

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

**Appellant:** [appellant], et al.

**Agency classification:** File Clerk  
GS-305-4

**Organization:** [Section]  
[Service]  
Office of the Medical Center Director  
Veterans Affairs Medical Center  
Veterans Health Administration  
U.S. Department of Veterans Affairs  
[city and state]

**OPM decision:** File Clerk  
GS-305-4

**OPM decision number:** C-0305-04-03

/s/ Jeffrey E. Sumberg

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Jeffrey E. Sumberg  
Deputy Associate Director  
Center for Merit System Accountability

November 3, 2009

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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*, appendix 4, section G (address provided in appendix 4, section H).

**Decision sent to:**

[appellants, et al.]  
[VA Medical Center]  
U.S. Department of Veterans Affairs  
[address]  
[city and state and zip code]

[Representative]  
Vice President, Non-Professional Unit  
AFGE Local [#####]  
[VA Medical Center]  
U.S. Department of Veterans Affairs  
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[Specialist]  
Human Resource Specialist POC  
Human Resources (05e)  
[VA Medical Center]  
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Director, Compensation and Classification Service (055)  
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## **Introduction**

On February 5, 2009, the Chicago Oversight and Accountability Group (COAG) of the U.S. Office of Personnel Management (OPM) accepted a group classification appeal from [appellants, et al]. The appellants occupy identical additional positions (hereinafter referred to as position) currently classified as File Clerk, GS-305-4, in the Patient Business Service, at the [location] Veterans Affairs Medical Center (VAMC), [location], Healthcare System of [state] Network, Veterans Health Administration (VHA), U.S. Department of Veterans Affairs (VA), in [city and state]. The appellants believe their position should be classified as Program Support Clerk (Scanning Specialist), GS-303-5. The initial agency administrative report (AAR) was received March 6, 2009. The appellants' rebuttal comments regarding the content of the AAR were received on March 16, 2009.

Review of documents in the AAR revealed inconsistencies. However, we proceeded with our fact-finding and made the appropriate pen and ink changes to the record based on information gathered during our follow up telephone conversations with the second-level supervisor. On May 12 and May 20, 2009, we received copies of the documents necessary to complete the AAR.

We conducted an initial telephone audit with the lead appellant on April 30, 2009, and made follow-up calls to verify information several times thereafter. On May 5, 2009, we conducted a telephone interview with the appellants' second-level supervisor. The interview and subsequent contacts were conducted with the second-level supervisor because he has more extensive knowledge of the organization and of the duties performed by the appellants than the immediate supervisor who only assumed those duties on or about April 13, 2009. We accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

## **Background**

The appellants were originally assigned to a position which was classified as File Clerk, GS-305-5. Based on OPM classification decision number C-0305-04-02, issued February 1, 2007, the agency was required to provide OPM with an intra-agency classification consistency report. In making its report, the agency reviewed positions that were identical, similar, or related to the appellants' to ensure that they are classified consistently with this appeal decision. As a result, the local human resources (HR) office reclassified the appellants' position on March 31, 2008, as File Clerk, GS-305-4, resulting in the downgrading of the position. The appellants appealed the decision to VA's headquarters HR office; and on October 22, 2008, that office returned the appeal without action sustaining the local HR office's classification determination. The appellants subsequently appealed the classification of their position to OPM.

## **General issues**

The appellants and their supervisor have certified to the accuracy of the appellants' official position description (PD) # [#####-#], but the appellants disagree with the grade-level determination. 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. The duties and responsibilities of

a position make up the work performed by the employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities currently assigned by management and performed by the employee. An OPM appeal decision is based on the work currently assigned to and performed by the appellant and sets aside any previous decision.

The appellants' questioned the sensitivity level of their PD of record. We previously addressed this issue by separate correspondence since the determination of PD sensitivity is not part of the position classification process and is not reviewable under position classification appeal procedures.

The appellants stated there are other agency scanning positions in health information management classified at the GS-5 level. By law, we must classify positions solely by comparing current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since the comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others, which may or may not be classified correctly, as a basis for deciding the appeal.

Implicit in the appellants' rationale is a concern their positions are classified inconsistently with other agency positions which perform similar work. Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring its positions are classified consistently with OPM appeal decisions. If the appellants consider their position so similar to others that they all warrant the same classification, they may pursue the matter by writing to their agency headquarters human resources office. In doing so, they should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to the differences between the appellants' position and the others.

