

OFFICE OF PERSONNEL MANAGEMENT
MERIT SYSTEMS OVERSIGHT AND EFFECTIVENESS
DALLAS OVERSIGHT DIVISION
CLASSIFICATION APPEAL DECISION

Under section 5112(b) of title 5, United States Code

Appellant: [Appellant]

Position: Management Analyst, GS-343-13
Position Number: N94020

Organization: Indian Health Service
Department of Health and Human Services
[installation city and state]

Decision: Management Analyst, GS-343-13
(Appeal denied)

OPM Decision Number: C-0343-13-01

Approved by:

/s/ Bonnie J. Brandon
Bonnie J. Brandon
Classification Appeals Officer

8/8/97
Date

INTRODUCTION

The appealed position is assigned to the [installation], Indian Health Service (IHS). The position's duty station is [installation city and state]. The appellant's position is presently classified as Management Analyst, GS-343-13. The appellant requests that her position be classified at the GS-14 grade level. Her position was audited by an IHS personnel management specialist in the spring of 1996. The specialist concluded that the appellant's position was operating at the GS-14 grade level rather than the GS-13 level, however, the position was not upgraded as a result of the audit findings.

This appeal is filed with the Office of Personnel Management under the provisions of chapter 51, title 5 of the United States Code. This is the final administrative decision of the Government, subject to discretionary review only under the conditions and time limits specified in title 5 of the Code of Federal Regulations, sections 511.605 and 511.613, and appendix 4 of the *Introduction to the Position Classification Standards*.

POSITION INFORMATION

The appellant serves as the records management officer for IHS. The position is physically part of [area], one of three IHS headquarters locations outside of the main [city, state] agency headquarters. The appellant reports to the Director of the Division of Administrative Services, who is located in the [state] office. In October of 1995, a reorganization order pulled IHS from the Public Health Service and established IHS as an operating division within the Department of Health and Human Services. The IHS has responsibility for providing comprehensive health services to American Indian and Alaska Natives to elevate their health status to the highest possible level. Programs throughout IHS are designed to provide acute care in multiple specialties.

As the records management program officer, the appellant has responsibility for planning, developing, analyzing, directing, evaluating, improving, and advising on a comprehensive records management program involving the creation, maintenance, use, retrieval, and disposal of records of all types. The appellant is the principal consultant in the records management field to all levels of management and program officials throughout IHS and to tribal organizations. She also serves on Department task forces dealing with various records management projects. The appellant supervises one secretary and one Management Analyst, who assist her in carrying out the records management program. The current records management program within IHS is relatively new, having been actively developed and implemented within the last seven years to comply with the requirements of Federal laws and regulations. The appellant has managed the program through its beginning stages up to the present time, by developing IHS policies and guidelines, providing training and technical assistance to managers and personnel throughout IHS to implement program procedures, and conducting management control reviews whereby the effectiveness of the program is evaluated.

Although the position description of record does not include information about the knowledge required or the guidelines used, it does accurately describe the duties and responsibilities of the appellant's position.

SERIES AND TITLE DETERMINATION

The GS-343 Management and Program Analysis Series includes positions which primarily serve as analysts and advisors to management on the evaluation of the effectiveness of government programs and operations or the productivity and efficiency of the management of Federal agencies. The standard's scope of coverage is broad, including positions with a wide variety of assignments. Specifically mentioned for coverage are positions concerned with "evaluating and advising on the organization, methods, and procedures for providing administrative support systems such as records, communications, directives, forms, files, and documentation." The appellant's responsibilities of analyzing, evaluating, improving, and advising on the records management program match the general intent of the GS-343 series. Thus, the appellant's position is correctly assigned to the Management and Program Analysis Series, GS-343. Management Analyst is the authorized title for nonsupervisory positions in this series that are primarily concerned with analyzing, evaluating, or improving the efficiency of internal administrative operations and management, as in the appellant's position.

