

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

Appellant: [name]

Agency classification: Administrative Support Specialist
GS-301-9

Organization: [organizational unit]
[organizational unit]
[command]
Department of the Army
[city and country]

OPM decision: GS-301-9
(Title at agency discretion)

OPM decision number: C-0301-09-04

/s/ Robert D. Hendler

Robert D. Hendler
Classification and Pay Claims
Program Manager
Center for Merit System Accountability

March 7, 2007

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 the 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]

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Introduction

On June 27, 2006, the Center for Merit System Accountability, U.S. Office of Personnel Management (OPM), accepted a position classification appeal from [appellant], who occupies the position of Administrative Support Specialist, GS-301-9, in the [organizational units], [command], in [city and country]. He requested that his position be classified at the GS-11 level. We accepted and decided this appeal under the provisions of section 5112 of title 5, United States Code (U.S.C.).

The appellant initially appealed the classification of his position to the Department of Defense in February 2006. That appeal was denied in April 2006.

We conducted a telephone audit with the appellant on September 21, 2006, and a subsequent telephone interview with his supervisor. We decided this appeal by considering the audit findings and all other information of record furnished by the appellant and his agency, including his official position description [number] and other material received in the agency administrative report on August 18, 2006.

General issues

The appellant believes that his position is classified inconsistently with other administrative positions at various locations throughout the Department of the Army. By law, we must classify positions solely by comparing current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since 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.

Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. It also has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellant considers his position so similar to another that they warrant the same classification, he may pursue the matter by writing to his agency's headquarters human resources (HR) office. In doing so, he should specify the precise organizational location/installation, classification, duties, and responsibilities of the position in question. If the position is found to be basically the same as his, the agency must correct its classification to be consistent with this appeal decision. Otherwise, the agency should explain to the appellant the differences between his position and the other position.

We note that the other administrative positions cited by the appellant may be similar to his position only in some respects. First, organizations may structure their administrative functions differently, either consolidating them in one position or distributing the work among several positions. Second, the difficulty and complexity of administrative work and thus its grade value is dependent to some degree on the size and/or complexity of the organization that it directly supports. Third, administrative positions may have differing degrees of delegated authority, e.g., they may have full authority for accomplishing personnel actions either personally or through subordinate staff, or they may serve as coordinators or liaison with a human resources staff that retains all authority for personnel actions. Thus, positions that appear superficially similar may

differ significantly in their duties, level of authority, or organizational context to support a difference in their grade levels.

The appellant has stated in writing that his position description is accurate and insists that his appeal be adjudicated based solely on this position description. However, this request directly contradicts other statements submitted by the appellant, wherein he claims to be performing duties that are neither mentioned in his position description or performance standards, corroborated by his supervisor, or supported by work samples. He also claims that his work has a degree of impact that cannot be realistically associated with the duties he performs. As a general response to this, it should be noted that we adjudicate a classification appeal by evaluating the appellant's *position*, i.e., the duties and responsibilities that are assigned by management and actually performed by the appellant, not the appellant's *position description*. In conjunction with other materials contained in the appeal record, we use the position description as a framework for our evaluation, but only to the extent that it coincides with the reality of the duties and work situation. If the position description is incomplete, overstated, or otherwise misrepresents the actual work being performed, we base our analysis on the information gathered in our factfinding process.

The appellant contends that a position description is a "legal employment contract" that may serve as "evidence" in a court of law and thus as the basis for a classification appeal. The appellant prepared and submitted with his appeal an evaluation of his position description supporting the GS-11 level, and claims that this is also "evidence." Other "evidence" claimed by the appellant includes statements made by him regarding the work he performs, although these statements were not supported by work samples. The appellant feels that his position should be upgraded on the basis of this various "evidence."

In response to these claims, a position description is not a legal document or contract; it is an administrative document that may be modified at any time at management discretion. Further, although we consider an appellant's arguments supporting the requested classification in our adjudication of the appeal, we do not regard a self-generated position evaluation as *prima facie* evidence for that classification. We adjudicate a classification appeal by evaluating the work that is *actually being performed*, not the work that an appellant claims is being performed if this cannot be substantiated by agency management or by producing written documentation of the work. The statutory basis of a classification appeal (5 U.S.C. 5112) requires OPM to "ascertain currently the facts as to the duties, responsibilities, and qualification requirements of a position" under appeal. Our authority in ascertaining facts in connection with an appeal is explicitly stated in 5 CFR 511.609, which permits OPM to investigate or audit an appealed position at its discretion. Thus, an appellant may not limit the parameters of our factfinding nor expect that we would substitute his or her personal judgment for our own analysis in the adjudication of an appeal.

