

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

Washington Oversight Division
1900 E Street, N.W.
Washington, DC 20415

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

Appellant: [names]

Agency classification: Auditor
GS-511-12

Organization: [branch]
[division]
[department]
Pension Benefit Guaranty Corporation
Washington, D.C.

OPM decision: Auditor
GS-511-11

OPM decision number: C-0511-11-02

Linda Kazinetz
Classification Appeals Officer

January 3, 2001

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a classification 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 the conditions and time limits specified in title 5, Code of Federal Regulations, sections 511.605, 511.613, and 511.614, as cited in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Since this decision changes the grade of the appealed position, it is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The 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.

The personnel office must also determine if the appellants are entitled to grade or pay retention, or both, under 5 U.S.C. 5362 and 5363 and 5 CFR 536. If the appellants are entitled to grade retention, the two-year retention period begins on the date this decision is implemented.

Decision sent to:

[appellant]

[servicing personnel officer]

Introduction

On August 4, 2000, the Washington Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellants], whose position is classified as Auditor, GS-511-12, in the [branch], [division], [department], at the Pension Benefit Guaranty Corporation (PBGC) in Washington, D.C. The appellants requested that their position be classified as GS-1801-13. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code.

An on-site position audit was conducted by a Washington Oversight Division representative on November 14, 2000, including an interview with [appellant's] first-line supervisor, [name], and subsequent telephone interviews with [appellant's] team leader, [name], and with the branch chief, [name]. This appeal was decided by considering the audit findings and all information of record furnished by the appellants and their agency, including their official position description, [number], classified by the servicing personnel office as Auditor, GS-511-12, on December 3, 1996.

General Issues

The appellants compare their position to GS-13 positions within their branch. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellants' position to others as a basis for deciding the appeal.

Position Information

The appellants audit standard pension plan terminations to determine if the benefits paid to the plan participants were correct in accordance with the Employee Retirement Income Security Act (ERISA). This involves reviewing the company's pension plan, financial records, and other material; auditing a sample of participants' benefit payouts; and preparing reports detailing the errors identified. The appellants reported that this work consumes approximately 75 percent of their time. Other duties performed on a regular basis include auditing multi-employer plans for companies who are requesting financial assistance from the Government to meet their pension obligations, and conducting compliance reviews in response to complaints by individuals regarding the disposition of their pension benefits.

The appellants' position description also includes responsibility for reviewing 4071 penalty cases to verify the accuracy of the penalty calculation. However, the appellants reported that they rarely, if ever, do these reviews due to changes in the governing regulations.

Series Determination

The appellants requested that their position be classified to the General Inspection, Investigation, and Compliance Series, GS-1801, which covers positions involving the performance of inspection, investigative, analytical, or advisory work to assure understanding of and compliance with Federal laws, regulations, or other mandatory guidelines. They based this request on their assertion that the primary function of their

position is to assure compliance with ERISA as it pertains to standard pension terminations. They also claim that less than 10 percent of their work requires accounting skills, and that the majority of their time is spent doing benefit calculations, which they contend is an actuarial function.

The GS-1801 series is a nonprofessional series, i.e., it does not have a positive education requirement. In contrast, the appellants' position description states that their position requires professional accounting knowledge and skills. We found that certain aspects of their work do require professional accounting competencies. These include audits of multi-employer plans and the reconciliation aspects of standard termination audits where they determine if plan assets were sufficient to discharge all obligations of the plan. Although this work constitutes less than 25 percent of the appellants' time, the professional qualification requirement precludes allocation to the GS-1801 series.

We also found that performing benefit calculations as a separate and distinct activity does not require professional accounting competencies. Evidence for this is found by examining the classification standard for the Federal Retirement Benefits Series, GS-270. That series includes positions responsible for analyzing, adjudicating, adjusting, and reconsidering retirement, disability, and survivor benefits applications and claims, and auditing annuitant and survivor rolls and taking actions to prevent fraudulent payments. Positions in this series require knowledge of Federal civil service retirement laws, regulations, and systems to determine entitlements, adjudicate claims, solve benefits problems, and oversee the annuity rolls, but they do not require professional accounting skills. The appellants are concerned with pension plans in the private rather than the Federal sector, but their duties are analogous in that they determine benefit eligibility and entitlements by reviewing the provisions of the individual plans and calculating participants' benefits using the formulas stipulated in the plans. Accounting skills may facilitate performance of this work, but are not actually required.

