

**U.S. Office of Personnel Management
Classification Appeal Decision
Under section 5112 of title 5, United States Code**

Appellant: [appellant's name]

Agency classification: Program and Resources Specialist
GS-301-12

Organization: [activity]
[department]
[unit]
U.S. Department of the Air Force
[installation]

OPM decision: GS-301-12
Title to be determined by agency

OPM decision number: C-0301-12-09

/s/ Judith A. Davis for

Robert D. Hendler
Classification and Pay Claims
Program Manager
Merit System Audit and Compliance

3/29/2011

Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a certificate which 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 (Introduction)*, appendix 4, Section G (address provided in appendix 4, section H).

As discussed in the decision, the appellant's position description (PD) of record must be revised to meet the PD standard of adequacy in the *Introduction*. The revised PD must be submitted to the U.S. Office of Personnel Management (OPM) office that accepted this appeal within 30 calendar days of the date of this decision.

Decision sent to:

[appellant's name and address]

[name and address of appellant's servicing personnel office]

[name and address of appellant's higher level personnel office]

Chief, Classification Appeals Adjudication Section
Department of Defense
Civilian Personnel Management Service
1400 Key Boulevard, Suite B-600
Arlington, VA 22209-5144

Introduction

On October 12, 2010, the Dallas Oversight of the OPM accepted a classification appeal from [appellant's name]. The appellant's position is currently classified as Program and Resources Specialist, GS-301-12, but she believes it should be classified at the GS-14 grade level. The position is assigned to the [activity]; [department]; [unit]; U.S. Department of the Air Force (USAF); at [installation]. We received the complete agency's administrative report on November 8, 2010, and the appellant's comments on the report on November 2, 2010. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

Background

The appellant's position was classified as Instructional Systems Specialist, GS-1750-13, prior to being moved under the National Security Personnel System (NSPS) as a YA-1750-02 position in 2007. At the time, the appellant did not disagree with the occupational series of her position but believed it should be classified in pay band (PB) 3 on the YC Supervisor/Manager pay schedule (PS). She filed a classification appeal with OPM after her agency's position reviews confirmed the YA-1750-02 classification. OPM's December 22, 2008, appeal decision sustained the PB and PS of her position but reclassified it from the 1750 Instructional System Specialist to the 301 General Analysis occupational series.

With the repeal of NSPS, the appellant and her immediate supervisor forwarded a draft position description (PD) to the AFB's Civilian Personnel Section (CPS) proposing classification of her position as Supervisory Civilian Advisor, GS-301-14. The CPS instead classified the appellant's position as Program and Resources Specialist, GS-301-12, and officially converted her from the NSPS effective September 12, 2010. The appellant subsequently filed an appeal with OPM to contest the classification of her GS position.

General issues

The appellant states some of her duties are similar to those performed by [organization] positions classified at a higher grade. Specifically, she said her work is comparable to duties described in a PD for an Instructional Systems Specialist, GS-1750-13, position assigned to another [organization] directorate. The appellant's rationale for a higher grade is also partly based on her current salary, which is equivalent to the GS-14, step 4, pay rate. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM position classification standards (PCS) and guidelines (5 U.S.C. 5106, 5107, and 5112). Other methods or factors of evaluation are not authorized for use in determining the classification of a position, such as rates of pay or comparison to positions which may or may not have been properly classified.

Although we may not compare the appellant's position to other positions, we note that, unlike the appellant's position, the GS-13 PD describes developing and interpreting education and training policy; developing and presenting formal and informal briefings to all leadership levels on joint and inter-service education and training issues; planning, leading, and managing joint and inter-service training reviews, studies, meetings, surveys, analyses, projects, and task forces;

and applying knowledge of learning theory, principles, methods, practices, and techniques and other knowledge typically required to perform properly covered GS-1750 work. Therefore, we conclude the appellant's work is substantially different from the work described in the GS-13 PD.

