

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

Philadelphia Field Services Group  
600 Arch Street, Room 3400  
Philadelphia, PA 19106-1596

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

**Appellant:** [appellant's name]

**Agency classification:** Budget Analyst  
GS-560-11

**Organization:** Administrative Programs Staff  
Office of the [name] State Director  
Rural Development  
U.S. Department of Agriculture  
[location]

**OPM decision:** Budget Analyst  
GS-560-9

**OPM decision number:** C-0560-09-05

/s/

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Michael J. Wilkin  
Deputy Associate Director  
Center for Merit System Compliance

July 19, 2005

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 (PCSs)*, appendix 4, section G (address provided in appendix 4, section H).

Since this decision lowers 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 applicable provisions of parts 351, 432, 536, and 752 of 5 CFR, must be followed in implementing the decision. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented. The servicing human resources office must submit a compliance report containing the corrected position description that meets the established standard of adequacy in the *Introduction to the PCSs* 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's name and address]

[name]  
Human Resources Manager  
USDA Rural Development  
[address]

[name]  
President, [union]  
[address]

OCHM-PPD  
U.S. Department of Agriculture  
47-W Whitten Building  
1400 Independence Avenue, SW  
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Director of Human Capital Management  
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## **Introduction**

On October 12, 2004, the Philadelphia Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [name]. On December 10, 2004, we received the agency's complete administrative report. Her position is classified as Budget Analyst, GS-560-11, but she believes it should be classified as Budget Analyst, GS-560-12. The appellant works on the Administrative Programs Staff, Office of the [name] State Director, Rural Development (RD), U.S. Department of Agriculture (USDA), in [location]. We have accepted and decided this appeal under section 5112 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 her agency. In addition, to help decide the appeal we conducted separate telephone interviews with the appellant and her supervisor on April 27, 2005, and on May 26, 2005, conducted an on-site desk audit with the appellant.

## **General issues**

The appellant has certified to the accuracy of her official position description (PD) #[number], but does not believe the interpretation of it is completely accurate. In support of this point, she states that wording from the Contracting Series, GS-1102 standard, from the GS-12 grade level has been put in her PD but it has been incorrectly treated as work covered by the Purchasing Series, GS-1105.

A PD is the official record of the major duties and responsibilities assigned to a position or job by an official with the authority to assign work. A position is the duties and responsibilities that make up the work performed by the employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities currently assigned by management and performed by the employee. An OPM appeal decision classifies a real operating position, and not simply the PD. This decision is based on the work currently assigned to and performed by the appellant and sets aside any previous agency decision.

The appellant makes various statements about the classification review process conducted by her agency, and compares her work to higher graded positions in other State offices. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM position classification standards (PCSs) 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 her 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 her appeal. Because our decision sets aside any previous agency decision, the classification practices used by the appellant's agency in classifying her position are not germane to the classification appeal process.

## **Position information**

The appellant's position supports five divisions located in [location] and 15 field offices. The organization is authorized 129 full-time equivalent employees. Approximately 90 are in the field offices and 40 are in the State office. She is responsible for formulating, consolidating and monitoring the obligations of the Administrative Operating Budget for employee salaries, expenses, and benefits (S&E); administrative discretionary funds covering such costs as

employee travel, office supplies, and office leases; and three Program Loan Cost Expense Funds used to service foreclosed and returned properties until they are resold, including advertising for outreach and appraisals for resale, title search, realtor commissions, real estate taxes, and selling expenses. The annual S&E and administrative discretionary funds budget currently totals approximately nine to 10 million dollars, and the annual property maintenance program funds budget is between one and a half to two million dollars.

The appellant spends approximately 50 percent of her time on budgetary duties. She develops the State budget plan annually, analyzing trends in past expenditures and forecasting future trends based on program plans that may impact administrative funds requirements and allocation. She reviews managers' estimates and monitors the use and rate of expenditure of budgeted funds, exercising cost/benefit analysis, program trade-offs, and possible alternative methods of funding. The appellant implements procedures to ensure compliance with budgetary processes, policies, and regulations issued by the State Director or National Office (NO) and prepares a variety of reports on the status of funds, expenses, and obligations. She advises managers on availability of funds in different budget accounts and serves as liaison with the national budget division. She oversees the processing of travel vouchers and travel accounts and prepares travel authorizations for all employees.

