, clearly defined, or easily located in instructions or guidelines. Work is reviewed in draft and/or final form for completeness, accuracy, and conformance to instructions. Final work is checked for proper clearances, number and distribution of copies, signatures, etc.

In contrast, at Level 2-2 (125 points) the supervisor provides general instructions for standard, preestablished, or continuing office automation tasks, e.g., priorities, deadlines, or quantity. When the work is unusual or difficult, more specific instructions are provided regarding desired format, electronic storage requirements, maintenance requirements, hardware/software selection, etc. The employee works independently in carrying out familiar assignments, e.g., using standard procedures for creating documents or retrieving data, and established use of software packages, and seeks guidance when new or unusual assignments call for deviations from established procedures or otherwise require special instructions. Work is usually spot checked for compliance with procedures or instructions, technical accuracy, and appearance and when work is unusual, for adherence to special instructions.

Although you work with the independence and freedom from review typical of Level 2-2, your office automation functions are limited and covered by detailed instructions. Entering file location into the DCHP, querying the DCHP for file location, and extracting a report on file activity do not entail the depth of decision making required at Level 2-2. There is only one system to use, and you do not have to choose among a variety of procedures to create documents or extract data. Therefore, because your position does not meet Level 2-2 fully, it must be credited at Level 2-1 (25 points).

Factor 3, Guidelines

This factor covers the nature of guidelines and the judgment needed to apply them. Guides used include, for example, desk manuals, established procedures and policies, traditional practice and reference materials.

Guidelines should not be confused with the knowledge described under Factor 1, Knowledge Required by the Position. Guidelines, written or unwritten, either provide reference data or

impose certain constraints on the use of knowledge. For example, the existence of specific instructions and procedures may limit the opportunity of an employee to make or recommend decisions or actions.

At Level 3-1 (25 points) in the GS-305 PCS, guidelines may consist of both standing oral instructions and written guides, most of which are readily memorized. The guidelines are complete and specific, and permit little discretion in their application. At this level, employees work strictly according to the guides, and refer deviations to the supervisor for decision. In contrast, guidelines at Level 3-2 (125 points) consist of many standing instructions and written procedural guides that are applicable in different situations. Employees must use judgment and initiative in selecting and applying the proper guide, e.g., in classifying and cross-indexing when the subject matter of the materials may be covered in a number of categories, etc. Guidelines are of limited use and the work routinely requires the employee to devise new ways to accomplish assignments. Judgment also is used in selecting alternative means of locating materials missing from files when search information is inadequate or misleading and several locations are possible.

The guidelines you use, and the judgment you use in applying them closely matches Level 3-1. You use a file clerks' manual which describes the filing system and its use in specific terms. There are also note sheets posted to provide further guidance, and written instructions on the use of the record tracking system and equipment used. The filing system dictates one filing location for each document, and guidelines are clearly defined. Patient data is used to trace records' movement. You consult your supervisor if the guidelines and patient data are insufficient to locate or file records. When there is insufficient information to locate a chart, the file is flagged in the tracking system to identify it is needed when it is returned. The judgmental demands placed upon you do not vary. You are limited in your opportunity to make or recommend decisions or vary your actions. Your procedures are predominately memorized, and the need to research guidance is rare after the initial, short-term training period. The applying of judgment to perform the more extensive searches found at Level 3-2 is vested in other positions in your Section. As discussed previously in this decision, the file search workload information developed during our fact-finding shows the volume of extensive searches fully meeting Level 3-2 is insufficient to support crediting Level 3-2 to your position. Accordingly, this factor is credited properly at Level 3-1 (25 points).

Your DCHP system file search work is integral to your manual file duties. At Level 3-1 in the Guide, detailed procedural guidelines cover all aspects of the work. Guidelines typically include locally developed equipment operating and document processing instructions that are directly applicable to the work performed. Portions of more general operating procedures and correspondence procedures may also be used repetitively at Level 3-1. In contrast, Level 3-2 involves using general procedural guidelines such as agency correspondence procedures, style manuals, technical dictionaries, sample work products, etc. There are a number of similar

guidelines to apply or there are alternative procedures for accomplishing a function such as choosing which editing procedure to use. As discussed previously, the DCHP guidelines you use are directly applicable and do not require the considering of alternatives found at Level 3-2. Accordingly, this factor is credited properly at Level 3-1 (25 points).