This work does not constitute actuarial work. The Actuary Series, GS-1510, covers positions which involve the application of professional knowledge and experience in actuarial science (including mathematics, statistics, and business, financial, and economic principles). Actuaries perform such work as calculating and compiling mortality tables, retirement and withdrawal rates, and survivorship values; developing formulas to obtain rates and values for insurance plans and annuities; and preparing estimates of the future size and composition of a population eligible for an insurance benefit. The appellants' work does not require professional-level competence in mathematics, nor does it involve the performance of actuarial work. The appellants *use* actuarial products, such as mortality tables, in calculating pension benefits, but they do not develop those products.

The accounting-related work performed by the appellants is typical of the Auditing Series, GS-511. This series covers work involving the systematic examination and appraisal of financial records reflecting the financial condition and operating results of an activity, when the work requires the application of professional accounting knowledges, standards, and principles. Although these duties comprise a small percentage of the overall work of the position and do not represent the primary purpose of the position, they impose a specific qualification requirement which serves as a basis for recruitment. Therefore, the

professional qualifications for the GS-511 series take precedence over the benefit calculation duties, which represent the primary purpose of the work and the preponderance of time spent.

Title Determination

The authorized title for nonsupervisory positions in this series is Auditor.

Grade Determination

Evaluation using the GS-511 standard

The appellants' auditing duties that require professional accounting skills were evaluated by application of the criteria contained in the standard for the Auditing Series, GS-511. This standard is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade conversion table provided in the standard. The factor point values 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 selected factor level description. If the position fails in any significant aspect to meet a particular factor level description, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of information an employee must understand in order to do the work, and the skills needed to apply that knowledge.

At Level 1-7, work requires professional knowledge of accounting and auditing to independently plan and conduct evaluations of agency operational programs, or industrial operations and their related accounting systems. The governing regulations, laws, and practices allow considerable latitude in the way the programs, processes, operations, and control systems are designed and implemented, thus requiring considerable skill in planning and developing the audit and interpreting the findings. Considerable analysis or a wide range of audit techniques such as interviews, computer assisted audit techniques, statistical analysis, and questionnaires are required to structure data or surface significant findings. A team effort is often required to complete assignments in a reasonable time frame. The standard provides the following illustrations of Level 1-7 work:

- Auditing the operations and accounts of contractors to determine the basis for cost setting under a variety of contracts.

- Auditing a contract with a university including a study of operations to determine an overhead rate by considering a number of judgmental factors, such as library use, faculty workloads, depreciation of laboratory equipment, and other factors that are difficult to quantify.

The knowledge required by the appellants' position matches Level 1-7. The position requires professional accounting knowledge to audit companies' financial records. There is considerable variation in both the accounting and recordkeeping systems of the companies and their pension plans. However, this is specifically provided for at Level 1-7 in its reference to "considerable latitude in the way programs, processes, operations, and control systems are designed and implemented." The work, which requires auditing companies' accounts to determine assets available for benefit payouts, is comparable to the illustrations cited above that involve auditing contractors' accounts to determine the basis for certain costs or rates.

The position does not meet Level 1-8. At that level, work requires professional knowledge of accounting and auditing and skill in applying this knowledge to *very broad assignments*. Typically, the auditor is a *recognized expert in developing* and applying auditing techniques and methodology or is skilled in planning and executing audits of *nationwide* programs or diversified activities that use a number of different accounting and control systems. The evaluations require an *integrated analysis* of a number of different programs and accounting systems. The auditor must apply audit theory in *developing new approaches* for the study of programs where there has been little experience in interpreting the data or success in surfacing meaningful findings. The governing regulations and laws are highly interpretive and require the application of audit theory to the solution of *controversial* problems. The standard provides the following illustrations of Level 1-8 work:

- Serving as technical expert in a major area of an agency's audit program, such as responsibility for interpreting Cost Accounting Standards where such interpretations are then uniformly applied throughout the organization.

- Planning and coordinating an audit of phases of a satellite navigation system by choosing and developing the areas of coverage, writing schedules and instructions for use by others located in a number of installations, and consolidating reports and presenting findings.

- Developing and revising audit standards and instructions covering broad audit areas, such as procurement, supply, ADP, logistics support, and operational programs for the use of audit offices, and furnishing advice on audit approach and areas of emphasis.

- Developing performance specifications and standards for auditing programs and activities throughout an agency, covering such factors as staff days required, proper use of audit techniques, reasonableness of conclusions, tone, readability, and direction, scope, and depth of factfinding.