The appellant does not spend a significant amount of time performing her supervisory duties. Hence, these duties are not considered for classification purposes such as title and grade determination.

GRADE LEVEL DETERMINATION

Positions in the GS-343 series are evaluated by application of the Administrative Analysis Grade Evaluation Guide, dated August, 1990. This guide is written in the Factor Evaluation System format. The following is our evaluation of the grade level of the appellant's position.

Factor 1 - Knowledge Required by the Position

At level 1-8, the highest level described in the guide, assignments require an expert analyst. At this level, the analyst has mastered the application of a wide range of qualitative and/or quantitative methods for the assessment and improvement of program effectiveness or the improvement of complex management processes and systems. Work at this level requires comprehensive knowledge of the range of administrative laws, policies, regulations, and precedents applicable to the administration of one or more important public programs. Work at this level also requires knowledge of relationships with other programs and key administrative support functions within the employing agency or in other agencies.

The knowledge required for the appellant's position is equivalent to level 1-8. She is the IHS expert technical specialist for the records management program. While the appellant's position

does not entail conducting comprehensive formal management analysis studies employing elaborate and sophisticated statistical or analytical techniques that characterize many positions covered by the GS-343 series at this level, she is required to use her comprehensive knowledge of applicable laws and regulations and of IHS organizations and functions to develop, implement, assess, and advise on the records management program within IHS.

More specifically, the appellant's work requires a comprehensive knowledge of a wide range of laws, rules, regulations, and executive orders pertaining to the records management program. These include the various requirements of oversight agencies such as the Office of Management and Budget (OMB), General Services Administration (GSA), General Accounting Office (GAO), and National Archives and Records Administration (NARA); and the regulations governing various IHS organizational functions, programs, and processes that specify certain records management requirements. For example, in developing and implementing the records management policies and procedures for the pharmacy or laboratory areas of an IHS hospital, the appellant must be knowledgeable of the applicable State and Federal regulations dealing with the records aspect of these specialized functional areas. Across IHS, this constitutes a wide array of regulations and requirements which must be researched, understood, and applied in the appellant's program. The appellant's work requires her to be knowledgeable of the diverse organizational operations, missions, and processes to effectively carry out the records management program. Specifically, she is knowledgeable of the operations and programs of the headquarters level, areal levels, and hospital and clinic levels of IHS.

Factor 2 - Supervisory Controls

At level 2-4, within a framework of priorities, funding, and overall project objectives, the employee and supervisor develop a mutually acceptable project plan which typically includes identification of the work to be done, the scope of the project, and deadlines for its completion. Within the parameters of the approved plan, the employee is responsible for planning and organizing the study, coordinating, and conducting all phases of the project. Completed projects, reports, and recommendations are reviewed by the supervisor for compatibility with organizational goals, guidelines, and effectiveness in achieving intended objectives.

The level of supervision over the appellant is equivalent to level 2-4. The appellant develops annual work plans which specify the work to be accomplished by her and her section. This work plan is submitted to the [appellant's] supervisor, who reviews it to ensure that he is in agreement with the plan's priorities and content. The supervisor may make changes to some of the priorities of the work plan. Within the parameters of the approved work plan and the section's budget, the appellant independently plans, coordinates, and completes the work. Through weekly status reports, the appellant keeps her supervisor apprised of her work, accomplishments, outside contacts, and problems encountered. The appellant's work is reviewed by the supervisor for consistency and compatibility with other program and organizational requirements and effectiveness in accomplishing the objectives of the program.

The level of supervision received by the appellant does not meet the full intent of level 2-5, where the employee is subject only to administrative and policy direction concerning overall project priorities and objectives. In providing input on the annual work plan and in giving general guidance on the program through frequent telephone contacts with the appellant, the supervisor has a more active role in providing direction to the appellant and the records management program than is envisioned at level 2-5, the highest level for this factor.