Factor 4, Complexity

This factor includes 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 required to perform the work.

At Level 4-2 (75 points) in the GS-305 PCS, work requires performing several related duties. Specific procedures or actions involved are chosen from a variety that are appropriately taken in different situations. There is variety in the materials processed and in the activity performed, e.g., recognizing a variety of types of printed forms and deciding the appropriate filing action to be taken with each, proper processing and safeguarding of security classified materials, etc. The work requires classifying to appropriate file categories based on subject-matter content of materials, searching for missing materials and locating requested materials when information varies or conflicts, or similar work.

In contrast, Level 4-3 (150 points) work involves multiple classifications, multiple indexes, multiple cross-referencing, and special searching when such duties are performed in a work context of overlapping classification categories, diverse and complicated subject-matter content (i.e., legal and technical subject matter in a variety of formats), and requires taking action to obtain improvements in records processing procedures, or performing work of a similar difficulty.

Your position meets Level 4-2. The filing system used in your position involves maintaining only one file for each patient, although the file may be in multiple volumes due to the large number of documents related to each patient's history. Each file is uniquely identified by the last four digits in the patient's social security number. Within each file, documents are sorted into mutually exclusive categories: health summary, mental health, primary care, clinical, x-ray, ambulatory care, and miscellaneous. Documents that do not fit into one of the first six categories listed are placed in the "miscellaneous" section. Your position also involves providing patient files to users as specifically requested, forwarding inactive files to record centers at times directed, and reactivating files when patients return to care after lengthy periods of nontreatment. Your position falls short of Level 4-3 because your work does not involve multiple classifications, cross-referencing or demanding cross-indexing. The subject matter of the records you file is limited to one technical field, and you do not have responsibility for improving procedures; that function is vested in your supervisor's position. Accordingly, this factor is credited at Level 4-2 (75 points).

At Level 4-1 (25 points) in the Guide, office automation work consists of clear-cut repetitive tasks, and employees have little or no choice of action. At this level, standard documents are produced, and specified information is retrieved from a database system. In contrast, at Level 4-2 documents, formats and processing functions require a varying number and sequence of steps and the use of different functions from one assignment to another. Assignments either involve a variety of standard documents or lengthy documents with a variety of format changes, or the use of more than one type of software. Your automation work does not satisfy the requirements of Level 4-2 because it involves the limited use of only one kind of software. This software produces standard reports that identify the use of individual files. Accordingly, your office automation work is credited properly at Level 4-1 (25 points).

Factor 5, Scope and Effect

This factor measures the purpose of work and the impact of work products both within and outside the organization. This factor only takes into account properly performed work. Only the effect of properly performed work may be considered.

At Level 5-1 (25 points), filing work involves well-established functions. The work, when performed on a timely basis, facilitates the work performed in the serviced units. Office automation work facilitates the work of the originators of the documents or the users of the data maintained. In contrast, work at Level 5-2 (75 points) involves improving the performance of the file unit overall, or determining and selecting appropriate materials for the serviced units. Performance affects the ability of personnel in the serviced units to perform their duties accurately, or provide services to others.

Your work fully meets Level 5-1. You are assigned responsibility for a block of the records maintained in the file room. You account for these records and ensure the records are maintained in good condition and consistent with instructions. You do not determine or select records; the records needed and the times they are needed are specifically identified by the units serviced. This limitation precludes the crediting of Level 5-2. Accordingly, this factor is credited properly at Level 5-1 (25 points).

