

U.S. Office of Personnel Management  
Division for Human Capital Leadership & Merit System Accountability  
Classification Appeals Program

Dallas Field Services Group  
1100 Commerce Street, Room 441  
Dallas, TX 75242

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

**Appellant:** [appellant]

**Agency classification:** Management and Program Analyst,  
GS-343-12

**Organization:** Business Services Division  
Office of Administration  
and Transition  
[name] Field Office  
Department of Energy  
[city and state]

**OPM decision:** Management and Program Analyst,  
GS-343-11

**OPM decision number:** C-0343-11-03

/s/ Judith L. Frenzel

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Judith L. Frenzel  
Classification Appeals Officer

January 15, 2004

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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).

Since this decision changes the grade level of the appealed position, it is to be effective no later than the beginning of the fourth pay period after the date of this decision, as permitted by 5 CFR 511.702. The appellant's human resources office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

**Decision sent to:**

[appellant's name and address]

Director, Human Resources  
[name] Field Office  
Department of Energy  
[office address]

Director  
Human Resource Management  
U.S. Department of Energy  
1000 Independence Avenue, SW.  
Washington, DC 20585

## **Introduction**

On September 30, 2003, the Dallas Field Services Group, U. S. Office of Personnel Management (OPM), accepted a position classification appeal from [appellant]. Her position is currently classified as a Management and Program Analyst, GS-343-12, assigned to the Business Services Division, Office of Administration and Transition, [name] Field Office [(field office)], Department of Energy (DOE) in [city and state]. The appellant believes her position should be classified as Management and Program Analyst, GS-343-13. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code (U.S.C.).

## **Background information**

The appellant's letter to OPM sought assistance in resolving an incorrectly graded position description of record. She discussed her attempts to have her position description revised by her agency to reflect changes in her duties and responsibilities. She stated that since May 2001, she has been solely responsible for the establishment and maintenance of a new program, the Energy Employees Occupational Illness Compensation Program Act (EEOICPA), for the [field office]. This program was established to provide compensation benefits for atomic weapons workers who developed work-related illnesses from exposure to radiation, beryllium, and silica. The Department of Labor administers the program for Federal workers while DOE administers the program for DOE contractor employees through State workers' compensation programs. [the field office's] primary responsibility is to determine if a worker was employed at the installation and to review requests for employment records based on Privacy Act requirements.

The appellant questions the accuracy of her GS-12 grade level in light of the increase in the number of new duties and responsibilities. She and her supervisor developed a proposed new position description and requested a desk audit and accretion of duties promotion. The agency evaluated the revised position description and classified at the GS-12 grade level, on September 3, 2003. The appellant was subsequently reassigned to the revised position description.

The agency's administrative report was received on October 22, 2003. It included statements signed by the appellant and her supervisor on October 15 and 16, 2003 respectively, certifying that the new position description of record, number [number], is complete and accurate.

To help decide the appeal, an OPM representative conducted on-site interviews with the appellant and her immediate supervisor on December 4, 2003. We carefully considered all of the information gathered during those interviews, as well as the information of record furnished by the appellant and her agency, including her current work assignments and official position description.

## **General Issues**

The appellant believes that the newly assigned program has resulted in a considerable increase in workload. Volume of work cannot be considered in determining the grade of a position (chapter 5 of the Classifier's Handbook). It is the difficulty, responsibility, and qualification requirements of the work performed that determine the grade level of a position (5 U.S.C. 5101)

## **Position Information**

The Business Services Division is responsible for a wide range of programs and services that must be successfully implemented to ensure accomplishment of the site closure mission. These include information technology, records management, internal space and property management, budget tracking, contracting office duties for facility support services, and the management of the Freedom of Information Act (FOIA), Privacy Act (PA), and EEOICPA programs. The Division is headed by a Supervisory Management and Program Analyst, GS-343-15, who supervises a staff of eight, with five GS-343 positions, including the appellant's.