Like OPM, the appellant's agency must classify positions based on comparison to OPM's PCSs and guidelines. Under 5 CFR 511.612, agencies are required to review their own classification decisions for identical, similar, or related positions to ensure consistency with OPM certificates. Consequently, the appellant's agency has primary responsibility for ensuring its positions are classified consistently with OPM appeal decisions. If the appellant believes her position is classified inconsistently with another, then she may pursue this matter by writing to the human resources office of her agency's headquarters. She should specify the precise organizational location, series, title, grade, and responsibilities of the positions in question. The agency should explain to her the differences between her position and the others, or classify those positions in accordance with this appeal decision.

The appellant raises several concerns about her agency's position review process (e.g., the agency failed to conduct a desk audit; the CPS's August 2, 2010, evaluation statement included inaccurate statements; and agency officials transposed the immediate supervisor's signature onto the official PD without his knowledge or consent, allegations which the appellant is currently pursuing through other processes). In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of the appellant's position. Because our decision sets aside all previous agency decisions, any concerns regarding the agency's classification review process are not germane to this decision.

The appellant asked OPM to consider the concept of impact of the person on the job in determining her position's classification. The concept, addressed in the *Introduction*, holds that an employee, by virtue of exceptional competence, may have such an impact on the duties, responsibilities, and qualification requirements of a position that it is changed to the point where its classification must also be changed. The mere fact that an individual in a position possesses higher qualifications or stands out from other individuals in comparable positions is not sufficient reason by itself to classify the position to a higher grade.

The appellant did not explain or provide evidence that the impact concept should be applied, i.e., her competence makes the position materially different from what it otherwise would be. After careful consideration, it is evident any changes to the appellant's position (e.g., supervision over two positions and Operations Career Program responsibilities) resulted from the directorate's 2009 reorganization, the program initiatives of other USAF organizations, and other factors unrelated to and beyond the control of the appellant. Management assigned these duties to the appellant's position, not because of unique qualifications and competence, but because the work relates to civilian personnel, workforce development, and manpower issues clearly falling under the appellant's scope of responsibility as described by her official PD. Therefore, the impact of the person on the job concept is not applicable to the appellant's position.

Position information

The [unit], a USAF major command (MAJCOM), recruits and provides individuals with military, technical, and flying training, in addition to pre-commissioning education and training, professional military education, professional continuing education, degree granting education, and citizenship education and training. The [department designation], the MAJCOM's largest directorate, is under the command of the Director, a Major General, who is the appellant's immediate supervisor, and three Deputy Directors. The directorate is separated into [number] divisions with each managed by a division chief (a mix of Colonel, GS-14, and GS-15 positions) and staffed with military and approximately [number] civilian employees.

The appellant estimates spending 25 percent of her time on civilian advisor, 25 percent on supervisory, 15 percent on Director's representative, 15 percent on special projects, and 20 percent on civilian employee workforce development work. The immediate supervisor generally agrees with the percentages assigned, but he said the special projects work is more accurately characterized as tasks, not projects, related to the civilian advisor responsibilities. We discuss the appellant's supervisory work later in the decision but a summary of the remaining duties follows.

As the directorate's civilian advisor, the appellant advises the Director, deputy directors, division chiefs, and other [department designation] staff on civilian personnel matters including, but not limited to, staffing action requests, manpower authorizations, annual performance appraisals, performance awards, and grievances. She coordinates with supervisors and managers throughout the request for personnel action (RPA) process by validating the need for the RPA, initiating the RPA, and coordinating with [unit] manpower and other staff when necessary. The appellant ensures the directorate staff follows appropriate laws, regulations, agency instructions, and other guidelines, alerting the submitting office if proposed actions appear inappropriate. She monitors, tracks, and updates staff regarding ongoing actions. She also responds to inquiries from employees relating to grievances, performance appraisals and awards, classification, and pay and leave. The Director, who serves as the pay pool manager for the Defense Civilian Intelligence Personnel System (DCIPS), said the appellant's work as the MAJCOM's DCIPS pay pool administrator is one of her primary responsibilities.

