

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

Chicago Human Capital Group
230 South Dearborn Street, Room 3060
Chicago, IL 60604

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

Appellants: [appellant]

Agency classification: Patient Relations Assistant
GS-303-7

Organization: Outpatient Clinic
Veterans Affairs Medical Center
[city and state]

OPM decision: title at agency discretion
GS-303-7

OPM decision number: C-0303-07-08

/s/ William B. Middendorf, Jr.

William B. Middendorf, Jr.
Classification Appeals Officer

July 18, 2003

Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), 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* (PCS's), appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[appellant]
[address]
[city and state]

[human resources officer]
Human Resources Officer
Department of Veterans Affairs
[address]
[city and state]

Deputy Assistant Secretary for
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Introduction

On January 23, 2003, the Chicago Oversight Division, now the Chicago Human Capital Group, of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. We received the agency's administrative report concerning the appeal on January 31, 2003. The appellant's position is currently classified as a Patient Relations Assistant, GS-303-7. The appellant believes the classification of her position should be Program Specialist, GS-301-9. The position is located in the Outpatient Clinic of the Veterans Affairs Medical Center (VAMC), Department of Veterans Affairs, in [city and state]. We have accepted and decided the appeal under section 5112 of title 5, United States Code (U.S.C.).

Background Information

The appellant believes that a different series, title, and higher grade are warranted because the current classification of her position does not accurately reflect the full spectrum of duties and responsibilities performed. The appellant was formally assigned to her current official position description (PD), Number [#####], on November 29, 2002. Both the appellant and her supervisor agree that the PD of record is accurate and complete with respect to the duties and responsibilities of the position.

Management's intent in setting up this position was that the incumbent would coordinate the administrative work of the Radiation Therapy Treatment Program. It was initially established as a GS-303-5 Program Support Clerk in the Social Work Section of Patient Care Services. The recent history of the position indicates that in September 1997, it was upgraded to a GS-303-6 Program Support Assistant. In May 2002, it was reclassified as a GS-187-7 Social Work Associate (when the incumbent was supervised by an MSW social worker), and in November 2002 (when it was supervised by a Nurse Manager) it was reclassified as the present GS-303-7 Patient Relations Assistant.

General Issues

In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of the appellant's position. By law, OPM must classify positions solely by comparing current duties and responsibilities to OPM classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Other factors, such as performance of unassigned duties not in the position description, quality of work, or level of performance, cannot be considered in the process of reaching this decision.

OPM is required by law to classify positions on the basis of their duties, responsibilities, and qualification requirements by comparison to the criteria specified in the appropriate classification standard or guide. While the appellant brings considerable skills to the position, the demands of the work, rather than her personal qualifications, govern the position's classification. Where her skills coincide with the position's requirements, however, they are credited against the classification criteria. Because our decision sets aside all previous agency decisions, the appellant's concerns regarding the agency's classification review process are not germane to this decision.

Position information

The appellant works in a 107-bed two-division tertiary level medical center that provides an array of acute and extended care services (inpatient, outpatient, and consult) to a primarily rural population of enrolled veterans spread throughout central and eastern [state] and adjoining parts of Indiana, Ohio, West Virginia and Tennessee. She coordinates the [city] VA Medical Center's Radiation Therapy Program, and also functions as the case manager for very ill and (usually) elderly cancer patients. She ensures that potential candidates are eligible for the treatment program, determines which of the treatment facilities located throughout the state is most convenient for the patient, makes arrangements for radiation treatments, and educates cancer patients and their families about the procedures and benefits of the program. The appellant spends approximately fifty percent of her time performing program coordination and approximately fifty percent carrying out case management responsibilities.

Her duties and responsibilities include developing communication strategies to raise awareness of the services and advantages provided by the radiation treatment program and to increase outreach among cancer patients. She collaborates with inpatient units, ten outpatient clinics, nine remote cancer treatment facilities, and community organizations (such as the American Cancer Society). The appellant meets regularly with cancer patients and their families and acts as their advocate. She also serves as a liaison between patients and the Medical Center, keeping management informed of patient concerns; preparing written statistical and narrative reports to management, including the Medical Center Director, Chief of Staff, and Associate Director for Patient Care Service; serving as a member of the management team at meetings involving relevant benefits, services, or any issues having an impact on radiation therapy patients; and safeguarding sensitive printed and electronic information.

