

OFFICE OF PERSONNEL MANAGEMENT
MERIT SYSTEMS OVERSIGHT AND EFFECTIVENESS
DALLAS OVERSIGHT DIVISION
CLASSIFICATION APPEAL DECISION

Under section 5112(b) of title 5, United States Code

Appellant: [Appellant]

Position: Office Assistant (Office Automation), GS-303-06
Position Number: [#]

Organization: [Organizational location]
[Region], U.S. Fish and Wildlife Service
Department of the Interior

Decision: GS-303-06
(Title at the discretion of the agency with parenthetical title
"Office Automation" affixed)
(Appeal Denied)

OPM decision number: C-0303-06-01

Approved by:

/s/ Bonnie J. Brandon
Bonnie J. Brandon

February 3, 1997
Date

Copy of decision sent to:

[Appellant]

Regional Personnel Officer
Fish and Wildlife Service
Department of the Interior
[Address]

Mr. Woodrow W. Hopper, Jr.
Director of Personnel
U.S. Department of the Interior
Washington, D.C. 20240

INTRODUCTION

The appellant is presently assigned to the [Organizational location] U.S. Fish and Wildlife Service, Department of the Interior, at [location]. The agency classified the position as Office Assistant (Office Automation), GS-303-06. The appellant requests that her position be classified as Administrative Support Assistant, GS-303-07. She filed an appeal with this office under the provisions of chapter 51 of title 5, United States Code (U.S.C.). This decision is the final administrative decision of the Government, subject to discretionary review only under the conditions and time limits specified in sections 511.605 and 511.613 of title 5, Code of Federal Regulations.

POSITION INFORMATION

The appellant provides administrative support to the refuge manager, staff, researchers, and visitors of the NWR. The staff consists of a Project Leader, GS-485-12; a Wildlife Biologist, GS-486-11; an Engineering Equipment Operator, WG-5716-10; a Maintenance Worker, WG-4749-08; and the appellant. This refuge is a restricted, dedicated research site rather than one that allows public access as many other refuges do. The University of [location] Biology Department, the National Science Foundation, and the U.S. Fish and Wildlife Service work cooperatively to sponsor long-term environmental research (LTER) at this refuge.

The appellant contends that the [project name] captive propagation program has had significant impact on her position. The Program operates under guidance and policy direction from the Coordinator, [location] Regional Office of the Department of the Interior. The purpose of this program is recovery of the critically endangered [animal]. The NWR is the [animal] holding facility where the Refuge Manager plans, directs, and controls all aspects of refuge management for this site covering approximately 230,000 acres. The appellant provided a list of duties in the appeal record and during the interview that she believes represents job accretions that are not included in her current position description. We find that these duties, though not discussed in lengthy detail in the position description, are adequately covered in the position's primary functions. The appellant's position description is adequate for classification purposes.

The appellant also provided a vacancy announcement for Budget Assistant (Office Automation), GS-561-5/6/7, that she notes is comparable to the appealed position. By law, we must classify positions solely by comparing their current duties and responsibilities to Office of Personnel Management standards and guidelines (5 U.S.C. 5107). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's current duties to former ones or position vacancy announcements as a basis for deciding the appeal. In reaching our classification decision, we have carefully reviewed all information furnished by the appellant and her agency.

SERIES AND TITLE DETERMINATION

The appealed position provides the main clerical, administrative, and technical support to the Refuge Manager and staff. The exact percentages of time spent on specific duties may fluctuate depending on the needs of the organization. The appellant's work time is divided among a variety of functions as follows:

*Prepares special use permits (30 percent) - Issuance of special use permits for LTER research. The appellant may issue conditional (temporary) permits in absence of the Refuge Manager, subject to subsequent approval.

*Budget administration (30 percent) - The appellant tracks, monitors, and reconciles the budget for the refuge and provides data for inclusion in annual operating budget and work plans.

*[Animal] propagation program assistance (15 percent) - Assistance typically entails procurement activities required to bring the refuge up to par for housing this endangered species. Procurement of items such as windmills, pens, plumbing, and parts for drinking systems is required.