The appellant also notes that he has been required to perform the work of other positions, sometimes for several months, while their occupants were on extended leave. However, duties performed in another employee's absence cannot be considered in determining the grade of a position. If an employee is assigned the work of a higher graded position for an extended period of time, the employee may be given a temporary promotion for the duration of the assignment,

but this does not affect the grade of the employee's official position of record. Conversely, if the employee is temporarily assigned lower-graded work, there would be no basis for a promotion, temporary or otherwise, since adding lower-graded work to a higher-graded position does not enhance the grade of the position.

We find the appellant's position description generally accurate in its depiction of his duties and responsibilities, although its wording in some areas could be misconstrued to imply that the appellant has a greater degree of responsibility than actually exists. For example, the position description states the appellant "maintains liaison with action officers and support staff members of 7ATC, higher headquarters, and field staff, and officials of other organizations in order to coordinate program efforts, investigations, analysis and evaluation of program efforts, and high priority actions." This is limited to the appellant coordinating the flow of correspondence related to these types of activities, rather than coordinating the activities themselves from an operational standpoint. The position description states the appellant "provides guidance, resolves problems, assigns and adjusts priorities, makes decisions, and takes action on behalf of the Deputy Commander." This authority is confined to those relatively limited administrative matters that fall within the realm of the appellant's responsibility. The position description states the appellant "researches material and prepares decision papers and command guidance for approval and dissemination to subordinate activities in those areas which affect command personnel program and civilian personnel." The appellant provided no work samples of this nature. Further, the scope of his position is limited to providing HR guidance to the center, whereas this wording implies command-level responsibilities that are not organizationally assigned to his position. Beyond these caveats, the position description provides a fairly accurate representation of the appellant's role as HR liaison and administrative coordinator.

Position information

The primary function of the appellant's position is to serve as the civilian personnel advisor for the [organizational unit]. In this capacity, he serves as liaison to the Civilian Personnel Advisory Center (CPAC), the Civilian Personnel Operations Center (CPOC), and the Civilian Human Resources Agency (CHRA) on the preparation and submission of personnel action requests and obtaining personnel services for the center and provides or forwards technical advice, guidance, and interpretation to management on HR issues and problems. He assists managers in resolving personnel problems, consulting with the servicing CPAC as appropriate; reviews performance standards prepared by supervisors for quality control and manages the awards pool; assists management in preparing long-range and fiscal year training plans for civilian employees; coordinates requests for civilian manpower changes and maintains staffing tables and organizational structures reflecting current authorizations; and updates local HR operating procedures to ensure compliance with changes in personnel regulations and guidelines. The appellant's position description identifies these duties as comprising approximately 65 percent of his time. This was corroborated by his supervisor and forms the basis for his individual performance standards.

The appellant contradicts the time percentages in his position description, claiming that his time is divided equally among HR, administrative officer, and management analyst work. However, there is a distinct difference between his perception of the work that he performs and actual

administrative officer or management analysis work. Outside his HR-related work, the appellant's duties most closely resemble work that is typically described as office management. Specifically, he screens packages incoming for the Deputy Commander for completeness and basic quality control, maintains the document tracking system for all administrative actions, and manages the Deputy Commander's calendar. He has no responsibility for substantive review or input to any of the documents he handles. He maintains the manpower data base reflecting current employment figures and retrieves data as requested, but he does not analyze this data to develop recommendations or solutions to manpower problems. The appellant also claims that he "directly manages" the civilian workforce of the center plus contractors and military staff who work as supervisors of civilian personnel, although he does not explain his understanding of the term "manages." His position does not conform to the commonly accepted interpretation of this term as he has no supervisory or program management responsibilities.

The appellant claims that his work has agency-wide impact (e.g., how soldiers are trained for war) and that it directly influences the efficiency and effectiveness of U.S. Army military operations. This degree of impact is not supported by the duties and responsibilities of his position. The appellant has no program operational responsibilities within his organization. He performs certain limited administrative functions that support and facilitate the work of higher-level program staff and management, and he maintains and provides data that may be used by this staff in making program decisions. However, this association with the work of the program staff does not mean that the broader influence of their work accrues to his own. The direct impact of the appellant's position does not extend beyond the immediate organization and does not have a substantive influence on the broader mission of that organization.

