

U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and ELSA 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: Computer Specialist
GS-334-11

Organization: [organizational name]
[higher level organizational name]
[name of] Region
[component name]
U.S. Department of Agriculture
[geographic location]

OPM decision: Computer Specialist
GS-334-11

OPM decision number: C-0334-11-03

Robert D. Hendler
Classification Appeals Officer

/s/ 11/13/97

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 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]

Personnel Director
U.S. Department of Agriculture
[component name]
[address]

Director, Office of Human
Resources Management
U.S. Department of Agriculture
Washington, DC 20250

Introduction

On July 10, 1997, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. His position is classified currently as Computer Specialist, GS-334-11, Position Description (PD) #MA5093. The appellant, however, believes the classification should be Computer Specialist, GS-334-12. The position is in the [organizational location](Staff), [higher level organizational name],[name of] Region, [agency component] Service (Service), U.S. Department of Agriculture, [geographic location]. We have accepted and decided his appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

The appellant believes that his PD is not completely accurate in that it does not recognize him: (1) serving as the senior problem solver for less experienced members of the Staff; (2) performing fully the Computer Security Officer duties “previously performed by GS-12 staff person who held the title of Computer Security Officer,” although he may not sign certain forms that must be signed by a GS-12 employee; and, (3) “developing computer projects and acting on task forces that involve many design efforts not currently being used in our agency and developing them to fit our office specifications. I also help implement these projects for other regional offices and field offices. While performing these tasks I have been called on many times to research state of the art technology to develop processes for accomplishing these projects.” The appellant took issue with the agency internal classification process, and cited the agency appeal decision to buttress some of his claims.

In his original appeal letter, and his letter of September 1, 1997, responding to the activity's appeal administrative report, the appellant stressed his functioning as Backup to the Local Area Network (LAN) Administrator, acting in his place to cover compressed work schedule time frames and periods of leave. He stressed his technical independence on certain projects, not reporting through the LAN Administrator. The appellant claimed the new “Centers of Excellence “ agency philosophy, allowing regional offices to help other regions in implementing assigned projects, has created a work situation in which special projects vary “from a few weeks to a few months” in length. He believes that recommending the purchase of \$50,000 of computer equipment last year to supplement the major purchases made by “our HQ office” supports his position being credited with “predicting future environments, and researching state-of-the-art technologies.”

These submissions have raised procedural issues warranting clarification. All positions subject to the Classification Law contained in title 5, U.S.C., must be classified in conformance with published position classification standards (PCS's) of OPM or, if there are no directly applicable PCS's, consistently with PCS's for related kinds of work. Therefore, other methods or factors of evaluation, such as comparison to other positions that may or may not be classified correctly, are not authorized for use in determining the classification of a position.

A PD is the official record of the major duties and responsibilities assigned to a position by a responsible management official, i.e., a person with authority to assign work to a position. A **position** is the combined duties and responsibilities that make up the work performed by an employee. Title 5, U.S.C., section 5106 prescribes the use of these duties and responsibilities, and

the qualifications required by these duties and responsibilities, as the basis for determining the classification of a position. The Introduction further provides that "As a rule, a position is classified on the basis of the duties actually performed." Additionally, 5 CFR 511.607(a)(1), in discussing PD accuracy issues, provides that OPM will decide classification appeals based on the actual duties and responsibilities assigned by management **and** performed by the employee. The point here is that it is a real operating position that is classified, and not simply the PD.

The application of OPM PCS's must be accomplished within the confines of the position classification theories, principles, and practices established by OPM. The Introduction to the Position Classification Standards (Introduction) states that:

Some positions involve performing different kinds and levels of work which, when separately evaluated in terms of duties, responsibilities, and qualifications required, are at different grade levels. . . .

In most instances, the highest level of work assigned to and performed by the employee for the majority of time [emphasis added] is grade-determining. When the highest level of work is a smaller portion of the job, it may be grade controlling only if:

- The work is officially assigned to the position on a regular and recurring basis;
- It is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time); and
- The higher level of knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

In the General Schedule classification system each grade represents a band of difficulty. Some positions entail performing work of difficulty and complexity that minimally meets the grade level requirements. Other positions perform work at the top of the grade band, but do not meet the minimum requirements for elevation to the next grade level. For example, all budget analyst positions performing work at the GS-11 grade level would be assigned to the same class; i.e., Budget Analyst, GS-560-11. This does not mean that all budget analyst positions at the GS-11 grade level perform identical work. The allocation of positions to that class is predicated on each position performing work of GS-11 grade level difficulty within a budget program requiring GS-11 budget system skills and knowledge. Therefore, the fact that the appellant may help less senior members of the immediate staff does not have an automatic grade level impact on his position.