The appellant represents the Director at various meetings, boards, and committees typically relating to civilian personnel and manpower management issues. She acts on behalf of the Director at meetings with the Civilian Personnel Advisory Team, Finance Management Committee, and those involving the DCIPS performance management process. The appellant also completes special projects or tasks at the Director's request. She provided examples including developing a GS-15 PD for a deputy director position; reviewing, initiating, processing, and coordinating the directorate's organizational change requests, ensuring positions are aligned with the appropriate organization; and reviewing professional military education applications for accuracy and adequacy prior to forwarding to the Air Force Personnel Center (AFPC) selection boards.

The appellant's workforce development program work includes requesting, coordinating, and prioritizing training request submissions from the directorate's staff. She researches and

identifies training facilities and educational institutions by considering training requirements, cost, travel, and other factors. For example, she identified a local training facility to provide A+ certification for the organization's systems administration positions. The appellant also responds to inquiries from employees regarding career opportunities, career programs, and civilian education and training requirements. In addition, she serves as the MAJCOM liaison for the AFPC's Operations Career Program.

The appellant and immediate supervisor certified to the accuracy of the duties described in the official PD, number [number]. 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. Major duties are normally those occupying a significant portion of the employee's time. They should be only those duties currently assigned, observable, identified with the position's purpose and organization, and expected to continue or recur on a regular basis over a period of time.

Our review found the appellant's PD includes work not currently being performed and inaccurately describes other duties. For example, the PD describes performing NSPS pay pool administrator work no longer applicable in the post-NSPS environment. The record shows the appellant is a first-level supervisor for two nonsupervisory positions. However, the PD describes a managerial position responsible for supervising both non-supervisory and supervisory positions (e.g., with statements such as accomplishing managerial and supervisory responsibilities as Directorate Senior Civilian Advisor; selecting candidates for subordinate nonsupervisory positions and recommending selections for supervisory positions taking into consideration skills and qualifications, mission requirements, and EEO and diversity objectives; and hearing and resolving group grievances and employee complaints referred by subordinate supervisors and employees). The appellant provides civilian personnel advice to the directorate's supervisory and managerial staff, but these individuals are not subordinates as the appellant has no supervisory authority over those positions.

PDs must meet the minimum standard of adequacy as described in the *Introduction*. Therefore, the appellant's PD must be revised so that there is a clear understanding of the duties and responsibilities representing the approved classification. Regardless, an OPM decision classifies a real operating position and not simply the PD. We have decided this appeal based on an assessment of the actual work assigned to and performed by the appellant.

To help decide this appeal, we conducted telephone audits with the appellant on February 15 and March 11, 2011; a telephone interview with her immediate supervisor on February 24, 2011; and a telephone interview with a CPS official on March 11, 2011. In deciding this appeal, we fully considered the interview findings and all information of record provided.

Series, title, and standard determination

The agency determined the appellant's duties and responsibilities are consistent with the GS-301 series and the appellant does not disagree. Based on careful review, we agree. Since OPM has not prescribed titles for positions in this series, the agency may construct a title by following the guidance in the *Introduction*.

The appellant said she spends approximately 25 percent of her time supervising two employees occupying Personnel Resources Assistant, GS-303-7, positions. Implicit in the appellant's rationale is that her position is supervisory because she spends 25 percent of her time supervising her staff and that the General Schedule Supervisory Guide (GSSG) should also be used to evaluate the position's grade level. On February 11, 2011, the appellant provided OPM with written responses to position-related questions. She stated, "I spend a minimum of 2 hours each day (sometimes longer) directing work, deciding correct course of action for civilian personnel matters, training on-the-job, reviewing work products, answering questions, etc." Literal interpretation of the work controls as described by the appellant would not exceed Level 2-2 within the Factor Evaluation System (FES). At this level, the supervisor is closely involved in the actual work processes, e.g., by suggesting or determining work methods, advising on available source materials, and reviewing work for compliance with instructions and established procedures. In contrast, both subordinates are assigned to identical PDs which credit the position's supervisory controls at Level 2-3 for working independently within a framework of established guidelines and procedures. Both PDs have been certified as current and accurate by competent management authority. Crediting the subordinate positions with Level 2-2 would have a negative grade-level impact.

