



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT  
Washington, DC 20415

Human Capital Leadership  
and Merit System  
Accountability Division

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

**Appellant:** [appellant]

**Agency classification:** Telecommunications Specialist  
GS-391-11

**Organization:** Office of Information Technology  
Office of the Manager  
[location] Center  
Associate Director Partnerships,  
Interpretation and Education,  
Volunteers, and Outdoor Recreation  
Deputy Director of Operations  
National Park Service  
U.S. Department of Interior  
[city and state]

**OPM decision:** Telecommunications Specialist  
GS-391-11

**OPM decision number:** C-0391-11-01

\_\_\_\_\_  
Robert D. Hendler  
Classification and Pay Claims  
Program Manager  
Center for Merit System Accountability

October 12, 2006

\_\_\_\_\_  
Date

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

**Decision sent to:**

[appellant]  
[location]  
[city and state]

Chief, Staffing and Compensation Policy  
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1849 C Street, NW, Mail Stop 5221  
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## **Introduction**

On March 14, 2006, the Chicago Human Capital Group of the U. S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant] who currently occupies a position classified as Telecommunications Specialist, GS-0391-11, in the Office of Information Technology (IT), Office of the Manager, [location] Center (HFC), Associate Director Partnerships, Interpretation and Education, Volunteers, and Outdoor Recreation, Deputy Director of Operations, National Park Service (NPS), U.S. Department of Interior (DoI), in [city and state]. The appellant believes her position should be reclassified as Telecommunications Specialist, GS-0391-12. We received the agency appeal administrative report (AAR) on June 7, 2006. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

To help us decide the appeal, we conducted a telephone audit with the appellant on July 25, 2006, and a telephone interview with her immediate supervisor on July 31, 2006. In deciding this appeal, we carefully considered the audit and interview findings and all other information of record furnished by the appellant and the agency.

## **Background information**

The appellant states she has sought, for more than two years, to have her position upgraded to GS-12 based on the full range of activities of her position. We have accepted her classification appeal based on evidence that she have made a reasonable attempt to obtain an accurate PD and we will decide the appeal on the basis of actual duties assigned by management and performed by the employee under 5 CFR 511.607(a)(1).

## **General issues**

The appellant occupies position description (PD) # 1104-000006 which was classified on May 17, 2004. Her supervisor has certified the PD's accuracy, but the appellant disagrees with the grade level determination. Prior to appealing to OPM, the appellant asked for a desk audit from [location] Center Human Resources Office. As a result of the desk audit, an addendum was added to the evaluation statement on October 7, 2004, but there were no changes to the assigned factor levels. On November 3, 2004, the appellant was notified that the audit revealed no change in the title, series, or grade. The appellant subsequently filed a classification appeal with the Office of Human Resources at DoI on December 1, 2004. In a decision dated November 7, 2005, the agency denied the appeal and determined the official classification of the appellant's position to be Telecommunications Specialist, GS-391-11. As a result of their decision, the appellant filed an appeal with OPM. However, after a careful review of the record, we find the agency-level decision constitutes a certificate and that NPS is directed to correct the position's classification evaluation statement to reflect the agency findings in accordance with published OPM regulations. A summary of our findings follows.

A PD is the official record of the major duties and responsibilities assigned to a position by an official with the authority to assign work. A position is the duties and responsibilities that make

up the work performed by an employee. Position classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities assigned by management and performed by the employee. An OPM appeal decision grades a real operating position, and not simply the PD. Therefore, this decision is based on the actual work assigned to and performed by the appellants.

By law, we must classify positions solely by comparing their duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of his position. Since comparison to standards is the exclusive method for classifying positions, and because our decision sets aside any previous agency decision, the classification practices used by the appellant's agency in classifying his position are not germane to the classification appeal process.

### **Position information**

The position is located at the [location] Interpretive Design Center (IDC) in the Office of Technology. The HFC is made up of IDC, [location] Training Center, [location] Conservation Facility, [location] National Historic Park and Maintenance Complex, and the [location] National Scenic Trail Park office.