The classification appeal process is a de novo review that includes a determination as to the duties and responsibilities assigned to the appellant's position and performed by the appellant, and constitutes the proper application of PCS's to those duties and responsibilities. Our analysis of the position is based in large part on the information provided during an on-site audit with the appellant, and an interview with his immediate supervisor, [supervisor's name], Chief, [organizational name] on November 3, 1997, and our independent review and analysis of the entire appeal record. Our audit with the appellant and our interview with his supervisor confirmed that the PD of record contains the major duties and responsibilities performed by the appellant and is hereby incorporated by reference into this decision. As discussed in the Grade determination section of this decision, the PD overstates the difficulty and complexity of some aspects of the position and requires correction.

Position information

The appellant provides computer system services in support of approximately 140 MARO employees, approximately 100 of whom are at the [geographical location] facility. The organization in which he works consists of his supervisor (Computer Specialist, GS-334-12, PD #MA5089), the LAN Administrator (Computer Specialist, GS-334-12, PD #MA5043), another Computer Specialist, GS-334-11, a Financial Management Specialist, GS-501-11, and a contractor employee who also provides computer systems services. The LAN services the [geographical location] facility. Eight other offices, scattered from [geographic location] to [geographic location] house the remainder of the staff. The LAN system is linked through a wide area network (WAN) to [geographic location]([program name]), [geographic location] ([program names]), and National Finance Center (internal financial management) mainframes. The smaller offices have dial up access to the mainframes and to the [name of region] LAN.

Our factfinding revealed the supervisor and the Financial Management Specialist, GS-501 primarily are involved in external computer support, e.g., reviewing State agency ADP hardware and software plans in support of U.S. Department of Agriculture and related [name of agency] before Federal funding. The remainder of the staff provides internal [name of region] computer services. Network software and applications software are determined by headquarters. [name of region] maintains specialized software for internal purposes. For example, it operates applications in support of the Commonwealth of Virginia [names of] programs. It maintains one integrated financial system with interlinked programs. Most specialized software, e.g., nutrition analysis, is selected by program users. The appellant evaluates software packages for ADP performance, e.g., whether it stands or whether it can share files and provide access to multiple users.

During the past two years the appellant's projects have included: (1) installing an Internet software package from headquarters, configuring the system by assuring it was allocated sufficient space in the file server, installing the browser on personal computers (PC's), and providing software training; (2) helping the LAN Administrator in planning migration from Windows 95 to Windows NT, including testing software package capabilities, providing recommendations on configuration standards (another region is scheduled to pilot the migration); (3) working directly with a headquarters staff member to evaluate Intel and DEC Alpha technology to determine which should replace the IBM 9370 file

server; (4) working directly with a headquarters' contractor on the EDI projects in which states enter form information through PC's, the data is transmitted to the mainframe, which required training in EDI technology to understand and track data flow; and, (5) working with a headquarter's contractor on [name] Alert (the contractor wrote software to track [program name] transactions to try to uncover fraud, and used the [name of Region] network for testing) in which the appellant helped in testing three communications protocol options. The appellant is being trained in Microsoft Virtual Basic before migrating most local programs written in dBASE III+ into ACCESS and EXCEL.

Series, title, and guide determination

The agency determined the appellant's position is covered by the Computer Specialist Series, GS-334, is titled Computer Specialist, and is graded using the Computer Specialist, GS-334 PCS with which the appellant has not disagreed. We concur that the GS-334 PCS covered the preponderance of the appellant's work. Aspects of the automated data processing (ADP) security functions of the position, e.g., processing of security forms and issuing of passwords, are covered by the Security Clerical and Assistance Series, GS-086 and the Security Administration Series, GS-080 PCS's.

Grade determination

The published Computer Specialist, GS-334 PCS is written in Factor Evaluation System (FES) format. Positions graded under the FES format are compared to nine factors. Levels are assigned for each factor and the points associated with the assigned levels are totaled and converted to a grade level by application of the Grade Conversion Table contained in the PCS. Under the FES, factor level descriptions mark the lower end, i.e., the floor, of the ranges for the indicated factor level. If a position fails in any significant aspect to meet a particular level in the standard, the next lower level and its lower point value must be assigned unless the deficiency is balanced by an equally important aspect that meets a higher level.