Series and title determination

The GS-301 series includes positions that perform, supervise, or manage non-professional, two-grade interval work for which no other series is appropriate. The work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives. The administrative work of this series involves skills such as analytical, research, and writing ability, and requires the application of judgment typically demonstrated by substantial, responsible experience, or that equivalent to a college level education. The appellant's position is correctly assigned to this series.

There are no titles specified for positions in the GS-301 series. Therefore, the agency may construct a title in keeping with the nature of the work performed. In doing so, the agency should adhere to the position titling guidance contained in the *Introduction to the Position Classification Standards*.

Although the primary responsibility of the appellant's position is the performance of HR advisory and coordinative work, it would not be appropriately assigned to the Human Resources Management Series, GS-201. That series requires substantial knowledge and skill in applying HR laws, concepts, principles, policies, methods, and practices. The position classification standard covering that series notes that "although some positions may include work requiring some knowledge and skills in the human resources management area, classification to the Human Resources Management Series, GS-201, may not be appropriate," particularly in those

cases where the work involves the application of related knowledge and skill but not to the extent that it may warrant classification to the series. The appellant's role is primarily to prepare, coordinate, transmit, and monitor personnel action requests, to maintain certain HR-related records, and to serve in effect as a conduit of technical HR information between the CPAC and center management. However, his position does not involve the actual performance of HR management work (e.g., classifying or staffing positions, preparing disciplinary letters, resolving labor-management disputes); he has no decision-making authority for HR matters; and he is not the *source* for authoritative HR regulatory guidance or interpretation. His position thus requires considerably less HR knowledges than are presumed under the GS-201 series.

Although the appellant claims to conduct analytical projects typical of management analysis work, he provided no actual work samples to support this claim. He states that much of this work is oral, i.e., program advice and recommendations given over the telephone, and he attempts to equate this to performing analytical studies. However, the examples he gave consist of responding to questions directly related to his assigned duties, such as HR queries, or providing factual information or data from the records he maintains. This is not consistent with the intent of management analysis work as it is described in the GS-343 Management and Program Analysis Series, the key component of which is *analyzing* program operations or administration to develop recommendations for improvement rather than, as in the appellant's case, merely retrieving data (e.g., the number of overhead hires) or explaining administrative processes or requirements (e.g., who pays for those overhires, the cost of employing a local national, how to get approval for a higher-graded position, etc.)

The appellant provided examples of a few relatively minor assignments that would be typical of work covered by the GS-344 Management and Program Clerical and Assistance Series. These include "charting (several charts) our whole organization"; assisting in preparing a presentation on how "spaces and faces" will move as the center transforms; and preparing charts to compare the cost of deploying local nationals versus contractors for training exercises. This work is explicitly addressed in the GS-344 standard, which describes such functions as maintaining records of organizational and workflow charts, staffing levels, mission and function statements, and program resource use and availability; making routine calculations such as standard cost estimates, production rates, staff hours, and workload figures; and preparing charts, graphs, and narrative information from material provided by others. Because GS-344 work does not normally exceed the GS-7 level, these assignments performed by the appellant do not contribute to his position's grade level.

Grade determination

The standard for the GS-301 series does not contain grade-level criteria. It instructs that positions in this series be evaluated using various standards for other series, depending on the position's content and work environment.

The primary function of the appellant's position and the highest grade level of work performed is his HR coordination and advisory responsibility. We evaluated this work by applying the Job Family Position Classification Standard for Administrative Work in the Human Resources Management Group, GS-200, as the most closely related source of grade level criteria..

The GS-200 standard is written in the Factor Evaluation System format, under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade conversion table provided in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor level description. If the position fails in any significant aspect to meet a particular factor level description, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information an employee must understand to do the work, and the skills needed to apply that knowledge.

At Level 1-6, the work requires knowledge of fundamental HR laws, principles, policies, and practices to advise on moderately complex but well-precedented and non-controversial issues. The employee makes informed judgments on problems and issues, provides advisory services on specific requests related to immediate problems of limited scope, and analyzes segments of broader HR issues or problems.

The appellant's position meets Level 1-6. The staffing of the center currently consists of about 75 General Schedule and 150 local national employees, in addition to a large military contingent. The appellant advises on HR issues related to the GS and local national workforce. These issues relate primarily to specific personnel action requests (e.g., upgrading existing positions or establishing and staffing new positions) and the types of localized and recurring HR problems that would be expected in a small organization.

At Level 1-7, the work requires knowledge of a wide range of HR concepts, laws, policies, and practices to solve a wide range of complex, interrelated problems and issues. The employee provides comprehensive advisory and technical services on substantive organizational functions and work practices and recommends appropriate interventions to resolve complex interrelated HR problems and issues; develops new or modified work methods, approaches, or procedures for delivering effective services to clients; applies consensus building, negotiation, and conflict resolution techniques; and delivers briefings, project papers, status reports, and correspondence to managers to foster understanding and acceptance of findings and recommendations.