The appellant spends approximately 50 percent of her time on the purchase of and payment for all program and administrative equipment, supplies and services. These include realty appraisals, repairs including construction, property maintenance and winterization, clean-up, lead-base paint removal, lawn mowing, and snow removal related to foreclosed and returned real estate. She also purchases or leases administrative goods and services such as supplies; e.g., pens, pencils, paper, furnishings, equipment, copiers, computer parts, printers, etc., and equipment maintenance agreements. She canvasses supply sources available through GSA catalogues, vendors participating in the Federal Supply Service, the agency warehouse or in the open market. Sealed bid procedures are not used. Some service contracts; e.g., appraisals, have standing lists of providers to be used on a rotational basis. Other services require obtaining at least three estimates. Decisions are based on price, quality, timeliness, and acceptance of special terms. Credit bureau reports are obtained as a sole source. Some contracts are open-ended with a list of pre-approved vendors. Negotiations are limited as the purchases are generally routine and repetitive. All purchases must conform to the Federal Acquisition Regulations and the Agricultural Acquisition Regulations.

The appellant has a Contracting Officer (CO) warrant in the amount of \$10,000. Purchases above that amount require signatory approval from other agricultural employees with an appropriate warrant level. She is also responsible for signing leases, negotiating, and procuring space on an as needed basis. She writes procedural memoranda detailing the necessary solicitation and documentation processes.

We find that the PD of record covers the major duties and responsibilities assigned to and performed by the appellant and incorporated by reference into this decision. However, as discussed in our grade determination, the PD implies a greater level of work complexity and judgment than the appellant's duties and responsibilities actually entail. Since PDs must meet the standard of adequacy in the *Introduction to the PCSs*, the appellant's agency must revise her PD to meet that standard.

**Series, title and standard determination**

The agency classified the appellant's position in the Budget Analysis Series, GS-560, and titled it as Budget Analyst. The appellant does not disagree with the agency's title and series determination. We concur. The budgetary functions are evaluated using the Job Family Position Classification Standard (JFS) for Professional and Administrative Work in the Accounting and Budget Group, GS-500, which includes the GS-560 series as a covered occupation.

We referred to the Contracting Series, GS-1102, and the Purchasing Series, GS-1105, position classification standards (PCSs) in order to determine the appropriate series covering her procurement work. The "Exclusions" section of the GS-1102 standard states that positions responsible for purchasing or leasing and for administering the purchase of services through the use of simplified purchase procedures are classifiable to the Purchasing Series, GS-1105, when the work requires a knowledge of commercial supply sources and common business practices with respect to sales, prices, discounts, deliveries, stocks and shipments, but when the work does not require knowledge of formal advertising and negotiation procedures as described in the GS-1102 Series. Simplified purchase procedures include informal open-market methods, such as repeat suppliers, price catalogs, and oral solicitation; orders under Blanket Purchase Agreements; orders under indefinite delivery contracts; e.g., Federal Supply Schedules, and purchase orders, invoices, vouchers, or priced purchase orders. They are characterized by low dollar value; e.g., \$10,000 to \$25,000, short contractual periods; e.g., within 30 days, award by purchase order or other instrument where terms and conditions are pre-established, large volume of actions, and adequate sources of supply. Some organizations combine simplified purchase procedures with contracting.

The low dollar value figures in the GS-1105 PCS are stated in 1993 dollars. Some agencies and/or components grant warrants of \$50,000 or more to Purchasing Agents for purchases from Federal Supply Schedules. We find that the Purchasing Series, GS-1105, covers the appellant's purchasing and contracting duties. Typical of that series, she acquires supplies, services, construction by purchase, rental or lease through delivery orders and/or small purchase procedures. The work requires knowledge of policies and procedures, and commercial supply sources and common business practices related to sales, prices, discounts, units of measurement, deliveries, stock and shipments. Contrary to the appellant's claim that CO warrants are only given employees in GS-1102 positions, CO warrants are routinely given to employees in GS-1105 positions. Therefore, we find the appellant's procurement work is covered by the GS-1105 series and is properly evaluated by application of the GS-1105 PCS.

### **Grade determination**

#### ***Evaluation using the GS-500 JFS***

The GS-500 Job Family Standard (JFS) uses the Factor Evaluation System (FES) method of position classification. Grades are determined by comparing a position's duties, responsibilities, and qualification requirements with the nine FES factors. A point value is assigned to each factor based on a comparison of the position's duties and responsibilities with the factor-level descriptions in the standard. The points assigned to an individual factor level mark the lower end of the range for that factor level. To warrant a given level, the position must fully equate to the overall intent of the factor-level description. If the position fails in any significant aspect to fully satisfy a particular factor-level description, the point value for the next lower level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher

level. The total points assigned are converted to a grade level by use of a grade conversion table in the PCS.