The appellant disagrees with the evaluation of Factor 3, Guidelines, and agrees with his agency's crediting of Levels 1-7, 2-4, 4-5, 5-4, 6/7-3c, 8-1 and 9-1. We reviewed carefully the levels assigned to the other factors by the agency and the accompanying rationale with which the appellant has not taken issue. We found these determinations to be appropriate for Factors 1, 2, 8, and 9 and have so credited the position. Accordingly, our appeal analysis focuses on the evaluation of the remaining factors.

Factor 1, Knowledge required by the position

Factor 1 measures the nature and extent of information or facts that the workers must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, theories, principles and concepts) and the nature and extent of the skills needed to apply that knowledge. To be used as a basis for selecting a level under this factor, a knowledge must be required and applied.

At Level 1-6 (950 points) employees use knowledge of established techniques and requirements of the employing organization, including data processing documentation procedures, standard data elements and codes, available utility routines, customary factfinding approaches, decision logic tables and structured analysis and design methodologies. The primary requirement at Level 1-6 is for knowledge of how to execute assignments. Computer specialists at this level develop individual programs, test plans, or reports within an approved framework; or facilitate user interface and access to computer systems by giving training on using generalized software. An applications oriented assignment normally entails knowledge of the technical characteristics of an operating mode, the system software, the appropriate programming language, and the inputs, outputs and overall processing logic, and the work process to be accomplished. Such knowledge is used to carry out assignments where the objectives to be reached are clearly identified and realized by straightforward adaptation of precedents and established practices.

In contrast, Level 1-7 (1,250 points) requires knowledge of system software and systems development life cycles, including systems documentation, design development, configuration management, cost analysis, data administration, systems integration and testing. This is used to track the use and status of resources for system design projects through development, modification, maintenance, and evaluation of a standard program management system. Employees use knowledge and skill to modify and adapt precedent solutions to unique or specialized requirements. Typically, they develop plans or specifications necessary for a proposed application. Also, at this level are troubleshooting design and software implementation problems.

The knowledge required of the position meets Level 1-6 for developing individual programs for limited internal applications within an approved framework, e.g., coding for programs using off-the-shelf software packages such as Microsoft Office EXCEL and DBASE III+; familiarity with the LAN technology, i.e., an IBM compatible PC network with WAN linkage to mainframes, and assisting contractors in limited aspects of more extensive studies. The appellant's use of the Novell system software security module also reflects the use of well-established off-the-shelf software typical of Level 1-6. Report extracting applications, using data base and spreadsheet software, are applications of limited scope, difficulty, and complexity, and do not entail developing the extensive plans, specifications, and extensive system interactions and interrelationships found at Level 1-7. The appellant, however, devotes a sufficient portion of his work time at Level 1-7 to systems development and design and troubleshooting projects to minimally warrant evaluation of the position at Level 1-7. These projects include studying alternative technology for file server replacement, planning conversion of the single major integrated MARO financial system into the new Microsoft environment, and continuing responsibility for hardware analysis and troubleshooting, including planning the approach to and installing peer-to-peer mini-LAN's in field offices. Therefore, we credit this factor at Level 1-7 (1,250 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 2-3 (275 points), the supervisor defines the employee's scope of responsibilities and the objectives, priorities and deadlines. The employee is provided assistance with unusual situations that do not have clear precedents. The employee plans and carries out the successive steps involved and handles problems and deviations according to agency standards, previous training, established practices, or system controls as appropriate in the application or specialty area. Projects typically require the employee to do some preliminary investigation to ascertain interrelationships that may affect the plan of attack. Work is reviewed for technical aspects such as efficiency of the program, and whether documentation complies with agency guidelines. Techniques used by the employee are usually not reviewed in detail.

In contrast, at Level 2-4 (450 points), the supervisor sets the overall objectives and, in consultation with the employee, determines time frames, and possible shifts in staff or other resources required. The employee, independently plans and carries out projects and analyses of the organization's requirements; interprets policies in conformance with established mission objectives; integrates and coordinates the work of others as necessary; and resolves most conflicts that arise. The employee informs the supervisor about progress, potentially controversial matters, or far-reaching implications. Completed work is reviewed for feasibility, compatibility with other work, or effectiveness in meeting requirements or achieving expected results.