*Personnel/Procurement/Purchasing/Accounting (collectively 25 percent) - The appellant handles personnel transactions for the staff and arranges procurement and purchase of equipment and supplies for refuge operation (e.g., vehicle maintenance, Occupational Safety and Health Administration (OSHA) training and requirements, uniforms). The appellant uses automated accounting systems to track the budget.

The Miscellaneous Clerk and Assistant Series, GS-303, is the best selection for the appellant's position. This standard includes positions the duties of which are to perform or supervise clerical, assistant, or technician work for which no other series is appropriate. A knowledge of the procedures and techniques needed to carry out the work of an organization is required. The appellant's clerical and assistance functions and knowledge required are comparable to those described in this series. No titles are prescribed in the GS-303 series. The title "Office Assistant" is constructed in accordance with the titling criteria in the *Introduction to the Position Classification Standards*, dated August 1991, and is at the discretion of the agency. This is an appropriate title for the position. The parenthetical title "Office Automation" is added since the position requires a qualified typist and skilled use of office automation equipment.

GRADE LEVEL DETERMINATION

The appellant's paramount responsibility includes two distinct functional areas: office clerical and assistance work and budget assistance. The clerical, administrative, and

technical support work are covered under the Miscellaneous Clerk and Assistant Series, GS-303, which directs that positions classified to this series be evaluated by the Grade Level Guide for Clerical and Assistance Work. This guide provides the following format: (1) the *law* is the definition of the grade level, (2) two evaluating factors, *Nature of Assignment* and *Level of Responsibility*, and (3) general work examples that illustrate each grade level.

GRADE LEVEL GUIDE FOR CLERICAL AND ASSISTANCE WORK

The Law

The GS-06 performs, under general supervision, difficult and responsible duties in office, business, fiscal administration, or similar work requiring (1) considerable training and supervisory or other experience; (2) broad working knowledge of a special and complex subject matter, procedure, or practice; and (3) to a considerable extent the exercise of independent judgment. The GS-07 level differs from that at GS-06 in that it requires a more comprehensive working knowledge in a particular field and considerable specialized training.

The appellant's duties match the GS-06 level defined in the law. The appellant operates under general supervision to complete difficult and responsible assignments in office, business, or fiscal administration. The appellant uses independent judgment to perform a variety of clerical, administrative, and technical support duties in support of the researcher permitting processes. The appellant also serves as a focal point in carrying out the administrative functions of budget administration and, to a lesser degree, purchasing, procurement, and personnel functions.

The appealed position does not require the type of specialized or formal training or comprehensive knowledge in specific fields that are expected at the GS-07 level. Therefore, the appealed position meets the GS-06 level of this criterion.

Nature of Assignment

Technical assistance work at the GS-06 level involves considerable evaluative judgment within well-defined, commonly occurring aspects of an administrative program or function. The work may involve providing direct assistance to specialists or analysts by performing a segment of their work, or it may involve responsibility for various products or continuing processes requiring application of established policies, practices, and criteria. Typical assignments involve identifying issues, problems, or conditions and seeking alternative solutions in accordance with rules and guidelines. Assignments requiring evaluative judgment are narrowly focused, address a single product or action, and are relatively clear-cut. The employee usually deals with problems or situations that remain stable and resemble past situations that require judgment in selecting a best or

appropriate solution. The work requires a practical knowledge of guidelines and precedent cases relating to a particular area and obtained through considerable work experience. It also requires skill in recognizing the dimensions of a problem and expressing ideas in writing.

The appellant's work is comparable to the GS-06 level which describes an employee providing direct assistance to a specialist or analyst where solutions to problems involve application of established guidelines. Similarly, the appellant adheres to laws as set forth in the United States Code and donor restrictive clauses in issuance of special permits. The appellant's work requires considerable knowledge of the [animal] Program mission, program objectives, and other assigned activities; but the questions that arise in this area are recurring and covered by specific legislation. The appellant issues temporary permits in the absence of the Refuge Manager. The appellant discusses the rules and characteristics of the refuge with scientists, students, and visitors; but the information given by the appellant remains relatively constant. For example, a visiting scientist submits a proposal stating the type of study, accomplishment expected or end result, and the impact it will have on the refuge (e.g., digging, sampling). The appellant then follows rules and regulations to enter criteria into a database and assure that the proposal meets the law which states the refuge will remain as nearly as possible in its natural state. Although unusual situations or requests may occasionally arise, the appellant may discuss these with the Refuge Manager. Adherence to law and guidelines rather than a high-order of evaluative skills or interpretive decision-making is required.

