

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

Dallas Oversight Division  
1100 Commerce Street, Room 441  
Dallas, TX 75242

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

**Appellant:** [appellant]

**Agency classification:** Program Support Assistant (OA)  
GS-303-5

**Organization:** Associate Chief Nursing Service/  
Transitional Care Unit  
Associate Chief of Staff/  
Clinical Management  
Office of the Chief of Staff  
VA Medical Center  
Department of Veterans Affairs  
[city and state]

**OPM decision:** GS-303-5  
(Title at the discretion of the agency,  
with the parenthetical title of Office  
Automation)

**OPM decision number:** C-0303-05-18

/s/

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Bonnie Brandon  
Classification Appeals Officer

October 21, 2002

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Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

**Decision sent to:**

[appellant's name and address]

Chief, Human Resources Management  
Department of Veterans Affairs Medical Center  
[installation address]

Chief, Compensation and Classification Division (051)  
Human Resources Management  
Department of Veterans Affairs  
810 Vermont Avenue, NW.  
Washington, DC 20420

Deputy Assistant Secretary for Human Resources Management (05)  
Department of Veterans Affairs  
810 Vermont Avenue, NW., Room 206  
Washington, DC 20420

## **Introduction**

On June 28, 2002, the Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. We received the agency's administrative report on July 25, 2002. The appellant's position is currently classified as Program Support Assistant (Office Automation), GS-303-5. She believes the position should be classified at the GS-6 level. The appellant disagrees with the series but did not indicate an alternative. The position is assigned to the Associate Chief Nursing Service/Transitional Care Unit, Associate Chief of Staff/Clinical Management, Office of the Chief of Staff, Medical Center, Department of Veterans Affairs, in [city and state]. The appellant appealed the classification of her position to the Department of Veterans Affairs' Office of Human Resources Management. Their decision, issued on May 8, 2002, sustained the agency's classification of the appellant's position. We have accepted and decided this appeal under section 5112(b) of title 5, United States Code.

We conducted a telephone audit with the appellant on August 9, 2002. We also interviewed her immediate supervisor on August 19, 2002. To clarify information provided during those conversations, we also conducted telephone interviews with the appellant's previous supervisor and a Program Analyst. In deciding this appeal, we fully considered the audit and interview findings and all information of record provided by the appellant and her agency, including current work assignments and the official position description [number]. Both the appellant and her supervisor certified that the appellant's position description is current and accurate. The appellant, however, expressed concern that the requirement for a qualified stenographer was removed from her position description. Our fact-finding revealed that the position does not require stenography skills and that the appellant uses these skills as a personal choice.

## **General issues**

The appellant provided letters to OPM from several individuals conveying their support for the reclassification and/or upgrade of her position. This support was generally based on the personal qualifications of the appellant. While qualifications held by the appellant are considered in the classification of a position, these are qualifications required to perform current duties and responsibilities, not qualifications the appellant personally possesses. Therefore, we could not consider the appellant's personal qualifications, except insofar as they are required to perform her current duties and responsibilities.

## **Position information**

The appellant works in the Transitional Care Unit under the immediate supervision of the Associate Chief Nursing Service. The Unit provides long-term care and is authorized 30 beds.

In April 2000, the appellant was reassigned to the Unit from the Quality Management Service after the service was reorganized. In October 2000, the appellant was given an additional responsibility as the Unit's Resident/Family Representative. What evolved was a position with two primary purposes. They are as follows:

- 1) Providing a comprehensive range of clerical, administrative, and statistical computer support to the Associate Chief Nursing Service/Transitional Care Unit, two Program Analysts, the Quality Manager, and the Risk Manager; and
- 2) Acting as a liaison between the Unit's patients and the staff.

The appellant spends 30 percent of her time as the Unit's Resident/Family Representative. When a patient is first admitted into the Unit, the appellant introduces herself to the patient, the family, and/or significant others. She explains her role as a conduit for patients to voice their issues, concerns, and problems. The appellant will usually follow up with daily visits to the patient. Patient concerns are documented and collated into a quarterly assessment report. The appellant also mails questionnaires to past patients to inquire on the quality of the care received during their stay.