Factor 3 - Guidelines

At level 3-4, guidelines consist of general administrative policies and management and organizational theories which require considerable adaptation or interpretation for application to issues and problems studied. At this level, administrative policies and precedent studies provide a basic outline of the results desired, but do not specify the methods needed to accomplish the project. Administrative guidelines usually cover program goals and objectives of the employing organization. Within the context of broad regulatory guidelines, the employee may modify or develop more specific guidelines such as implementing regulations or methods for improving the effectiveness and productivity of operating programs.

The nature of the appellant's guidelines meets level 3-4. The appellant interprets and applies broad records management requirements contained in law; Federal and State regulations; executive orders; Department guidelines; public policies; and requirements of oversight agencies such as OMB, GAO, NARA, and GSA. Within this broad regulatory framework, the appellant develops specific policies, procedures, and guidance that define and govern the IHS records management program.

The guidelines used by the appellant do not meet level 3-5, where guidelines typically are limited to basic administrative policy statements. Although the appellant's position meets one aspect of this level, functioning as the recognized IHS expert in records management, the records management program is covered by guidelines and requirements which are more relevant and detailed than are the nonspecific, broadly stated, guides at this level.

Factor 4 - Complexity

At level 4-5, the work consists of projects and studies which require analysis of interrelated issues of effectiveness, efficiency, and productivity. Typical assignments require developing detailed plans, goals, and objectives for the long-range implementation and administration of the program. The work is complicated by conflicting program goals and objectives which may derive from changes in legislative or regulatory guidelines, variations in the demand for program services, and the need to deal with subjective concepts such as value judgments. An example is analyzing agency requirements for resource management information systems for a nationwide medical care program, where the work involves developing the overall systems concepts, providing input on state-of-the-art systems design, defining new information requirements, and developing procedures and formats for timely and accurate reporting.

The complexity of the appellant's position meets level 4-5. The work consists of developing the IHS records management policies, procedures, guidelines, and standards that govern the proper creation, maintenance, use, retrieval, and disposal of IHS and contractor records at all organizational levels. The appellant considers long-range issues, effectiveness, and differing organizational operations in setting program goals and objectives, establishing program implementation plans, developing training plans and materials, and designing systems for monitoring and evaluating the program. The work is complicated by the changing nature of electronic records and technology and the associated changes to legislative and regulatory guidance. Another change complicating the appellant's work is the new area of compacting and contracting, which requires her to ensure the propriety of records management systems when tribal organizations attain and operate former IHS programs. Additionally, the appellant's work is complicated by the diverse IHS organizational levels, programs, functions, and governing Federal and State regulations, which impact the records management needs and requirements. In developing, implementing, and evaluating the program, the appellant must deal with some resistance from managers or other personnel who question the value and need for such a detailed program.

The appellant's work is not of the scope and complexity intended at level 4-6, where the work concerns key agency programs and is of such breadth and intensity as to require a multi-discipline approach in which the analyst serves as the leader. At this level, the nature and scope of the issues dealt with are largely undefined and it is difficult to discern the intent of legislation and policies. The appellant's work concerns the narrow program area of records management for IHS and does not involve the level of complexity associated with broad programs consisting of a range of functional areas. The appellant's records management program is carried out in conformance with extensive laws and regulations which define the program area more so than what is characteristic of level 4-6.

Factor 5 - Scope and Effect

At level 5-4, the purpose of the work is to assess the productivity, effectiveness, and efficiency of program operations or to analyze and resolve problems in the staffing, effectiveness, and efficiency of administrative support and staff activities. Work at this level may also include developing related administrative regulations, such as those governing the allocation and distribution of personnel, supplies, equipment, and other resources, or promulgating program guidance for application across organizational lines or in varied geographic locations. The work contributes to the improvement of productivity, effectiveness, and efficiency in program operations or administrative support activities at different echelons or geographical locations, and may affect program plans and mission effectiveness at these echelons or locations.