The appellant's procurement-related responsibilities for the [animal] project were significantly reduced after implementation and at best only occupied 15 to 20 percent of the appellant's time. The work generally requires the appellant to use evaluative judgment in clear-cut and repetitive situations rather than identifying and studying factors in more complex problems as described at the GS-07 level.

At the GS-07 level, work consists of duties with continuing responsibility for projects, questions, or problems encountered within an area of a program or functional specialty. Assignments involve a wide variety of situations and typically consist of a series of related actions prior to a final decision. Decisions and recommendations are based on the development and evaluation of information that comes from various sources.

GS-07 level assignments are more difficult than those encountered by the appellant. These difficulties may arise from a need to consider program variations (e.g., expected charges, or frequent deviations from normal procedures) or the complexities of the items involved.

The nature of the appellant's assignments contrasts with GS-07 assignments in that the appellant is not required to possess specialized knowledge of a program or functional speciality. The appellant provides clerical and administrative support for more than one

activity or functional specialization which require general knowledge of guidelines and procedures. The appellant provides assistance to the Refuge Manager by carrying out the bulk of budgetary, accounting, and procurement transactions as well as providing information to refuge visitors. The appellant works in a relatively narrow budgetary area which limits the breadth and depth of knowledge required and the complexity of problems encountered. She maintains accountability of the office budget (approximately \$300,000) by collecting and providing manpower, procurement, and other data for inclusion in budget estimates and the annual work plans. The appellant performs analyses and reconciliations for a variety of appropriated funds, cost recoverable accounts, and special purpose accounts. Personnel actions handled by the appellant are infrequent since there are only five permanent employees and little turnover in this office.

The appellant discussed "safety and fire" responsibilities as other support activities in the appeal record and during the interview. Responsibilities associated with safety rules and regulations are a requisite of the current position. The appellant has completed OSHA training and other training appropriate for fire activities. However, these responsibilities do not exceed the GS-06 level of the applied standard and are not substantial enough to warrant evaluating under separate criteria.

The appellant performs duties similar to those described by the work example under the GS-07 level, but the appealed position lacks the depth and the complexity in assignments as would be found in a larger, more diverse office structure. The GS-06 level illustrates, ". . . an employee runs a statistical reporting and records system for a major division of a regional office [that is a] relatively stable organization that does not have widely diverse functions [and] consolidates annual funding estimates from subordinate offices into a complete budget request for the division"

Typically, GS-07 employees are more concerned with the broader aspects of program objectives, peculiarities, and interrelationships rather than a defined range of assignments subject to recurring guidelines and regulations as demonstrated by the appellant's position.

Level of Responsibility

At the GS-06 level, the employee works independently and completed work is generally evaluated for appropriateness and effectiveness in meeting requirements. Regulations, instructions, and prior cases are available as guidance, and the employee exercises judgment in applying them to specific cases or problems. Contacts with others are to provide, obtain, or develop information in order to identify problems, needs or issues, and/or to coordinate work efforts or resolve problems.

Employees at the GS-07 level independently complete assignments and resolve most conflicts that arise. The primary difference between the GS-06 and GS-07 levels is in the difficulty and boundaries of the assignments. Similar duties may be performed at both the GS-06 level and the GS-07 level. However, the evaluative judgment and analytical ability required for assignments are a determining factor. At the GS-07 level, the guidelines are more complex because the employee is dealing with a variety of problems and situations, and the guides tend to be general and apply less to specific actions. Employees at the GS-07 level must use significant judgment to interpret guidance and improvise procedures. Generally, the contacts are the same as described at lower levels; but, to a greater degree, the employee at the GS-07 level is a resource for explaining regulatory guidance and resolving operational problems and disagreements affecting assigned areas.