Implicit in the appellant's claim is that his supervisor "does not have the technical background to perform the duties required by these special task forces," is his belief that evaluating the position at Level 1-7, 2-4, and 5-4 conflicts with the crediting of Level 3-4. That is, since he uses high level knowledge and skill independently on major projects, a higher level for Factor 3 must be creditable to his position. Although factors are inextricably linked, the dynamic opined by the appellant conflicts with established OPM guidance. As discussed in the Classifier's Handbook, many two-grade interval administrative positions at the GS-11 grade level reflect factor level pattern combinations of Levels 1-7, 2-4, and 3-3. The fact that a position is assigned projects work, develops resource requirements and time frames, resolves conflicts, and integrates the work of others does not meet that work is inherently accomplished within the limited guidelines and controls typical of Level 3-4. The appellant is assigned project responsibility for work assignments for which documentation, methodologies, and procedures are established. For example, using peer-to-peer LAN connections in the field offices involved working within well documented hardware parameters, and migrating programs from DBASE III+ to Microsoft EXCEL. We find that the substantial delegation of work planning authority from the supervisor and the LAN Administrator to the appellant permits his position to function for a sufficient portion of the work time within the constraints that permit evaluation of the position at Level 2-4 (450 points).

Factor 3, Guidelines

This factor covers the nature of guidelines and the judgment needed to apply them. Guides used include, for example: established procedures and policies, traditional practices, and reference material such as manuals and handbooks. Guidelines should not be confused with knowledge described under

Factor 1 - Knowledge Required by the Position. Guidelines either provide reference data or impose certain constraints on the use of knowledge.

At Level 3-3 (275 Points) reference material such as handbooks, manuals, models, and plans are available but are not completely applicable to work assignments or gaps exist in significant areas. This requires the incumbent to adapt guides and precedents to assigned projects or gather considerable information to supplement lack of specific information for a particular problem. Judgment is required in relating precedent approaches to specific situations. Established guidelines must often be interpreted to advise others on the application of policy or regulation.

In contrast, guidelines at Level 3-4 (450 Points) are typically policies and precedents that provide guidance that is general in nature with little specificity regarding the approach to be followed in accomplishing work. As stated in the FES Primary Standard, guidelines for performing the work at Level 3-4 are scarce and of limited use. Performance of assigned work usually requires deviating from traditional methods or researching trends and patterns to develop improved methods or formulate criteria. The employee uses state-of-the-art techniques and technologies to develop new and improved methods to deal with particular projects. The employee exercises considerable judgment in relating technical developments or requirements to particular projects. At this level, the employee shows initiative and resourcefulness in projects that encompass: unprecedented design efforts; integrating the work of others as a team or project leader; or predicting future environments or the impact on future processing.

The appellant claims that his purchasing of computer equipment based on personal “research” on the Web, e.g., downloading equipment technical documents and reading ADP magazines, leading to purchase recommendations for printers, laptop computers, and relates software, such as PC Anywhere, his project leadership, and task force work projects are examples of work that warrant evaluation at Level 3-4. The limited scale LAN environment at [name of region] operates within well documented system operating instructions, various technical manuals, and computer language guides and references. The record shows formal training is often provided and vendor and other technical support is available to help in dealing with new or unique problems or situations. Available guides are not often specific to particular problems or applications. The appellant is required to research uncommon approaches and often modify or extrapolate prescribed methods to accomplish local/unique applications, e.g., planning, developing, and installing peer-to-peer LAN’s, and testing the three alternative protocols for “EBT” FSP Alert. This fully meets Level 3-3. Although migrating from DBASE III+ to EXCEL represents new application work in the [name of region] environment, this migration is not unique or unprecedented in the realm of data processing. Although the appellant may be required to research or consult with others regarding alternative approaches, these are not analogous to the situations described at Level 3-4. Developing reports or forms and the associated programs do not constitute unprecedented design efforts or require application of state-of-the-art techniques or technologies as envisioned at Level 3-4. These assignments reflect improvement in client use of an established system environment typical of Level 3-3.