Level 1-7 is not met. The appellant does not normally encounter a wide range of complex, interrelated HR management problems and issues. Most problems that arise are limited in scope, relate to specific actions being proposed, and do not typically require development of new or modified work methods, approaches, or procedures. Given the limited size of the work force serviced and the recurring nature of the problems and issues dealt with, the appellant's work does not require the degree, depth, and breadth of knowledge and skill characteristic of Level 1-7.

Level 1-6 is credited (950 points).

Factor 2, Supervisory controls

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

At Level 2-3, the supervisor outlines or discusses possible problem areas and defines objectives, plans, priorities, and deadlines. Assignments have clear precedents and the employee independently plans and carries out the work in conformance with accepted policies and practices; 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 provides assistance on controversial or unusual situations; reviews completed work for conformity with policy, the effectiveness of the employee's approach to the problem, technical soundness, and adherence to deadlines; and does not usually review in detail the methods used to complete the assignment.

The appellant's position meets Level 2-3. The appellant works independently on ongoing assignments and keeps the supervisor informed of significant issues. Most actions or issues are precedented, and the appellant receives technical guidance from CPAC staff as required. Work is reviewed in terms of results accomplished and adherence to stated policy.

At Level 2-4, the supervisor establishes the objectives and resources of the program and with the employee, discusses time frames, scope of the assignment, and possible approaches. The employee determines how to carry out the work but keeps the supervisor informed of progress and potentially controversial matters. The employee frequently interprets regulations on his/her own initiative, applies new methods to resolve complex and/or intricate, controversial, or unprecedented issues and problems, and resolves most of the conflicts that arise. The supervisor reviews completed work for soundness of overall approach, effectiveness in meeting requirements, and feasibility of recommendations.

Level 2-4 is not fully met. While the appellant provides advice on HR issues and resolves many problems on his own, his role is that of liaison with the technical HR staff at the CPAC. He would not be expected to resolve complex, controversial, or unprecedented issues without conferring with them, nor would such problems be expected to arise routinely within the limited staffing situation of the center. Similarly, in those cases where the regulations are uncertain or ambiguous, he would be expected to obtain authoritative interpretations from the CPAC staff, who retain decision authority on all such matters.

Level 2-3 is credited (275 points).

Factor 3, Guidelines

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

At Level 3-3, the employee uses a wide variety of reference materials and manuals; however, they are not always directly applicable to the issues or problems. Precedents are available

outlining the preferred approach to more general problems. The employee researches and adapts available guidelines to specific issues and problems.

The appellant's position meets Level 3-3. The guidelines include agency policy statements and OPM and agency regulations, standards, and directives. The appellant selects proper alternatives to efficiently carry out the work. Guidelines are available for most situations and are generally applicable.

At Level 3-4, the employee uses very general guidelines and precedents. 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 develops new methods and criteria, proposes new policies and practices, researches trends and patterns, and modifies, adapts, and/or refines broader guidelines.

Level 3-4 is not met. The appellant uses generally applicable and available OPM and agency guidelines and precedents. Issues that are not covered by available HR guidelines or where the proper interpretation of the guidelines in relation to the issue at hand is not clear are referred to the CPAC for technical guidance. The organizational level at which the appellant works does not afford him the opportunity to develop new HR policies, practices, or guidelines. Rather, he works within the established HR frameworks developed at higher HR management levels.

Level 3-3 is credited (275 points).

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.

At Level 4-3, the work consists of applying established analytical techniques to problems and issues more of a technical rather than an advisory nature, and issues and problems of the same type, i.e., determining the most effective *technical* approaches to the problem requiring the application of established analytical techniques and methods and standard regulations and procedures. The employee resolves a moderate range of problems or situations requiring the use of established analytical techniques to isolate and evaluate appropriate precedents, to examine and analyze documentation, to reconcile discrepancies or inconsistencies, and to develop supportable conclusions based on standardized research.

The appellant's position meets Level 4-3. His work requires application of established analytical techniques to a moderate range of HR issues. He follows established regulations, guidance, or precedents in providing technical advice to management and employees on the steps or processes required to accomplish proposed personnel actions. This involves the performance of such standardized research as reading the relevant regulations and guidelines or consulting with the CPAC for guidance.