The appellants' assignments are not as broad as expected at this level, nor does their role in the organization require or permit them to act as experts in the development and application of audit techniques. This level contemplates two different types of work assignments. The first type is those assignments that involve staff-level policy or program development work, i.e., developing uniform auditing standards and procedures to be applied throughout an agency (hence the reference to being a recognized expert in developing auditing methodology). The appellants do not occupy a staff-type position and are not responsible for developing auditing standards or procedures to be followed by other auditors. The second type is operational assignments that involve auditing nationwide programs or diversified activities where the analyses must be integrated and new audit approaches must be applied because of the unprecedented or controversial nature of the situations encountered. The appellants do not audit nationwide programs. Although multi-employer plans involve auditing the accounting systems of several different companies, this does not represent an integrated analysis in the sense intended by the standard, i.e., it does not involve coordinating and consolidating reports prepared by others for various phases of the review, as is depicted in the illustration above for auditing a satellite navigation system. Further, there is no indication that the appellants have to apply audit theory in developing new approaches for these audits. The audit procedures are fairly standardized in terms of the documents to be reviewed, the data to be analyzed, and the issues to be considered. They are not comparable to, for example, performing an operational audit of a large program where the auditor would have to determine what areas of the program should be reviewed and what data should be collected to provide the most relevant and meaningful assessment of the overall operation. These are routine audits of medium-sized companies and do not involve controversial problems that would require the degree of expertise and organizational recognition expected at Level 1-8. The interpretation of new laws and regulations as they apply to the work carried out by PBGC is assigned to other components of the agency.

Level 1-7 is credited.

1250 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 2-4, the supervisor makes audit assignments outlining the overall objectives and the resources available. The auditor and the supervisor discuss reasonable time frames, audit stages, and possible approaches. The employee is fully responsible for planning and carrying out the work; directing other auditors; resolving most of the conflicts that arise; coordinating the work with others; developing changes to the audit plan and methodology; and interpreting policy. The employee keeps the supervisor informed of progress and potential controversies, such as possible fraud or impact on other audit efforts or agency program areas. Completed work is reviewed for soundness of overall approach, effectiveness in meeting requirements or expected results, and feasibility of recommendations.

The level of responsibility under which the appellants work is comparable to Level 2-4. The appellants are given audit assignments with general instructions as to the work to be done. From that point onward, they carry out the work independently, obtaining needed information from the appropriate sources, resolving most of the problems that arise, and keeping the supervisor informed of progress or unusual situations encountered. The supervisor reviews completed audit reports for adequacy of the review and technical soundness of the conclusions.

The position does not meet Level 2-5. At that level, the supervisor provides *administrative* direction in terms of *broadly defined missions* or functions of the agency. The employee defines objectives and coordinates the audits, assignments, or projects to be completed. Audit reports or other work products are considered to be *technically authoritative* and are normally accepted without significant changes. Review of the work covers such matters as fulfillment of audit program objectives and effect of advice and influence on the overall audit program. Recommendations for new projects and alterations of objectives are usually evaluated for such considerations as availability of funds and other resources or priorities.

This level covers positions with some degree of program management authority to define overall objectives, devise projects, and coordinate the work of others, where the work is subject to administrative review (i.e., budgetary controls and policy considerations) by a higher-level management official rather than technical review by a higher-graded auditor. The appellants have no program management responsibilities, are not technically or programmatically responsible for work performed by other auditors, and work under the technical control of a supervisory auditor or team leader. As such, this level does not apply to their position.

Level 2-4 is credited.

450 points

Factor 3, Guidelines

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

At Level 3-3, guidelines are not completely applicable or have gaps in specificity. Guidelines include audit plans for commonly performed audits (often completed on a schedule) which provide a preferred approach, or accounting standards that describe the generally accepted requirements for recording and reporting transactions rather than the specific accounting system in use. Audit methods and techniques normally applied are inadequate in some respects and require adaptation to the peculiarities of the assignment.

The guidelines used by the appellants match Level 3-3. The methodology followed by the appellants in conducting audits is basically standardized. However, because the recordkeeping and accounting systems used by the audited companies vary, the appellants must adapt their methods and the sequence of audit processes to fit the circumstances of the particular case.