For these and other reasons, we find the appellant does not spend 25 percent or more of her time supervising these two subordinate positions. Although the subordinate GS-7 positions are currently at the full performance level, the appellant said she is initiating action to classify both positions to the GS-9 grade level instead. Grade progression is normally considered when a position's knowledge requirements, complexity, scope of responsibility, etc. increase as supervisory control decreases, further undermining the appellant's assertions regarding the amount of time she devotes to supervisory work. In addition, the appellant's 25 percent estimate incorrectly includes nonsupervisory work time not considered under the GSSG. In her written responses to OPM in describing her supervisory work, the appellant's statements are prefaced with supervisory-type language (e.g., "...supervise/manage all civilian personnel actions and formal training requirements for [number] Divisions, matrixed to supervise/manage all DCIPS performance system requirements for [number] separate bases, etc."). However, these statements describe nonsupervisory civilian advisor responsibilities unrelated to the work covered by the GSSG involving technically and administratively directing the work of subordinate positions. Therefore, we find the GSSG is not appropriate for grade-level determination. Even if the GSSG was appropriate for grade-level application, the appellant's supervisory work, owing to the scope and effect of the program directed and the GS-7 level of work supervised, would be evaluated at a considerably lower grade level than her nonsupervisory work.

The GS-301 series does not contain grade-level criteria. As directed by the *Introduction*, an appropriate general classification guide or criteria in a PCS for related work should be used if there are no specific grade-level criteria. The agency applied the grading criteria in the Administrative Analysis Grade Evaluation Guide (AAGEG), which provides criteria for nonsupervisory staff administrative analytical, planning, and evaluative work at grades GS-9 and above. After careful review of the record, we concur with the agency's application of the AAGEG.

None of the appellant's human resources assignments exceed the GS-9 level when compared to the Job Family Standard for Administrative Work in the Human Resources Group, GS-200. Therefore, these duties will not be discussed further.

Grade determination

The AAGEG is written in the FES format, under which factor levels and accompanying point values are assigned for each of the nine factors. The total is converted to a grade level by use of the grade conversion table provided in the PCS. Under the FES, each factor-level description demonstrates the minimum characteristics needed to receive credit for the described level. 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 unless an equally important aspect that meets a higher level balances the deficiency. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level.

The appellant's initial request to OPM includes an evaluation of her position supporting the GS-14 grade level based on adding the point values credited to various factors she selected from the Primary Standard, the FES's "standard-for-standards" in Appendix 3 of the *Introduction*, and the GSSG. Her selection of 10 factors from the Primary Standard and the GSSG resulted in a point value equivalent to the GS-14 grade level. Classifying supervisory positions requires applying criteria for measuring work as provided in the PCS for which the position is classified or in related PCSs in addition to the GSSG when positions meet the guide's minimum coverage requirements. Had the appellant's position met the GSSG's minimum coverage requirements, classification principles require applying the AAGEG and GSSG separately, not jointly; and assigning factor levels to all nine factors in the AAGEG to determine the grade level of nonsupervisory work performed and to all six factors in the GSSG to determine the grade level of supervisory work performed. The grade level of the position would be controlled by the highest level of work, either nonsupervisory or supervisory, performed on a regular and recurring basis for 25 percent or more of the appellant's work time.

The agency applied the grade-level criteria in the AAGEG and credited the appellant's position at Levels 1-7, 2-4, 3-4, 4-4, 5-4, 6-3, 7-c, 8-1, and 9-1. The appellant only disagrees with the agency's evaluation of Factors 1, 3, and 4, as evidenced by the written record and telephone audit responses. We reviewed the agency's determination for Factors 2, 5, 6, 7, 8, and 9, concur, and have credited the position accordingly. Our evaluation will focus on the remaining factors contested by the appellant.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of information or facts the employee must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, regulations, and principles) and the nature and extent of the skills needed to apply the knowledge.