Using established guidelines, the appellant determines patient eligibility for the radiation therapy program. If the patient is eligible, the appellant uses the physician's treatment plan to assess the patient's specific radiation therapy needs and arrange for the delivery of those requirements. The appellant schedules radiation treatment appointments as required. With the aid of established guidelines, the appellant gives patients and their family members detailed explanations of the radiation therapy procedure and ensures that all of their questions are answered. The appellant regularly interacts with patients and family members who may be emotionally distraught. The appellant tracks patient progress using an automated program. The appellant assists the patients and their families with issues such as arranging for assistance for household chores and transportation requirements.

As coordinator of the Radiation Therapy Program, the appellant works independently, interacting with nurses, physicians, and all levels of in-house staff, outpatient clinics and remote treatment facilities, community and service organizations, and state and local offices.

We conducted a telephone audit with the appellant on April 14, 2003, and a telephone interview with her supervisor, [name], on May 22. The PD of record contains the major duties and responsibilities assigned by management and performed by the appellant. In deciding this appeal, we fully considered the audit and interview findings and all information of record furnished by the appellant and her agency, including her official PD which we incorporate by reference into this decision.

Series, title, and standard determination

The agency has classified the position in the Miscellaneous Clerk and Assistant Series, GS-303, titled it Patient Relations Assistant because it requires assisting the clinic staff, and determined it is properly graded by application of the Grade Level Guide for Clerical and Assistance Work. The appellant has asked that the position's title and series be changed to Program Specialist, GS-301, because she believes that she is performing and establishing operating methods and procedures while providing technical and administrative support to an operating function that provides radiation therapy to eligible veterans. The Miscellaneous Administration and Program Series, GS-301, includes positions that perform administrative two-grade interval work for which no other series is appropriate.

Guidance in the Introduction to the Position Classification Standards and The Classifier's Handbook describes the distinctions between positions properly classified in two-grade interval administrative series and positions classified in one-grade interval support series.

Administrative positions (two-grade interval) are involved in work primarily requiring a high order of analytical ability, typically involving evaluation, modification, and development of the basic programs, policies, and procedures that facilitate the work of Federal agencies and programs. This ability is combined with a comprehensive knowledge of (1) the functions, processes, theories, and principles of management; and (2) the methods used to gather, analyze, and evaluate information. Such work typically involves planning for and developing systems, functions, and services; formulating, developing, recommending, and establishing policies, operating methods, or procedures; and adapting established policy to the unique requirements of a particular program.

In contrast, the appellant typically follows established procedures that require program knowledge and practical experience for implementation, rather than knowledge of management or administrative principles. She does not perform studies of the depth and breadth typically assigned to two-grade interval positions, e.g., broader studies of systems, procedures, program effectiveness, or organizational structure. For example, she determines which treatment facility is most feasible for an individual patient, and ensures that transportation and lodging arrangements are made as necessary. This type of situational analysis does not meet the intent of two-grade interval administrative work. The appellant provides outreach and explanatory services to assist the staff of the Out Patient Clinic at the VA Medical Center in [city and state], in providing radiation therapy to eligible veterans. She also meets with the patient and the patient's family to review information, such as the American Cancer Society pamphlet, "Understanding Radiation Therapy: A Guide to Patients and Families," and answer any questions they may have.

While she provides this information independently, the content of the pamphlet and the non-clinical nature of her work itself obviously limit the scope of the advice she can give. It is important to note that she does not provide the actual radiation therapy herself. Her work does not meet the description of work in the GS-301 or any other two-grade interval series.

The appellant believes that the Guide for the Evaluation of Program Specialist Positions should be applied in classifying her position. However, that guide is for use in the grade-level evaluation of professional and highly technical positions which involve the development, evaluation, or promotion of social welfare, social insurance, and related programs administered by State agencies or other public and nonprofit organizations and institutions. Such positions require a knowledge of the principles, methods, and techniques of one or more behavioral, social, or related sciences, and skill in the consultative process. The appellant's position does not require such professional and highly technical knowledge of the principles of the behavioral or social sciences as described by this guide. Therefore, this guide may not be used to evaluate the appellant's work.