*Factor 1, Knowledge required by the position*

This factor measures the nature and extent of information or facts that a worker must understand to do acceptable work; e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts, and the nature and extent of the skills needed to apply this knowledge. To be used as a basis for selecting a level under this factor a knowledge must be required and applied.

Work at Level 1-6 requires knowledge of, and skill in applying, the organization's missions, functions, goals, objectives, work processes, and sources of funding; also commonly used budget and/or finance practices, procedures, regulations, precedents, policies and guides that pertain to the assigned work; and sources of factual data about budgeting and/or finance matters relevant to assigned tasks. The knowledge level must be sufficient to relate needs and accomplishments of the organization to anticipated and/or actual dollar figures in the budget; relate this knowledge to the needs of the serviced organizations; and work independently on routine or continuing assignments. Typically, the locations of full performance positions that require this level of knowledge are in organizational components below which there are no subordinate functional offices.

The appellant's work meets Level 1-6. As at that level, the knowledge required and applied by the appellant in formulating the annual salary and expense budget estimates include knowledge of the organization's mission and functions including different program initiatives; e.g., economic property development zones, rural business enterprise zones, Erie Canal corridor vs. Statewide programs, etc.; the knowledge of commitment accounting that includes the obligation of funds and expense layout for the State and field offices; and the knowledge of tracking, reporting and transferring of funds between accounts. Typical of Level 1-6, the appellant applies commonly used budget practices, procedures, regulations, policies and guides that specifically pertain to the work performed, including NO policies and guidance. Her work compares closely to the first illustration at Level 1-6 in the JFS in which the analyst compiles, correlates, and consolidates individual estimates for such items as personal S&E, travel, and minor building maintenance. As in the illustration, she tracks and analyzes obligations and expenditures in the approved operating budget which covers such items as office supplies, telephone service, utility services, personal travel, vehicle repair, and minor building maintenance; determines whether funds are being used on a timely basis in support of the annual work plan, and writes brief reports that detail the purposes, such as travel and overtime, for which funds are obligated and expended.

Level 1-7 is the highest level for S&E budgeting of a support nature in a Federal agency. Level 1-7 work requires detailed, intensive knowledge of, and skill in applying, policies, precedents, goals, objectives, regulations, and guidelines in such areas as financial oversight, budget formulation and/or budget execution sufficient to analyze and evaluate continual changes in program plans and funding and their effect on financial and budget milestones, and develop recommendations for financial or budgetary actions under these types of conditions and time pressures. This knowledge is applied in evaluating continual changes in program plans and funding and their effect on financial and budget program milestones, and in recommending financial or budgetary actions when there are difficult complicating factors such as uncertainty

due to short and rapidly changing program and financial/budgetary deadlines and objectives, missing or conflicting program and financial/budgetary information, and a lack of predictive data. Illustrative of such work is monitoring the execution of budget with many different funding sources and types of funding such as direct multi-year appropriations, allotments from many different appropriations, transfers of funds from other agencies, reimbursements for services performed, and revenue from working capital and trust accounts. The employee identifies and analyzes trends in the receipt, obligations, or expenditure of funds to ensure that objectives of the annual financial plan are being met on a timely basis, and that available funds are being properly and effectively used to support program objectives.

Unlike Level 1-7, the [name] State RD mission does not entail frequent program changes to the extent that they require applying complex analytical methods and techniques to assess their effect on the administrative budget. The budget is preponderantly S&E, does not fluctuate substantially from year to year, and is primarily based on historical information. In contrast, Level 1-7 S&E budgets require managing such funds for dynamic organizations which require substantial movement and reallocation with the uncertainties and conditions found at Level 1-7. Unlike Level 1-7, the appellant's budget reallocation work typically is limited to moving administrative discretionary funds from one support area to another and does not require responding to substantially changing mission and budgetary conditions. The appellant's cost-benefit analysis is limited to such areas as the purchasing of standard office support equipment and supplies, property maintenance and repair services, leasing office space and other administrative budget issues typical of Level 1-6. Therefore, Level 1-6 (950 points) is assigned for this factor.

### *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 how the work is reviewed or controlled. Controls are exercised by the supervisor in the way assignments are made, instructions are given to the employee, priorities and deadlines are set, and objectives and boundaries are defined. Responsibility of the employee depends upon the extent to which the employee is expected to develop the sequence and timing of various aspects of the work, to modify or recommend modification of instructions, and to participate in establishing priorities and defining objectives. The degree of review of completed work depends upon the nature and extent of the review.