The Office of Information Technology (IT) is composed of the Associate Manager (Chief of Information Technology), GS-2210-13, five IT Management Information Specialists, GS-2210-12, one Telecommunications specialist, GS-391-11, and one administrative technician, GS-303-06. The Associate Manager reports directly to the Center Director. The appellant works under the general supervision of the Chief Information Officer, who is responsible for overall management of telecommunications services and systems at HFC. She carries out her assigned duties independently and her work products are generally not reviewed.

The appellant serves as the Telecommunications Systems Manager for HFC responsible for planning, managing, and directing the full range of telecommunications services, maintaining the overall design and technical monitoring of the HFC systems. The appellant manages the telephone and voice mail systems; provides administrative support for the voice and data circuits; makes recommendations and implements new systems or modifications to existing systems; performs technical and monitoring maintenance and services; and is responsible for investigating user complaints and taking corrective action. She has the authority to order additional telecom circuits and she facilitates and monitors this process for customers. The appellant oversees and monitors the on site work provided by GSA contractors and vendors. The appellant also serves as the liaison between HFC, GSA representatives, and vendors and, as the Designated Agency Representative for HFC, is able to order telecom services from vendors or to transition from one vendor to another.

We find that the PD of record contains the major duties and responsibilities assigned and performed by the appellant and we incorporate it by reference into this decision.

### **Series, title, and standard determination**

The agency classified the appellant's position using the position classification standard (PCS) for Telecommunications Series, GS-391, and titled it Telecommunications Specialist. The appellant does not disagree. Based on our analysis of the record, we concur. The grading criteria published in the GS-391 PCS are directly applicable to the appellant's position and must be used for grade level determination.

### **Grade determination**

The GS-391 PCS is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are assigned for each of nine factors. The total is converted to a grade level by use of the grade conversion table provided in the standard. Under the FES, each factor level description in a standard describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor level description in any significant aspect, it must be credited at a lower level.

The appellant disagrees with her agency's determinations for two factors and believes that her position should be credited at Levels 2-5 and 5-4. She agrees with her agency's crediting of Levels 1-7, 3-3, 4-4, 3b for 6 and 7, and 2a for 8 and 9. After careful review of the record, we concur with the uncontested agency determinations.

#### *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. Controls are exercised by the supervisor in the way assignments are made, instructions are given to the employee, priorities and deadlines are set, and objectives and boundaries are defined. Responsibility of the employee depends upon the extent to which the employee is expected to develop the sequence and timing of various aspects of the work, to modify or recommend modifications of instructions, and to participate in establishing priorities and defining objectives. The degree of review of completed work depends upon the nature and extent of the review. As stated in the *Classifier's Handbook*, it is not just the degree of independence that is evaluated, but also the degree to which the nature of work allows the employee to make decisions and commitments and to exercise judgment.

At Level 2-4, the supervisor sets the overall objectives and, in consultation with the employee, determines timeframes and possible shifts in staff or other resources required. The employee is responsible for planning and carrying out the work, resolving most of the conflicts that arise, integrating and coordinating the work of others as necessary, and interpreting policy on own initiative in terms of established objectives. The supervisor is kept informed of progress, potentially controversial matters or unusual conditions with far-reaching implications. Completed work is reviewed from an overall standpoint in terms of feasibility, compatibility with other work, or effectiveness in meeting requirements or achieving expected results.

At Level 2-5, the supervisor provides administrative direction with assignments in terms of broadly defined missions or objectives. Within these broad areas of direction, the employee has responsibility for planning, designing, and carrying out major studies or projects, and for

coordinating with experts both within and outside of the organization. Results of the work are considered technically authoritative and are normally accepted without change. If the work is reviewed, the review is concerned with such matters as meeting objectives, effect of advice on the overall requirements, or precedents which might apply to other programs. Recommendations for new projects and alteration of objectives are usually evaluated for such considerations as availability of resources, broad goals, or national priorities.

Similar to that described at Level 2-4, the appellant's supervisor establishes the overall objectives, and the appellant independently exercises expertise in her specialty area (telecommunications) and ensures the integrity of the [location] Center Complex telecom system. The appellant also receives work assignments directly and indirectly from managers or employees whose phones are not working. She plans and carries out her duties, resolving conflicts, and integrating the work of other phone contractors and various other vendors, as necessary. Her supervisor is kept informed of potentially budgetary, controversial or unusual issues. Work is reviewed for fulfillment of overall program requirements.