### **Position information**

The appellants work under the general supervision of the Chief, Health Information Management Section, Patient Business Service, GS-669-12. The Lead File Clerk, GS-305-5, is available to provide assistance to the appellants in accomplishing their work.

The appellants perform duties related to receiving, scanning, indexing, and destroying health and administrative information. Duties include, but are not limited to, the indexing of scanned documents into the appropriate database which is accessed via the Computerized Patient Records System (CPRS) Graphical User Interface (GUI) tools in order to associate each scanned document with the correct patient's CPRS record. The appellants receive documents from agency and non-agency health care facilities, and letters from members of Congress. The position description (PD) of record contains more detailed information about the duties and responsibilities performed by the appellants, and we incorporate it by reference into this decision.

**Series, title, and standard determination**

The agency has assigned this position to the Mail and File Series, GS-305, but the lead appellant requests the title and series be changed to Program Support Clerk (Scanning Specialist), GS-303, because the scanning of documents and duties associated with that process; i.e., creation of file notes, has changed the nature of how the work is done. However, use of the 303 series is reserved for those instances where no single classification series clearly covers the primary and paramount functions of the position.

The appellants' position is correctly classified to the 305 series. The Mail and File Series, GS-305, position classification standard (PCS) recognizes under Occupational Information the existence of automated filing systems and states neither the mechanical devices nor the operations performed in automated systems involved have affected the basic nature of mail or file work. Automated systems involve the rearrangement of, but no basic change in, basic filing processes. The appellant's work is directly covered by the GS-305 series since the appellants are responsible for the maintenance and control of consolidated health records in an automated filing system environment. They scan and electronically file documents into patient files from agency and non-agency health providers. Their filing work performed within an automated system is encompassed by the 305 series. The title, File Clerk, is the prescribed title for nonsupervisory positions in grades GS-1 through GS-5 when file duties are predominant in the position. Therefore, the appellants' position is properly allocated as File Clerk, GS-305. Because the directly applicable GS-305 series PCS contains published grading criteria, it is neither necessary nor appropriate to apply the grading criteria in the Grade Level Guide for Clerical and Assistance Work as proposed by the appellants (5 U.S.C. 5107).

**Grade determination**

The GS-305 PCS uses the factor evaluation system (FES) under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade-conversion table provided in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails in any significant aspect to meet a particular factor-level description, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level.

The appellants do not identify any specific factor level determination made by the agency. They do, however, disagree with the resulting grade-level determination based on the nine factors. Therefore, our analysis will include each of the nine factors.

*Factor 1, Knowledge required by the position*

This factor measures the nature and extent of information or facts a worker must understand in order to do acceptable work and the nature and extent of skills needed to apply that knowledge.

To be used as a basis for selecting a level under this factor, the knowledge must be required and applied.

At Level 1-2, duties require a basic knowledge of the functions of the units serviced and the content of the material being filed. At this level, the employee performs filing tasks which are considered less complex. Assignments at this level include the simple file systems which use, for example, alphabetical sorting of files and arranging records within folders and in cabinets as well as consolidating new material with previously filed hard copy material.

At Level 1-3, the highest level described in the PCS, work requires a thorough knowledge of the functions performed within the units serviced (e.g., the various operations performed within an administrative services unit), a thorough knowledge of the subject-matter content of the materials being processed and a thorough knowledge of correspondence procedures and filing systems which may be characterized as complex. In file positions this knowledge is used when the subject matter is overlapping or difficult to discern. In these instances proper determinations require study of materials to determine specific categories from, among many which may be applicable.

Like Level 1-3, the appellants use a thorough knowledge of the contents and filing sequence of both medical and administrative records. The appellants use knowledge of records in order to properly index and scan medical and administrative records into CPRS through related scanning hardware and imaging software. The appellants apply knowledge of the type and purpose of documents kept by the medical center presently and in the past and use a thorough knowledge of the facility's medical and administrative files in both electronic and hard copy form to ensure information is properly stored and retrieved. The appellants apply skill in the use of computers to determine record location, fill record requests, retrieve records, to charge records in and out, to create new volumes and to conduct record search. The appellants also apply a good working knowledge of medical terminology in order to deal with the subject-matter issues typical of Level 1-3.