At Level 2-3, the supervisor outlines or discusses possible problem areas and defines objectives, plans, priorities and deadlines. The employee independently plans and carries out the assignment in conformance with accepted budget or finance practices. The employee adheres to instructions, policies and guidelines in exercising judgment to resolve commonly encountered work problems and deviations, and brings controversial information or findings to the supervisor's attention for direction. The supervisor does not usually review methods used in detail, but reviews and evaluates completed work for technical soundness, adequacy of analysis, validity of conclusions, conformity with applicable policies and regulations, and feasibility of any proposals.

The supervisory controls over the position match Level 2-3. As, at that level, the appellant prepares budget forecasts for salaries, benefits, overtime, travel, training, postage, shipping and three Program Loan Cost Expense funds, based on past budgets, subsequent expenditures, and limited program changes. She prepares this for the State Director subject to discussion with and approval of the Administrative Officer. She also prepares periodic reports of expenditures indicating the total available balance through direct contact with the Budget Reporting Information and Organization (BRIO) system.

At Level 2-4, the supervisor outlines overall objectives and the resources available. In consultation with the supervisor, the employee discusses timeframes, scope of the assignment including possible stages, and possible approaches. The employee functions as technical authority with responsibility for actions that include directing other functional specialists, resolving most of the conflicts, coordinating the work with others, developing changes to plans and/or methodologies, interpreting policy and regulatory requirements, and keeping the supervisor informed of potentially controversial matters. These include major problems such as the need for supplementary appropriations and/or inability to meet key budget and program guidelines. The supervisor reviews the work for soundness of overall approach, effectiveness in meeting requirements or producing the results expected, and the feasibility of recommendations and adherence to requirements. The supervisor does not usually review methods used.

The appellant's position does not meet Level 2-4. It is not just the degree of independence, but also the degree to which the nature of the work allows the employee to make decisions and commitments and to exercise judgment that is evaluated. Unlike Level 2-4, the appellant does not routinely deal with the problems or potentially controversial matters entailing the application of Level 2-4 judgment. While the appellant works within continuing program objectives, the scope and scale of the program is such that work does not require staging and budget program resource needs do not fluctuate because of projects or initiatives. The nature of the appellant's budget does not routinely require the extensive policy and regulatory interpretation or changes in plans and methodology found at Level 2-4. Any issues of potential or major impact remain the responsibility of the appellant's supervisor. Because this factor does not fully meet Level 2-4, Level 2-3 (275 points) must be credited.

### *Factor 3, Guidelines*

This factor covers the nature of guidelines and the judgment employees need to apply them. Individual assignments may vary in the specificity, applicability, and availability of guidelines; thus, the judgment employees use similarly varies. The existence of detailed plans and other instructions may make innovation in planning and conducting work unnecessary or undesirable. However, in the absence of guidance provided by prior agency experience with the task at hand or when objectives are broadly stated, the employee may use considerable judgment in developing an approach or planning the work.

At Level 3-3, guidelines typically provide a preferred approach or describe generally accepted standards rather than precisely delineating requirements. A situation may require a level of detail or scope of instruction greater than provided by the guidelines. The employee uses judgment to adapt the guidelines to specific cases or problems to interpret a large number of varied policies and procedures. Guidelines at Level 3-3 typically include handbooks developed at higher echelons covering a range of agency accounting, finance, or budget operations, and which may provide suggestions and goals for increasing effective advisory services to



management, as well as procedures that the employee must either implement or consider in establishing local office practices.

As at Level 3-3, the appellant's guidelines include the Code of Federal Regulations, Federal Acquisition Regulations, USDA regulations, budgetary and leasing regulations, Federal Travel Regulations, etc. As at that level, these basic regulations are supplemented by NO guidelines and directives. The guidelines available to the appellant are general and require interpretation to specific issues. Typical of Level 3-3, she frequently takes these regulations and guidelines to develop State procedures to be followed by managers and employees on administrative funds matters.

The position does not meet Level 3-4 where guidelines are scarce and documentation of work of earlier assignments is not available or applicable because of changes in subject matter or objectives. At Level 3-4, typical guidelines include OMB circulars, directives, and regulations; Treasury Department regulations; judicial decisions; Comptroller General Decisions; the employing agency's broad program goals and policy statements that describe only the purpose for which a program or system was established; and/or requirements that define general specifications for management and financial systems or the parameters from which an accounting system is to be defined. The employee must devise new techniques for identifying trends and patterns, acquiring information and analyzing data, modifying systems, and developing solutions and presenting findings. The employee may interpret guidance for employees at the same or subordinate levels.