Implicit in the appellant's rationale is his belief that participating in headquarters sponsored task forces, particularly when not reporting to the LAN administrator, meets Level 3-4. This is erroneous for two reasons. First, it assumes that all headquarters' work meets or exceeds Level 3-4. As discussed previously in this decision, it is the work performed, and not the organizational location of the work, that controls grade level worth. Second, working on projects that may entail Level 3-4 creativity does not result in all positions engaged in the project meeting that level. For example, if the headquarters' position responsible for investigating IBM 9370 replacement alternatives might be construed as meeting Level 3-4, the appellant's involvement in a support mode; i.e., without delegated decision making responsibility, precludes crediting that same level to the appellant's position. This is in concert with the basic classification principle that two positions may not be credited for performing the same work. The record shows that other positions on the Staff are delegated the interpretive responsibility for any major local system changes that may approach or meet Level 3-4. Therefore, the position is credited properly at Level 3-3 (275 points).

Factor 4, Complexity

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

At Level 4-4 (225 points), assignments consist of projects, studies, or evaluations characterized by the need for substantial problem analysis. Concern is with several stages in an automation project, or project assignments in a specialty area that require a variety of techniques and methods to evaluate alternatives. Decisions involve assessing situations complicated by conflicting or insufficient data that must be analyzed to determine applicability of established methods. Different technical approaches must often be tested and projections made. Consideration must be given to probable areas of future systems changes of comparable automation problems that will ease subsequent modifications. The work requires consideration of considerable data. The level of difficulty is typified by developing programming specifications for major modifications to existing systems or new systems where precedents exist at the same general scale of operation as the new systems. Computer equipment or system software evaluation and modification at this level primarily concern items available from vendors already in use in Government ADP operations.

In contrast, Level 4-5 assignments consist of various projects or studies characterized by the need for significant departures from past practices and typically involve: (1) a number of stages in an automation project to include studies preliminary to the decision to automate; or, (2) an unusual depth of analysis of system software, computer equipment, or similar broad specialty area. The analytical demands are evidenced by such features as: (1) responsibility for integrating facets of work performed by others; (2) concern with fields of rapidly changing technology; and, (3) problems of a type that have been resistant to solutions in the past. Decisions about what needs to be done are complicated by the novel or obscure nature of the problems and/or special requirements for organization and coordination, e.g., an integrated payroll, personnel and accounting system. Usually there are conflicting requirements, the problems are defined poorly, or they require projections based

on variable data or technological developments. Developments in system software or equipment technology make project designs obsolete and require major reconsideration of many or all aspects of the project, and impact on related systems or project funding. Technical difficulty is exceptional, such as developing major items of system software (e.g., assemblers, compilers, multiprogramming routines, files maintenance routines) where numerous conditions, options, and machine characteristics must be considered, or developing specifications for a major segment of a new application system where the work is unprecedented in nature or scope.

The PD of record uses language from Level 4-5 in the GS-334 PCS improperly. Much of the appellant's work requires manipulating program applications that primarily produce reports based on typical reports developed within established patterns; helping MARO employees use off-the-shelf software; and, visiting field offices to distribute and install new programs. While the appellant deals with a large volume of data, as is typical of Level 4-4, much of it is for purposes typical of Level 4-3, e.g., designing small scale applications programs to extract and display data from a large existing data bases. These programs do not affect on other programs run in the system as envisioned at Level 4-4, e.g., major modifications to existing systems. They must be developed using established techniques for extracting, manipulating, and displaying the data in the ADP package being used. As is typical of Level 4-3, the small, routine report and ADP site assistance work assignments are stand alone projects for which the appellant is responsible.

We find, however, that the appellant's more demanding project work meets the intent of Level 4-4, e.g., responsibility for components of the IBM 9370 replacement study and equivalent task force assignments, and responsibility for major planning aspects of migrating the [name of region] integrated financial management system to EXCEL. We find the [name of region] environment, as a whole, fails to meet Level 4-5 in that the major systems and applications software decisions, and basic hardware configuration decisions required to support Level 4-5 are reserved to headquarters. Therefore, the position is credited at Level 4-4 (225 points).

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. Only the effect of properly performed work is considered.

At Level 5-3 (150 points) work involves resolving a variety of conventional problems, questions, or situations such as typically is the case where responsibility has been assigned for maintenance of a set of programs. Established practices and techniques are used. The work affects the adequacy of such activities as field investigations, or internal operations. This level includes responsibility for projects that, although affecting activities or individuals throughout the agency, are primarily to support a local operation. For example, developing or modifying an automated records keeping system at an agency training center responsible for maintaining training records on agency employees found through the country.

