

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

Atlanta Field Services Group  
75 Spring Street, SW., Suite 1018  
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**Classification Appeal Decision**  
**Under section 5112 of title 5, United States Code**

**Appellant:** [appellant]

**Agency classification:** Health System Specialist  
GS-671-9

**Organization:** [organization]  
[organization]  
Air Education and Training Command  
Department of the Air Force  
[location]

**OPM decision:** Health System Specialist  
GS-671-9

**OPM decision number:** C-0671-09-04

/s/ Robert D. Hendler  
Robert D. Hendler  
Classification and Pay Claims  
Program Manager

October 27, 2005  
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:**

[appellant]  
[address]  
[location]

Chief, Civilian Personnel  
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## **Introduction**

On June 22, 2005, the Atlanta Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. Her position is currently classified as Health System Specialist, GS-671-9, and is located in the [organization], [organization][acronym], Air Education and Training Command, Department of the Air Force at [location]. The appellant requests that her position be upgraded to GS-11. We received the complete appeal administrative report on July 18, 2005. We have accepted and decided her appeal under section 5112(b) of title 5, United States Code (U.S.C.).

## **General issues**

The appellant makes various statements about her agency's review and evaluation of her position. She believes that the agency supported its rationale using OPM classification appeal decisions for positions that are not comparable to her position in terms of scope, interpretation of regulations, application of new work methods, resolution of controversial problems, etc. Part of the appellant's rationale is based on her comparison of her position description (PD) to higher graded PDs at other Air Force medical facilities.

By law, we must classify positions solely by comparing her current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since the comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others which may or may not be classified correctly, as a basis for deciding the appeal. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of her position. Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison. Since our decision sets aside any previous agency decision, any actions previously taken by the agency in their review of the appellant's position are not germane to the classification appeal process.

Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellant considers her position so similar to others that they all warrant the same classification, she may pursue the matter by writing to her agency's human resources headquarters. In doing so, she should specify the precise organizational location, classification, duties and responsibilities of the positions in question. If the positions are found to be basically the same as hers, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to her the differences between her position and the others.

During our fact finding discussions, both the appellant and her supervisor also identified the volume, quality, and the efficiency of the work performed by the appellant as rationale supporting a higher grade for the appellant's position. However, volume cannot be considered in determining the grade of a position (*The Classifier's Handbook*, chapter 5). The quality of work is not germane to the classification process since the classification analysis of a position is based on the assumption that the assigned work is properly performed (*The Classifier's Handbook*, chapter 3, Factor 5). Therefore, issues raised by the interviewees regarding the effectiveness of

the appellant's work may not be considered in the classification of her position. Rather, they are properly considered as part of the performance management process.

The appellant is assigned to PD number [#]. Both the appellant and her supervisor certified the accuracy of the PD. In reaching our classification decision, we have carefully reviewed all information furnished by the appellant and the agency, including the PD of record which we find contains the major duties assigned to and performed by the appellant and we incorporate it by reference into this decision. We also conducted a telephone audit with the appellant and interviewed her current supervisor.

### **Position information**

The [acronym] operates an outpatient medical treatment facility (MTF) which is designated as a large clinic by the agency. The MTF encompasses approximately 13 clinics and pharmacy and other services and provides medical and preventive health care to over 20,600 eligible personnel, including active duty and retired military personnel and their families, reservists, and hospital staff. The appellant administers the performance improvement and patient safety and risk management programs as they relate to health care delivery at the MTF for Department of Defense beneficiaries. She is the point of contact for reviewing new or revised Joint Commission on Accreditation of Healthcare Organizations (JCAHO) standards and other directives and policies, determining impact for the MTF and implementing changes. She plans for, coordinates, prepares and implements program policies. The appellant reviews and tracks safety goals, incidents, alerts, failure mode effects analysis, near misses, root cause analysis and lessons learned to prepare comprehensive documentation for use by staff and for reports. She further uses this information to develop goals and objectives and improve clinical processes.

The appellant also is responsible for the credentialing program. She ensures background clearances and privileging issues are completed. The appellant reviews credentialing recommendations to ensure that they are within JCAHO standards, provides appropriate procedures and guidelines to the providers, and validates, enters, and tracks the licenses and training requirements of the medical personnel staff. She attends the credentials review meetings to report on findings. She recently was assigned the responsibility for the accreditation and compliance health care program which involves reviewing data for a new inspection process and briefing the senior medical specialists on the results. In addition, the appellant is instrumental in providing training to the staff, creating lessons learned and best practices, providing input and ideas on the processes, and reporting on events, such as new policies, procedures, safety goals, etc., at the senior executive staff meetings.