Level 1-3 is credited 350 points.

### *Factor 2, Supervisory Controls*

This factor covers the nature and extent of direct and indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

At Level 2-2, the supervisor provides instructions for non-recurring assignments and changes in procedures. Most assignments are performed independently according to established procedures. The supervisor is consulted when problems arise for which there are no precedents. The work is reviewed for accuracy by spot-checking or selective sampling, and may be reviewed occasionally for compliance with regulations.

At Level 2-3, the employee independently plans and adjusts file functions to meet the requirements of the serviced units. The serviced units are concerned with new, emerging or innovative programs such as those found in engineering laboratories in research and

development where there is relatively constant change. The employee at Level 2-3 must independently recognize the need for and take action to establish new file procedures and to otherwise adapt or change established procedures.

Like Level 2-2, the appellants perform day-to-day work independently under general supervision. The Lead File Clerk and supervisor are available to provide instruction should difficult situations arise or for situations which have no precedent. The appellants perform their duties based on established procedures. They scan approximately 50 different types of documents, copies of which are compiled in an office standard operating procedure (SOP). Level 2-3 is not met where the employee independently plan and adjust functions to meet the requirements of serviced units. These functions are vested in higher-level positions in the appellants' organization.

Level 2-2 is credited (125 points).

### *Factor 3, Guidelines*

This factor covers the nature of the guidelines used and the judgment needed to apply them. Guidelines include desk manuals, established procedures and policies, traditional practices and reference manuals.

Guidelines at Level 3-2 include numerous standing oral instructions and written procedural guides which are applicable in differing work situations. The employee must use initiative and judgment in selecting from among established procedures that which is most applicable to a situation. Judgment is also used in selecting alternative means of locating materials missing from files when search information is inadequate or misleading and several locations are possible.

At Level 3-3, guidelines consist of standing oral instructions and written guides which may not be applicable (and in some cases may not cover) an extensive range of varying operating situations. Significant judgment is required both to determine which of the guides to apply to specific cases or problems and to adapt or improvise procedures to accommodate precedent-setting or unique situations. Written guides typically include various records management manuals that are used in setting up initial file services to serve new organizational requirements or to extensively modify existing services because of major deficiencies or system changes.

The appellant's position meets Level 3-2. The guidelines available to the appellants include the VHA Handbook 1605.1, VHA Handbook 1907.1, the Privacy Act of 1974, Health Insurance Portability and Accountability Act (HIPPA), technical user manuals for the personal computer, and imaging applications. The appellants exercise judgment in choosing from among established procedures and available guidelines. Situations requiring substantial deviation from established methods require supervisory approval.

Level 3-2 (125 points) is credited.

*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 4-2, work entails performing several related duties involving consideration of appropriate procedures or actions to be taken in a variety of work situations. Generally, there is variety in the materials processed and in the activity required (e.g., recognizing a variety of types of printed forms and deciding the appropriate filing action to be taken, proper processing and safeguarding of security classified materials, etc.). Work at this level also requires distinguishing among a large number of distribution points when the functions of some serviced units overlap, searching for missing materials and locating requested materials when information varies or conflicts.

At Level 4-3, work requires performing a number of duties involving the full range of filing procedures in a work situation where there is typically a great variety in the materials received, great complexity of subject-matter materials and processing actions (e.g., scientific or technical materials, requirement for multiple actions of an independent or sequential nature, etc.).

Like Level 4-2, the appellants process a wide variety of documents to include laboratory, nuclear, ophthalmology and optometry reports, power of attorney and guardianship forms, as well as autopsy results. The appellants utilize their knowledge of medical terminology to recognize the subject matter of each document. The appellants scan documents received from within the [location] VAMC, from other VA facilities and private sector facilities. The appellants review notes associated with the documents to be scanned. If notes are not provided the appellants verify documents are for the correct patient and create notes using an automated template for the documents to be scanned. Notes include for example, document type and type of medical procedure performed. This matches the exercise of choices in how to perform work found at Level 4-2.