While the appellant is the sole budget analyst dealing with the administrative budget, her work involves dealing with repetitive situations in the budget area that do not require or permit the appellant to devise new techniques for identifying trends and patterns typical of Level 3-4. Unlike Level 3-4, NO requirements and guidelines are technically substantive and are not limited solely to the purpose for which a program or system was established. The local procedures that the appellant develops are not for use by other budget program employees typical of Level 3-4, but are for program employees and managers to help them understand established financial program requirements and obligations typical of Level 3-3. Therefore, Level 3-3 (275 points) is assigned for this factor.

#### *Factor 4, Complexity*

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

Work at Level 4-3 consists of performing varied duties by applying a series of different and unrelated but established methods, practices and techniques. At that level, programs and services may involve such items as salaries and wages of employees, office supplies, equipment, travel and the timing of financial actions such as acquisition, distribution or transfer of funds. The employee compiles, analyzes and summarizes financial and/or budgetary information related to assigned areas of the organization's financial program. The employee translates organizational needs and objectives, by line item and object class, into budget dollars and the funding actions required to accomplish them. The budget analyst considers program goals, provisions of applicable policies, regulations, and procedures, and alternative methods of obtaining and

distributing funds. The employee may recommend the approval or disapproval of requests for allotments of funds or actions involving the commitment of funds. Accounts budgeted for are relatively stable and funding is from readily identifiable sources. Decisions are based on the amount of funds in an account, deadlines integral to the budget cycle, and local controls and regulations pertaining to spending.

The appellant's work matches Level 4-3. The preponderantly S&E budget that she oversees is relatively stable. Variations are dealt with based on historical information; e.g., additional funds necessary for the maintenance and repair of additional foreclosed properties. As at Level 4-3, she forecasts budgetary needs on an annual basis, compares actual costs with prior year expenses, tracks all charges for legitimacy, compiles a salaries and benefits projection report and a monthly detailed transactions report (BRIO), and identifies trends in the use of funds for budget planning for salaries and expenses, administrative discretionary funds and expenses and three Program Loan Cost Expense Funds. She is not involved in the overall RD operating budgets that involve the management of multi-million dollar projects and grants.

At Level 4-4, work consists of performing a variety of analytical, technical, and administrative work for substantive programs and support activities. These programs and activities are funded through a number of sources such as appropriations, allotments, reimbursable accounts, and transfers of funds between organizations. Programs and funding are unstable and subject to change throughout the fiscal year. These changes necessitate making frequent adjustments to budget estimates or conducting partial re-budgeting during the fiscal year. Program funding may extend for several years or more, as in the case of no-year appropriation. The budget typically includes a wide range of object classes and line items for one or a few substantive programs and organizations. Alternatively, the budget may include fewer object classes and accounts, but through which a wide range of programs is funded. The budget analyst identifies and analyzes changes in budgetary and/or financial policies, regulations, constraints, objectives, and available funds that affect the accomplishment of program objectives. The employee analyzes budget and/or financial program data to develop annual and multi-year budget estimates for assigned programs and activities; conducts research, identifies, and analyzes trends in the use of funds; and recommends adjustments in program spending that require the rescheduling of program workloads. The employee assists program managers and staff officials in interpreting the impact of and planning for multi-year financial/budgetary and program changes. To do the work, the budget analyst must choose the analytical technique that is appropriate for the task such as cost-benefit analysis, depreciation, and pro-ration of revenues and costs. The presence of conflicting program and financial data make it difficult to identify reliable data. Unpredictable short-term deadlines that vary according to financial/budgetary objectives, available funding, program goals, and workload make it difficult for the employee to: identify trends in the use of funds; recommend program spending adjustments that require rescheduling of program workloads; and assist program managers and staff officials in interpreting the impact of, and planning for, multi-year financial/budgetary and program changes.

Unlike Level 4-4, the appellant works with a relatively stable administrative budget. The three Program Loan Cost Expense Funds that she oversees do not present the technical difficulty and complexity of substantive program funds defined in Level 4-4. The three components of the appellant's State RD budget do not have the funding complexities and instability, frequency of change, or the analytical demands found at Level 4-4, e.g., multi-year budgets in support of significant substantive programs and complex cost-benefit analysis leading to the commitment of

such funds. As a result, the appellant's work does not require or permit her to apply the complex budgeting techniques to analyze and respond to the complex budget issues typical of Level 4-4. Therefore, Level 4-3 (150 points) is assigned for this factor.