The appellant is responsible for the overall administration and implementation of the FOIA, PA, and the EEOICPA at the [field office] and [name] Environmental Technology Site ([technology site]). She serves as the [field office] Program Manager and as such is considered the technical authority and central point of contact primarily for contractors/subcontractors, other employees, and officials of the DOE, who seek information concerning the FOIA, PA, and EEOICPA programs and the existing policies regarding their access. The appellant is designated as the FOIA/PA Officer and has been delegated the authority to make final determinations on right to privacy exemptions under Exemption 6 and adequacy of search responses under the FOIA. Denials of access under any of the other exemptions must be signed by the site manager with advice from the FOIA/PA Officer.

The appellant manages and processes requests for information under the FOIA and PA that vary from routine to those that may present complex issues. She works with the Office of Chief Counsel, program offices, contractors, and others to assure exemptions are properly applied and personal information is protected while responding to requests for information. The appellant receives, processes, and manages requests under the PA for access to and amendment of agency records. She also administers the publication and maintenance of the DOE systems of records under the PA that are maintained at the site, eliminating those no longer required. She works with the Office of Hearings and Appeals when the denial of information is appealed, collecting background material for submission to that office. The appellant collects statistical information for the installation's input to mandated statutory reports.

The appellant drafts instructions and procedural guides for the facility that implement the FOIA, electronic FOIA, and the PA. She reviews and prepares comments on the effect of legislative proposals to amend the FOIA, PA, and other related statutes that affect confidentiality of information to DOE Headquarters.

The appellant develops, organizes, and conducts training activities required by the access laws at [field office] which include FOIA, PA, and EEOICPA training. She identifies specific training needs of her coworkers and the contractor staff, prepares requisite training material and conducts necessary training.

## **Series, Title, and Standard Determination**

The GS-343 Management and Program Analysis Series includes positions which primarily serve as analysts and advisors to management on the evaluation of the effectiveness of programs and

operations or the productivity and efficiency of these programs. Positions in this series require knowledge of the substantive nature of agency programs and activities; agency missions, policies, and objectives; management principles and processes; and the analytical and evaluative methods and techniques for assessing program development or execution and improving organizational effectiveness and efficiency. The standard's scope of coverage is broad and includes work involved in evaluating and advising on the organization, methods, and procedures for providing administrative support systems such as records, communications, directives, and files.

The appellant's duties and responsibilities are a part of the agency's records management program that requires an in-depth knowledge of the FOIA, PA, and EEOICPA programs and the effective management of these programs as well as the related agency programs and activities. These duties match the general intent of the GS-343 series. While the series excludes line activities, the appellant's position does include program responsibilities and represents the line of selection and promotion in the organization. Neither the appellant nor the agency questions the present series or title. The appellant's position is correctly assigned to the Management and Program Analysis Series, GS-343 and titled Management and Program Analyst.

There are no grade-level criteria provided in the GS-343 standard. In accordance with instructions provided in this standard, the position was evaluated by reference to the Administrative Analysis Grade Evaluation Guide (AAGEG).

### **Grade Determination**

The AAGEG is written in Factor Evaluation System (FES) format. Positions are placed in grades on the basis of their duties, responsibilities, and the qualifications required as evaluated in terms of the nine FES factors common to non-supervisory General Schedule (GS) positions. Point values are assigned for each factor, with the total numerical score being converted to a grade level using the Grade Conversion Chart provided in the guide. Under the FES, the factor point values mark the lower end of the ranges for each factor level. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the description. If the position fails in any significant aspect to meet a particular factor level description, the point value for the next lower factor must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level. Our evaluation with respect to the nine FES factors follows.

#### *Factor 1, Knowledge required by the position*

This factor measures the kind and nature of knowledge and skills needed and how they are utilized in doing the work.

At Level 1-6, duties require knowledge and skill in applying analytical and evaluative techniques to the identification, consideration, and resolution of issues or problems of a procedural or factual nature. These issues or problems deal with readily observable conditions, adhering to procedures and regulations clearly defined within written guidelines and containing information of a factual nature. Also at this level, knowledge of the theory and principles of management

and organization, including administrative practices and procedures common or standard to all organizations (i.e., delegation of authority, routing of correspondence, filing systems, and storage of files and records). The knowledge and skill demonstrated by the appellant exceeds the requirements for Level 1-6.