The appellant spends 60 percent of her time providing clerical and administrative support. Typical duties include, but are not limited to, receiving and answering telephone inquiries; taking and typing minutes; composing letters; scheduling and arranging logistics of appointments and meetings; requisitioning and monitoring services, supplies, and equipment for the office; data entry; distributing mail; preparing recurring reports; preparing presentation materials; acting as timekeeper; and developing and maintaining statistical computer spreadsheets for a wide variety of clinical and administrative reviews (e.g., Drug Utilization and Evaluations, pharmacy satisfaction surveys, employee satisfaction surveys, and Utilization Reviews). Furthermore, a significant portion of the appellant's time is spent assisting the Program Analysts, who also serve as Joint Commission on Accreditation of Healthcare Organizations (JCAHO) Coordinators. In addition to performing the duties listed above, the appellant also helps in the preparation of mock and JCAHO surveys, ensures confidential information remains safeguarded, and does the necessary follow-up and reporting for patient incidents. She is responsible for maintaining JCAHO manuals and updates as well.

Ten percent of the appellant's time is allocated for training support functions. The appellant serves as a facilitator for the Learning Maps and Treating Veterans with Care programs. However, only duties that occupy at least 25 percent of an employee's time can affect the grade of a position (*Introduction to the Position Classification Standards*, section III.J). Because the appellant spends less than 25 percent of her time on training support functions, they are neither series nor grade controlling. Therefore, we have not evaluated the grade of the appellant's training support duties in this decision.

The appellant's position description and other material of record furnish much more information about her duties and responsibilities and how they are performed.

### **Series and title determination**

The agency has classified the appellant's position in the Miscellaneous Clerk and Assistant Series, GS-303. This series includes positions the duties of which are to perform or supervise clerical, assistant, or technician work for which no other series is appropriate. The work requires knowledge of the procedures and techniques involved in carrying out the work of an organization

and involves application of procedures and practices within the framework of established guidelines. The appellant performs a number of support functions requiring knowledge of information management and clerical and administrative procedures, instructions, regulations, and directives as they relate to her employing organization. The GS-303 series best represents the position's primary purposes.

The agency has titled the appellant's position as Program Support Assistant (OA). The appellant believes the position should be titled Transitional Care Unit Resident/Family Representative. However, OPM has prescribed no titles for positions in the GS-303 series. Therefore, according to section III.H.2 of the *Introduction to the Position Classification Standards*, the appellant's agency may choose the official title for the position. The parenthetical title OA must be added to identify the requirements for knowledge of office automation systems and typing.

### **Standard determination**

In determining the grade of the appellant's position, we used the Grade Level Guide for Clerical and Assistance Work to evaluate the clerical and assistance work and the Office Automation Grade Evaluation Guide to evaluate the OA work.

### **Grade determination**

#### ***Evaluation using the Grade Level Guide for Clerical and Assistance Work***

The Grade Level Guide for Clerical and Assistance Work provides general criteria for use in determining the grade level of nonsupervisory clerical and assistance work. Administrative support work of the kind described in the guide is performed in offices, hospitals, and numerous other settings in all Federal agencies. The guide describes the general characteristics of each grade level from GS-1 through GS-7 and uses two criteria for grading purposes: *Nature of assignment* (which includes knowledge required and complexity of the work) and *Level of responsibility* (which includes supervisory controls, guidelines, and contacts).

The position is evaluated as follows:

#### ***Nature of assignment***

At the GS-5 level, work consists of performing a full range of standard and nonstandard clerical assignments and resolving a variety of nonrecurring problems. Work includes a variety of assignments involving different and unrelated steps, processes, or methods. The employee must identify and understand the issues involved in each assignment and determine what steps and procedures are necessary and the order of their performance. Completion of each transaction typically involves selecting a course of action from a number of possibilities. The work requires extensive knowledge of an organization's rules, procedures, operations, or business practices to perform the more complex, interrelated, or one-of-a-kind clerical processing procedures.

The appellant's work meets the GS-5 level. The appellant performs the full range of standard and nonstandard office clerical assignments and resolves a variety of nonrecurring administrative

problems. Similar to the GS-5 level, the appellant carries out a variety of assignments involving different and unrelated steps, processes, or methods. Examples include:

- receiving and directing visitors to appropriate personnel;
- receiving and directing incoming telephone calls to appropriate personnel;
- inventorying and maintaining office equipment;
- composing letters and reports; and
- preparing presentation materials.