*Factor 5, Scope and effect*

This factor covers the relationship between the nature of work; i.e., the purpose, breadth, and depth of the assignment, and the effect of the work products or services both within and outside the organization. Effect measures such things as whether the work output facilitates the work of others, provides timely services of a personal nature, or impacts on the adequacy of research conclusions. The concept of effect alone does not provide sufficient information to properly understand and evaluate the impact of the position. The scope of the work completes the picture allowing consistent evaluations. Only the effect of properly performed work is considered.

At Level 5-3, budget analysis applies specific budgetary rules, regulations, principles and procedures associated with all phases of budget formulation and execution related to segments of the budget for assigned support activities to resolve conventional problems and issues. The work affects the information on the amount, timeliness and availability of funds and the availability of accounting data for personnel S&E, routine maintenance and similar administrative support activities in appropriated or industrially funded organizations.

The scope and effect of the appellant's work match Level 5-3. As at that level, the preponderantly S&E budget affects the amount and timely availability of money in those funds so that the RD staff can perform the organization's mission. Typical of Level 5-3, the appellant uses standard budget methods and techniques to resolve a range of conventional problems; e.g., moving funds within the administrative discretionary budget to deal with changes in administrative support needs such as additional travel funds and recommending changes in foreclosed property repair based on funds availability.

Work at Level 5-4 involves executing modifications to systems, programs, and/or operations, and/or establishing criteria and other means to assess, investigate, or analyze a variety of unusual problems and conditions. The work involves a wide range of agency activities or the operations of other agencies, or the activities of private sector entities with which the agency conducts business or provides services. Typical of Level 5-4 budget work is formulating and/or monitoring the execution of long-range (i.e., 3 to 5 years or longer) detailed budget forecasts and plans to fund the implementation of substantive agency programs and projects. It includes establishing financial and budgetary goals, timetables, milestones, and other criteria against which the relative costs and benefits of program achievements can be measured and assessing cost-effectiveness in meeting program goals. Programs supported involve such matters as the production and distribution of goods, construction, or the delivery of services to the public. They include planning the timely acquisition and use of funds through time-phased allotments and transfers of funds; adjusting long-range budget forecasts and monitoring their execution for assigned substantive programs; analyzing costs, benefits, and trends in rates of obligation and expenditure of funds; or recommending ways to improve the utilization of funds.

At Level 5-4, the work involves such outcomes as: the amount and availability of funds for major substantive or administrative programs and services such as developing strategic weapons that are part of larger systems; construction of housing; or conducting regulatory and

enforcement programs within a region or comparable area of the nation. Other outcomes at this level involve the operations of other Federal agencies, States, public organizations, large universities, or large private industrial concerns; or the budgets, programs, and interests of other Federal agencies, public organizations, and/or private industrial firms when the supported programs and/or projects cut across component lines within the agency.

Unlike Level 5-4, the appellant's work directly affects the internal operations of a small field organization. It does not involve assessing, investigating, or analyzing a variety of unusual problems and conditions within the meaning of the GS-500 JFS. The management of large-scale RD program funds, and the attendant problems and conditions that managing them entails, is vested in other positions in the State office. Therefore, Level 5-3 (150 points) is assigned for this factor.

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

Factor 6 includes face-to-face and telephone contacts with persons not in the supervisory chain. Levels described under this factor are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contacts take place; e.g., the degree to which the employee and those contacted recognize their relative roles and authorities. Points may be credited under this factor only for contacts that are essential for successful performance of the work.

*Personal contacts*

Personal contacts at Level 2 involve employees in the agency, both inside and outside the immediate organization, such as management support personnel in budget, accounting, financial management, human resources and information technology offices. Contacts also include personnel from various levels within the agency such as headquarters, regions, districts or field offices or other operating offices in the immediate installations. The appellant's contacts with technicians in the National Finance Center and the NO, the State Director, managers and others in the State and 15 field offices matches Level 2.

The contacts at Level 3 include officials, managers, executives of other agencies and outside organizations such as Congressional or Executive Branch staff members, OMB representatives, and various levels of agency management such as policy review boards at higher levels in the agency. Level 3 is not creditable since the appellant does not have such contacts on a regular and recurring basis.