The position does not meet Level 3-4. At that level, audit policies concerning an individual assignment are stated in terms of goals to be accomplished rather than outlining the approach to be taken. Available guidelines are stated in general terms, for example, agency regulations that prescribe only the purpose for which the subject program and its accounting systems have been set up. Usually the assignments are not preceded by previous similar efforts. At this level, some auditors develop *new methods or criteria*, such as supplementary or explanatory guidance from headquarters for field offices. Others research trends and patterns to develop *new methods and techniques* for acquiring or analyzing data.

The appellants' work is guided by a procedural manual that outlines general processing steps for conducting audits. Although the appellants may have to deviate from these procedures to investigate issues that arise during the course of the audit, this is more consistent with the adaptations to guidelines described at Level 3-3. The audits conducted by the appellants do not vary significantly as they have the same purpose and thus involve reviewing the same aspects of a company's financial operations. In this sense, the work is well-precedented in that the audit approaches and methodologies have become established over time. Further, since the appellants perform operating-level rather than staff work, they are not responsible for developing new methods or guidelines for use by other auditors.

Level 3-3 is credited.

275 points

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of the tasks or processes 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 4-4, the work requires auditing programs, operations, accounting systems, and activities covering many different and unrelated processes and functions. There are numerous unknown factors to be identified and analyzed, and new situations and conditions are continuously encountered. The employee performs analyses such as evaluating the current status of accounting or reporting systems or operating programs; evaluating the rationale for determining costs; determining the nature and extent of liabilities or deficiencies; or evaluating the methodology used in reevaluating assets. The employee must assess a variety of conditions such as incomplete records, unreliable data, resistance of participants to findings, and variability in the way programs and systems are set up and operated.

The complexity of the appellants' work is comparable to Level 4-4. Their work involves auditing companies with widely varying operations, accounting systems, and pension plans to determine their assets and liabilities. The pension plan records may be incomplete or not readily available, particularly in those cases where plans were consolidated in connection with company mergers.

The position does not meet Level 4-5. At that level, the work is characterized by either (a) intensive efforts in audit planning, coordination, or problem definition or (b) intensive efforts in problem solving or analysis

for an area of accounting or auditing where the employee functions as a designated authority. When functioning as an audit coordinator, the employee *develops audit plans* for the comprehensive analyses of a great variety of functions and operations and *coordinates the activities of a number of audit teams*. When functioning as a designated authority in a speciality area (e.g., contract auditing), the employee addresses problems that have been referred by other auditors or otherwise serves in an *advisory capacity*. In either case, the programs and systems under audit are *broad in scope, complex, and interrelated*. The work is complicated by the extreme diversity of functional programs and operations and their related accounting and control systems, the conflicting requirements inherent in issues such as balancing cost against requirements when addressing major agency programs having numerous goals or end products, or the need to establish criteria when advising other auditors on the application of accounting principles and practices.

The appellants are neither audit coordinators nor designated authorities for a particular auditing specialty area. Further, although their work by its nature involves auditing diverse operations and systems, the audited companies are not comparable in size and complexity to those envisioned at this level (i.e., major agency programs with numerous and interrelated systems and operations). Thus, diversity of operations is not in itself sufficient to meet this level without the attendant functional responsibilities described, and is fully covered as an evaluative element under Level 4-4 as discussed above.

Level 4-4 is credited.

225 points

Factor 5, Scope and Effect

This factor covers the relationship between the nature of the work, and the effect of the work products or services both within and outside the organization.

At Level 5-3, the purpose of the work is to conduct a variety of audit processes using standard audit procedures. The audits measure the degree of program and financial management compliance with regulations and adherence to accepted accounting principles and management practices. The work affects the way systems and programs operate by providing the information necessary for corrective actions.

The scope and effect of the appellants' work are analogous to Level 5-3. The purpose of their work is to conduct individual audits of companies in connection with standard pension plan terminations to establish the level of assets available and pension benefit obligations outstanding. The methodology used in conducting this work consists of standard audit procedures. The work affects the distribution of pension plan assets by or on behalf of individual companies by providing the information needed to establish the level of pension benefits owed to participants.

At Level 5-4, the purpose of the work is to *develop audit approaches* to evaluate a variety of programs and accounting systems. Audit approaches vary widely because of the variability of subject programs and systems due to differences in organization or mission, technological advances, or changes in regulations. Audit reports provide information on program operations and identify causes of deficiencies or problems.

The work affects *the way financial management accounting systems and programs are structured and operated* throughout the regulated industries or other organizations with which the agency conducts business or provides services.

