

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

Appellant: [appellant]

Agency classification: Lease Administration Specialist
GS-1101-11

Organization: Public Buildings Service
[location] Service Center
[location] South Office
General Services Administration (GSA)
[city and state]

OPM decision: GS-1101-11
Title at agency discretion

OPM decision number: C-1101-11-05

/s/ Robert D. Hendler

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

March 27, 2007

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, payrolls, 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]
[location] Property
Management Center
[location] 50 (6PWC-S)
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[city, state zip code]

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Introduction

On August 9, 2006, the Chicago Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. On November 27, 2006, we received the complete agency administrative report. The appellant's position is classified as Lease Administration Specialist, GS-1101-11, but he believes his mail management duties warrant reclassification as Mail Management Specialist, GS-1101-12. The appellant's position is located at the Public Buildings Service, [location } Service Center, [location] South Office, General Services Administration (GSA), in [city and state]. We accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

To help decide the appeal, we conducted a telephone audit with the appellant on October 25, 2006, and a telephone interview with his immediate supervisor on October 25, 2006. In reaching our decision, we carefully considered the audit and interview findings and all information of record furnished by the appellant and his agency, including his official position description (PD).

Background

During a reorganization several years ago, the appellant was offered and accepted a reassignment to a position in lease administration in the Public Buildings Service (PBS). The appellant requested, and management agreed, that he be allowed to retain his mail management duties he had performed in his former position despite the fact that these duties were not an inherent part of PBS work. However, because the mail management and related Contracting Officer Representative (COR) duties and responsibilities were not reflected in the PD to which the appellant was reassigned (Lease Administration Specialist, GS-1101-11, PD number [#####-#]), he requested the agency review the classification of his position and revise the PD. A review was subsequently conducted, the PD was revised, and the appellant was reassigned to the PD number [#####-#], classified as Lease Administration Specialist, GS-1101-11 effective June 11, 2006, which includes the mail management and COR duties and responsibilities he performs.

General issues

The appellant's supervisor has certified to the new PD's accuracy, and the lease administration duties and the grade level assigned to them are not in dispute. The appellant believes he is the sole mail management policy expert for the GSA [location] Region and that his mail management duties, coupled with his level of expertise, warrant a change in title to reflect his mail management responsibilities and an increase in grade level. In addition, the appellant takes issue being referred to in the PD as "the pre-sort and mail coordinator/manager." He believes the term "coordinator" does not reflect his level of autonomy or expertise.

The appellant makes various statements about his working conditions, his agency, and its evaluation of his position. In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of his position. By law, we must make that decision solely by comparing his current duties and responsibilities to OPM standards and

guidelines (5 U.S.C. 5106, 5107, and 5112). Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

Position information

The primary function of the appellant's position is to perform work supporting the regional lease administration, acquisition, and enforcement programs. The appellant reports to the Director of the [location] Property Management Center who provides general program direction and determines work priorities. The appellant works independently to produce the required assignments. He provides technical support for the lease inspection and compliance program, analyzes building operational policies and procedures, interprets and implements the agency's building management policies, determines facility and space needs of Federal agencies, and investigates and hears complaints received from tenant agencies and building managers.

The appellant also has responsibility for certain mail management activities to ensure mail facilities are efficient, financially accountable, and compliant with Federal mail regulations and related contract requirements. These duties can be broken down into three distinct areas: (1) COR for the regional mailroom contract, (2) COR for the regional mail pre-sort contract, and (3) management of regional mail. As COR for the regional mailroom contract, the appellant works closely with the regional contracting officer to ensure contractual requirements are followed. He also tracks and accounts for mail meter costs, ensures the necessary mail equipment is provided, develops and maintains a mailroom security plan, and recommends changes in mailroom operations to the contracting officer.

The regional mail pre-sort contract involves a specific mail preparation used to receive a discounted mailing rate by sorting mail in accordance with United States Postal Service (USPS) standards. As COR for three pre-sort contracts in [location], Omaha, and St. Louis, the appellant ensures Federal agencies and contract vendors follow pre-sort requirements. He administers and approves security, quality control, and emergency procedure plans at pre-sort facilities and markets the pre-sort contract to Federal agencies. Regional mail management duties require the incumbent to work with members of the Administrative Policy Division at agency headquarters (HQ) in order to ensure the region is in compliance with Federal mail management regulations and policies. He provides technical and administrative support to the region, disseminates information provided by HQ, identifies and implements cost-savings and efficiency measures, oversees mail meter funds, develops and maintains a mailroom facility security plan, seeks out and implements cost savings measures, and works with HQ and GSA's Finance Division to ensure availability of funds for mailroom equipment.

Based on our review, we find the official PD contains the major duties and responsibilities assigned to and performed by the appellant, and we incorporate it by reference into this decision.