The appellant works under the supervision of the Chief, Medical Staff. She works independently on standard and repetitive assignments and uses initiative and judgment to accomplish recurring work and resolve routine problems of a recurring nature. The appellant keeps the supervisor informed of work progress and any unexpected or controversial issues. Completed work is reviewed for effectiveness of overall approach and conformance with policy. The work methods used to arrive at the end results are not reviewed in detail.

### **Series, title, and standard determination**

The agency classified the appellant's position in the Health System Specialist Series, GS-671, and titled it Health System Specialist. The appellant does not contest the series or title determination. We agree with the agency's determination.

There are no grade-level criteria provided in the GS-671 position classification standard. The agency used the Administrative Analysis Grade Evaluation Guide (AAGEG) for grade-level determination. We concur in its use.

### **Grade determination**

The AAGEG is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are assigned for each of nine factors. The total is converted to a grade level by use of the grade conversion table provided in the standard. 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.

The appellant believes that her position should be credited at Levels 1-7, 2-4, 4-4, and 5-4 and concurs with the agency's crediting of Levels 3-3, 6-3 and 7-c, 8-1, and 9-1. After careful review of the record, we concur with the uncontested agency determinations and have so credited the position. Our analysis of the contested factors follows.

#### *Factor 1, Knowledge required by the position*

This factor measures the kind and nature of knowledge and skills needed and how they are utilized in doing the work. The agency credited Level 1-6.

At Level 1-6, employees apply analytical and evaluative techniques to the identification, consideration, and resolution of issues or problems of a procedural or factual nature. The issues or problems deal with readily observable conditions, written guidelines covering work methods and procedures, and information of a factual nature. Included at this level is knowledge of the theory and principles of management and organization, including administrative practices and procedures common to organizations (e.g., channels of communication, delegation of authority, routing of correspondence, filing systems and storage of files and records). Assignments typically involve using qualitative and quantitative analytical techniques such as literature search, work measurement, task analysis, productivity charting, developing and administering questionnaires, etc.

In addition to knowledge required at Level 1-6, assignments at Level 1-7 require knowledge and skill in applying analytical and evaluative methods and techniques to study the efficiency and effectiveness of program operations carried out by administrative or professional personnel or substantive administrative support functions. This level includes knowledge of pertinent laws, regulations, policies and precedents which affect the use of program and related support resources in the area being studied. This knowledge is used to plan, schedule, and conduct

studies to evaluate and recommend ways to improve the effectiveness and efficiency of work operations, program effectiveness, and/or organizational productivity. Knowledge at this level is applied in developing new or modified work methods, organizational structures, records and files, management processes, staffing patterns, procedures for administering program services, guidelines and procedures, and automating work processes for the conduct of administrative support functions or program operations. Illustrations provided at Level 1-7 contemplate projects and studies that are typically throughout a military command, a complex multimission local installation, or the equivalent. The illustrations refer to knowledge of organizations, programs, missions, and functions of the parent military command along with knowledge to conduct staffing requirements and utilization surveys of headquarters organizations or various field installations.

Level 1-6 is met. As at this level, the appellant analyzes and evaluates guidelines, processes, and data that are primarily of a factual or observable nature. The work requires knowledge of JCAHO standards and other agency rules and regulations in order to ensure that the performance improvement program is in compliance with requirements. The appellant uses analytical skills and techniques in preparing documents to meet established standards of the MTF, gathering and consolidating clinical quality data, and providing accurate and comprehensive quarterly reports. Like Level 1-6, she uses quantitative analytical techniques to create graphs, incidents and near-misses reports and to determine whether the standard of care was met. Comparable to Level 1-6, the appellant uses analytical and evaluative skills in developing health systems to prevent potential compensable events for patients, visitors, and the staff. For example, she developed local guidelines and implemented the patient safety program by providing measures to meet the JCAHO standards and agency directives; developed the near-miss form and productivity sheets to provide pertinent data and identify needs for follow-up actions; and developed a stamp used to identify the correct body part of patients for surgical procedures. Like Level 1-6, the appellant prepares and delivers briefings and provides training on her assigned programs and the use of automated healthcare systems to medical professional and non-professional staff.

Level 1-7 is not met. The appellant's position is not responsible for performing substantive functional studies that require regulatory and other program knowledge to develop or modify work methods, organizational structures, staffing patterns, management processes, etc., as intended at Level 1-7. Her work involves application of well-established techniques and methods to identify, consider, and resolve issues of a factual procedural nature for the MTF. It typically requires the knowledge of established standards and directives and operational procedures used at the MTF. The appellant's work does not have the broader scope and complexity of issues typical of Level 1-7 since her assignments encompass MTF activities instead of activities throughout an entire military command, headquarters organizations, or various field installations.