The appellants do not develop audit approaches but rather apply standard audit techniques to individual cases. Although the accounting systems and pension plans audited vary, the actual audit methodology does not. Further, the work does not have a broad impact in the sense of, for example, setting standards or requirements for how the audited companies' accounting records are kept, given that the audits are conducted after the pension plans have been terminated and often after the companies have dissolved.

Level 5-3 is credited.

150 points

Factor 6, Personal Contacts

This factor includes face-to-face and telephone contacts with persons not in the supervisory chain. The relationship between Factors 6 and 7 presumes that the same contacts will be evaluated under both factors.

At Level 6-3, contacts include officials, managers, professionals, and employees and executives of other agencies and outside organizations, such as representatives of contractors and lawyers and accountants of business firms. This matches the types of contacts the appellants have outside the agency.

The position does not meet Level 6-4. At that level, contacts are with high ranking officials from outside the agency at *national or international levels*, such as members of Congress, presidents of large national or international firms, presidents of national unions, or mayors of large cities. The appellants have no contacts of this nature. The cases assigned to the appellants normally involve medium-sized companies with typically no more than a few hundred employees, falling far short of the large national or international firms referenced at this level.

Level 6-3 is credited.

60 points

Factor 7, Purpose of Contacts

This factor covers the purpose of personal contacts ranging from factual exchange of information to situations involving significant or controversial issues and differing viewpoints and objectives.

At Level 7-2, the purpose of the contacts is to plan, coordinate, or conduct audit assignments, such as interviewing others to obtain information or resolve problems. This basically expresses the nature of the appellants' contacts, wherein they may contact pension plan administrators or other officials to obtain or clarify accounting data or other technical information.

The position does not meet Level 7-3. At that level, the purpose of the contacts is to influence or persuade representatives of the organization audited to accept critical or controversial findings and recommendations. The appellants prepare audit reports of their findings, but most of their communications with company officials are by letter. Noncompliance cases are referred to other agency components for resolution.

Level 7-2 is credited. 50 points

Factor 8, Physical Demands

This factor covers the requirements and physical demands placed on the employee by the work situation.

The position matches Level 8-1, which covers sedentary work.

Level 8-1 is credited. 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.

The position matches Level 9-1, which describes a typical office environment.

Level 9-1 is credited. 5 points

Summary

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-7	1250
Supervisory Controls	2-4	450
Guidelines	3-3	275
Complexity	4-4	225
Scope and Effect	5-3	150
Personal Contacts	6-3	60
Purpose of Contacts	7-2	50
Physical Demands	8-1	5
Work Environment	9-1	<u>5</u>
Total		2470

The total of 2470 points falls within the GS-11 range (2355-2750) on the grade conversion table provided in the standard.

Evaluation using the GS-270 standard

The appellants' duties involving the calculation of pension benefits were evaluated by application of the criteria contained in the Federal Retirement Benefits Series, GS-270. Since this standard is designed to cover broader work assignments than performed by the appellants, the criteria applicable to their duties were extracted from the overall factor level definitions.

Factor 1, Knowledge Required by the Position

The knowledge required by the appellants' position matches Level 1-7. At that level, work requires comprehensive knowledge of retirement benefit programs to perform the complete spectrum of functions within an assigned area without limitation as to type of case and degree of difficulty. This knowledge is used to resolve cases that require advanced expertise to resolve their adjudication peculiarities. This level fully provides for the types of difficult benefit calculations that may be encountered by the appellants and is the highest level described for operating-level assignments.

The position does not meet Level 1-8. At that level, work requires expert knowledge of retirement programs to develop new program policy, comprehensive guidelines, or major new systems, or to extend and refine new approaches to deal with large categories of participants as a result of new legislation or major court decisions. This level describes staff-type assignments involving policy or program development work that is not representative of the appellants' role in the organization.

Level 1-7 is credited.

1250 points

Factor 2, Supervisory Controls

The appellants' level of responsibility matches Level 2-4 (the highest level described under this factor.) This factor level definition is almost identical to the corresponding definition in the GS-511 standard and thus requires no further discussion. Level 2-5 is not described in this standard.

Level 2-4 is credited.

450 points

Factor 3, Guidelines

The guidelines used by the appellants match Level 3-3. At that level, guidelines include laws, regulations, organizational policy, and procedural manuals, but the employee may need to refer to technical manuals, precedent cases, or court or other legal decisions. The employee often encounters cases and situations for which guidelines or precedents are unclear or not completely appropriate. This level covers those aspects of the appellants' duties involving difficult benefit calculations where they must research and apply superseded or infrequently used legal or regulatory provisions.