The appellants' work does not meet Level 4-3 where duties involve multiple cross-referencing, multiple classification of information. At Level 4-3, duties are performed in a work context of overlapping classification categories, diverse and complicated subject-matter content and recognition of the need for improvements in records processing procedures. The appellants review and scan approximately 50 different types of documents. However, a copy of each of these types of documents is maintained in the office SOP and, like Level 4-2, the appellants choose a course of action from a variety of approved procedures.

Level 4-2 (75 points) is credited.

*Factor 5, Scope and Effect*

This factor covers the relationship between the nature of the work; i.e., the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization.



At Level 5-1, positions are concerned with well established files functions. Performing these functions on a timely basis facilitates the work performed in the serviced units.

At Level 5-2, positions are concerned with work involving the improvement of methods or procedures affecting the overall efficiency of the file unit; or work that involves determining and selecting appropriate materials to be made available to serviced units for their use. Performance affects the ability of personnel in the serviced units to perform their duties in an accurate manner, or provide services to others.

As at Level 5-1, the purpose of the appellants' position is to provide scanned and hard copy medical and administrative documents in a timely and accurate manner. The appellants' perform their duties in accordance with prescribed methods. Like level 5-1, the approved types of documents that can be scanned have been established and the appellants work within recognized parameters. The materials to be scanned such as records of treatment or support of claims for pension are specific to each patient. The appellants' performance of their duties affects the completeness of the patient's record which is used by health service providers which is consistent with Level 5-1 where functions performed by the employee facilitate the work performed by other units.

Level 5-2 is not met as the appellants are not responsible for the improvement of methods or procedures used in the unit nor are they selecting appropriate materials to be made available to serviced units for their use. These functions are vested in higher-level positions in the VAMC.

Level 5-1 (25 points) is credited.

#### *Factor 6, Personal Contacts*

This factor includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. Levels described under this factor are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place.

At Level 6-1, personal contacts are primarily with employees in the immediate work unit and also in related file units.

At Level 6-2, personal contacts are typically with personnel in serviced units and may also include personnel outside the organization.

Like Level 6-2, the appellants make contact with clinical and administrative staff at the medical center and at other facilities. Contacts with individuals are in person, by phone and via electronic methods.

Level 6-2 (25 points) is credited.

*Factor 7, Purpose of Contacts*

The purpose of contacts ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, or objects.

The purpose of contacts at Level 7-1 is to obtain or exchange information regarding performance of functions in the immediate work unit, and as required, to provide information to personnel in serviced units regarding file operations.

At Level 7-2, the purpose of contacts is to work with personnel in serviced units in resolving such operating problems as delays in receipt of materials, improperly coded or classified files or inadequacy of existing file categories.

Like level 7-1, the purpose of the appellant's contacts is to acquire or provide information. Functions typical of Level 7-2 are vested in higher-level positions at the VAMC.

Level 7-1 (20 points) is credited.

*Factor 8, Physical Demands*

This factor covers the requirements and physical demands placed on the employee by the work assignment. This includes physical characteristics and abilities and the physical exertion involved in the work.

At Level 8-1, the work is primarily performed while sitting. Duties require occasional periods of standing, walking, bending, or carrying of light objects such as letter trays, file folder, etc.

At Level 8-2, the work requires long periods of standing, walking, bending, etc., or requires recurring lifting and carrying of packages pouches or bags under 50 pounds.

Like Level 8-1, the appellant's work is mostly sedentary. The appellants' work requires some standing walking bending or carrying of light objects. All file unit members annually prepare record retirement boxes which may weigh 20-25 pounds.

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.

At Level 9-1, work is performed in an office setting that is adequately lighted, heated and ventilated.

At Level 9-2, work is performed on loading docks or other areas exposed to the weather or in areas subject to high noise levels and vibration and may require the use of protective clothing.

Like Level 9-1, the appellants work in an office setting.

Level 9-1 (5 points) is credited.

*Summary*

Factor	Level	Points
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	5-1	25
6. Personal Contacts	6-2	25
7. Purpose of Contacts	7-1	20
8. Physical Demands	8-1	5
9. Work Environment	9-1	5
Total		755

A total of 755 points falls within the GS-4 range (655 to 850) on the grade-conversion table provided in the GS-305 PCS.

**Decision**

The position is properly classified as File Clerk, GS-305-4.