The appealed position functions in a relatively stable organization. Work activities lack the fluctuations in personnel management, budget, and program requirements expected at the GS-07 level. The independence that the appellant is allowed in performing her work meets the level of responsibility expected at the GS-06 level in most aspects. The appellant spends a small portion of her time instructing volunteer employees in computer operations and other general clerical work which can only be considered one-grade interval work. The coordinative work the appellant performs in regards to securing supplies, equipment, and uniforms does not exceed the GS-06 level. The special permit work takes a substantial amount of the appellant's time. Regulations and policies of the NWR direct that portions of the property be made available for scientific research and is subject to restrictive covenants imposed by donors. The appellant determines if special conditions are met during the research process, assists researchers by providing answers to questions, and updates particular locations of lab sites and enters the information into a database. The NWR does not require the level of responsibility needed to run larger refuges that are open to the public. Some refuges have several hundred thousand visitors a year, unlike [this NWR] which averaged approximately 2,200 visitors over the last two years with some being repetitive visitors.

Grade Decision

Both the Nature of Assignment and Level of Responsibility equate to the GS-06 level of the Grade Level Guide for Clerical and Assistance Work.

BUDGET CLERICAL AND ASSISTANCE SERIES, GS-561

The budget work occupies a large percentage of the appellant's time and is evaluated separately to determine its impact. We have, therefore, applied the standard for Budget Clerical and Assistance Series, GS-561. The standard is published in the Factor

Evaluation System format, which assesses grade level by evaluation of nine grade-influencing factors.

Factor 1. Knowledge required by the Position

This factor measures the nature and extent of information or facts which the worker must understand in order to do acceptable work (e.g., steps, procedures, principles, concepts) and the nature and extent of skills needed to apply them.

Work at Level 1-3 requires detailed knowledge of the procedures and regulations for allotment and distribution of funds and code structures of accounts of assigned activities (e.g., supply, personnel, travel, transportation, utilities, and procurement). This knowledge is used to compare requests for funds with allowable funding limits in selected budgetary documents and to verify that funds are available for the stated purpose. Knowledge of different object classes and line items is applied in determining where to locate funding information and in adjusting entries to reflect current status of funds in different accounts involving many different object classes and line items within the same appropriation or revolving fund.

Level 1-4 describes an employee who has a practical knowledge of agency budgetary processes and procedures for transactions involving two or more appropriations with different guidelines and procedures or a comparable mix of appropriations with different revolving fund accounts. Knowledge required at this level typically includes regulations which apply to the processing of requests for allotments to cover substantive, mission-oriented programs; procedures for transferring funds between accounts and among different appropriations; and requirements for reporting on budget execution. This knowledge is used to extract budget information from many different source documents and to summarize this information in annual budget estimates and a variety of reports.

As the refuge station bookkeeper, the appellant maintains accountability for a budget of approximately \$300,000 by performing budget analysis and reconciliations for a variety of appropriated funds. The appellant's position requires knowledge of the rules and regulations governing the various budgetary sources from which the office's funds are derived (appropriated fund, cost recoverable accounts, and special purpose accounts), such as those relating to allowed expenditures and the procedures for transferring funds between accounts and funding sources. The appellant utilizes general budgetary procedures and requirements (such as the forms, data, and narrative information required for the annual budget estimates) and knowledge of the financial reporting system, particularly as it relates to reconciling accounts and making periodic reports on the status of funds. These duties clearly exceed Level 1-3. Accordingly, this factor is credited with Level 1-4 (550 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 2-2, the supervisor makes continuing or individual assignments by indicating generally what is to be done, limitations, deadlines, and priorities. The supervisor provides additional specific instructions for new or difficult assignments. The employee exercises initiative in completing recurring assignments within prescribed time limits. Completed assignments and methods used in processing budget transactions and in arriving at account totals, subtotals, and percentages are reviewed for accuracy and compliance with accepted guidelines and procedures for the work. The appealed position exceeds this level in that the appellant is the focal point for administrative and budget concerns and is given authority to operate independently on most aspects of her work.