The position does not meet Level 3-4. At that level, guidelines include laws, regulations, and policies that are broadly stated or contradictory and procedures that, when they exist, are incomplete or of limited use. These guidelines are often inadequate for dealing with highly contested cases or those involving new areas of coverage. The employee must extend or modify guidelines to perform such work as developing the agency's position on appealed cases; devising new or revised methods and criteria; or formulating more specific guidelines for use by others. The appellants do not have the types of responsibilities that would require them to develop guidelines or criteria for use by others, or to interpret and extend guidelines as the basis for appealed or contested cases. They prepare initial reports of findings and responses to reconsideration requests, but these are not "appealed" cases where an agency position must be developed and presented in formal legal proceedings.

Level 3-3 is credited.

275 points

Factor 4, Complexity

The complexity of the appellants' work matches Level 4-4. At that level, cases involve issues and governing provisions that are unclear, unusual combinations of circumstances, or other special entitlement matters. Features complicating the work may include the need to apply numerous statutory provisions affecting benefits or establishing special conditions for retirement; to develop information for cases that involve disputed facts; to reconstruct records that were lost or claimed to exist; or to resolve situations not specifically covered by regulations. The mix of work often includes cases for which data are conflicting, incomplete, or old, requiring extensive reconstruction of case histories. The employee must sort out convoluted factual situations, apply a tangle of governing provisions, some of which may be subject to varying interpretations, and resolve discrepancies concerning the propriety of the payment or benefits. This level fully covers the difficulties encountered in the appellants' benefit calculation work.

The position does not meet Level 4-5. At that level, work consists of addressing unusual, sensitive, and far-reaching problems, such as developing and arguing final technical case decisions in appellate proceedings; analyzing and determining the impact of court cases or new legislation that potentially affect thousands of annuitants; developing regulations and associated interpretive material to implement new legislation; or recommending changes in the organization's policies and practices. This level addresses exclusively staff-level work and thus does not apply to the appellants' position.

Level 4-4 is credited.

225 points

Factor 5, Scope and Effect

The scope and effect of the appellants' work match Level 5-3. At that level, the purpose of the work is to analyze, evaluate, and adjudicate a variety of cases using established methods and procedures. The work products affect the economic well-being of annuitants or the design or operation of systems within a program area. The appellants calculate the benefits of individual pension plan participants in accordance

with the formulas stipulated in the plans. The work thus affects the pension benefits received by the participants and the manner in which these benefits are calculated for the overall participants in a given plan.

The position does not meet Level 5-4. At that level, the purpose of the work is to resolve cases that require unusual procedures, such as applying new or obscure laws or legal decisions, or to make determinations that may change or modify prior decisions of other components of the organization. The work may affect a class of beneficiaries and the operations of other agencies; result in new regulations, methods, or operating procedures; form the basis for significantly modifying systems; or otherwise contribute to the improvement of productivity, effectiveness, and efficiency of program operations. The appellants' work does not have this degree of impact as their determinations relate only to the specific cases or plans under audit review.

Level 5-3 is credited.

150 points

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

Under *People Contacted*, the appellants' position matches Level 3 (the highest level described under this factor), where contacts are with outside parties such as attorneys, bank officials, health benefit carriers, or union representatives. Under *Purpose*, the position matches Level b, where the purpose of contacts is to resolve case-related or other matters by clarifying issues, obtaining additional information, and resolving technical issues. Level c is not met, where the purpose is to investigate and resolve difficult and controversial issues such as representing the agency before administrative judges. Most of the appellants' external contacts are through written communication. They do not have the types of contentious face-to-face contacts expected at this level.

Level 3b is credited.

110 points

Factor 8, Physical Demands, and *Factor 9, Work Environment*, are identical to those described in the GS-511 standard.

Summary

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-7	1250
Supervisory Controls	2-4	450
Guidelines	3-3	275
Complexity	4-4	225
Scope and Effect	5-3	150

Personal Contacts/ Purpose of Contacts	3b	110
Physical Demands	8-1	5
Work Environment	9-1	<u>5</u>
Total		2470

The total of 2470 points falls within the GS-11 point range (2355-2750) on the grade conversion table provided in the standard.

Both the appellants' professional auditing duties and their benefit calculation work are graded at the GS-11 level.

Decision

The appealed position is properly classified as Auditor, GS-511-11.