The purpose of office automation work at Level 5-1 is to perform specific recurring tasks required to maintain electronic records, e.g., calendars, spreadsheets, and databases, and/or to produce various items, e.g., correspondence, memos, or reports according to the most recent data. The services facilitate the work of the originators of the documents or the users of the data maintained. In contrast, the purpose of work at Level 5-2 is to collect, select, organize and provide information to others in oral or written form by applying established rules, regulations, procedures and office automation practices. The work affects the way other employees document, store, receive, or transmit information, and increases the availability and usefulness of the information involved.

The information you retrieve from the automated system is for your use in locating and accounting for charts. These types of responsibilities parallel the work described at Level 5-1. It does not entail the data content extraction and organization found at Level 5-2. Accordingly, this factor is credited properly at Level 5-1 (25 points).

Factor 6, Personal Contacts

Factor 6 includes those contacts that are either face-to-face or telephonic. Additionally, this factor takes into account the difficulty in making contacts and the setting in which the contacts take place.

Your contacts meet, but do not exceed, Level 6-2 (25 points), the highest level described in the GS-305 PCS. At Level 6-2, contacts typically are with the persons in the serviced units and may include contacts with persons outside the organization such as postal service employees and personnel in administrative units at higher or subordinate levels of the same agency. Your contacts are with medical staff and clerical persons in the units serviced. You also deal with personnel at other VA facilities to acquire or forward records, and persons at the Federal Records Center to retire inactive records and retrieve records to be reactivated. Accordingly, this factor is credited properly at Level 6-2 (25 points).

In the Guide, Level 1 contacts are within the immediate work unit or related support units. Level 2 involves contacts at various levels throughout the agency who are involved in or affected by integrating or changing automated office procedures. Your contacts are not involved in or affected by integrating or changing automated office procedures. Accordingly, this factor is credited properly at Level 1 (the equivalent of Level 6-1 (10 points) in the GS-305 PCS).

Factor 7, Purpose of Contacts

This factor describes the purpose of contacts evaluated in Factor 6 as ranging from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals or objectives.

At Level 7-1 (20 points) in the GS-305 PCS, contacts are to obtain or exchange information regarding the performance of functions in the immediate work unit and to provide information on file operations as required. In contrast, contacts at Level 7-2 (50 points) are to resolve such operating problems as improperly coded or classified files or materials and problems of similar difficulty, including the inadequacy of existing file categories.

Your position compares closely to Level 7-1. Your contacts are to obtain or exchange information, or to provide files and other materials. You have limited opportunity to solve

problems. The filing system you use is objectively defined and does not provide opportunities for discussions regarding coding and classification options. Files are either developed and maintained correctly or they are not. You have no responsibility for establishing or amending file categories. Accordingly, this factor is credited properly at Level 7-1 (20 points).

At Level A in the Guide, contacts are to exchange information about the assignment or methods used to complete assignments. At Level B, contacts are for planning, coordinating and integrating work processes or methods for office automation between and among related units. Your contacts related to the office automation work are minimal and involve exchanging information. Accordingly, this factor is credited at Level A (the equivalent of Level 7-1 (20 points) in the GS-305 PCS).

Factor 8, Physical Demands

This factor covers the requirements and physical demands placed on the employee by the work assignment related to both physical characteristics and abilities and also the physical exertion involved in the work. To some extent the frequency or intensity of the exertion must also be considered.

At Level 8-2 (20 points) in the GS-305 PCS, work requires long periods of standing, walking, bending, etc.; or recurring lifting and carrying of moderately heavy items (less than 50 pounds) and occasional lifting and carrying of heavier materials. In contrast, at Level 8-3 (50 points) requires regular and recurring lifting and carrying of objects weighing more than 50 pounds and occasional lifting and carrying of heavier materials.

Your work involves lifting and carrying individual files and boxes of files that weigh up to 40 pounds each. Accordingly, this factor is credited properly at Level 8-2 (20 points). Level 8-1 (5 points) is the only level in the Guide since it entails keyboard and related operations. Your automation work meets, but does not exceed Level 8-1 (5 points).

Factor 9, Work Environment

This factor describes the surroundings in which the employee works and any special safety regulations or precautions that the employee must observe to avoid mishaps or discomfort.