At Level 1-7, the position requires knowledge and skill in applying analytical and evaluative methods and techniques to issues or studies concerning the efficiency and effectiveness of program operations carried out by administrative or professional personnel, or by substantive

administrative support functions (i.e., internal activities or functions such as supply, budget, procurement, or personnel which serve to facilitate line or program operations). Level 1-7 includes knowledge of pertinent laws, regulations, policies, and precedents affecting the use of program and related support resources (people, money, or equipment) in the area studied. Projects and studies typically require knowledge of the major issues, program goals and objectives, work processes, and administrative operations of the organization. Knowledge is used to plan, schedule, and conduct projects and studies to evaluate and recommend ways to improve the effectiveness and efficiency of work operations in a program or support setting. The assignments require knowledge and skill in adapting analytical techniques and/or organizational productivity. Knowledge is applied in developing new or modified work methods, organizational structures, management processes, procedures for administering program services, guidelines and procedures, etc.

At Level 1-8, the employee operates as an expert analyst who has mastered the application of a wide range of qualitative and/or quantitative methods for the assessment and improvement of program effectiveness or the improvement of complex management processes and systems. This level also requires comprehensive knowledge of the range of administrative laws, policies, regulations, and precedents applicable to the administration of one or more important public programs. This typically includes knowledge of agency program goals and objectives, the sequence and timing of key program events and milestones, and methods of evaluating the worth of program accomplishments. Work requires knowledge of relationships with other programs and key administrative support functions within the employing agency or in other agencies. Study objectives are to identify and propose solutions to management problems which are characterized by their breadth, importance, and severity, and for which previous studies and established management techniques are frequently inadequate. Also included at this level is skill to plan, organize, and direct team study work and to negotiate effectively with management to accept and implement recommendations, where the proposals involve substantial agency resources, require extensive changes in established procedures, or may be in conflict with the desires of the activity studied.

The appellant's position meets Level 1-7. As at this level, her position requires thorough knowledge and skill in applying analytical and evaluative methods and techniques to the civilian personnel, manpower, and workforce development issues affecting the operational efficiency and effectiveness of the [number] divisions. As the MAJCOM's pay pool administrator for DCIPS-covered employees, the appellant performs various tasks including, but not limited to, participating in DCIPS-related meetings and training; tracking completion status of performance evaluations and providing reminders for overdue evaluations; scheduling, preparing, and facilitating pay pool board meetings; providing technical guidance to managers and employees; compiling and updating the Compensation Workbench Tool (an Excel spreadsheet with embedded formulas) based on pay pool board decisions; developing and modifying the business rules and practices for the MAJCOM's board proceedings; developing briefing slides and other reference materials; and reporting to the Director on progress and other significant events. Her work also requires making procedural changes to board proceedings. For example, the [number] pay pool board members are geographically dispersed and are typically the Wing Commanders from various AFBs. To improve the efficiency and effectiveness of board meetings, the appellant decided to provide electronic copies of all performance appraisals prior to meetings for

board members to read and consider before, rather than during, their discussion. This and other process improvement examples are comparable to Level 1-7 work, applying knowledge of the work goals and objectives to recommend improvements to work operations. Also consistent with Level 1-7, her pay pool administrator work requires considerable interpersonal skills to facilitate and negotiate disagreements and discussions between board members and others.

The appellant is also responsible for coordinating with the divisions to evaluate contractor functions being considered for conversion to Federal civilian employment. This requires collecting information from divisions, identifying contractor work, determining equivalent work costs if performed by a civilian employee based on the skills and work time required, calculating cost estimates, and forwarding recommendations for the Director's consideration. The appellant also identifies and recommends positions to be left unfilled after retirement, resignation, and other attrition reasons. This and other work is comparable to Level 1-7 work requiring developing new staffing patterns by applying analytical and evaluative techniques to operational effectiveness and efficiency matters. Also at Level 1-7, this work requires applying knowledge of the existing organizational structure, program goals and objectives, and work processes to identify potential major issues from her recommendations.

