

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

San Francisco Field Services Group
120 Howard Street, Room 760
San Francisco, CA 94105-0001

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

Appellant: [Name of appellant]

Agency classification: Information Technology Specialist
(Systems Analysis)
GS-2210-11

Organization: [Appellant's organization/location]
Bureau of Land Management
U.S. Department of the Interior

OPM decision: Information Technology Specialist
(Systems Analysis)
GS-2210-11

OPM decision number: C-2210-11-02

Carlos A. Torrico
Classification Appeals Officer

November 10, 2003
Date

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

Decision sent to:

[Name and address of appellant]

[Address of servicing human resources office]

Human Resources Officer
Bureau of Land Management
U.S. Department of the Interior

Director of Personnel
U.S. Department of the Interior
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Introduction

On August 26, 2003, the San Francisco Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [name of appellant]. On September 4, 2003, we received the agency's administrative report concerning the appeal. The appellant's position is currently classified as Information Technology Specialist (Systems Analysis), GS-2210-11. However, he believes it should be graded at the GS-12 level. The position is located in the [appellant's organization/location] Bureau of Land Management (BLM), U.S. Department of the Interior (DOI). We have accepted and decided his appeal under section 5112(b) of title 5, United States Code (U.S.C.).

This decision is based on a thorough review of all information submitted by the appellant and his agency. In addition, to help decide the appeal we conducted separate telephone interviews with the appellant and his supervisor to gather more information about the position.

General issues

The appellant compares the duties of his position to those of similar positions in another agency classified at the GS-12 level. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of his position. Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding his appeal.

Position information

Both the appellant and his supervisor have certified to the accuracy of the appellant's official position description (PD) [number]. The appellant's position supports efforts to secure BLM's water rights through appropriate legal and administrative means in the western water rights adjudication known as the [name of adjudication]. The incumbent serves as principal advisor for information technology (IT) water rights systems analysis and system development under the supervision of the Water Rights Team Leader. Statewide, the appellant implements IT concepts, principles, and methods in the development of water rights applications. He develops IT systems that merge business processes and operational requirements into systems that assure that BLM responds in a legal, timely, and accurate manner to the [name of adjudication] Court and adheres to the laws of [name of state], and the policies of BLM and DOI. In doing so he applies knowledge of IT principles, concepts, and methods to plan, design and implement new and improved information systems to meet the needs of his unit. He consults with customers throughout the state to identify and specify requirements, and develops overall function and systems requirements and specifications to meet program needs.

The results of our interviews, the appellant's PD, and other material of record provide more information about his duties and responsibilities and how they are performed.

Series, title, and standard determination

The agency has classified the appellant's position in the Information Technology Management Series, GS-2210, titling it Information Technology Specialist (Systems Analysis), and the appellant does not disagree. We concur with the agency's title and series determination. The Job Family Position Classification Standard for Administrative Work in the Information Technology Group, GS-2200, contains appropriate grading criteria for positions in the GS-2210 series that must be applied to determine the grade level of such positions.

Grade determination

The GS-2200 Job Family Standard (JFS) is written in the Factor Evaluation System (FES), which employs nine factors. Under the FES, each factor level description in a standard describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. Each factor level has a corresponding point value. The total points assigned are converted to a grade by use of the grade conversion table in the standard.

The appellant disputes the agency's assignment of levels for Factors 3, 5, 6, and 7. He does not dispute the levels assigned for Factors 1, 2, 4, 8, and 9. After careful review, we concur with the agency's evaluation of those five factors, and have limited our discussion that follows to those in dispute.

Factor 3, Guidelines

This factor covers the nature of guidelines used and the judgment needed to apply them. The agency assigned Level 3-3, but the appellant believes that Level 3-5 is warranted.

At Level 3-3, employees use a wide variety of guidelines but they are not always directly applicable to issues and problems or have gaps in specificity. Precedents are available outlining the preferred approach to more general problems or issues. The employee uses judgment in researching, choosing, interpreting, modifying, and applying available guidelines for adaptation to specific problems or issues.

At Level 3-4, the employee uses guidelines and precedents that are very general regarding agency policy statements and objectives. Guidelines specific to assignments are often scarce, inapplicable or have gaps in specificity that require considerable interpretation and/or adaptation for application to issues and problems. The employee uses judgment, initiative, and resourcefulness in deviating from established methods to modify, adapt, and/or refine broader guidelines to resolve specific complex and/or intricate issues and problems; treat specific issues or problems; research trends and patterns; develop new methods and criteria; and/or propose new policies and practices.