Level 1-6 is credited for 950 points.

### *Factor 2, Supervisory Controls*

This factor measures how the work is assigned, the employee's responsibility for carrying out the work, and how the work is reviewed. The agency credited Level 2-3.

At Level 2-3, the supervisor assigns specific projects in terms of issues, organizations, functions, or work processes to be studied and sets deadlines for completing the work. The supervisor or higher grade analyst provides assistance on controversial issues or on the application of qualitative or quantitative analytical methods to the study of subjects for which precedent studies are not available. The employee independently plans, coordinates, and carries out the successive steps in fact-finding and analysis of issues necessary to complete each phase of assigned projects. Work problems are normally resolved without reference to the supervisor, in accordance with the body of accepted policies and precedents. Work is reviewed for conformance with overall requirements as well as contribution to the objectives. Findings and recommendations developed by the employee are reviewed prior to release, publication or discussion with management officials.

At Level 2-4, the employee and supervisor develop a mutually acceptable project plan which includes identification of the work to be done, the scope of the project and deadlines for its completion. Within the parameters of the approved plan, the employee has responsibility for planning and organizing the study, estimating costs, coordinating with staff and line management personnel, and conducting all phases of the project. This frequently involves the definitive interpretation of regulations and study procedures and the initial application of new methods. The employee informs the supervisor of potentially controversial findings, issues, or problems with widespread impact. Completed work is also reviewed critically outside the employee's immediate office by staff and line management officials whose programs and employees would be affected by implementation of the recommendations.

Level 2-3 is met. The appellant receives overall objectives from her supervisor. She independently plans and carries out all phases of her assignments including analysis of processes and procedures. The appellant normally resolves any problems that arise during the course of her work without supervisory assistance. Comparable to Level 2-3, she coordinates work with staff in her own and other departments. The appellant keeps the supervisor informed of progress in completing assignments and any unexpected issues and controversial findings that are encountered. Completed work is reviewed for effectiveness of overall approach and conformance with policy. Work products consist of reports of finding and recommendations and are submitted through the supervisor to MTF management officials who determine actions to be taken.

Level 2-4 is not met. While the appellant operates independently in planning and carrying out her assignments, the scope of her work is more limited than is characteristic of Level 2-4 and does not involve comparable study planning and organizing, identification of budget estimates, identification of study phases and parameters, etc. Her analytical assignments are more specific in that they pertain to the direct delivery of a limited range of programs, services, and procedures provided by the MTF, as opposed to the more extensive operations and associated procedures of a hospital that might involve the broader studies described at Level 2-4. Unlike this level, the

appellant does not provide definitive interpretations of regulations and study procedures or apply new methods to carry out analyses and studies. Rather than providing definitive interpretations of standards, she reviews them to determine local impact and may obtain further information on interpretations from JCAHO or higher level agency staff. Unlike Level 2-4, the appellant's work is reviewed by the supervisor and by others in the MTF whose organizations or operations are impacted by reports, studies or proposed changes.

Level 2-3 is credited for 275 points.

#### *Factor 4, Complexity*

This factor covers the nature, number, variety, and intricacy of the tasks, 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. The agency credited Level 4-3.

At Level 4-3, the work principally involves dealing with problems and relationships of a procedural nature rather than the substance of work operations, issues, or other subjects studied. At this level, the employee analyzes the issues in the assignment, then selects and applies accepted analytical techniques such as task analysis, workload measurement, and trend analysis to resolve procedural problems affecting the efficiency, effectiveness or productivity of the organization and/or workers studied. Projects usually take place within organizations with related functions and objectives, although organization and work procedures differ from one assignment to the next. Organizational efficiency assignments typically involve observing work in progress to identify and resolve problems in work-flow, work methods and procedures, task distribution, overall workload, forms and record keeping, span of control and organizational structure. When performed, evaluative studies involve measurement of current work output, group productivity and accomplishments, or identification of current resource needs (staff, supplies, equipment, and space). Findings and recommendations are based upon analysis of work observations, review of production records or similar documentation, research of precedent studies and application of standard administrative guidelines.