In contrast, work at Level 5-4 (225 points) involves investigating and analyzing a variety of unusual problems, questions, or conditions associated with a particular application or specialty area; formulating projects or studies such as those to substantially alter major systems; or establishing criteria in an assigned application or specialty area, e.g., developing programming or procurement specifications. The work performed affects a wide range of agency activities, activities of non-Government organizations, or functions of other agencies. Typically assignments at this level are concerned with: (1) the agency's single centralized ADP operation that is linked to terminals at numerous agency sites throughout the country; or (2) standard systems to be used subsequently on numerous equipment units or at numerous installation level ADP operations in the agency.

The PD of record uses language from Level 5-4 in the GS-334 PCS improperly, e.g., "The work affects a wide range of Agency ADP activities and provides systems development resolutions to all aspects of technical [name of] Programs administered at [name of region], other Federal, state, and local agencies." The mainframe systems accessed by [name of region], representative of example 1 under Level 5-4 are not under its control. The appellant does not deal, on a regular and recurring basis, with state systems as discussed previously in this decision.

Duties and responsibilities assigned to a position flow from the mission assigned to the organization in which they are found. The positions created to perform that assigned mission must be considered in relation to one another; i.e., each position reflects a part of the work assigned to the organization. Therefore, the duties and responsibilities assigned to the appellant's position and performed by him may not be considered in a vacuum.

The [name of region] ADP program primarily is facility based and oriented. Any assistance provided to other Service facilities must be viewed within this mission and functional context. Our fact-finding confirmed the task force work, and the "Centers of Excellence" approach to the Service ADP program involves both the appellant and the remainder of the [name of region] ADP staff. Our interviews revealed [name of region] has been used to pilot some areas, e.g., EDI and the IBM 9370 replacement, and that such test functions are expected to evolve as a predictable, regular and recurring part of the Staff mission. As discussed previously, however, working on projects that may entail Level 5-4 creativity does not result in all positions engaged in the project meeting that level. For example, if the headquarters' position responsible for investigating IBM 9370 replacement alternatives might be construed as meeting Level 5-4, the appellant's involvement in a support mode; i.e., without delegated decision making responsibility, precludes crediting that same level to the appellant's position. This is in concert with the basic classification principle that two positions may not be credited for performing the same work. The record shows that other position's on the Staff are delegated the interpretive responsibility for any major local system changes or large scale testing operations that may approach or meet Level 5-4. Therefore, the position is credited properly at Level 5-3 (150 points).

Factor 6, Personal contacts

This factor includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. The levels for this factor are based on what is required to make the initial contact, the difficulty in communicating with those contacted, and the setting in which the contacts take place, e.g., the degree to which the employee and those contacted recognize their relative roles and authorities.

At Level 2, contacts include those with employees in the agency but outside the immediate organization, such as user representatives or field personnel engaged in differently, i.e., non-ADP, work. The FES Primary Standard also discusses contacts outside the agency at Level 2. These contacts are with members of the general public in a moderately structured setting, e.g., the contacts generally are established routinely; are usually at the employee's work place; the exact purpose of the contact may be unclear at first to one or more of the parties; and one or more of the parties may be uninformed concerning the role or authority of other participants, e.g., persons seeking airline reservations.

Level 3 contacts, in addition to those within the agency, are with vendor representatives, computer personnel of other agencies, representatives of professional associations, and the like. This level may also include contacts with the head of the employing agency or program officials several managerial levels above the employee when such contacts occur on an ad hoc or other irregular basis. As indicated in the FES Primary Standard, Level 3 contacts are in a moderately unstructured setting, e.g., contacts are not established on a routine basis; and, the role and authority of each party is identified and developed during the contacts, e.g., contacts with persons in their capacity as attorneys, contractors, or representatives of professional organizations, the news media, or public action groups.