The appellant's position meets the scope and effect characteristic of level 5-4. The appellant serves as the records management officer for the IHS program. She performs the range of work associated with developing the IHS records management program policies and guidelines for use and implementation throughout the differing organizational levels and functions of IHS;

researching the various records management requirements pertaining to numerous IHS programs and functions; providing training, technical assistance, and advice to all levels of IHS officials and tribal organizations; conducting management control reviews to evaluate and gain compliance with program requirements; and representing the agency on Departmentwide task force groups and in meetings with officials from other agencies. The appellant's work affects the accurate, efficient, and effective operations of the records management program in organizations throughout IHS and within IHS as a whole.

The scope and effect of the appellant's position do not meet level 5-5, where the purpose of the work is to evaluate major administrative aspects of substantive, mission-oriented programs. Although the records management program is an important administrative program for IHS, the appellant's work in developing and implementing this program is not equivalent to the scope and effect of making significant contributions to a substantive, mission-oriented program. Work typical of level 5-5 concerns developing new ways to resolve major administrative problems or plan the most significant administrative management aspects of professional or scientific programs. The work at this level directly affects the accomplishment of principal program goals and objectives, such as the delivery of program benefits or services. The appellant's work fails to reach this level of direct impact on major administrative aspects of missions and programs or on the quality and quantity of benefits and services provided by IHS.

Factor 6 and 7 - Personal Contacts and Purpose of Contacts

Personal Contacts

At level 3, contacts are with persons outside the agency which may include consultants, contractors, or business executives, in a moderately unstructured setting. This level may also include contacts with the head of the employing agency or program officials several managerial levels removed from the employee when such contacts occur on an ad-hoc basis.

Level 3 describes the nature of the appellant's contacts. She has frequent contact with IHS top management officials; IHS key officials at the headquarters, area, and hospital/clinic levels; other IHS personnel such as records officers; contractors; NARA officials; and tribal organization officials.

The appellant is not required to make regular contacts with individuals outside of IHS such as other agency heads, top congressional staff officials, or mayors of major cities, in order to accomplish the work of the position, as required at level 4.

Purpose of Contacts

At level c, contacts are made to influence managers or other officials to accept and implement findings and recommendations on organizational improvement or program effectiveness.

Contacts may involve resistance due to such issues as organizational conflict, competing objectives, or resource problems.

Level c describes the purpose of the appellant's contacts. As the records management program manager, she contacts various management and program officials throughout IHS to persuade them to accept and comply with the requirements of the program. Whereas the official records program is still relatively new within IHS, the appellant must influence managers to change long-established procedures which do not conform to the current requirements. The appellant also has contacts within IHS to identify and solve problems and provide technical assistance. She has contacts with NARA officials in making recommendations, obtaining technical information, and representing IHS in the records management area. She also advises tribal organizations that have entered into compacting and contracting agreements.

The purpose of the appellant's contacts is not to justify or settle matters involving significant or controversial issues, as described at level d.

Factor 8 - Physical Demands

The appellant's work is primarily sedentary, as at level 8-1.

Factor 9 - Work Environment

The appellant's work is performed in an office setting, as at level 9-1.

Summary of Factor Levels

The point total for the nine factors is 3190. According to the grade conversion chart on page 3 of the Administrative Analysis Grade Evaluation Guide, this converts to the GS-13 grade level and falls within the point range of 3155 to 3600. The following table summarizes the factor levels credited to the appellant's position.

<u>Factor</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-8	1550
Supervisory Controls	2-4	450
Guidelines	3-4	450
Complexity	4-5	325
Scope and Effect	5-4	225
Personal Contacts and Purpose of Contacts	3c	180
Physical Demands	8-1	5
<u>Work Environment</u>	<u>9-1</u>	<u>5</u>
TOTAL		3190

DECISION

The appellant's position is appropriately classified as Management Analyst, GS-343-13.