

**U.S. Office of Personnel Management
Division for Human Capital Leadership & Merit System Accountability
Classification Appeals Program**

Center for Merit System Compliance
1900 E Street, NW., Room 7675
Washington, DC 20415-6000

**Classification Appeal Decision
Under section 5112 of title 5, United States Code**

Appellant: [name]

Agency classification: Customer Service Data Entry Clerk
GS-303-5

Organization: [branch]
[group]
[program]
[center]
[division]
Office of Personnel Management
[city and State]

OPM decision: GS-303-3
(Title at agency discretion with *Office Automation* parenthetical title)

OPM decision number: C-0303-03-03

/s/ Linda Kazinetz
Linda J. Kazinetz
Classification Appeals Officer

September 15, 2003
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 involves a change in the classification of the appealed position, it is to be effective no earlier than the date of the certificate and not later than the beginning of the sixth pay period following the date of the certificate as permitted by 5 CFR 511.702. The applicable provisions of parts 351, 536, and 752 of title 5, Code of Federal Regulations, must be followed in implementing the decision. The servicing human resources 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]

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Introduction

On March 20, 2003, the Center for Merit System Compliance (formerly the Merit System Compliance Group) of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who is employed as a Customer Service Data Entry Clerk, GS-303-5, in the [branch] of the [group], [program], [center], under the [division], OPM, in [city and State]. The appellant requested that her position be classified as Contact Representative (Customer Service Specialist), GS-962-7. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code.

A desk audit was conducted by an appeals representative on June 10, 2003, including an interview with the appellant's supervisor, [name]. This appeal was decided by considering the audit findings, information furnished by the appellant, her official position description [number], and other material in the agency administrative report received on May 1, 2003.

Position Information

The appellant responds to telephone calls, correspondence, and reports of contacts from annuitants and their family members that relate to change of address, name, or tax withholding, initiation or transfer of direct deposit, missing checks, and annuitant deaths. She inputs basic information thus received into an automated system, which either effects the change (e.g., changes in name, address, direct deposit, and withholding), or transmits the information elsewhere for action by others (e.g., annuitant deaths are reported to Boyers; lost checks are reported to the Treasury Department for tracing and reissuance; returned checks are referred to a specialist for reauthorization). The appellant redirects other calls within OPM. She also performs a relatively minor amount of data entry to process transactions received from other offices.

The appellant's position description was found to be basically accurate. The appellant had contested its accuracy and submitted a listing of additional duties, which were found to represent a more detailed description of the duties already addressed in the position description.

Series Determination

The appellant's position is properly assigned to the Miscellaneous Clerk and Assistant Series, GS-303, which includes positions involved in performing clerical, assistant, or technician work for which no other series is appropriate. Clerical work in this series involves the processing or maintenance of records or documents representing the transactions of the organization. This generally characterizes the appellant's work, which involves processing changes to annuitants' records.

The appellant's work does not fall within the Contact Representative Series, GS-962. This series includes positions that primarily involve contacts with the public for the purposes of (1) providing information on rights, benefits, privileges, or obligations under a body of law; (2) explaining pertinent legal provisions, regulations, and related administrative practices and their application to specific cases; *and* (3) assisting individuals in developing needed evidence and

preparing required documents, or in resolving errors, delays, or other problems in obtaining benefits. Work in this series involves explaining to individuals how to obtain benefits, the forms and documents needed, the basis for agency determinations in individual cases, and the administrative and legal recourses available in the case of denial. This series specifically excludes such work as information receptionist duties, where employees provide limited information on whom to call to get answers to benefits questions, and other clerical support work where employees review applications for benefits for completeness and consistency and give information on filing and processing requirements. Contact representatives provide information beyond these procedural matters by advising individuals on the merits of their cases and on the decisions that are likely to be made regarding their applications for benefits.

Although one of the primary duties of the appellant's position is to answer the telephone, she personally handles only those calls relating to a few types of changes in annuitants' records. She provides only limited information in response to these recurring inquiries, e.g., explaining direct deposit options, procedures for reissuing lost checks, and normal processing times. All other calls outside these prescribed areas are redirected to the responsible offices within OPM. The appellant is not expected or authorized to independently provide more detailed or complex information on regulatory provisions or to advise callers on any substantive aspects of their particular cases, nor is she authorized to effect any actions beyond the limited, defined records changes described above.

Title Determination

Since there are no titles prescribed for the GS-303 series, the position may be titled at the agency's discretion, with the parenthetical title *Office Automation*.

Grade Determination

There are no published grade-level criteria for the GS-303 series. The standard instructs that positions classified to this series be evaluated by applying the General Grade-Evaluation Guide for Nonsupervisory Clerical Positions. This guide was superseded by the Grade Level Guide for Clerical and Assistance Work, which is used as a source of grade level guidance for work that is not covered by more specific grade level criteria in other guides or standards.