At Level 1-7, in addition to the knowledge required at Level 1-6, the duties require knowledge and skill in applying analytical and evaluative methods and techniques to study the efficiency and effectiveness of program operations carried out by administrative or substantive administrative support functions. This level includes knowledge of pertinent laws, regulations, policies, and precedents that affect use of program and related support resources. This knowledge is used to plan and conduct projects and studies to evaluate work operations, determine program effectiveness, and develop or modify work operations and processes.

Comparable to the Level 1-7, the position requires a comprehensive knowledge of standard operating procedures and is considered the [field office/technical site] technical authority for three programs: FOIA, PA, and EEOICA. She serves as the Program Manager and central point of contact for responses to those seeking information concerning DOE's policies and procedures concerning access laws. She has been delegated authority as the denial/authorizing official for Exemption 6, (personnel and medical records), and adequacy of search responses for the [field site/technical site]. As at Level 1-7, she has developed the [field office/technical site] procedures needed for the EEOICA and modified work processes to improve timeliness of processing information requests. She determines the category of the requester for fee purposes and determines if waiver or reduction in fees should be granted. Because of her expertise, she is called upon to provide input to DOE Headquarters on the effects of legislative proposals to amend the FOIA and PA and other related statutes pertaining to privacy interests and confidentiality of information. She has worked with Information Technology (IT) specialists to provide input as to program needs in the development of a new automated tracking system for collecting and recording data for the [field office] on requests for information under the programs.

The knowledge and skills required for this position do not meet Level 1-8. The Guide describes Level 1-8 as the "expert analyst" having mastered a wide range of qualitative and quantitative methods for assessment and improvement of complex processes and systems. At this level, the boundaries of studies and projects are extremely broad and difficult to determine in advance and some parameters are actually developed "in process." The appellant's position does not meet this level. Although the appellant does administer several programs, she is expected to evaluate the relationship of these programs with others in the facility. While she comments on legislative proposals and proposed policy changes, others within DOE are also asked for input, and the content of final comments prepared and submitted by DOE Headquarters. The appellant's work objectives are well defined and in almost all cases, precedents have been established. The problems encountered by the appellant are not characterized by their breadth, importance, and severity but are considered regular and routine and are not of the agency-wide program significance found at Level 1-8.

Level 1-7 is credited for 1,250 points.

### *Factor 2, Supervisory Controls*

This factor measures how the work is assigned, the employee's responsibility for carrying out the work, and how the work is reviewed.

At Level 2-4, the employee and the supervisor develop an acceptable project plan, identifying the work to be done, scope of the project, and deadlines, within a framework of priorities, funding, and overall objectives. Within the approved project plan, the employee is responsible for planning and organizing the study, estimating costs, coordinating with other staff, and conducting all phases of the project. The employee informs the supervisor of potentially controversial issues or problems. Completed work is reviewed for compatibility with goals, guidelines, and effectiveness in achieving the intended objectives. Completed work is also reviewed outside the immediate office by staff and line management officials whose programs and employee would be affected by implementation of the recommendations.

Comparable to Level 2-4, the appellant works under the general supervision of the Business Services Director, who assigns work in terms of overall objectives and basic priorities. Much of her work is of a routine nature and the majority of her assignments fall within well-defined parameters, and are accomplished independently. The appellant has delegated authority as the denial/authorizing official for Exemption 6 and adequacy of search responses for the [field office/technical site]. Exemption 6 under FOIA requires that personal information such as personnel, medical, and similar files are directly identifiable to a specific individual and not a group of individuals. The appellant assigns requests for release of information to contractors who in turn research and prepare a response. She independently analyzes those responses to determine if information is releasable in accordance with established guidelines. The appellant represents the final level of review of Exemption 6 requests and as such her review represents the "definitive interpretation" of the legal regulations and requirements. As at Level 2-4, the supervisor reviews recommendations for release of information only when they fall outside the realm of Exemption 6 provisions, if they represent potentially controversial findings or information that is not allowable for release, or denials. In these cases, the appellant coordinates and consults with attorneys in the Office of Chief Counsel and her first and second-level supervisors. These requests represent less than twenty percent of the total requests submitted under FOIA and PA. This level of supervision is consistent with Level 2-4.