At Level 9-1 (5 points) in the GS-305 PCS, work typically is performed in an office setting that is adequately lighted and is climate controlled. In contrast, Level 9-2 (20 points) work is performed on a loading dock or other areas exposed to the weather or high levels of noise or vibrations. Level 9-2 work requires special safety precautions such as working near moving machinery, using flammable or explosive materials, being exposed to irritating chemicals or

14.

infectious diseases, or working with power tools. Employees performing at this level are normally required to wear protective clothing or gear.

Most of your work is performed indoors where there is adequate light and the climate is controlled. Only when records are boxed up for shipment or destruction does the work require special safety precautions beyond those used in normal office environments, i.e., special gloves. This duty is completed approximately twice per year. Only when you move between buildings to deliver files are you exposed to varying weather. Accordingly, this factor is credited properly at Level 9-1 (5 points).

Level 9-1 (5 points) is the only level in the Guide since it entails keyboard and related operations in an office setting. Your automation work meets, but does not exceed Level 9-1 (5 points).

Summary

In summary, we have credited your position as follows using the GS-305 PCS:

<u>Factor</u>	<u>Level</u>	<u>Points</u>
1	1-2	200
2	2-2	125
3	3-1	25
4	4-2	75
5	5-1	25
6	6-2	25
7	7-1	20
8	8-2	20
9	9-1	<u>5</u>
		520 Points

We have credited your position as follows using the Guide:

<u>Factor</u>	<u>Level</u>	<u>Points</u>
1	1-2	200
2	2-1	25
3	3-1	25
4	4-1	25
5	5-1	25
6&7	1A	30
8	8-1	5
9	9-1	<u>5</u>
		340 Points

The total of 520 points falls within the GS-3 grade level range of 455-650 points on the Grade Conversion Table in all FES PCS's. The total of 340 points falls within the GS-2 range of 255-450 points.

Based on the above analyses, we find that your position is properly classified as File Clerk, GS-305-3.

Integral to your appeal rationale is your belief that your position is classified inconsistently with those occupied by employees who perform similar work at other VAMC's. Although you did not provide specific information showing the specific duties and responsibilities performed by these positions, it appears the positions are in organizations at the same echelon as your position. In addition, the appeal record shows that these positions were cited by your supervisor, a management official, in his attempt to upgrade your position at the VAMC before you filed your internal agency classification appeal. Based on this information, we are compelled to conclude that the other positions cited and so similar as to warrant our tasking an intra-agency consistency review of File Clerk positions throughout the Veterans Health Administration's medical centers. We have asked your agency personnel office to review the other positions in question as required under 5 CFR 511.612, and to submit a report either explaining the differences between your position and the other positions you cited that supports a difference in the application of the controlling PCS's or, if the positions warrant a similar application, setting forth a plan to correct the classification of the other positions to achieve internal consistency. We have asked the agency to inform you of the results of the study. While your agency has the primary responsibility for intra-agency consistency, including consistency with OPM decisions, your agency may not change the classification certification in an OPM decision nor may your agency classify a position based on position-to-position comparison.

This appeal decision represents the current facts regarding the duties, responsibilities and qualification requirements of the position that are the basis for its classification. Under the provisions of the Classification Law, OPM has the responsibility to determine whether positions are placed properly in classes and grades in conformance and consistent with published PCS's. When misclassifications are found, we have no choice but to direct corrective action. Such actions are not directed arbitrarily, and do not reflect on the employee's ability, qualifications, or quality of work.

This decision constitutes a classification certificate under the authority of section 5112(b) of title 5, U.S. Code. This certificate is mandatory and binding on all administrative, certifying, payroll, disbursing and accounting officials of the Government. In accordance with 5 CFR 511.702, it must be implemented no later than the beginning of the sixth pay period following the date of this decision. The servicing personnel office must submit a compliance report to this office no later than 20 days following their receipt of this decision. You and your co-appellants may contact your servicing personnel office for information about the implementation of this decision.

Please inform your co-appellants of our decision.

Sincerely,

Robert D. Hendler
Classification Appeals Officer