

U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeal and FLSA Programs

Philadelphia Oversight Division
600 Arch Street, Room 3400
Philadelphia, PA 19106-1596

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

Appellant: [appellant's name]

Agency classification: Management and Program
Assistant (OA)
GS-344-7

Organization: Public Affairs Office
[name] District
Internal Revenue Service
[location]

OPM decision: Editorial Assistant (OA)
GS-1087-7

OPM decision number: C-1087-07-01

Robert D. Hendler
Classification Appeals Officer
/s/ 4/6/00

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, payroll, disbursing and accounting officials of the government. The agency is responsible for reviewing its classification decision 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 Position Classification Standards (PCS's), appendix 4, Section G (address provided in appendix 4, section H).

Since this decision changes the classification of the position, it is to be effective no later than the beginning of the fourth pay period after the date of the decision (5 CFR 511.702). The servicing human resources office must submit a compliance report containing the corrected position description (PD) and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

Decision sent to:

[appellant's name]
[address]
[location]

Ms. Marlene Craig
Acting Chief, National Classification Center
U.S. Department of Treasury
Internal Revenue Service
401 W. Peachtree St., NW, Stop 821-D
Atlanta, GA 30365

Mr. Ronald A. Glaser
Director of Personnel Policy
U.S. Department of Treasury
Room 4180-ANX
Washington, DC 20220

Mr. James O'Malley
National Director, Personnel Division
U.S. Department of Treasury
Internal Revenue Service
1111 Constitution Avenue, NW
Room 1408
Washington, DC 20224

Introduction

On January 6, 2000, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. Her position is currently classified as a Management and Program Assistant (OA), GS-344-7. Based on an audit of the position, the Internal Revenue Service (IRS) National Classification Center in Atlanta, GA concluded on September 15, 1999, that the position was properly classified as Editorial Assistant (OA), GS-1087-7. However, action was not taken to reclassify the position. In her appeal to OPM, the appellant requested that the position be reclassified as a Visual Information Specialist, GS-1084 or a Writer-Editor, GS-1082-7/9. The position is located in the Public Affairs Office, [name] District, IRS, [location]. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C).

General issues

The appellant believes that her position should be reclassified based primarily on the desktop publishing work that she performs. She states that desktop publishing is a major portion of her work occupying approximately 60 to 70 percent of her time. The appellant states that these duties are the primary and paramount focus of her work, but have not been fully considered in the classification of the position. She believes that her agency fails to recognize that she is: (1) using extensive desktop publishing skills to produce various internal and external newsletters; (2) soliciting input from various sources for inclusion in the newsletters; (3) choosing appropriate graphics for the newsletters; and (4) exercising judgment and creativity in the selection of attributes for various publications.

The appellant disagrees with the decision of the IRS National Classification Center to reclassify the position as an Editorial Assistant (OA), GS-1087-7. The appellant believes that this series determination was made to prevent her position from being upgraded. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Therefore, we have considered this agency information only insofar as it is relevant to making that comparison.

The appellant states that her current PD is not classified correctly. A PD is the official record of the major duties and responsibilities assigned to a position by a responsible agency official. Title 5, U.S.C. 5106 prescribes the use of these duties and responsibilities, and the qualifications required, as the basis for determining the classification of a position. The classification appeal process includes determining the duties and responsibilities that are assigned to the appellant's position and actually performed by the appellant, and applies the appropriate PCS's to those duties and responsibilities. We find the current PD does not reflect the duties being performed by the appellant as discussed in this decision.

On March 15, 2000, we conducted telephone audits with the appellant and her first level supervisor, [name]. On March 17, 2000, we conducted a telephone interview with her other coworker to further clarify how work is assigned and controlled in the office. In deciding this appeal, we carefully considered the information provided by the appellant and her agency, the

PD of record (Management and Program Assistant (OA), GS-344-7, SPD No. 92258) and our independent review and analysis of the entire appeal record.

Position information

The appellant's primary responsibility is to provide clerical and administrative support to the Public Affairs Office. This office is comprised of three employees: the appellant, her supervisor, and a Public Affairs Specialist, GS-1035-11. The appellant's duties include: desktop publishing of internal and external IRS newsletters, brochures and publications; reviewing and categorizing incoming correspondence and news clips; sorting mail; typing letters; faxing documents; screening incoming telephone calls; maintaining numerous databases; and ordering supplies and filing general correspondence.

The major portion of her work involves preparing and publishing IRS newsletters. The appellant works closely with the Public Affairs Specialist to produce two newsletters: *Revenews*, for current and retired IRS employees, and *Tax Link*, for tax practitioners in the [state name] and [state name] geographic area. These newsletters are published three to four times each year. The appellant is responsible for contacting various offices throughout the IRS to obtain input for the newsletters. She reviews any submissions for clarity. However, typically the Public Affairs Specialist writes the articles that are included in the newsletters. Throughout the process, the Public Affairs Specialist provides general instructions on the placement of the articles and news clips.