To perform effectively, especially in her role as the Resident/Family Representative, the appellant must be skilled in problem solving and in communicating effectively, both orally and in writing. The appellant's situation is complicated in that she sometimes must work with patients who have difficulty in presenting their problems and understanding explanations because of age, physical disability, emotional stress, or other factors that impede effective communication. Similar to positions at this level, the appellant must have an in-depth knowledge of the rules, procedures, and operations to be able to identify and understand the issues involved in each assignment. The appellant must also make a determination of the necessary steps, procedures, and the proper sequence. For example, the appellant listens to the patient and determines the urgency of their needs and, if need be, elevates concerns to the appropriate professional. A patient complaining about the food is illustrative of the type of problems, issues, and concerns typically confronted by the appellant. In this case, the appellant would then notify the dietitian of these concerns. The appellant explains recourses available to the patient and then writes narrative reports documenting these contacts. The appellant uses judgment in identifying the issues involved with each assignment and determines the processes needed to complete the assignment. Characteristic of the GS-5 level, the appellant is knowledgeable of the organization's practices in terms of creating and producing reports, operating a computer and other office equipment, and communicating with patients.

At the GS-6 level, work typically entails processing a wide variety of transactions for more than one type of assigned activity or functional specialization. Assignments are subject to different sets of rules, regulations, and procedures. Such issues must be examined that a course of action has substantive impact on the outcome of the assignments. Additionally, the work requires comprehensive knowledge of rules, regulations, and other guidelines relating to completing assignments in the program area assigned. This knowledge is usually attained through extensive, increasingly difficult, and practical experience and training in the subject-matter field. The work also requires ability to interpret and apply regulatory procedural requirements to process unusually difficult and complicated transactions.

The appellant's work does not meet the GS-6 level. The work she performs includes a variety of assignments which requires the appellant to understand the issues involved and determine what procedures to follow and in what order. This is illustrated by her role as the Resident/Family Representative. However, contrary to the GS-6 level, while the appellant performs a range of

standard and nonstandard assignments, her assigned work does not require an ability to interpret and apply regulatory and procedural requirements to solve unusually difficult and complicated problems. The appellant is responsible for the daily management of incident reports, which includes tracking the documentation for an incident to its completion. Several other duties require the appellant to work closely with physicians and other medical professionals in a collaborative manner to ensure that patient concerns are addressed, appropriate forms related to incidents are processed, and JCAHO standards are being implemented. Neither this, nor any of her other duties, pose unusually difficult or complex problems to her work. Instead, the appellant generally deals with problems or situations that remain stable and resemble past problems or situations. The problems the appellant usually confronts are frequently recurring and not likely to escalate to the point of requiring the incumbent to possess a comprehensive knowledge of rules, regulations, and guidelines.

This factor is properly evaluated at the GS-5 level.

#### *Level of responsibility*

At the GS-5 level, the supervisor assigns work by defining objectives, priorities, and deadlines and provides guidance on assignments which do not have clear precedents. The employee works in accordance with accepted practices and completed work is evaluated for technical soundness, appropriateness, and effectiveness in meeting goals. Extensive guides in the form of instructions, manuals, regulations, and precedents apply to the work. The number and similarity of guidelines and work situations require the employee to use judgment in locating and selecting the most appropriate guidelines for application and adapting them according to circumstances of the specific case or transaction. A number of procedural problems may arise which also require interpretation and adaptation of established guides. Often, the employee must determine which of several alternative guidelines to use. If existing guidelines cannot be applied, the employee refers the matter to the supervisor. Contacts are with a variety of persons within and outside the agency for the purpose of receiving or providing information relating to the work or for the purpose of resolving problems in connection with recurring responsibilities.

The appellant fully meets the GS-5 level. She independently carries out day-to-day administrative and clerical assignments for the Assistant Chief Nursing Service, the Program Analysts, the Risk Manager, and the Quality Manager. She also independently assists with other aspects of the program. Characteristic of the GS-5 level, the appellant uses judgment to determine the appropriate course of action to take when performing her duties. The employee performs such work as receiving, screening, and personally handling telephone calls and visitors; reading and routing incoming correspondence; drafting replies to general inquiries; and maintaining recurring internal reports. Similar to the GS-5 level, the appellant's work requires the use of a number of applicable guidelines and procedures and makes decisions within the parameters of these guidelines and procedures. As the Resident/Family Representative, the appellant typically confronts problems that are generally narrow in focus, usually concerning a patient's comforts, and the effect of the appellant's decisions is measured in terms of the impact on the patient rather than on the program itself.