At Level 4-4, the work involves gathering information, identifying and analyzing issues, and developing recommendations to resolve substantive problems of effectiveness and efficiency of work operations in a program setting. Subjects and projects assigned at this level usually consist of issues, problems, or concepts that are not always susceptible to direct observation and analysis. Difficulty is encountered in measuring effectiveness and productivity due to variations in the nature of administrative processes studied and information that is conflicting or incomplete or cannot readily be obtained by direct means. At this level, assignments may involve compiling, reconciling, and correlating voluminous workload data from a variety of sources with different reporting requirements and formats, or the data must be carefully cross-checked, analyzed and interpreted to obtain accurate and relevant information. Characteristic of work at this level is originality in refining existing work methods and techniques for application to the analysis of specific issues or resolution of problems.

Level 4-3 is met. As at this level, the appellant's work involves an organization with related functions and requires analyzing established requirements and compliance status, gathering and



generating data, identifying problems primarily of a procedural, factual, or observable nature, and developing, or coordinating development of, methods to improve performance. She adapts established practices to the unique requirements of the local programs that she's assigned. For example, she develops templates for providers to capture data, creates forms to help identify problems and workflow, and develops, alone or working with a team, strategies to improve processes and avoid risks to patients, visitors, and staff.

Level 4-4 is not met. The appellant's assignments do not routinely involve issues or problems that are difficult to identify through direct observation and analysis or situations where information is conflicting, incomplete, or difficult to obtain. Unlike Level 4-4, identifying problems and recommending solutions involves developing goals, forms, and procedures for performance measurement, patient safety, and risk management from factual information or processes. Her work involves use of established standards, methods and techniques and does not require refinement of work methods and techniques, the revision of methods of collecting workload data, or the adoption of new measures of productivity envisioned at this level.

Level 4-3 is credited for 150 points.

#### *Factor 5, Scope and effect*

This factor covers the relationship between the nature of the work and the effect of the work products or services. The agency credited Level 5-3.

At Level 5-3, the purpose of the work is to plan and carry out projects to improve the efficiency and productivity of organizations and employees in administrative support activities. Employees at this level identify, analyze, and make recommendations to resolve conventional problems and situations in workflow, work distribution, staffing, performance appraisals, organizational structure and/or administration. Employees may be assigned portions of broader studies of largely administrative organizations or participate in the evaluation of program effectiveness at the operating level. Work may also involve developing detailed procedures and guidelines to supplement established administrative regulations or program guidance. Completed reports and recommendations influence decisions by managers concerning the internal administrative operations of the organizations and activities studied. The work may involve identifying problems, studying, analyzing and making recommendations concerning the efficiency and productivity of administrative operations in different components of an organization.

At Level 5-4, work involves establishing criteria to measure and/or predict the attainment of program or organizational goals and objectives. Work at this level may also include developing related administrative regulations, such as those governing the allocation and distribution of personnel, supplies, equipment, and other resources or publishing program guidance for application across organizational lines or in varied geographic locations. Work contributes to the improvement of productivity, effectiveness, and efficiency in program operations and/or administrative support activities at different levels and/or geographical locations within the organization and affects the plans, goals, and effectiveness of missions and programs at these various levels or locations.

Level 5-3 is met. The purpose of the appellant's work is to carry out administrative assignments for the [acronym] to ensure health, safety, and welfare of patients and employees. The appellant is responsible for resolving conventional problems, e.g., workflow, documentation, time management, etc., and issues and improving processes associated with her assigned MTF programs. Like Level 5-3, her work includes reviewing, determining impact and appropriate action for the MTF, and implementing new or revised guidance and procedures. She also identifies problems, analyzes facts, researches information, and makes recommendations to resolve the situations. Comparable to Level 5-3, her reports, proposed strategies, policies and procedures, etc., influence administrative operations of the activities studied.

Level 5-4 is not met. The purpose of the appellant's work is not to improve productivity, effectiveness, and efficiency of program operations or resolve problems in the effectiveness and efficiency of administrative support at many different echelons or many geographical locations as expected at this level. The appellant works with standards and directives or criteria established by JCAHO or at other agency levels in developing MTF goals and requirements and does not establish criteria to measure and/or predict the attainment of program or operational goals. Unlike Level 5-4, her work affects activities at a single MTF and does not regularly affect different levels or geographic locations outside the [acronym].

Level 5-3 is credited for 150 points.

#### *Summary*

<i>Factor</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. & 7. <i>Personal contacts/ Purpose of contacts</i>	3-c	180
8. <i>Physical demands</i>	8-1	5
9. <i>Work environment</i>	9-1	<u>5</u>
<i>Total points</i>		1990

A total of 1990 points falls within the GS-9 grade level point range of 1855 -2100 points on the Grade Conversion Table.

#### **Decision**

This position is properly classified as Health System Specialist, GS-671-9.