The appellant reviews the articles provided to her and suggests changes to format, design, placement or content. She exercises judgment in making changes that do not impact the intent of the written material. She is responsible for sending camera ready and electronic copies for printing, and mailing the *Revenews* newsletter to approximately 400 IRS retirees. The *Tax Link*, distributed to approximately 6,000 tax practitioners in [state name] and [state name], is mailed directly from the Post Office. The appellant also provides guidance and assistance to other IRS Divisions and develops brochures and flyers at their request. She exercises judgment and creativity in advising these offices on format, design and graphics. She converts information sent to her from word processing software to PageMaker. The appellant assists in planning various agency events and takes photographs at these events, as needed.

The appellant applies her knowledge of desktop publishing software such as PageMaker, Adobe Illustrator and Photo Shop in performing her duties. She also uses word processing and data base applications. The appellant inputs and extracts data from various customer databases (radio, television, tax practitioners, and community members) and ensures that they are kept up-to-date. She reviews and maintains records on news clippings that are sent to the Public Affairs Office. The appellant reviews incoming submissions, determines if they warrant acceptance, categorizes them by subject and forwards them to the supervisor.

Series, title and standard determination

The appellant's PD of record is classified to the Management and Program Assistance Series, GS-344. The appellant disagrees, as does the agency classification decision of September 15,

1999. We concur that the GS-344 series is not appropriate and does not reflect the major duties and responsibilities performed by the appellant. She does not perform clerical and technical work in support of management analysis and program analysis.

The Editorial Assistance Series, GS-1087, covers positions involved in editorial support work such as editing manuscripts for basic grammar and clarity as well as adjusting copy for format. While writers and editors are concerned primarily with subject matter, editorial assistants are concerned with format requirements and altering the order of presentation. The work of editorial assistant positions includes determining the publications' format by planning type fonts, spacing, and page arrangements, and using operating equipment to produce the desired end result.

The appellant performs a wide range of clerical support duties, as previously discussed. However, her primary and paramount duties are covered by the GS-1087 series. She is responsible for formatting various documents, including brochures, flyers, posters and newsletters. Her duties also require knowledge of desktop publishing, including editorial program support. These duties require a general knowledge of the substantive work of Public Affairs operations but not a comprehensive knowledge of the program. Typical of one-grade interval positions, the appellant accomplishes her duties based on the application of established precedents or guidelines. Although the position requires a general understanding of Public Affairs operations, it does not require a broad and in-depth knowledge of communications methods and techniques found in two-grade interval public affairs work.

The Writer Editor Series, GS-1082, and Visual Information Specialist Series, GS-1084, that the appellant has suggested for the reclassification of her position, are both two-grade interval series. GS-1082 work involves writing and editing materials, including reports, magazines, articles and news releases. Writers gather information by researching literature and interviewing experts. In presenting the information, they consider agency policy, consistency with previous agency information, and audience knowledge. GS-1084 work involves communicating information through visual means, including the design and display of various visual materials. Visual Information Specialists select the necessary visual materials, design the placement and appearance of the materials and plan type styles, color schemes and textures. The work in this series requires a broad knowledge of the principles and techniques of visual design.

The appellant performs work in support of the office's GS-1082 and limited GS-1084 functions. Unlike the appellant's work, two-grade interval administrative work requires a high degree of analytical ability as well as intensive knowledge of the principles and practices applicable to the specific occupation, e.g., GS-1082. Such work typically involves analyzing and evaluating programs; formulating and recommending policies and procedures; and applying a knowledge of administrative theory in adapting practice to the unique requirements of a particular program.

The Supervisory Public Affairs Specialist, GS-1035-13 and the Public Affairs Specialist, GS-1035-11 perform the two-grade interval analytical work of the office. The supervisor plans and oversees the office mission, provides guidance to the staff, and serves as the spokesperson for the IRS District. The Public Affairs Specialist serves as the primary writer/editor in the office. While the appellant is expected to include recurring topics, the Public Affairs Specialist

determines what should be published and provides the appellant with a general framework for design and display.

The appellant's duties related to the editing and manipulation of the content of the published documents is evaluated properly by applying the Editorial Assistance Series, GS-1087 PCS. The position's competitive keyboard skills and required knowledge of office automation (OA) systems, including desktop publishing, are evaluated properly by using the Office Automation Grade Evaluation Guide (OAGEG). The OAGEG is used in combination with other PCS's to evaluate positions classified in other series when OA duties are assigned to those positions.

Based on the grade level analysis that follows, the position is properly allocated as an Editorial Assistant (OA), GS-1087.