Level 2-3 best describes the supervisory control over the appealed position. At this level, the employee independently carries out the most difficult procedural and technical processing of budgetary transactions covered in the available guidelines, seeking assistance only when the transactions are unprecedented and clearly not covered by existing guidelines. Completed work is reviewed for overall conformance to budgetary policies and requirements and the availability of funds.

The appellant's latitude in accomplishing the work is comparable to Level 2-3. She works independently on budget and administrative projects unless she encounters problems clearly not covered by existing guidelines. She makes adjustments to the most complicated appropriated fund accounts without supervisory intervention, only informing the supervisor of the status of the budget and accounts. This factor is credited at Level 2-3 (275 points).

Factor 3. Guidelines

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

Guides applicable to Level 3-2 are the same as those described at the lower level to include established office operating procedures, budgetary forms and formats, and procedural guidance manuals. Additionally, specific guides are available that may detail methods for automated budget entry and reporting requirements. Judgment is required to select appropriate guidelines to meet specific work methods or situations (e.g., transfer of funds, processing suballotments).

Guides applicable to the appellant's work are comparable to Level 3-2. Budgetary guidelines used by the appellant include agency manuals, supplements, procurement manuals, and refuge directives and precedents. The appellant uses judgment in selecting appropriate guidelines to accomplish tasks and meet reporting requirements. Considerations include changes in format when entering, consolidating, or reporting budget data or adjusting figures in related forms and schedules to obtain internal agreement and consistency with overall totals and subtotals or seeking alternative methods involving transfer of charges between accounts.

Guidelines for the appealed position are more specifically and directly applicable than those described at Level 3-3. Guides available to the appellant typically cover most transactions. The appellant works at a field activity below the level at which the major administrative resources of the agency are situated, and she reports financial transactions on documents or through automated systems that are illustrated or defined by higher a organizational level.

Employees at Level 3-3 generally reference Office of Management and Budget and Treasury Department Circulars to complete complex transactions consolidated at higher levels within the agency prior to submission for approval of funds. In addition, the employee at this level independently adapts or deviates from procedural instructions to cover new and unusual work situations. The appellant's situation does not meet the intent of the criteria at Level 3-3. Therefore, this factor is credited at Level 3-2 (125 points).

Factor 4. Complexity

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

The appealed position exceeds Level 4-2 where the employee identifies the appropriate budget accounts, object classes, codes, and activity symbols for job orders, vouchers, cost estimates, funding requests and reimbursements; enters or extracts cost information according to type of transactions; and verifies that all necessary procedures have been followed in documenting transactions. Typically, transactions encountered occur within a single appropriation or a single revolving fund subject to the same set of rules, procedures, and guidelines. Actions to be taken involve adjustments to account balances to reflect the effects of budgetary transactions (i.e., gains and losses to accounts).

At Level 4-3, the employee works with different and unrelated appropriated and/or revolving fund accounts, each of which is subject to different rules, regulations, and

procedures. The assignments also include responsibility for a number of accounts of a diverse nature (e.g., supplies, services, revenue, contracts). It is often necessary to gather, interpret, and consolidate information from a wide variety of management, budget, and accounting documents to prepare completed reports.

The appellant's work consists of identifying, compiling, consolidating, checking, verifying and organizing a wide variety of detailed budget data related to different appropriation accounts. She maintains records of commitments, obligations, and expenses to determine if objectives are being met and cost ceilings adhered to. She provides supporting data which is needed to prepare budget estimates and annual work plans. She is also responsible for identifying and providing recommendations to the supervisor on adjustments in accounts. We find this work to be comparable to Level 4-3. Accordingly, Level 4-3 (150 Points) is credited.

Factor 5. Scope and Effect

This factor covers the relationship between the nature of the work and the effect of the work products or services both within and outside the organization.