The appellant's assignments do not involve evaluation of or have influence over broad program goals or agency objectives typical of Level 2-5. At that level of the Guide, the employee is recognized as the authority in the analysis and evaluation of programs and issues, subject only to administrative and policy direction. The employee is delegated complete responsibility and authority to plan, schedule, and carry out major projects with a high level of organizational impact. At this level, analyses and recommendations are normally reviewed by management officials only for potential influence on broad agency policy objectives and program goals, and are normally accepted without significant change. The appellant's role in the program is more prescribed and technical guidance and review are available and provided as appropriate, comparable to Level 2-4.

Level 2-4 is credited for 450 points.

### *Factor 3, Guidelines*

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

At Level 3-3, the guidelines consist of standard reference material, texts, and manuals covering the application of analytical methods and techniques and instructions and manuals covering the subjects involved. Analytical methods contained in the guides are not always directly applicable to work assignments, however, precedent studies are available. The employee uses judgment in choosing, interpreting, or adapting available guidelines to specific issues or situations. Studies at this level are covered by a variety of administrative regulations and procedures. The employee must use judgment in researching the regulations, determining the relationship between guidelines and organizational efficiency, effectiveness, and productivity.

Comparable to Level 3-3, the guidelines used by the appellant consist of the FOIA, the Electronic FOIA, the Privacy Act, and their DOE implementing regulations, OMB Guidelines, Department of Justice policy, DOE organizational and policy statements, and court decisions. The FOIA/PA program regulations are rigidly defined according to legal stipulations and thoroughly researched by HQ before dissemination as to the implications of their enforcement. The regulations are intended for strict adherence, and leave very little room for interpretation.

As at Level 3-3, the appellant provides input to DOE Headquarters on proposed legislative changes to FOIA and PA and their impact on [field office/technology site]. She develops guidelines for local implementation when there are new laws or regulations or other events require such issuance, but she does not determine the intent nor is she instrumental in the development or revision of existing regulations. The record shows that the appellant has numerous manuals and reference materials filled with previous cases and studies of legal requirements and administrative or regulatory compliance issues. The standardized and strict adherence to established guidelines and the availability of numerous precedent studies is consistent with criteria established for Level 3-3.

The appellant's position does not meet Level 3-4. At that level, guidelines consist of general administrative policies and management and organization theories that require considerable adaptation and/or interpretation. Administrative guidelines cover program goals and objectives of the organizations. Within the context of broad regulatory guidelines, the employee may refine or develop more specific guidelines such as implementing regulations or methods for the measurement and improvement of effectiveness and productivity in the administration of operating programs.

The appellant's position has responsibility for implementation of regulations affecting the [field office/technical site], using the published guidance as described earlier. The guidance and instructions available are more specific than that typical of Level 3-4. Her input on proposed legislative change is made to Headquarters and is considered with input from her counterparts across the agency. Therefore, while she may develop local procedures and instructions within



the parameters of agency guidance, they may not be considered as interpretations of broad regulatory guidelines typical of Level 3-4.

Level 3-3 is credited for 275 points.

#### *Factor 4, Complexity*

This factor covers the nature, number, variety, and intricacy of the tasks, 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, the work involves gathering information, identifying and analyzing issues, and developing recommendations to resolve substantive problems of effectiveness and efficiency of work operations in a program setting. Subjects and projects assigned at this level usually consist of issues, problems, or concepts that are not always susceptible to direct observation and analysis. Difficulty is encountered in measuring effectiveness and productivity due to the variations in the nature of the administrative processes studied and information is often conflicting or incomplete. At this level, assignments may involve compiling, reconciling, and correlating voluminous workload data from a variety of sources with different reporting requirements and formats, or the data must be carefully cross-checked, analyzed, and interpreted to obtain accurate and relevant information.