Evaluation Using the Grade Level Guide for Clerical and Assistance Work

This guide is written in a narrative format, with grade level criteria expressed in terms of two evaluation factors, *Nature of assignment* (which includes the elements of knowledge requirements and work complexity), and *Level of responsibility* (which includes the elements of supervisory controls, guidelines, and contacts.)

Nature of assignment

The appellant's work assignments most closely match the GS-3 level. At that level, work consists of many different prescribed tasks, steps, or operations. Deciding what needs to be done requires the employee to choose from among similar procedures. The work varies primarily in

factual ways, such as in the sources of information or in the kinds of forms, transactions, or entries. The work requires good understanding of the structure of the organization served and enough knowledge of the organization's terminology and work flow to employ the correct set and sequence of tasks, steps, or operations.

A work example described by the guide at this level is that of an office clerk who performs a variety of clerical work in an office providing services to the public. The employee carries out such tasks as taking and delivering telephone messages, answering routine inquiries, recording and filing information on specific cases, and keeping time and attendance records and coordinating their submission to the payroll office.

The appellant's work consists of different tasks involved in processing changes to annuitant records in an automated system. This requires choosing from among similar procedures depending on the specific type of transaction. The work varies in terms of the kinds of entries being made, e.g., an address or name change, death notification, or change in tax withholding. The work requires knowledge of specific processing procedures for making these changes to annuitant records, and general understanding of the functions and structure of the broader retirement organization to direct calls to the appropriate offices. This work parallels the GS-3 example described above, in that the office provides services to the public and the appellant answers the telephone, responds to routine requests, and records specific changes in annuitant records.

The appellant's work assignments do not meet the GS-4 level. At that level, work consists of performing a full range of standard clerical assignments and resolving recurring problems. The work consists of related steps, processes, or methods which require the employee to identify and recognize differences among a variety of recurring situations. Actions to be taken or responses to be made differ in nature and sequence because of differences in the particular characteristics of each case or transaction. In addition to knowledge of how to carry out procedures, the work requires some subject-matter knowledge of an organization's programs and operations or of a body of standardized rules, procedures, or operations in order to determine what is being done, why the action is being taken, and how it must be accomplished.

A work example described by the guide at this level is that of a security clerk who performs a variety of recordkeeping, reporting, and informational duties. The employee compiles, maintains, and updates data, lists, and reports of computer passwords, security violations, and employees and visitors authorized access to the building and/or its computer system. The employee applies knowledge of the organization's security procedures, processes, and rules governing building access, reports of physical security violations, personnel clearances and identification, and computer access authorizations.

The appellant's work does not consist of a "full range of standard clerical assignments" but rather of a few limited and recurring processing transactions. She does not resolve problems but rather refers them to others for resolution or instructions. The actions to be taken in regard to a particular type of transaction do not vary, i.e., there are prescribed and unvarying steps to be followed for each type of record change. The nature of the work is such that there is no requirement to read documents to determine what is being done, why the action is being taken,

and how it must be accomplished. Rather, the appellant responds to clear-cut requests to make certain specific changes to annuitant records. In contrast to the GS-4 example described above, her work is limited to recordkeeping and does not include the associated compilation and reporting duties.

Level of responsibility

The level of responsibility inherent in the appellant's position matches the GS-3 level. At that level, work is assigned in terms of what is to be accomplished and how to accomplish it. The supervisor is available if the daily routine should be disrupted and complications arise. Familiar situations or requests for information are handled independently. Guidelines are normally specific and the requirements for performing the day-to-day work are memorized, but judgment is required in referring some callers to the appropriate personnel or in providing information. Contacts are to assist coworkers and to provide information to callers and users of the services.

The appellant's work is recurring and procedures on how to accomplish it are established. The appellant independently handles those transactions that are within the confines of her assignment. Problems encountered are referred to the supervisor or other staff. The appellant only processes a few types of transactions and each of these involves only a few steps to input the information in the automated system, therefore the procedures can be easily memorized. Some judgment is required in redirecting calls. Contacts are to receive and provide limited information related to the assigned tasks.

The appellant's level of responsibility does not meet the GS-4 level. At that level, the supervisor provides little assistance with recurring assignments, and the employee uses initiative to complete work in accordance with accepted practices. Unusual situations may require the assistance of the supervisor or higher level employee, and the completed work may be reviewed more closely. Procedures for doing the work have been established and a number of specific guidelines are available. The employee uses judgment in locating and selecting the most appropriate guidelines, references, and procedures. The employee has contacts with co-workers and people outside the organization to exchange information and to resolve problems in connection with the immediate assignments.