The appellant's contacts are generally with employees in the medical center, patients, and with JCAHO accrediting agencies. The appellant may occasionally come in contact with members of the general public and with employees in the agency but outside the medical center. Consistent with the GS-5 level, the purpose of the appellant's contacts is to plan, coordinate, gather, and provide information for the Unit. The contacts are also for resolving and eliminating potential problems. The appellant receives occasional assignments from the immediate supervisor, the Risk Manager, and the Quality Manager, but more frequently from the Program Analysts. These individuals define the objectives and priorities of the work, providing guidance and instructions with those assignments lacking clear precedents.

At the GS-6 level, the supervisor reviews completed work for conformance with policy and requirements. The clerical employee is recognized as an authority on processing transactions or completing assignments within a complicated framework of established procedures and guidelines, often where there are no clear precedents. This recognition typically extends beyond the immediate office or work unit to the overall organization or, in some cases, outside the organization. The employee is regarded as an expert source of information on regulatory requirements for the various transactions and is frequently called upon to provide accurate information on short notice. Guidelines for the work are numerous and varied, making it difficult for the employee to choose the most appropriate instruction and decide how the various transactions are to be completed. Guidelines often do not apply directly, requiring the employee to make adaptations to cover new and unusual work situations. This may involve deviating from established procedures to process transactions which cannot be completed through regular channels or involve actions where guidelines are conflicting or unusable. Contacts are with employees in the agency, in other agencies, or with management or users or providers of agency services. The employee provides information, explains the application of regulations, or resolves problems relating to the assignment.

The appellant's position approaches the GS-6 level but does not fully meet it. Completed work is not subject to detailed review. While the review of her work is typical of the GS-6 grade level, our fact-finding and the position description revealed that the appellant's work is covered by extensive guides in the form of instructions, manuals, regulations, and precedents typical of the GS-5 level. The appellant's contacts also approach those at the GS-6 level. They are with employees in the agency, with management, and with patients to provide information or resolve problems. However, we credited these contacts at the GS-5 level instead, because the issues and problems with which the appellant deals are not of the GS-6 complexity. Therefore, this aspect of her work fails to fully meet the higher grade level.

In a letter to OPM, the appellant stated that she is "...called upon on a regular basis by both management and service chiefs throughout the hospital, to provide information relative to various standards in the manual." The appellant plays a vital role in the maintenance, the organization, and the implementation of the JCAHO standards. Her contacts with service chiefs are generally limited in scope to the distribution, organization, and implementation of these standards. The interpretation of these standards requires extensive knowledge in clinical matters. The appellant's level of responsibility does not rise to the GS-6 level in that she is not regarded as an expert source of information on regulatory requirements. The appellant is the "keeper" of



the JCAHO manual and updates. On the other hand, the Program Analysts are the recognized experts in the interpretation of JCAHO standards.

Contrary to the GS-6 level, the appellant is not required to often make adaptations to cover new and unusual work situations. While the appellant is the individual who patients most frequently contact and talk with on matters of concern, the supervisor is available for unusual or controversial matters when guidelines and precedents are not available. The appellant indicates that she performs virtually all duties independently, which she believes is a testament to her extensive training, experience, and knowledge. The appellant is authorized to act on her own initiative within defined parameters to resolve problems. Her level of responsibility may appear to meet the GS-6 criteria. However, careful reading of the standard and other OPM guidelines indicates that for a person's level of responsibility to truly meet GS-6 criteria, the appellant's responsibilities should be exercised within the context of GS-6 assignments. As discussed previously, the appellant's assignments are best graded at GS-5.

This factor is properly evaluated at the GS-5 level.

Since both factors are evaluated at GS-5, the overall evaluation of the clerical and administrative support functions is GS-5.

#### ***Evaluation using the Office Automation Grade Evaluation Guide***

The office automation work is evaluated against the Office Automation Grade Evaluation Guide, which is written in the Factor Evaluation System format. These duties do not impact the grade of the position, therefore, only a summary evaluation follows:

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-3	350
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 and Purpose of contacts	1a	30
8. Physical demands	8-1	5
9. Work environment	9-1	5
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<i>Total</i>		790

In accordance with the grade conversion table in the guide, a total of 790 points falls within the range of GS-4, 655 to 850 points.

***Summary***

The highest level of substantive work is evaluated at the GS-5 level. The office automation work is evaluated at GS-4. The position is properly evaluated at the GS-5 level.

**Decision**

This position is properly classified as GS-303-5, with the title to be determined by the agency to include (OA).