Level 2-5 is not met. Level 2-5 reflects administrative supervision only, with full technical authority delegated to the employee. Typically, this level of authority is accompanied by responsibility for a significant program or function. While the appellant has significant technical responsibility, her supervisor retains final responsibility within the HFC for administration of the overall telecommunications program. Level 2-4 involves a high degree of independence and responsibility, and thus fully recognizes the technical responsibility vested in the subject position. While she provides recommendations for new projects, it does not substantially exceed this level. Her completed work is still subject to technical review, even though this is not often done. The results of her work and her recommendations, even though normally accepted as technically authoritative, may be changed to meet other considerations, such as budget realities. In addition, while the appellant is responsible for her individual work products, her supervisor is responsible for the results of the overall telecommunications program.

This factor is assigned Level 2-4 and 450 points are credited.

#### *Factor 5, Scope and effect*

Scope and effect 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 5-3, the work involves resolving a variety of conventional telecommunications problems, questions, or situations, such as those where the employee is responsible for monitoring established communications systems and programs, or performing independent reviews and recommending actions involving well-established criteria, methods, techniques, and procedures. The employee's work products, advice, and assistance affect the efficiency and operational effectiveness of established telecommunications systems, and contribute to the effectiveness of newly introduced programs and facilities requiring telecommunications support. The effect of the work is primarily local in nature, although some systems may be part of

multifacility or nationwide/international networks with interlocking telecommunications requirements.

At Level 5-4, the employee is involved in investigating and analyzing a variety of unusual telecommunications problems, questions, or conditions associated with formulating projects or studies to substantially alter major telecommunications systems, or establishing criteria in an assigned area of specialization (e.g., establishing telecommunications operating instructions for wide area computer networks in a number of different locations), or evaluating the effectiveness of existing voice, data, and/or video systems. The work affects telecommunications operations, installation, and maintenance practices in a number of different functional operations within the organization and, to a lesser extent, in vendor operations. It contributes to developing solutions to telecommunications problems and questions, and in developing alternatives and options to meet requirements in a variety of physical and environmental circumstances. Program and project proposals frequently cut across component or geographic lines within the agency (e.g., across bureaus, commands, regions) and may also affect the budgets, programs, and interests of other Federal agencies or private industrial firms.

As described in Level 5-3, the appellant performs a full range of tasks described at the level and her work directly affects the efficiency and operational effectiveness of established and planned telecommunications systems and networks at the Center. The effect of the appellants work is primarily local in nature, although some systems may be part of multifacility networks with interlocking telecommunications requirements.

While the appellants' work exceeds the scope of Level 5-3 in some respects, it does not fully meet Level 5-4. Similar to Level 5-4, the appellant develops recommendations for new systems or modifications to existing systems, including overseeing the replacement of an existing telephone system, involving both voice and data communications. She provides advisory, planning, and technical services in the telecommunications area. The appellant investigates and analyzes telecommunications systems and networks that involve voice and data systems; however, that work falls short of the wide variety of unusual telecommunications problems or questions discussed at this level. Unlike Level 5-4, the appellant's programs and projects do not frequently cut across component or geographic lines within the agency. The appellant states in addition to the Center, she serves the [location] Historical Park, [location] Training Center, [location] Scenic Trail Office and the Museum Management Program. However, her work only affects telecommunications operations, installation, and maintenance at the individual organizations within the HFC, and helps to develop solutions to local communications problems and achieve program objectives.

This factor is evaluated at Level 5-3 and 150 points are credited.

*Summary of FES factors*

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-7	1250 points
2. Supervisory controls	2-4	450 points
3. Guidelines	3-3	275 points

4. Complexity	4-4	225 points
5. Scope and effect	5-3	150 points
6. and 7. Personal contacts/Purpose of contacts	3-b	110 points
8. and 9. Physical demands/Work environment	2-a	<u>25 points</u>
<i>Total</i>		2485 points

The total of 2485 points falls within the GS-11 range (2355-2750) on the grade conversion table in the PCS. Therefore, the appellant's position is evaluated at the GS-11 grade level.

### **Decision**

The appellant's position is properly classified as Telecommunications Specialist, GS-391-11.