The appellant's position does not meet Level 1-8. The PCS describes Level 1-8 as an "expert analyst" having mastered a wide range of qualitative and quantitative methods for assessing and improving complex processes and systems. The appellant provides recommendations and advice to directorate staff on civilian personnel, manpower, and workforce development matters. The staff may resist complying with her advice or suggestions, but her assignments do not involve identifying and proposing solutions to problems characterized by their breadth, importance, or severity as expected at Level 1-8. The appellant provides advice and recommendations based on an analysis of existing information against established policies, procedures, and objectives. For example, the USAF provides broad DCIPS-related guidance outlining the pay pool board process, expectations, and timeframes. As pay pool administrator, the appellant develops and communicates business rules and procedures, establishes deadlines, answers technical questions, and takes appropriate steps to comply with the agency guidelines. However, unlike Level 1-8, this and other work do not involve analyzing or evaluating a program or requiring knowledge of broad agency administrative programs where legislation must be translated into program goals, actions, or services.

The appellant's operations career program work also does not meet Level 1-8. Briefly, the AFPC manages the USAF's career programs. Each occupational series is assigned to one of 23 career fields including personnel, financial management, safety, operations, etc. The operations career program, for which the appellant serves as the MAJCOM's liaison/point of contact, identifies career broadening, career mobility, training, mentorship, and other opportunities for centrally-managed occupations in 2181 Aircraft Operations, 2152 Air Traffic Control, certain 343 Management and Program Analysis, and other series. The AFPC career program staff is responsible for developing and communicating program guidelines and policies. As the liaison, the appellant's work involves disseminating program information to appropriate staff, responding to inquiries, collaborating in the development of program guides, etc. However, unlike Level 1-8, this does not require the work of an "expert analyst" to plan, organize, or direct

team work where the proposals involve substantial agency resources or require extensive changes in established procedures.

Level 1-7 is credited for 1,250 points.

Factor 3, Guidelines

This factor considers the nature of guidelines and the judgment needed to apply them.

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.

At Level 3-5, guidelines consist of basic administrative policy statements concerning the issue or problem being studied, and may include reference to pertinent legislative history, related court decisions, State and local laws, or policy initiatives of agency management. The employee uses judgment and discretion in determining intent, and in interpreting and revising existing policy and regulatory guidance for use by others within or outside the employing organization (e.g., other analysts, line managers, or contractors). Some employees review proposed legislation or regulations which would significantly change the basic character of agency programs, the way the agency conducts its business with the public or with private industry, or which modify important inter-agency relationships. Other employees develop study formats for use by others on a project team or at subordinate echelons in the organization. At this level, the employees are recognized as experts in the development and/or interpretation of guidance on program planning and evaluation in their area of specialization (e.g., contingency/emergency planning, workforce management, position management, work measurement, or productivity improvement).

The appellant's position requires applying broad guidelines contained in law, regulations, and agency standards and instructions. She identifies the specific problems and issues and then chooses applicable methods and techniques to develop recommendations regarding modifying the directorate's staffing levels, improving the MAJCOM's DCIPS pay pool board process, establishing training request priorities, etc. The USAF provides the appellant with the annual DCIPS pay pool fund budget for performance-based salary increases and bonuses, as well as broad agency guidelines covering basic roles and responsibilities, overall tasks and activities, timeline with sequence of events, and basic strategies. Similar to Level 3-4, the appellant, within the context of this outline, develops and refines specific MAJCOM-wide business rules and practices by assigning specific tasks to individuals, establishing dates to ensure agency deadlines are met, preparing and finalizing the calendar of events to include panel meetings and mock pay

pools, defining rules and processes to be followed by board members during the actual pay pool meetings, etc. The appellant's guidelines meet Level 3-4.

The appellant's position does not meet Level 3-5 at which guidelines consist of basic administrative policy statements concerning the issue and may include reference to pertinent legislative history, related court decisions, State and local laws, or policy initiatives of agency management. The PCS provides an example at Level 3-5 of employees reviewing proposed legislation or regulations that would significantly change the basic character of agency programs. Another example involves employees who develop study formats for use by others on a project team or at subordinate echelons in the organization. The guidelines available to the appellant are more specific than the basic policy statements expected at Level 3-5 as discussed previously in this decision.