At Level 4-4, the employee resolves problems and issues that involve conflicting or incomplete information and are characterized by complex, controversial, or sensitive matters containing several interrelated issues. Problems require modification of analytical techniques to accommodate a wide range of variables. For example, the employee may identify ways to improve or enhance HR management services; analyze the effects of changes in law and regulations; and/or assess situations that are complicated by ambiguous, disputed, or conflicting information and formulate a legal and/or factually supportable position.

Level 4-4 is not met. The appellant's assignment is not characterized by comparable complexity regularly requiring modification of analytical techniques and involving sensitive matters. The appellant provides routine HR advice for a small and relatively stable organization. Formal HR authority, services, and regulatory and procedural guidance are provided by other organizations. The appellant's role is limited to monitoring, providing advice, and initiating HR actions for employees. His assignment does not have the complex features characteristic of Level 4-4.

Level 4-3 is credited (150 points).

Factor 5, Scope and effect

This factor covers the relationship between the nature of the work, e.g., the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization.

At Level 5-3, the employee applies accepted criteria, principles, and standard methods to resolve a variety of conventional issues and problems or portions of broader studies that require developing detailed procedures and guidelines to supplement existing guidance. Work reports and recommendations influence the decisions made by managers and employees and affect customer perception of the HR program.

The appellant's position meets Level 5-3. He applies accepted criteria and standard methods to resolve a variety of conventional problems arising within a small operating environment, e.g., hours of work, overtime, performance standards, or employee complaints. His advisory services influence decisions made by employees and management and his work affects the effectiveness of the center's HR processes.

At Level 5-4, work involves resolving or advising on complex problems and issues that typically require analyzing and/or troubleshooting a wide range of unusual conditions. Work ultimately affects the objectives and effectiveness of the agency HR program and operations.

Level 5-4 is not met. The appellant's work does not routinely involve resolution of comparable complex problems having a wide range of unusual conditions. These problems occur infrequently. While the appellant may provide initial guidance and recommendations relative to regulations, guidelines, and precedents relating to more complex problems, the supervisor and higher level HR staff would be involved with their resolution. The appellant's duties, recommendations, and decisions have local impact, but do not affect the objectives and effectiveness of the overall agency HR program.

Level 5-3 is credited (150 points).

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

This factor includes face-to-face contacts and telephone dialogue with persons not in the supervisory chain.

Personal contacts

The appellant's position meets Level 2. At that level, contacts are with agency personnel at all levels, as well as employees, representatives of private concerns, applicants, and the general public in moderately structured settings. The appellant's contacts likewise are with military and civilian staff of the center and agency staff at higher organizational levels.

Level 3 is not met, where contacts are with persons outside the agency, including consultants, contractors, or business executives, or with agency officials several managerial levels removed from the employee when such contacts occur on an ad hoc basis. The appellant does not regularly and routinely have contacts of this nature.

Purpose of contacts

The appellant's position meets Level B. At that level, contacts involve planning, coordinating, or advising on work efforts, or resolving issues or operating problems by influencing or persuading people who are working toward mutual goals and have basically cooperative attitudes. The appellant's contacts are comparable in that he provides advisory service to managers and obtains or exchanges information.

Level C is not met, where contacts are to influence and persuade employees and managers to accept and implement findings and recommendations where resistance is encountered due to organizational conflict, competing objectives, or resource problems. The appellant is the point of contact for a variety of HR management actions and issues. Actions are of an individual nature and do not generally involve organizational conflict, competing objectives, or resource problems. Controversial and significant matters are handled by the supervisor and/or higher level HR staff.

Level 2B is credited (75 points).

Factor 8, Physical demands

This factor covers the requirements and physical demands placed on the employee by the work assignment.

The appellant's position matches Level 8-1 (the only level described for this factor), where the work is sedentary, requiring no special physical effort.

Level 8-1 is credited (5 points).

Factor 9, Work environment

This factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required.

The appellant's position matches Level 9-1 (the only level described for this factor), which describes a typical office environment with adequate light, heat, and ventilation.

Level 9-1 is credited (5 points).

Summary

Factors	Level	Points
Knowledge required by the position	1-6	950
Supervisory controls	2-3	275
Guidelines	3-3	275
Complexity	4-3	150
Scope and effect	5-3	150
Personal contacts/Purpose of contacts	2B	75
Physical demands	8-1	5
Work environment	9-1	<u>5</u>
Total		1885

The total of 1885 points falls within the GS-9 point range (1855-2100 points) on the grade conversion table provided in the standard.

Decision

The appellant's position is properly classified as GS-301-9, with the title at agency discretion.