*Purpose of contacts*

At Level B, contacts are to plan, arrange, coordinate or advise on work efforts and/or arrange for interviews and meetings to obtain information and obtain data to verify questionable items. Though differences of opinion may exist, the persons contacted are usually working toward a common goal and generally are cooperative. Contacts may involve significance of guidelines, necessity for additional facts, or the preferred course of action including preferred methods of data gathering. The appellant's contacts match Level B since they involve such things as advising managers on funds availability and reallocation to meet mission needs.

At Level C, contacts are to influence, motivate, interrogate or control persons with wide disagreement on the merits of a proposed action; e.g. persuading program managers with widely differing goals to follow a course of action consistent with established budget policies. The appellant's work does not routinely involve these demands. Resolving the types of issues found at Level C is vested in her supervisor's position.

Therefore, these factors are credited at Level 2B (75 points).

*Factor 8, Physical demands*

The appellant's work meets Level 8-1 (5 points), the only level defined in the JFS. As at that level, her work is principally sedentary but may require walking and standing in conjunction with travel to and attendance at meetings and conferences away from the work site. No special physical effort or ability is required to do the work.

*Factor 9, Work Environment*

The appellant's work meets Level 9-1 (5 points), the only level defined in the JFS. As at that level, the appellant works in an adequately lighted, heated and ventilated office setting.

*Summary*

<i>Factors</i>	<i>Level</i>	<i>Points</i>
1. <i>Knowledge required by the position</i>	1-6	950
2. <i>Supervisory controls</i>	2-3	275
3. <i>Guidelines</i>	3-3	275
4. <i>Complexity</i>	4-3	150
5. <i>Scope and effect</i>	5-3	150
6. <i>Personal contacts and 7. Purpose of contacts</i>	2B	75
8. <i>Physical demands</i>	8-1	5
9. <i>Work environment</i>	9-1	<u>5</u>
	Total Points	1,885

A total of 1,885 points falls within the GS-9 grade level point range of 1,855-2,100 points on the Grade Conversion Table.

*Evaluation using the GS-1105 PCS*

The GS-1105 PCS is also written in FES format. The GS-1105 series is a single-grade interval series where the duties do not control the classification of the appellant's position. Therefore, we will therefore address the GS-1105 duties in an abbreviated fashion. The agency appeal decision that addressed the appellant's GS-1105 duties in detail credited the position with Levels 1-4, 2-4, 3-3, 4-3, 5-3, 6/7 2b, 8-1, and 9-1. Based on careful review of the record, we have credited the position at Levels 3-3, 4-3, 5-3, 6/7 2b, 8-1 and 9-1. Because of the relationship between Factor 1 and 2, we will address both factors.

*Factor 1, Knowledge require by the position*

The appellant's purchasing functions do not exceed Level 1-4. Level 1-4 covers work involving specialized requirements and/or commercial requirements that have unstable prices or product characteristics, hard-to-locate sources, many critical characteristics, or similar complicating factors. Illustrative of such work is purchasing a variety of services, reviewing the specifications outlined by the customer, making suggestions to improve the purchase description, discussing requirements and questions with interested vendors, attempting to determine reasons for lack of vendor response and brainstorming solutions for amendments to purchase descriptions that may involve changing specifications, delivery procedures, reporting formats or timeframes. The appellant's analysis of professional services contracts, assuring Federal Acquisition Regulation clauses are applicable and current, requiring submission of qualifications and professional certification, etc., do not exceed the depth and breadth of purchasing methods and procedural knowledge found at Level 1-4.

These purchases do not reflect application of the specialized technical purchasing methods found at Level 1-5; e.g., developing and selecting criteria/technical ranking factors for purchases of a variety of detailed commercial services. Illustrative of such work is a service project using many different kinds of equipment and trades personnel for which factors (e.g., age and kind of equipment, skill of the operator, reliability of the service) in addition to price, delivery, and transportation terms, will be essential to determining the best offer. The employee must consider the capability and reliability of the various equipment that will be used, the background and skill level of the trades personnel employed by the vendor, and the firm's reputation for performing quality work and providing follow-up service. Awards are based on an evaluation of which offer represents the greatest or best value. Frequently, the evaluation involves difficult decisions because the competing vendors have different strengths, and various tradeoffs must be analyzed and considered.