This degree of supervisory controls is based on the performance of the correspondingly more varied assignments described at this level. The appellant's work is repetitive and, as such, "unusual situations" do not arise. The appellant is not authorized to handle any complicating situations beyond the standard records changes that constitute her assignment. These would be referred to a specialist for resolution. There is limited need to refer to guidelines or references in performing the work. The appellant's contacts with annuitants are for the purpose of receiving limited information relating to changes in their records rather than for advising them of requirements or resolving problems.

Summary

The appellant's position meets but does not exceed the GS-3 level under both evaluation factors above.

Since the grade level criteria in this guide are generalized, the grade was confirmed by applying the Job Family Standard for Assistance Work in the Human Resources Management Group, GS-200, which covers work that is similar to the appellant's in terms of the types of processes she carries out.

Evaluation Using the GS-200 Standard

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.

The knowledge required by the appellant's position matches Level 1-2, where work requires knowledge of basic procedures and operations sufficient to perform routine support tasks; provide routine information; complete forms and applications for benefits; request records from the records center; and use a personal computer, terminal, and office software programs to enter data, complete forms, and correct errors and omissions in documents, files, and records.

Correspondingly, the appellant must understand the basic operations for processing a few simple and recurring transactions in the OPM automated retirement system and to provide routine information related to these transactions.

The position does not meet Level 1-3, where work requires knowledge of a standardized body of procedures and operations sufficient to perform a full range of support assignments; use personal computers to prepare documents with complicated formatting; and use personal computers and software programs to extract, revise, or sort information from files, records, or databases. An example provided in the standard of Level 1-3 assignments in the employee benefits field includes assisting employees seeking general information concerning retirement benefits, disability, and other types of benefits; providing information concerning conditions to be met for reinstatement of insurance, conversion of life insurance, basic features of programs, and options associated with retirement including voluntary retirement, disability retirement, discontinued service, early out, buy-outs, and other reduction-in-force provisions; providing information concerning survivor benefits, voluntary deposits and redeposits, disability benefits, health and life insurance options, public pension offset, windfall elimination, Social Security, Thrift Savings Plan, and other current and emerging provisions; preparing initial retirement annuity estimates;

and assisting employees with the preparation and submission of retirement application or retirement fund redeposits.

The appellant does not perform work comparable to “a full range of support assignments” as that term is intended in the standard, but rather certain limited processing tasks to make a few specific changes to annuitant records, including name and address changes, direct deposit designations, changes in tax withholdings, and death notifications. The information she provides to callers is limited to questions directly related to these tasks, such as explaining normal processing times. Other inquiries are referred to the specialists or to other OPM offices as appropriate. She does not provide any information of comparable range and complexity to that described at Level 1-3, nor does she directly assist applicants in the preparation and submission of any applications or documents. Her use of personal computers is also more limited than described at this level, confined to processing a few recurring transactions. She does not, for example, extract data for reports or make more extensive revisions to the records in the database.

Level 1-2 is credited (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.

The level of responsibility under which the appellant works is comparable to Level 2-2. At that level, the supervisor provides continuing assignments indicating generally what is to be done, deadlines, quantities, and priorities. The employee works independently in carrying out recurring assignments, such as entering data into an automated system, follows limited procedures controlling how the work is to be done, and refers specific problems not covered by standard operating procedures to the supervisor or other designated employees. Recurring assignments are reviewed through quality control procedures.

The appellant receives most of her assignments as part of the normal workflow of the office, e.g., answering the telephone and processing transactions. The nature of the work makes supervisory review impractical except from the standpoint of the overall quality and efficiency of her services.

The position does not meet Level 2-3. At that level, the supervisor makes assignments by outlining and discussing issues and defining objectives, priorities, and deadlines. The employee independently plans the work, resolves problems, carries out the successive steps, recommends alternative actions, and refers new or controversial issues to the supervisor for direction. Work products (such as job vacancy announcements, ranking factors, position descriptions, job evaluation statements, and recommendations for disciplinary action) are reviewed for technical soundness, appropriateness, and conformity to policies and requirements.

This level is based on the performance of more difficult technical assignments comparable to the examples provided above. Work of this nature would require such supervisory input as discussing issues and objectives and reviewing written products, and it would involve employee

responsibility for planning the work and handling problems. The appellant's work, in contrast, consists of a limited number of processes that require virtually no intervention by the supervisor or any planning or problem resolution by the appellant. She produces no written products that would be susceptible to the type of supervisory review addressed at this level.

Level 2-2 is credited (125 points).

Factor 3, Guidelines

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

The guidelines used by the appellant match Level 3-1. At that level, the employee uses detailed and specific guidelines, such as oral and written directives, operating procedures, office policies, equipment operating manuals, style manuals, and other standard references. The employee follows clear-cut steps, such as entering routine data elements into a manual or automated system.