Series, title, and standard determination

The agency has assigned the appellant's position to the Business and Industry Group, GS-1100, and classified it in the General Business and Industry Series, GS-1101, and the appellant agrees. We concur with the agency's determination. Similar to positions in the GS-1100 group, the

primary work performed by the appellant includes advising on and administering programs that require paramount knowledge of business practices; the characteristics and use of property and equipment; the conduct of related studies; the collection, analysis, and dissemination of information; the establishment and maintenance of contacts with industry and commerce; the provision of advisory services; the examination and appraisal of merchandise or property; and the administration of regulatory provisions and controls. Therefore, this position belongs in the GS-1101 series because it covers other work properly classified in the GS-1100 group for which no other series has been provided.

The agency titled the position as Lease Administration Specialist, because the paramount requirement of the appellant's position is to support lease administration functions. However, the appellant disagrees with the titling of his position and believes *Mail Management Specialist* more accurately reflects the grade controlling duties of his position. OPM does not prescribe titles for positions in the GS-1101 series. Because there are no prescribed titles for positions in that series, titling is not an appealable matter (5 CFR 511.607(4)). According to the *Introduction to the Position Classification Standards*, Section III.H.2., an agency may designate a title as appropriate as long as it communicates an immediate understanding and identification of the position. Therefore, the official title is left to the agency's discretion.

Grade determination

There are no grade level criteria provided by the GS-1101 series. The *Position Classification Standard (PCS) for Realty Series*, GS-1170, was used to evaluate the lease administration duties at the GS-11 grade level. The appellant does not disagree with these determinations, and after a thorough review of the record, we concur and have so credited the position.

The agency used the *Administrative Analysis Grade Evaluation Guide (AAGEG)* to evaluate the appellant's mail management duties because they are similar to the non-supervisory analytical, planning, and evaluative work described therein. The appellant agrees with the agency's crediting of all factors, with the exception of Factor 3 (Guidelines) where he says he does not believe his mail management duties are adequately addressed or properly credited. After a thorough review of the record, we concur with the agency's evaluation of the uncontested factors. Therefore, our analysis will focus on Factor 3.

At issue is whether the mail management duties of the appellant's position are grade controlling and warrant a higher grade level determination. Work may be credited as grade controlling only if it is officially assigned to the position on a regular and recurring basis; is a significant part of the overall position (i.e., occupying at least 25 percent of the employee's time); and the higher level of knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant (*Introduction to the Position Classification Standards*, III, J.).

While the duties performed are not in dispute, the appellant and his supervisor disagree on the amount of time being spent on mail activities. The supervisor believes these duties occupy 20 percent of the appellant's work time as stated in the PD and indicates it has never been regional management's intention or desire that these duties become a significant part of the overall position (i.e., occupying at least 25 percent of the appellant's time). The appellant states he

spends between 30 and 40 percent of his time on mail management-related duties, but no records have been kept to accurately capture actual time spent. The supervisor believes changes in Federal mail regulations have expanded the appellant's mail management program responsibilities. He states further that if the appellant does, in fact, spend more than 20 percent of his time engaged in mail management activities, most likely it is because he is responding to requests from HQ staff since they engage in direct communication and such requests are not normally cleared with regional management.

GSA is responsible for providing guidance and assistance to Federal agencies on the processing of mail. GSA's mail operations are spread across 500 locations. [location] is one of three locations considered to process large volumes of mail. Those assigned mail management duties historically have not been expected to stay abreast of all regulations issued by the USPS or recommendations made by the Department of Homeland Security (DHS). As a result, no regional or field employee has mail management as a primary function; those duties are considered to be collateral and are currently being carried out by employees at various grade levels.

In order to contain costs and increase accountability, agencies are now being required by GSA to change how they pay for postage by transitioning from the Official Mail Accounting System (OMAS – a government-unique system used by the USPS to track Federal spending on postage) to commercial payment processes. The deadline for this transition was December 31, 2003, but agencies had the option of requesting a deviation. GSA was granted such a deviation until September 30, 2007. The appellant was asked to participate in a national study of GSA's mail program, and he chaired a "best practices" subgroup tasked with recommending how best to implement commercial mail payment practices. In August 2004, the appellant, along with six other committee members, prepared a report outlining specific recommendations, and the Heartland Region was selected as the first region to transition to commercial mail payment. This, along with the requirement to upgrade security at mail facilities and replace mail existing mail meters with digital meters by 2008, has resulted in the appellant spending more time on mail-related duties than had previously been the case. Therefore, given GSA headquarters assigned mail management work, we must conclude the appellant spends 25 percent of his time on mail management duties, constituting a significant part of his work sufficient to warrant application of the AAGEG.

Evaluation of position using the AAGEG

The AAGEG is written in the Factor Evaluation System (FES) format. Under the FES format, grade level is established by evaluating the duties, responsibilities, and qualifications required of the position against nine factors common to non-supervisory positions covered by the General Schedule. The factor point values mark the lower end of the ranges for the factor levels. For a factor 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. The total points are converted to a grade by use of the grade conversion table in the AAGEG.