Level 5-2 is typically appropriate for most budget clerk and assistant positions regardless of their location in the employing agency. At this level, employees maintain detailed records of budgetary transactions, adjust account balances to reflect the effects of budgetary transactions, and collect and organize budgetary data for use in budget reports or budget estimates. The work affects the accuracy and reliability of budget estimates, allotment of funds for designated purposes, and reports on budget execution. It also affects the timely availability of funds and the accuracy of budgetary information furnished to program managers.

Level 5-3 describes positions typically found in budget or program offices with responsibility for the overall review, coordination, and consolidation of budgetary activities of subordinate budget or program offices. At this level, the purpose of the work is to maintain an extensive system of budgetary information and to consolidate the annual budget request for an organization and its subcomponents. The work affects the timely distribution of funds to subordinate offices.

The purpose of the work of the appealed position is not to consolidate, organize, and maintain an extensive system of budgetary information but to maintain detailed records of budgetary transactions involving the refuge. Indicative of Level 5-2, the appellant compiles, consolidates, and organizes data for budget estimates for salaries, supplies, contracts, vehicle maintenance, equipment, etc., for refuge operations. Her work affects the accuracy, adequacy, timely submission, and acceptability of annual budget estimates and facilitates the work of the supervisor and the NWR. The appealed position does not involve activities comparable in scope to that described at Level 5-3 where positions are

typically in budget and program offices with subordinate activities. Consequently, this factor is credited at Level 5-2 (75 points).

Factor 6. Personal Contacts

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

Level 6-1 is exceeded, where employee contacts are usually with budget analysts and/or persons performing related budgetary activities within the immediate employing office. The appellant is the sole administrative/budget personnel within her office. Thus, many of her contacts are with the regional office personnel.

The appellant deals with the project leader, budgetary and accounting personnel within the agency, and vendors and employees within other services. The appellant's contacts are comparable to Level 6-2. At this level, contacts are with individuals engaged in the mission of the agency or in various administrative functions inside or outside the agency. This factor is credited at Level 6-2 (25 points).

Factor 7. Purpose of Contacts

This factor describes the purpose of the contacts identified under Factor 6.

The purpose of the appellant's contacts are comparable to Level 7-1. At this level, the purpose of contacts is to obtain, clarify, or provide information concerning the status of funds in budgetary accounts and the procedures for obtaining, using, or replacing funds. The appellant's contacts are for the purpose of exchanging budgetary data, reconciling discrepancies in accounts, and resolving differences in payment invoices. The purpose of the appellant's contacts is to obtain, clarify, or provide information concerning the status of funds in budgetary accounts and the procedures for obtaining, using, or replacing funds.

The appealed position does not meet Level 7-2, where the purpose of contacts is to coordinate and advise on procedures for the preparation, maintenance, and submission of budgetary forms, schedules, and reports and to persuade others to follow recommended practices. The appellant's contacts do not involve these types of activities. She does not have to persuade others to accept practices or procedures in the budgeting arena.

Therefore, this factor is credited at Level 7-1 (20 points).

Factor 8. Physical Demands

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

The appellant's work is mainly sedentary, with no special physical demands. This is comparable to Level 8-1 where the work is typically performed while comfortably seated at a desk. Level 8-1 (5 points) is credited.

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 works in an office setting with no unusual risks or discomforts which is comparable to Level 9-1. This factor is credited at Level 9-1 (5 points).

Grade Decision

Application of the criteria published in the Budget Clerical and Assistance Series standard to the appealed position results in a total of 1230 points, which falls within the range of GS-06 (1105-1350) according to the grade conversion table on page 4 of the standard. Budget clerical and assistance functions are accordingly evaluated at the GS-06 level for the appealed position.

DECISION

Comparing the appellant's purchasing and procurement duties to the GS-1105 Purchasing Series and the GS-1106 Procurement Clerical and Technician Series results in a grade no higher than GS-05 and, therefore, is not discussed in detail in this evaluation.

We find that the appellant's position is properly classified to the GS-303 Miscellaneous Clerk and Assistant Series at the GS-06 level with the title at the discretion of the agency. The parenthetical title "Office Automation" must be affixed to the title that is selected.