

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

Chicago Oversight Division
230 South Dearborn Street, DPN 30-6
Chicago, Illinois 60604

**Classification Appeal Decision
Under Section 5112 of Title 5, United States Code**

Appellant: [Name]

Agency Classification: Lead Processor, GS-1101-5

Organization: U.S. Department of Agriculture
Rural Housing Service
[Name] Center
[Name] Branch
[Name] Unit
[City, State]

OPM decision: Lead Mail Clerk
GS-305-5

OPM decision number: C-0305-05-01

/s/

Douglas K. Schauer
Classification Appeals Officer

July 23, 2001

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

This decision is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The servicing personnel office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

Decision sent to:

Appellant:

[appellant's name and address]

Agency:

[name and address of appellant's servicing personnel office]

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Introduction

On December 6, 2000, the Chicago Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [Name], employed at the U.S. Department of Agriculture, Rural Housing Service, [Name] Center, [Name] Branch, [Name] Section, [Name] Unit. The appellant is assigned to job number [number], Lead Processor, GS-1101-5. She believes the appropriate classification is Lead Processor, GS-1101-6. We accepted and decided the appeal under section 5112 of title 5, United States Code (USC). We interviewed Ms. [Name] on June 12, 2001.

General Issues

Prior to July 1998 the work of the appellant's unit and that of the sister organization in the [Name] Section, the [Name] Unit, were combined within one organizational unit. In July 1998 the functions were separated and the positions in the [Name] Unit were reclassified and upgraded to Processor, GS-1101-5. All of the employees were given the opportunity to apply for the new, higher graded positions, and those now employed as GS-5 Processors in the [Name] Unit were competitively appointed to those positions.

From information available as the result of another classification appeal from the [Name] Center, and our associated research it seems that this very large organization located in [City, State], has a homogeneous organization in terms of the classification of the great majority of its technical action officer positions. The position classification specialists servicing the [Name] Center determined that the basic functions of the large [Name] Center technical staff are properly covered by the GS-1100 Business and Industry Group. Since there is no one occupation applicable to these positions, the appellant is classified to the "catch-all" occupation in this family, the General Business and Industry Series, GS-1101. This decision will determine the propriety of assigning the appellant's position to the GS-1101 even though the primary duties are classifiable to another occupational series.

Position Information

The appellant is one of approximately 12 employees in the [Name] Unit. She is supervised by a GS-1101-7. The section is composed of a Unit Supervisor, one Workflow Coordinator (the appellant) and ten GS-1101-4 Processors.

The appellant's organization was previously titled "[Name]," and according to the mission statement, the mission of the [Name] Section is "to deliver mail to our customers accurately, timely, and efficiently, ensuring each customer has an opportunity to become a successful homeowner." A principal mission of the USDA, Rural Development is to finance decent, affordable housing for rural America. The appellant's organization within the [Name] Section is the [Name] Unit. Their primary mission is the receipt and delivery of correspondence, packages and other mail within the [Name] Center, to receive and meter or otherwise process outgoing mail from offices within the [Name] Center, and to distribute or outprocess the mail to the recipients via internal distribution, the U.S. Postal Service (USPS), Federal Express, UPS, and contractor employees. In addition, when mail is

returned with addressee unknown, employees of the [Name] Unit are charged with researching and correcting the addresses of borrowers.

The appellant, as the Workflow Coordinator, is also responsible for making sure the work of the unit is distributed equitably and efficiently among the employees, to provide guidance, both verbal and written, on complex or unusual circumstances, and to provide on-the-job training as necessary. This work does not take up all of the appellant's time, however. She works as a full-time processor on Mondays, and as needed throughout the week.

There are 32 internal offices to which mail items have to be distributed. Often, Rural Development's main customers throughout the United States and Puerto Rico, the borrowers, fail to designate the recipient of the correspondence on the address. In this instance, employees of the [Name] Unit are responsible for opening the mail and determining the proper recipient. If the employees can not make a determination, they will bring the mail to the appellant. This requires the appellant to possess an excellent working knowledge of the mission and function of each office in the [Name] Center. The [Name] Unit also processes in excess of 200 items of accountable mail per day. This mail requires special handling, and the unit has an accountability system which keeps track of all items and ensures they get delivered in a timely manner. The appellant is tasked with assisting other employees in her unit in handling unusual or complicated routing questions.

The appellant, along with other unit employees, also processes outgoing mail. This varies according to the type of mail it is and the recipient. All mail utilizing the U.S. Postal System has to be metered, charged to the appropriate office, and accounted for. To process items for Federal Express, for certified, express and pre-sorted USPS mail, for Airborne Express, and for UPS the appellant uses different administrative processes and procedures. There are approximately 100 Rural Development district and field offices and 50 state offices to which mail is sent, and many hundreds of individual customers.

A large portion of the appellant's work is processing mail items returned for the incorrect address or "addressee unknown." To determine the correct address the appellant utilizes a variety of available sources. She utilizes the automated FasTeller and the Credit Retrieval systems to find addresses. She also contacts local Post Offices and telephone companies to attempt to find the correct addresses. She may task other administrative offices in Rural Development, and ask field representatives of Rural Development to physically check out properties in her effort to find the correct address.

In performing her work the appellant must operate a Personal Computer (PC) and utilize various software systems. These include the FasTeller system, which is a proprietary Rural Development system that records a large volume of information on borrowers and accounts. She also has access to a Credit Retrieval system, which contains a variety of personal information on persons throughout the U.S., to find out addresses or leads to find addresses.