At Level 3-5, employees use guidelines that are often ambiguous and express conflicting or incompatible goals and objectives, requiring extensive interpretation. Employees use judgment and ingenuity, and exercise broad latitude, to determine the intent of applicable guidelines; develop policy and guidelines for specific areas of work; and formulate interpretations that may take the form of policy statements and guidelines. At this level top agency management officials and senior staff recognize the employee as a technical expert.

The appellant's position favorably compares to Level 3-3. While information and guidance may be lacking in terms of general policy regarding the [name of adjudication], to carry out his information technology functions the appellant has available and uses a wide variety of IT guidance, including reference materials and technical guidance. IT directives are established by the DOI Chief Information Officer (CIO) and passed down through the bureau level to the [name of state] State Office CIO, who further refines and disseminates the information. The appellant researches, modifies and adapts available guidelines to specific IT problems or program issues, including using equipment manufacturers' manuals and vendor systems software literature for application to specific technical problems. If the appellant does not have the necessary guidance to resolve particular issues, (e.g., software guidance for converting 18,000 WordPerfect documents to Word), he supplements gaps in references by contacting industry experts. The appellant then analyzes his findings and employs judgment in recommending solutions and producing a product or system. In that manner precedents can be found outlining preferred approaches to general IT problems.

The position does not meet Level 3-4. While program policies and objectives may be generally stated, IT guidelines applicable to assignments are generally available and can be used to resolve technical issues and problems. Typically, the appellant is assigned an issue or problem to be solved and has the freedom to interpret and adapt his work methods. However, unlike Level 3-4 he does not need to adapt or refine broad guidelines. Additionally, he is not faced with researching trends and patterns, developing new methods, or proposing new policies and practices as noted at Level 3-4. To develop IT solutions for capturing, displaying and analyzing data, he exercises judgment and resourcefulness in researching, adapting, and applying appropriate IT applications, but the problems encountered are not so complex and intricate as envisioned at Level 3-4. While interpretation and modification to existing software guidance is sometimes necessary to develop data systems and data management protocols, basic guidelines are available to address IT problems and issues.

The appellant's position does not meet Level 3-5. Although guidelines outlining goals and objectives are stated in general terms, unlike Level 3-5 they are not ambiguous or incompatible with one another. In exercising judgment in applying guidelines, the appellant is not expected to develop policy and guidelines for particular areas of work, or interpret guidelines to the point of formulating policy statements. Although he is counted on locally for his technical expertise, the record shows that he is not viewed as a technical expert by top agency management officials, i.e., bureau or departmental headquarters levels.

This factor is evaluated at Level 3-3 and 275 points are credited.

Factor 5, Scope and effect

This factor covers the relationship between the nature of the work, as measured by the purpose, breadth, and depth of the assignments, and the effect of work products or services both within and outside the organization.

At Level 5-3, work involves a variety of common problems, questions, or situations that are dealt with in accordance with established criteria, and affects the design, implementation, operation, or support of IT systems; or the quality and reliability of services. Illustrative systems analysis work at Level 5-3 involves leading group discussions with functional customers to elicit, identify, and specify requirements for the development of new applications software. The employee works with customers in evaluating and reducing the list of functional requirements to those considered to be most important. Such work results in the development of clear and specific business requirements that lead to the development of systems that effectively serve customer needs.

At Level 5-4, work involves establishing criteria, formulating projects, assessing program effectiveness, and/or investigating/analyzing a variety of unusual conditions, problems, or issues. Work affects a wide range of agency activities or the activities of other organizations. Illustrative systems analysis work at Level 5-4 involves defining and validating the need for proposed new systems by consulting with program officials in customer program organizations; identifying and evaluating potential systems design approaches; and developing final technical specifications for new systems. Such work contributes to the development of applications that improve the organization's efficiency in accomplishing a wide variety of functions and activities.

The appellant's position meets Level 5-3. Like that level, his work involves a variety of common technical problems that affect the design, implementation, operation, and support of IT systems within his unit. It also impacts on the quality and reliability of Water Rights operations by providing the kind of IT systems necessary for data development, analysis, and coordination among all parties using the automated systems. Like the illustrative work example at Level 5-3, the appellant leads group discussions with customers such as [name of adjudication], BLM, Department of Justice, Bureau of Reclamation, state agencies, Forest Service, [name of contractor] (regional contractor), and attorneys to identify application software requirements and explain IT solutions, problems, and concerns. He plays a key role in developing, integrating and interfacing IT systems that support the Water Rights program in the state. His work results in the development of clear and specific requirements that lead to the development of systems that serve customer needs for information systems, database management, data transfer and extraction, all of which affect how BLM in [name of state] manages water.

The appellant's position does not fully meet Level 5-4. While he is sometimes called upon to identify and support the need for a new IT system, evaluate possible systems design approaches, and occasionally develop final technical specifications for a new system, his work does not affect a wide range of agency (i.e., bureau or department) activities or those of other organizations. His work efforts are limited to providing IT support to BLM's [name of state] State Water Rights program, which is only one of several programs and activities administered by the State Office.