Support positions (one-grade interval) perform work that follows established methods, procedures, and guidelines, and may require a high degree of technical skill, care, and precision. The work can be performed based on a practical knowledge of the purpose, operation, procedures, techniques, and guidelines of the specific program area or functional assignments. Support personnel typically learn to do the work on the job. Similarly, the appellant generally follows established rules, policies, procedures, and practices to resolve a wide range of issues and problems. She applies practical knowledge of the purpose, operation, procedures, techniques and guidelines of the Radiation Therapy Program. Like other assistants, she has learned the work on the job. Consequently, the appellant's position is properly classified in a one-grade interval line of work, rather than the GS-301 series.

In the appellant's position, the practical knowledge does require practical program knowledge in several functional areas, such as conducting training, preparing various reports, promoting cooperation, and planning and scheduling, but no area is predominant. With no single series specifically covering these specialized functions, we find that the appellants' work is properly allocated to the Miscellaneous Clerk and Assistant, GS-303 series. The GS-303 series covers one-grade interval work not classifiable elsewhere. It includes positions like the appellant's where the duties are to perform assistant work requiring knowledge of the procedures and techniques involved in carrying out the work of an organization within the framework of established guidelines. Since OPM has not prescribed titles for positions in the GS-303 series, the title of the position is not an issue that may be appealed to OPM (5 CFR 511.607). Therefore, the agency may develop an official title for the position in accordance with section III.H.2 of the *Introduction to the Position Classification Standards*. If the appellant disagrees with the title of the position, she may attempt to resolve the issue by using the agency's grievance procedures.

Grade determination

The classification standard for the GS-303 series does not include grade-level criteria. The standard instructs that positions in this series be evaluated by reference to other standards for occupations with analogous knowledge and skills. The appellant's medical administrative support work is best evaluated by application of the grading criteria in the Grade Level Guide for Clerical and Assistance Work.

Evaluation using the Grade Level Guide for Clerical and Assistance Work

The Grade Level Guide for Clerical and Assistance Work provides general criteria for use in determining the grade level of non supervisory assistance work from GS-1 through GS-7. Grade levels are determined and defined using two broad factors: *Nature of assignment* (which includes the knowledge required and complexity of the work) and *Level of responsibility* (which includes supervisory controls, guidelines, and contacts). Qualification requirements are not described separately but are reflected as appropriate in both the nature of assignment and level of responsibility.

Nature of assignment

This factor measures the difficulty and complexity of the work performed by the incumbent. It includes the skills and knowledge required to coordinate the Radiation Therapy Program, the personal contacts involved in working with cancer patients and their families, and the judgment to assess patients' reactions and progress.

At the GS-7 level, work consists of specialized duties with continuing responsibility for projects, questions, or problems that arise within an area of a program or functional specialty as defined by management. Work assignments involve a wide variety of problems or situations common to the segment of the program or function for which the employee is responsible. Each assignment typically consists of a series of related actions or decisions prior to final completion. Decisions or recommendations are based on the development and evaluation of information that comes from various sources. The work involves identifying and studying factors or conditions and determining their interrelationships as appropriate to the defined area of work. The incumbent must be concerned about taking or recommending actions that are consistent with the objectives and requirements of the program or functions. The work requires knowledge and skill to recognize the dimensions of the problems involved, collect the necessary information, establish the facts, and take or recommend action based upon application or interpretation of established guidelines. The work also requires practical knowledge, developed through increasingly difficult, on-the-job training or experience dealing with the operations, regulations, principles, and peculiarities of the assigned program, function, or activity.