Factor 3. Guidelines

This factor covers the nature of guidelines and the judgment need to apply them.

At Level 3-3, guidelines consist of standard reference material, texts, and manuals covering the application of analytical methods and techniques (statistical, descriptive, or evaluative) and instructions and manuals covering the subjects involved (e.g., organizations, equipment, procedures, policies, and regulations). Analytical methods contained in the guidelines are not always directly applicable to specific work assignments. However, precedent studies of similar subjects are available for reference. Judgment is required in choosing, interpreting, or adapting available guidelines to specific issues or subjects studied. The employee analyzes the subject and the current guidelines which cover it (e.g., workflow, delegations of authority, or regulatory compliance) and makes recommendations for changes. Included at this level are work assignments in which the subject studied is covered by a wide variety of administrative regulations and procedural guidelines. In such circumstances, judgment must be used in researching regulations, and in determining the relationship between guidelines and organizational efficiency, program effectiveness, or productivity.

At Level 3-4, guidelines consist of general administrative policies and management and organizational theories which require considerable adaptation and/or interpretation for application to issues and problems studied. At this level, administrative policies and precedent studies provide a basic outline of the results desired, but do not go into detail as to the methods used to accomplish the project. Administrative guidelines usually cover program goals and objectives of the employing organization, such as agency controls on size of workforce, productivity targets, and similar objectives. Within the context of broad regulatory guidelines the employee may refine or develop more specific guidelines such as implementing regulations or methods for the measurement and improvement of effectiveness and productivity in the administration of operating programs.

Similar to guidelines described at Level 3-3, those available to the appellant include the USPS's Domestic Mail Manual, which contains all regulatory information on domestic mail services, rates, and conditions governing use of the services. The USPS also issues monthly newsletters and regular postal bulletins and updates regarding its mail programs. GSA policy and procedural guidelines stem from its Federal Mail Management Regulation at 41 CFR Parts 101-9 and 102-192 and require the enhancement of security at Federal mail centers, the transition to commercial payment processes, and the migration to current (digital) mail meter technology to reduce fraud and wasteful spending. To facilitate implementation of the new requirements, GSA's Mail Communications Policy Office collaborated with the Interagency Mail Policy Council to determine how best to proceed. Since the 9/11 attacks, it has become vitally important that clear and detailed procedures exist for assessing and managing security and biological threats in order to protect Federal mail facilities. GSA has made such procedures available in its *Mail Center Security Guide* (2004) and *GSA Policy Advisory: National Guidelines for Assessing and Managing Biological Threats in Federal Mail Facilities* (2003). Agency policy is set and guidelines are developed at the HQ level, with input from the Agency Mail Manager and recommendations from study groups and regional mail managers, and are issued by the Office of GSA Administrative Policy.

Level 3-4 is not met. Unlike Level 3-4, available guidelines are more specific than the general outline of concepts and methods usually described at that level. While the appellant uses judgment and initiative to adapt, explain, summarize, or communicate policy and procedures, his work does not require the degree of initiative and ingenuity to deviate from accepted practices intended at that level. He is responsible for administering policies and guidelines that are already in place. His development of local procedures and instruction within the parameters of agency guidance does not require or permit interpretation of broad regulatory guidelines typical of Level 3-4. While the appellant is recognized as the local expert in the development of methodology for implementing directives and supporting guidance issued by HQ, he does not determine the intent of such directives. His input on proposed changes is made to the HQ level and is considered along with input from counterparts across the agency or task/study group members, but his role is as a subject-matter expert. The appellant is not responsible for the final agencywide policy directives as these functions are reserved to the HQ level. Therefore, Level 3-3 (275 points) is credited.

The appellant's position is assigned the following factor levels using the AAGEG to evaluate his mail management duties:

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-7	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and effect	5-4	225
6. Personal contacts and 7. Purpose of contacts	3-c	180
8. Physical demands	8-1	5
9. Work environment	9-1	5
<i>Total</i>		2615

According to the grade conversion table, a total of 2615 points falls within the GS-11 grade level point range (2355-2750).

Evaluation of position using the GS-1170 PCS.

The appellant's position is assigned the following factor levels using the PCS for Realty Series, GS-1170, to evaluate his lease administration duties.

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-7	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225

5. Scope and effect	5-4	225
6. Personal contacts and 7. Purpose of contacts	3-c	180
8. Physical demands	8-1	5
9. Work environment	9-1	5
<i>Total</i>		2615

According to the grade conversion table, a total of 2615 points falls within the GS-11 grade level point range (2355-2750).

Summary

Since the position is evaluated at the GS-11 grade level using both the AAGEG and the GS-1170 PCS, the appellant's position is properly classified at the GS-11 grade level.

Decision

The appellant's position is properly classified as GS-1101-11, with the position title at the agency's discretion.