The record shows that the appellant's work does not regularly affect other components outside of Water Rights.

This factor is evaluated at Level 5-3 and 150 points are assigned.

Factors 6 and 7, Personal contacts and Purpose of contacts

These factors measure the type of personal contacts that occur in the work and the purpose of those contacts. They include face-to-face contacts and telephone dialogue with persons not in the supervisory chain. Levels described under these factors are based on what is required to make the initial contact, the difficulty of communication with those contacted, how well the employee and those contacted recognize their relative roles and authorities, the reason for the communication and the context or environment in which the communication takes place. These factors are inter-dependent. One first determines the appropriate level for each factor, then obtains the point value for these factors from the intersection of the two levels as shown on the Point Assignment Chart in the standard.

Personal contacts

At Level 6-2, contacts are with employees and managers in the agency, both inside and outside the immediate office or related units, as well as employees, representatives of private concerns, and/or the general public, in moderately structured settings. Contact with employees and managers may be from various levels in the agency, such as headquarters, regions, districts, field offices, or other operating offices at the same location.

At Level 6-3, contacts are with individuals or groups from outside the agency, including consultants, contractors, vendors, or representatives of professional associations, the media, or public interest groups, in moderately unstructured settings. This level may also include contacts with agency officials who are several managerial levels removed from the employee when such contacts occur on an ad hoc basis. The employee must recognize or learn the role and authority of each party during the course of the meeting.

The appellant's position meets Level 6-2, but falls short of fully meeting Level 6-3. Like Level 6-2 he meets with employees and managers in various organizations in the State Office, and with persons from district and field offices, as well as headquarters personnel. Similar to Level 6-3, the appellant also meets with individuals or groups from outside the agency including personnel from the [name of state] Department of Water Resources, [name of contractor], Forest Service, Department of Justice, Bureau of Reclamation, and private organizations. However, like Level 6-2 these contacts are made in a moderately structured setting, rather than a moderately unstructured setting characteristic of Level 6-3. While the appellant's contacts are extensive, the role and authority of each contact is generally clear and known ahead of time (rather than having to be determined during the course of a meeting), and any decisions that affect the Water Rights Team and/or BLM policy are made by the Team Leader or Deputy State Director for Resources. Unlike Level 6-3, the appellant does not have contacts on an ad hoc basis.

Purpose of contacts

At Level 7-B, the purpose of the contacts is to plan, coordinate, or advise on work efforts, or to resolve issues or operating problems by influencing or persuading people who are working toward mutual goals and have basically cooperative attitudes. Contacts typically involve identifying options for resolving problems.

At Level 7-C, the purpose of the contacts is to influence and persuade employees and managers to accept and implement findings and recommendations. The employee may encounter resistance as a result of issues such as organizational conflict, competing objectives, or resource problems. He/she must be skillful in approaching contacts to obtain the desired effect; e.g., gaining compliance with established policies and regulations by persuasion or negotiation.

The appellant's position matches Level 7-B. His contacts are made to exchange technical information and resolve problems having to do with such issues as long-term records management, electronic signatures, data integrity, and data transfer. Those contacted have basically cooperative attitudes and are working toward the same goals. Through influence and persuasion the appellant convinces staff and managers to accept his IT recommendations and/or implement BLM policies and guidance. Typically the problems or issues may be open to possible interpretations, but the good working relationships the appellant has with his contacts has helped to resolve issues before they become problems.

The position does not meet Level 7-C. Unlike that level, the purpose of the appellant's contacts is not to persuade others to accept his recommendations in situations where there are competing interests thus creating resistance resulting from issues such as organizational conflict or resource problems. The appellant has contact with most of the same people all the time, and he has regular coordination meetings with staff of the [name of state] Department of Water Resources, and monthly meetings with personnel from [contractor], Bureau of Reclamation, Forest Service, and the [name of state] State Attorney General's Office. Those contacted have basically cooperative attitudes, and there is no significant need to negotiate on a regular and recurring basis to gain compliance with policies or regulations.

Factors 6 and 7 are assigned Level 2-B and a total of 75 points is credited.

Summary of FES factors

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-7	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and effect	5-3	150
6. and 7. Personal contacts/Purpose of contacts	2-B	75

8. Physical demands	8-1	5
9. Work environment	9-1	<u>5</u>
<i>Total</i>		2435

A total of 2435 points falls within the GS-11 range (2355-2750) on the grade conversion table in the standard. Therefore, the appellant's duties are graded at the GS-11 level.

Decision

The appellant's position is properly classified as Information Technology Specialist (Systems Analysis), GS-2210-11.