Comparable to Level 4-4, the appellant receives a variety of requests for information under the FOIA/PA and EEOICPA. The information she works with is often conflicting or incomplete, and the requests for classified or formerly classified information on a given individual may reside in two or three different sites. The appellant must analyze each request to determine whether the information requested is releasable in part or in full. The appellant works as the management advisor on her assigned programs and, as such, she must consider such factors as the distribution of functions; the coordination of training for contractors; keeping them updated on regulatory or systemic changes; workload and time frames; and functional responsibilities. This work is comparable to Level 4-4 as defined in the standard

Like Level 4-4, the appellant was instrumental in the development of the process to obtain employment records and medical data under the EEOICPA. The appellant works with [field office/technical site] contractors, acting as the team lead, in coordinating the work processes, and in identifying and establishing new or updated procedures for streamlining and simplifying the information-gathering process while ensuring compliance with EEOICPA requirements. She has worked with IT staff in developing a data tracking system for information requests to better enable mandated reporting requirements. As at Level 4-4, the appellant gathers information, identifies and analyzes issues, and develops recommendations to resolve substantive problems of effectiveness and efficiency of work operations in a structured program setting. To accomplish these analyses, the appellant must continually gather, interpret, analyze, and correlate large amounts of narrative information and stay abreast of the latest legislative initiatives.

The appellant's work does not meet Level 4-5.. At this level, the work consists of projects and studies which require analysis of interrelated issues of effectiveness, efficiency, and productivity

of substantive mission-oriented programs. Decisions about how to proceed are complicated by conflicting program goals and objectives. Assignments are further complicated by the need to deal with subjective concepts such as value judgments, the consideration of long-range implementation and administration and the development of criteria for evaluating the effectiveness of the program. Unlike the appellant's duties, this level is intended to cover positions involved in the analysis of broader, more complex program operations, carried out at various levels of the organization or dispersed throughout many separate locations or installations. Work of this complexity in her assigned programs is vested in higher levels within her agency.

Level 4-4 is credited for 225 points.

#### *Factor 5, Scope and Effect*

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

At Level 5-4, the purpose of the work is to assess the productivity, effectiveness, and efficiency of program operations or to analyze and resolve problems in the effectiveness and efficiency of administrative support and staff activities. Work at this level may include developing related administrative procedures for promulgating program guidance for application in varied geographic locations. As stated in the standard, work that involves the evaluation of program effectiveness usually focuses on the delivery of program benefits or services at the operating level. The work contributes to the improvement, effectiveness, and efficiency in operations and affects the plan, goals, and effectiveness of missions and programs at different echelons and/or geographic locations. Work may also affect the work done in components of other agencies.

The scope and effect of the appellant's work matches Level 5-4. The purpose of the appellant's work is to determine whether material that is requested under FOIA/PA is releasable to the public. In making these determinations, the appellant coordinates the work of contractors, attorneys in the Office of Chief Counsel to ensure confidentiality of information is protected, and numerous individuals and private entities requesting this information. She communicates with requesters, providers, and others to resolve problems and protect privacy implications. EEOICPA information responses affect the work done in the Department of Labor and National Institute for Occupational Safety and Health as well as DOE's Office of Worker Advocacy. The appellant's work in reviewing and preparing comments on the effect of legislative proposals to amend the FOIA/PA and other related statutes affecting privacy interests of individuals and confidentiality of information, and developing and/or modifying local procedures reflect the reach and impact matching Level 5-4.

The position does not meet Level 5-5. At this level, the purpose of the work is to analyze and evaluate major administrative aspects of substantive, mission-oriented programs. This involves developing long-range program goals, plans, and milestones, or evaluating the effectiveness of programs conducted throughout a bureau or service of an agency, a regional structure of equivalent scope, or a large complex multi-mission field activity. Work products at this level are defined as complete decision packages, staff studies, and recommendations which upon

implementation would significantly change major administrative aspects of missions and programs or substantially affect the quality and quantity of services provided to the agency's clients.