Grade determination

The appellant performs editorial assistant and desk top publishing work which, when evaluated in terms of scope of responsibility and qualifications required, are at different grade levels. In most instances, the highest level of work performed by the employee for the majority of the time is grade-determining. If work assigned and performed by the employee at a higher grade is only performed a minority of the time, it may be grade controlling only if it is officially assigned on a regular and recurring basis, occupies at least 25 percent of the employee's time and that the higher level knowledge and skill needed to accomplish the work would be required in recruiting for the position if it should become vacant. The appellant's desktop publishing editorial assistant work, evaluated by application of the GS-1087 PCS, meets this requirement.

Evaluation using the GS-1087 PCS

The GS-1087 PCS provides for grade level analysis using two factors: Nature of assignments and Level of responsibility.

Nature of assignments

This factor measures the type and complexity of assignments. At the GS-7 grade level, editorial assistants advise writers, editors and others on agency publication requirements. At this level, assistants suggest changes in the organization of sections of manuscripts and articles in addition to the restructuring and reordering of sentences and paragraphs. They do not rewrite manuscripts or articles to appeal to the potential audience, but they inform the originating writer or office of requirements. GS-7 assistants edit manuscripts for clarity and grammatical correctness. Some GS-7 assistants advise other offices or provide assistance on format and stylistic requirements of publications which differ in manner and style of presentation based on established agency policies, practices and required publication styles. They advise manuscript producers before and during the writing process on possible format and styles of presentation.

The appellant's duties and responsibilities meet, but do not exceed, the GS-7 grade level, the highest level described for this factor. While the specialist serves as the primary writer for the office, the appellant offers suggestions to improve the clarity or revise the content of the articles.

The appellant also makes minor revisions to the content of the article to conform to agency preferences, correct grammar or adjust sentences to adjust to layout parameters. Likewise, she works in conjunction with the specialist in publishing electronic and hard copies of the IRS newsletters. While the work consists of standard processes related to the development and format of newsletters and articles, the appellant uses judgment due to the particular characteristics associated with each publication. The appellant is also actively involved with assisting District divisions, e.g., Tax Payer Service, Tax Payer Education and Tax Collection in developing brochures and flyers. She advises them on suggested layouts, fonts, design and graphics and develops the format or customizes it to ensure that the most suitable method for conveying the message is used. Therefore, this factor is credited at the GS-7 grade level.

Level of responsibility

This factor measures the nature of the use of guidelines and the degree of supervision received by the appellant. At the GS-7 grade level, editorial assistants use a number of general manuals and similar references. They advise writers, editors or other personnel of current publications and any impending changes with minimal supervision. They may recommend changes in current specifications and suggest presentation methods for new publications. They edit the content of the publication without changing the intent of the message. The originator is responsible for ensuring the revision conforms to the original publication.

The appellant's level of responsibility meets, but does not exceed, the GS-7 grade level, the highest level described in the GS-1087 PCS. She works closely with the specialist in developing and publishing articles for the IRS internal and external newsletters using a variety of references and desktop software. She is also responsible for keeping abreast of any changes or new technology related to desktop publishing to develop accurate, informative work products with minimal supervision. While the specialist provides general instructions related to the overall publication of the various newsletters, the appellant uses initiative and judgment in completing the work following accepted practices and agency policies. The specialist reviews draft newsletters prior to submission to the supervisor for final approval. Therefore, this factor is credited at the GS-7 grade level.

With both factors credited at the GS-7 grade level, the appellant's editorial assistant work is credited at the GS-7 grade level.

Evaluation using the OAGEG

The OAGEG is used to evaluate work performed using various software applications, including desktop publishing, to alter the format and design of the publications. Desktop publishing software is a tool used by editorial assistants to manipulate the format of their work. The appellant uses various software functions, including word processing and desktop publishing. A breakout of the OA factors and associated points are shown below.

The position is credited with the highest level for Factor 1. However, because the appellant does not determine what functions should be automated and how that should be done, or make equivalent automation decisions, we are precluded from crediting higher levels for any of the

remaining factors. Given that the OA duties represent lower level work, they do not impact the final grade of the position.

Summary

In summary, we have credited the position as follows:

Factor	Level	Points
1. Knowledge required by the position	1-4	550
2. Supervisory controls	2-2	125
3. Guidelines	3-2	125
4. Complexity	4-2	75
5. Scope and effect	5-2	75
6 & 7. Personal contacts/Purpose of contact	2-b	75
8. Physical demands	8-1	5
9. Work environment	9-1	<u>5</u>
Total points:		1035

The total of 1035 points falls within the GS-5 grade level point range of 855-1100 points in the OAGEG.

Decision

The position is classified properly as Editorial Assistant (OA), GS-1087-7.