Level 3-4 is credited for 450 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 4-4, work involves gathering information, identifying and analyzing issues, and developing recommendations to resolve problems with the effectiveness and efficiency of work operations in a program or program support setting. Work at this level requires the application of qualitative and quantitative techniques that frequently require modification to fit a wider range of variables. Projects at this level usually consist of issues that are not always susceptible to direct observation and analysis. Difficulty is encountered in measuring the effectiveness and productivity due to variations in the nature of processing information. For example, assignments may involve compiling voluminous workload data from a variety of sources with different reporting requirements and formats. Originality in refining existing work methods and techniques is characteristic of Level 4-4.

At Level 4-5, work consists of projects and studies requiring analysis of interrelated issues of effectiveness, efficiency, and productivity of substantive mission-oriented programs. Typical assignments require developing detailed plans, goals, and objectives for the long-range implementation and administration of the program, and/or developing criteria for evaluating the effectiveness of the program. Decisions about how to proceed in planning, organizing, and conducting studies are complicated by conflicting program goals and objectives which may derive from changes in legislative or regulatory guidelines, productivity, and/or variations in the demand for program services. Assignments are further complicated by the need to deal with subjective concepts such as value judgments; the quality and quantity of actions are measurable primarily in predictive terms; and findings and conclusions are highly subjective and not readily susceptible to verification through replication of study methods or reevaluation of results. Options, recommendations, and conclusions developed by the employee take into account and give appropriate weight to uncertainties about the data and other variables which affect long-range program performance.

The appellant's position meets Level 4-4. As at this level, her work involves identifying and resolving problems with the effectiveness and efficiency of the directorate's civilian personnel, manpower, and workforce development operations, coordinating with management to identify suggestions for improvement. For example, the appellant's pay pool administrator work involves organizing and facilitating a mock pay pool session by guiding the panel to make performance-based salary increase and bonus decisions based on midyear ratings. She considers the lessons learned to refine the business rules and processes for the actual pay pool meetings. Recommending process improvements, training, or support needed based on a collection, review, and assessment of lessons learned from the mock pay pool session and the prior year's pay pool process is characteristic of the type of Level 4-4 work involved with improving operational effectiveness and efficiency.

Also similar to Level 4-4, the appellant responds to reconsideration requests from DCIPS-covered employees contesting the performance rating assigned. She prepares recommendations to the Director for consideration (e.g., refer the supervisor and employee to the alternative dispute resolution process). To fully address reconsideration requests, the work requires considering the information provided by the employee, identifying the problem or issue by interviewing the appropriate board member and/or immediate supervisor of the employee requesting reconsideration, coordinating with the servicing civilian personnel office at the employee's AFB, and ensuring consistency of performance ratings by reviewing the ratings of other employees. The appellant's work also resolves difficulties in facilitating and negotiating the group interaction of pay pool board members with their multiple communication styles, behaviors, and motives in order to reach an acceptable outcome. Level 4-4 is met.

The appellant's position does not meet Level 4-5. The breadth and scope of her work are not characteristic of Level 4-5. The appellant's work does not require developing detailed plans, goals, and objectives for the study or the development of new analytical methods as expected of Level 4-5 work. Unlike Level 4-5, she determines the appropriate approach to analyze an issue or concern based on previous experience or guidelines. Furthermore, her work does not entail dealing with the conflicting program goals and objectives which may derive from changes in legislative or regulatory guidelines, productivity, and/or variations in the demand for program services typical of Level 4-5 which would complicate the appellant's decisions regarding how to proceed with work assignments. Like Level 4-4, the administrative support programs she oversees and facilitates require the exercise of originality in refining existing work methods and techniques for application to the analysis of specific issues or resolution of problems as discussed previously.

Level 4-4 is credited for 225 points.

Summary

<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	3-4	450
4. Complexity	4-4	225
5. Scope and Effect	5-4	225
6. & 7. Personal Contacts and Purpose of Contacts	3-c	180
8. Physical Demands	8-1	5
9. Work Environment	9-1	<u>5</u>
<i>Total</i>		2,790

A total of 2,790 points falls within the GS-12 range (2,755 to 3,150) on the grade conversion table in the PCS.

Decision

The position is properly classified as GS-301-12. The title is at the agency's discretion.