The appellant's assignment is limited to processing a few simple, recurring transactions by entering the data into an automated system using the same basic sequences for each type of transaction. Since there is no variation in procedures, guidelines are brief and specific.

The position does not meet Level 3-2. At that level, the employee uses a number of established procedural guidelines such as work samples, references, and operating manuals, and applies judgment in selecting procedures for application to specific cases.

Because of the limited nature of the appellant's work, there is no need for her to use a variety of procedural guides for different types of tasks. There is virtually no judgment required in carrying out the work since the procedure for handling each discrete task is prescribed and unambiguous, e.g., how to process an address change or death notification.

Level 3-1 is credited (25 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.

The complexity of the appellant's work is comparable to Level 4-2. At that level, work consists of related steps, processes, and standard explanations of methods or programs. The employee makes decisions on appropriate actions from various choices and uses information that is factual in nature. The employee recognizes different processes required to assist customers. For example, the employee provides basic information to employees concerning health benefits, life insurance, and routine retirement actions; explains eligibility requirements, the enrollment process, and basic features of the employee benefits program; and processes simple claims submitted by employees for compensation benefits.

The appellant's work consists of carrying out a few recurring tasks associated with processing routine transactions, and providing basic information directly related to those transactions. She uses information that is factual in nature (i.e., a request from an annuitant to make a specific change in his or her records, such as a change in address or tax withholding), and selects the appropriate processing steps based on the particular kind of transaction.

The position does not meet Level 4-3. At that level, the work consists of different and unrelated steps. The employee analyzes factual data, identifies the scope and nature of problems or issues, and determines the appropriate action from among many alternatives. An example provided in the standard of Level 4-3 complexity describes providing information and assistance to employees regarding program requirements, processing procedures, and issues of various types of retirement programs including voluntary, disability, discontinued service, early out, buy-outs, and other reduction-in-force provisions; explaining survivor benefits, computations, health and life insurance options, public pension offset, windfall elimination, Social Security, Thrift Savings Plan, and other current and emerging provisions; and assisting employees with problems applying for benefits.

The appellant's work has few variations in terms of the steps that she follows in carrying it out. It does not require that she read or analyze documents to identify facts and determine what action is required. Rather, she responds to specific requests to make certain limited changes to annuitant records. She does not independently provide information on retirement benefits beyond the parameters of her processing tasks.

Level 4-2 is credited (75 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.

The scope and effect of the appellant's work match Level 5-2. At that level, work involves technical services and practices and applying specific rules or procedures. The work affects the accuracy of records and other data. For example, the employee processes benefit requests, obtains required information or supporting documentation, and provides basic information concerning employee benefits to employees.

The appellant carries out specific procedures involved in processing transactions in an automated system, and as such her work affects the accuracy of annuitant records.

The position does not meet Level 5-3. At that level, work involves treating a variety of routine problems or questions using established procedures, such as rating employees for promotion. The work has a direct effect on the quality and adequacy of employee records, program operations, and services provided. For example, the employee explains benefit options available to employees based upon analysis of individual cases and processes claims that require identifying and substantiating relevant information.

This level basically describes the performance of limited case work. In contrast, the purpose of the appellant's work is to carry out limited and prescribed processing tasks. Her work keeps annuitant records current, but does not directly affect the quality of the core services and operations carried out in the organization.

Level 5-2 is credited (75 points).

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

These factors include face-to-face and telephone contacts with persons not in the supervisory chain and the purpose of those contacts. The relationship between Factors 6 and 7 presumes that the same contacts will be evaluated under both factors.

The appellant's personal contacts match Level 2 (the highest level described under this factor), where contacts are with employees and managers in the agency and with applicants, retirees, beneficiaries, and/or the general public. The appellant has contacts with co-workers and with annuitants and their family members.

The purpose of the appellant's contacts match Level A, where contacts are for the purposes of acquiring or exchanging facts or information needed to complete assignments. Level B is not met, where contacts are for the purposes of planning and coordinating work or resolving operating problems by persuading others. The appellant's contacts are solely for receiving, recording, and transmitting information rather than for planning and coordinating her work with other staff work or resolving problems.

Level 2A is credited (45 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	1-2	200
Supervisory controls	2-2	125
Guidelines	3-1	25
Complexity	4-2	75
Scope and effect	5-2	75
Personal contacts/ Purpose of contacts	2A	45
Physical demands	8-1	5
Work environment	9-1	<u>5</u>
Total		555

The total of 555 points falls within the GS-3 range (455-650) on the grade conversion table provided in the standard.

Decision

The appealed position is properly classified as GS-303-3, with the title at agency discretion and with the parenthetical title *Office Automation*.