As discussed previously in this decision, the work that controls the classification of a position must be regular and recurring. The contacts considered in the grade level analysis of a position, therefore, must contribute to the performance of those grade controlling duties. The PD of record states that contacts are with [name of region] user representatives, fellow computer system personnel, computer personnel of other agencies, equipment or system software vendors and consultants. Our factfinding revealed contacts with computer personnel with other agencies, if they occur, are infrequent. Contacts with vendors are routine, e.g., obtaining technical information on and discussing prices on equipment such as laptops and printers. Contacts also occur with headquarters technical staff, including contractors, when the appellant is working on task forces and projects. These contacts are accomplished within a relatively structured context in which each person is aware of each other's role and authority. Thus, while the appellant's external contacts are typical of those at Level 3, they are not accomplished with substantial frequency within the moderately unstructured setting envisioned at Level 3, e.g., contacts with contractors in which the role and authority of each party must be established such as during compliance reviews or contract negotiations. Therefore, because the nature of the contacts do not fully meet Level 3, this factor is evaluated properly at Level 2.

Factor 7, Purpose of contacts

The purpose of contacts that serve as a basis for this factor must be the same as the contacts that are the basis for the level awarded for Factor 6.

At Level b, the purpose of contacts is to coordinate work efforts, solve problems, or to provide advice to managers on noncontroversial organization or program related issues and concerns. As discussed in the FES primary standard, problems are resolved by influencing or motivating individuals or groups who are working toward mutual goals and who have basically cooperative attitudes.

At Level c, the purpose of contact is to (a) influence others to utilize particular technical methods and procedures, or (b) to persuade others to cooperate in meeting objectives when (in either case) there are problems in securing cooperation. As amplified in the FES Primary Standard, the people contacted may be fearful, skeptical, uncooperative, or dangerous, e.g., gaining compliance with established policies and regulations by persuasion or negotiation.

The PD of record states that contacts are to exchange and obtain information, to test alternative proposals and techniques, and to provide input that may result in major decisions of design concepts relating to automated systems. It also states the employee must serve as a coordinator in situations where system requirements or implementation schedules are in conflict across the user community or between users and systems organizations. The limited size and scale of the [name of region] ADP system, and the retention of ADP program authority in higher graded positions on the staff, does not support the language contained in the PD.

The appeal record shows that the purpose of the appellant's most demanding contacts is to influence or persuade others to use particular technical methods and procedures typical of Level c. However, the contacts do not regularly entail the difficulties in securing cooperation found at Level c, e.g., securing support from contractors who are uncooperative because of the significant resource demands entailed in the request. The [name of region] staff and others with whom the appellant routinely deals are cooperative and have a common goal; i.e., effective use of the [name of region] ADP system. Thus, while aspects of the appellant's contacts approach Level c, that level is not met fully. Accordingly, this factor must be evaluated at Level b which, in combination with Level 2, results in the crediting the position at Level 2-b (75 points).

Factor 8, Physical demands

The appellant's position meets Level 8-1 (5 points) based on office activity typical of the ADP environment. Equipment work, including cable pulling, is not so demanding as to warrant consideration of Level 8-2, i.e., **long** periods of standing, bending, crouching; **recurring** lifting of moderately heavy items; and, walking over rough, uneven, or rocky surfaces. Therefore, Level 8-1 (5 points) is credited.

Factor 9, Work environment

The appellant's work environment consists of the everyday risks and discomforts of offices and similar work sites, warranting evaluation at Level 9-1 (5 points).

Summary

In sum, we have evaluated the appellant's position as follows:

Factor	Level	Points
1. Knowledge required by the position	1-7	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and effect	5-3	150
6. Personal contacts and	2 b	75
7. Purpose of contacts		
8. Physical demands	8-1	5
9. Work environment	9-1	<u>5</u>
Total points:		2,435

A total of 2,435 points falls within the GS-11 grade level point range of 2,355-2,750 points on the Grade Conversion Table in the GS-334 PCS.

We find a significant part of the appellant's ADP security work is covered by the Security Clerical and Assistance Series, GS-086, including processing information access requests within well established guidelines. The ongoing security program duties and responsibilities assigned to the position minimally meet the requirements for coverage and evaluation by application of the Security Administration Series, GS-080 PCS. We find the limited scope of the security program, including clearly defined requirements for mainframe access, responsibility for security reviews at field offices and annual security training, does not exceed Level 1-6 (950 points) as defined in the GS-080 PCS. We fully considered the Contingency Plan, Risk Analysis, and Computer Security Plan requirements of the position in our analysis. Although the agency may restrict responsibility for these functions to positions at and above certain defined grade levels, our application of the GS-080 PCS to the appellant's actual work yields a combination of factor levels with Level 1-6 resulting in a lower grade level than that produced by application of the GS-334 PCS.

Decision

The appellant's position is classified properly as Computer Specialist, GS-334-11.