The appellant, as Workflow Coordinator, is responsible for providing a number of reports to

management. She utilizes the ACCUTRAC system to account for and produce reports on the metered mail and the mail budget. Each week she provides her supervisor daily production reports for each processor. She also tracks the number of pieces of incoming mail by the PO Box to which it is delivered.

Series Determination

The classifiers servicing the [Name] Unit considered classifying the processor positions to the GS-305, Mail and File Series; however, they classified the appellant's position to the GS-1101 occupational series. Their rationale was that the work of the processor positions requires subject matter knowledge of [Name] Center's loan servicing system and other technical aspects of the Rural Development service. We believe that an additional underlying reason was to maintain organizational homogeneity in classification and to provide qualifying experience for employees in the [Name] Unit who wish to apply for higher graded positions in the Rural Development [Name] Center.

The reasons cited above for assigning a position to one occupational series as opposed to another are justified, but only under certain circumstances. The duties must not be clearly identified with one occupational series to the exclusion of all others. When a position is clearly classifiable to one occupational series, it cannot be classified to another series to meet goals or expectations not related to proper classification. According to OPM's The Classifier's Handbook, a position should be classified to the occupation which best represents the main purpose for the existence of the position. It should be classified to the occupation that represents the paramount knowledge, or the most important type of subject matter knowledge or experience required to do the work. Positions are often classified to the occupation that best represents the reason for the existence of the organization within which the positions are found.

The appellant spends a considerable amount of her time in searching for the correct addresses of borrowers, and these efforts are often intensive and time-consuming. In order to acquire the correct address, the appellant must understand and utilize a proprietary computer system, task other offices, and sometimes task Rural Development field offices near the property for the borrower's address. This work requires knowledge of the missions, functions and operations of the offices (and personnel) which make up Rural Development. However, the reason for the establishment of the [Name] Unit or of the appellant's position was not to track down and correct the addresses of borrowers. The mission of the [Name] Unit, as stated in the mission statement, is to process mail. Regardless of the tools utilized to accomplish this goal, processing mail is the reason for the existence of the organization. Prior to the recent re-naming of the organization, it was called [Name]. We conclude from our position audit that the primary knowledges required of the position are those concerned with the processing of incoming and outgoing mail. The primary reason for the existence of the position is to accurately process mail.

The Classifier's Handbook also states that a valid consideration for classifying a position into a particular occupation is if the occupation represents the normal line of progression for the position

and/or similar positions in the organization. This would seem to apply to the [Name] Center where the majority of technician positions are classified to GS-1101. However, virtually all other positions in the [Name] Center are graded higher than the appellant's position. While the knowledges specific to the mail work performed by the appellant do not necessarily qualify an incumbent for one of these positions, the knowledges gained of the [Name] Center and its missions, functions and organizations while performing the mail duties are certainly qualifying experience as is the knowledge of the FasTeller and other systems utilized in both mail processing and functional technical work.

We conclude that the Mail and File Series, GS-305 is the most appropriate occupational series for the appellant's position. The GS-305 series "covers positions involving the ... performance of clerical work related to the processing of incoming or outgoing mail ... *and the performance of related work* [OPM emphasis added] when such duties require the application of established mail ... methods and procedures, knowledge of prescribed systems for governing the flow and control of communications, ... and knowledges of the organization and functions of the operating unit or units served." Processing the mail is the reason for the existence of the positions and the research required to find borrowers' addresses is incidental to the mail mission and operations.

Grade and Title Determination

The GS-305 Mail and File Clerk standard directs classifiers to the General Schedule Leader Grade Evaluation Guide for any positions which involve performance of mail duties and, in addition (as a regular and recurring part of the assignment) leading three or more employees in the performance of mail duties. The appellant is currently the team leader for 10 employees. In this capacity she assists them in resolving more complex or unusual tasks, provides on-the-job training as necessary, and generates a variety of reports on the workflow of the unit. She also works alongside the other processors, performing similar duties and assisting them in fulfilling the mission of the [Name] Unit.

We applied the OPM General Schedule Leader Grade Evaluation Guide because the incumbent has the responsibility to lead a group of Mail and File Clerks. This standard is used to classify positions of general schedule leaders who, as a regular and recurring part of their assignment, lead three or more employees in accomplishing work in clerical or other one-grade interval occupations in the General Schedule. Leaders also perform nonsupervisory work that is usually of the same kind and level as that done by the group led.

Part I of the General Schedule Leader Grade Evaluation Guide, which deals with the classification of one-grade interval general schedule work leader positions, states that leader positions are classified one GS grade above the highest level of nonsupervisory work led. The highest level of nonsupervisory work being done at the [Name] Unit, according to a recent OPM decision, is Mail Clerk, GS-305-4. In addition, we have determined that the non-leader work performed by the appellant is not of substantially greater complexity to warrant a higher grade level. Accordingly, the appellant's position is correctly classified at the GS-5 level that is one grade above the highest level of nonsupervisory work led.

Decision

Positions covered by the General Schedule Leader Grade Evaluation Guide are identified by prefixing the word "Lead" to the title of the position in which leader is qualified and which reflects the nonsupervisory work being performed.

The proper classification of the appellant's position is Lead Mail Clerk, GS-305-5.