The appellant states that she has significant input on the plans for the closure activities of the [field office] site and the subsequent changes in the [field office] staff. In the document entitled "Sunset Transition Plan for FOIA/PA/EEOICPA Program", she developed a schedule of transition events identified as short-term strategies, as well as several options for long-range planning. This document was prepared subsequent to the June 2003 [field office] Federal Workforce Transition Plan. The copy provided was not signed or dated as approved, and we were unable to ascertain what, if any, portions were accepted by management. However, this plan was for transition within serviced field facilities comparable to Level 5-4. The appellant's work is conducted on a much smaller scale than that represented at Level 5-5 which is intended for positions involved in evaluating large-scale operations, either throughout an agency, region, or an extremely large field activity

Level 5-4 is credited for 225 points.

#### *Factor 6, Personal contacts, and Factor 7, Purpose of contacts*

These factors include face-to-face and telephonic contact and other dialogue and the purpose of these contacts. These two factors are evaluated together to recognize their interrelationship. Final point credit is determined by identifying where the evaluations of each factor intersect in the table contained in the guide.

#### *Persons contacted*

Contacts at Level 6-3 include individuals or groups from outside the employing agency, including consultants, contractors, or business executives in a moderately unstructured setting. This level may include contacts with the head of the employing agency or program officials several managerial levels removed from the employee. In many cases, the contacts may be on an ad hoc basis, with the relationship being established and developed during the course of the work.

Like Level 6-3, the appellant has regular contacts with all levels of [field office] management, including IT staff. She is involved in consultation with DOE HQ staff, [field office] contractors, attorneys in the Office of Chief Counsel, Congressional office staff, and occasionally, the news media and organized public interest groups under the setting typical of that level.

At Level 6-4, contacts are with high-ranking officials from outside the employing agency at national or international levels, state officials, state executive or legislative leaders, mayors of major cities, or executives of comparable private sector organizations. The appellant does not have regular contact with agency heads or congressional staff officials typical of Level 6-4. .

### *Purpose of contacts*

At Level c, contacts are to influence managers or other officials to accept and implement findings and recommendations on organizational improvements or program effectiveness. Employees may encounter resistance due to such issues as organizational conflict, competing objectives, or resource problems.

As at Level c, the purpose of the appellant's contacts is to analyze, explain, defend, negotiate issues, and disseminate information related to the programs. Program offices are contacted to expedite processing of access requests. The appellant maintains liaison with HQ, other field facilities, and contractor offices to coordinate access requests and obtain information needed for annual reports. Contractors are contacted to provide information and advice regarding changes in statutory requirements and to gain acceptance of DOE regulations and procedures. Some contacts are for the purpose of conducting briefings or training sessions. Many times, the appellant is contacted for feedback or insight on unusual situations because of her knowledge and experience in her particular area of expertise.

At Level d, contacts are made to justify or settle matters involving significant or controversial issues such as recommending major program changes, substantial expenditures, or significant changes in the nature and/or scope of the organization. Level d is not appropriate for the appellant's position in that she is not responsible for the scope of issues or the authority to act on them found at this level.

These two factors are credited at Level 3c for a combined total of 180 points.

### *Factor 8, Physical demands*

This factor covers the requirements and physical demands placed on the appellant by the work assignments.

The position matches Level 8-1, which is defined as sedentary work, although some slight physical work may be required, e.g., infrequent lifting of boxes of records.

Level 8-1 is credited for 5 points.

### *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.

Level 9-1 describes the work environment as an adequately lighted and climate-controlled office setting. The appellant's work is normally performed in this type of office setting, although she does occasionally make trips to a records storage area to obtain records. The travel required in her position is consistent with this level.

Level 9-1 is credited for 5 points.

### Grade summary

The appellant's position is assigned the following factor levels:

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-7	1,250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and effect	5-4	225
6. Personal contacts and	6-3	
7. Purpose of contacts	7-c	180
8. Physical demands	8-1	5
9. Work environment	9-1	5
<i>Total</i>		2,615

Using the Grade Conversion Table in the guide, a total of 2,615 points falls within the GS-11 range (2,355 – 2,750).

### Decision

The appealed position is properly classified as Management and Program Analyst, GS-343-11.