The appellant's Program Coordinator duties meet but do not exceed the nature of assignments depicted at the GS-7 level. As Program Coordinator, the appellant collaborates with in-house staff, outpatient clinics and cancer treatment facilities around the state of [state], and various community-based organizations. She also attends meetings involving services and benefits that may have an impact on the cancer patients in the radiation therapy program (such as the Cancer Committee and the Thoracic Oncology Multidisciplinary Team), and keeps management informed about issues and concerns of program patients, so that any changes can be incorporated into the strategic planning process as appropriate. The appellant also reviews statistical data files and narrative information to detect trends and help management identify systemic problems. In addition, she prepares periodic written reports to the Medical Center Director, Chief of Staff, and the Associate Director for Patient Care, as appropriate. The appellant has made several process improvements, including making procedures more efficient and eliminating duplication of effort by developing an electronic request for radiation therapy and also an electronic referral process

that allows both Medical Center and University of [state] staff to access a patient's record and view the most current treatment notes.

Case management responsibilities include coordinating the treatment plan outlined by the physician for each cancer patient in the program, explaining the process and educating cancer patients and their families about details of the radiation therapy program prior to initiation and over the course of the typical 6-8 week treatment period, training staff across service lines to ensure continuity of care, holding meetings with patients and families to augment the education process and to gather feedback used to recommend improvements, and providing emotional support and practical assistance (for example, referring a family member to the Community Resource Manual developed by the appellant, or showing a spouse who has never paid bills how to pay them). The appellant's case management duties do not exceed the GS-6 level as described in the guide. As at that level, the appellant deals with a relatively narrow range of case situations that occur in a broad administrative program or function, i.e., radiation therapy is one of many patient treatment programs. As at this level, the appellant's case management work typically involves identifying issues, problems, or conditions and seeking alternative solutions based on evaluation of applicable rules, regulations, and procedures.

Level of Responsibility

This factor covers the nature and availability of the guidelines that control the work; the direction, control, and guidance received from professional staff; the kind and degree of supervision over the work during its performance; and the degree of review of actions, decisions, and authority delegated to the incumbent to modify procedures.

At the GS-7 level, the supervisor makes assignments in terms of objectives, priorities, and deadlines. The employee independently completes assignments in accordance with accepted practices, resolving most conflicts that arise. Completed work is evaluated for appropriateness and conformance to policy. Guidelines for the work are more complex than at the next lower grade because the employee encounters a wider variety of problems and situations which require choosing alternative responses. Guides, such as regulations, policy statements, and precedent cases, tend to be general and descriptive of intent, but do not specifically cover all aspects of the assignments. Guidelines apply less to specific actions and more to the operational characteristics and procedural requirements of the program or function. The employee must use significant judgment and interpretation to apply the guides to specific cases and adapt or improvise procedures to accommodate unusual or one-of-a-kind situations.

The appellant's Program Coordinator duties meet but do not exceed the level of responsibility depicted at the GS-7 level. As Program Coordinator, her work involves communicating policies and procedures, developing outreach strategies to publicize available radiation therapy benefits and services, planning and facilitating meetings with cancer patients and their families, providing them information and educating them about the program, responding to their questions and requests, and serving as a liaison between patients and the Medical Center. The appellant independently plans, organizes and executes the program, and works under the supervision of the Nurse Manager, Outpatient Clinic, who determines the overall objectives. She consults with the supervisor when unusual situations arise that may have substantial potential negative impact or wide-ranging implications, and proposes solutions. The work is reviewed in terms of the

achievement of program objectives and compliance with agency policies. Guidelines are not always available. The appellant must use independent judgment in interpreting, applying and adapting guidelines to changing situations. Contacts are with patient, families, stakeholders, and a variety of managerial, clinical and administrative staff within the medical center and the radiation therapy sites.

The level of responsibility of the appellant's case management duties meets the GS-6 level. Acting as the liaison to the Radiation Therapy staff, the appellant follows standard operating procedures established to meet the needs of patients and their families by. Typical of that level, she uses judgment in interpreting and adapting these guidelines for application to specific cases or problems. As at the GS-6 level, the appellant normally carries out case management responsibilities by contacting others to provide, receive, or develop information to identify problems, needs or issues, and/or to coordinate work efforts or resolve problems.

Summary

Based on the application of the rules for mixed grade positions contained in the *Introduction to the Position Classification Standards*, the appellant's program coordinator work occupies a sufficient portion of the appellant's time to control the classification of her position. Therefore, the appellant's position is properly classified at the GS-7 level.

Decision

The appellant's position is properly classified as GS-303-7 (title at agency discretion).