As described in the GS-1105 PCS, commercial services and commercial construction products typically are described in industry terminology, are well-advertised, and are available from many local suppliers. Commercial services include most custodial and maintenance work, equipment repairs, packing and crating, cleaning, and laundry. This also may include off-the-shelf training courses or seminars. Commercial construction projects include routine repairs and alterations, such as installing doors or windows. Specialized services or construction products typically are described in formal Government specifications or detailed purchase descriptions and are available from a limited number of potential suppliers. Specialized services include scientific or medical studies and testing. Specialized construction projects include engineering design studies and alterations and repairs to roads and buildings.

We do not find the qualifications and certification requirements enumerated in the most complex Requests for Purchases for building security, maintenance, winterization, lead-based paint removal, etc. reflect the specialized terms, or depth of analysis for greatest or best value envisioned at Level 1-5. In addition, many of the services contracted for are of limited technical complexity, are available from a variety of local sources, e.g., lawn mowing, and would not exceed Level 1-3. Therefore, we concur with the agency that this factor is properly credited at Level 1-4 (550 points)

### *Factor 2, Supervisory controls*

At Level 2-3, the supervisor or other designated authority assigns work with standing instructions on objectives, priorities, and deadlines, and indicates special considerations or unusual requirements. The employee plans and carries out successive steps necessary to make purchases and uses accepted practices or procedures to resolve problems and deviations. Problems and deviations include; e.g., requirements that have fluctuating price and item characteristics, are sole source, and are urgently required, or items that are new to the market. The employee independently performs tasks, such as negotiating price with a sole source vendor, persuading reluctant vendors to bid, and collecting data to determine price reasonableness for requirements not acquired previously or recently. In other work situations, problems may result from the specialized nature of the requirement. For example, the employee may have to identify loopholes in specifications or statements of work that are very lengthy, detailed, or otherwise difficult to understand. The employee independently suggests revisions or additions to ensure information pertaining to the contractor's obligations is clear and adequate. After searching precedents, the employee consults with the supervisor or others to resolve major problems (e.g., how to prepare information that will be used to respond to written protests from nonselected vendors). The supervisor reviews recommended awards or completed purchase files for technical soundness, appropriateness, and conformity to policy and requirements. The methods the employee uses to complete assignments usually are not reviewed in detail.

In contrast, at Level 2-4, the supervisor or other designated authority defines the overall objectives and requirements of the work and provides further guidance or consultation at the employee's request. The employee, having developed expertise in purchasing and administering orders for various kinds of requirements, is responsible for resolving most conflicts that arise, coordinating the work with others, and interpreting policy on his/her own initiative to meet established objectives. For example, the employee regularly resolves conflicts in administering purchase orders, such as protests, claims, and terminations for convenience or default. The employee is delegated considerable latitude in committing the agency or activity to a course of action and typically has no higher level procurement expertise immediately available. It is generally not feasible to obtain higher level assistance anyway since many of the problems require immediate attention and intensive on-the-spot negotiation. The supervisor is, however, kept informed of progress or controversial matters. The supervisor periodically evaluates completed work for results achieved and effectiveness in meeting requirements within legal and regulatory constraints.

While recognizing the appellant's freedom from supervision for this function, and the delegation of CO signatory authority, the nature and complexity of the purchasing work are restricted. As discussed previously, it is not just the degree of independence, but also the degree to which the nature of the work allows the employee to make decisions and commitments and to exercise judgment that is evaluated. Unlike Level 2-4, the appellant does not routinely deal with the problems or potentially controversial matters entailing the application of Level 2-4 judgment such as protests, claims, and terminations for convenience or default. The routine and recurring types of purchases and related decisions made; e.g., leasing, do not regularly require the scope and scale of policy interpretive demands requiring the exercise of Level 2-4 judgment. Because this factor does not fully meet Level 2-4, this factor must be credited at Level 2-3 (275 points).

*Summary*

<b><i>Factors</i></b>	<b><i>Level</i></b>	<b><i>Points</i></b>
1. <i>Knowledge required by the position</i>	1-4	550
2. <i>Supervisory controls</i>	2-3	275
3. <i>Guidelines</i>	3-3	275
4. <i>Complexity</i>	4-3	150
5. <i>Scope and effect</i>	5-3	150
6. <i>Personal contacts and 7. Purpose of contacts</i>	2b	75
8. <i>Physical demands</i>	8-1	5
9. <i>Work environment</i>	9-1	<u>5</u>
	<b>Total Points</b>	<b>1,485</b>

A total of 1,485 points falls within the GS-7 grade level point range of 1,355-1,600 points on the Grade Conversion Table.

**Decision**

Based on mixed grade principles, the appellant's position is correctly classified as Budget Analyst, GS-560-9.