United States
Office of
Personnel Management

Dallas Oversight Division
1100 Commerce Street, Room 4C22
Dallas, TX 75242-9968

In Reply Refer To: Your Reference:

OPM decision number: C-0343-09-01, 9/26/97

Euna L. Sexton
Chief, Civilian Policy Division (DPCC)
Directorate of Civilian Policy and Personnel Plans
Department of the Air Force
1040 Air Force Pentagon
Washington DC 20330-1040

Dear Ms. Sexton:

This is in response to your letter of November 24, 1997, requesting reconsideration of this office's decision on [the appellant's] position classification appeal (decision dated September 26, 1997).

Under civil service regulations at 5 CFR 511, there are three bases for OPM to reconsider a position classification appeal decision: (1) upon presentation of information which should have been considered in the decision process but was not; (2) upon presentation of a persuasive argument that the decision was based on a misinterpretation of relevant job information; and (3) upon presentation of a persuasive argument that the decision was based on an erroneous interpretation of the classification standards.

Your letter indicates that material information concerning the mission and function of [the appellant's] organization was not considered and that this error caused OPM to over-value the scope and responsibilities of [the appellant's] position. In support of this contention, you present a detailed description of the HQ AFSPC organization, the delegations of authority, and the functional responsibilities that relate to [the appellant's] work unit. You also present your own assessment of the impact of the Quality management approach in this environment and your classification assessment of the primary work example cited in our decision.

After reviewing the appeal file, I find that the organizational information you submitted was included in the original file and was, in fact, considered in making our decision. However, I also found that the position description contains

language which suggests duties and responsibilities so far above what your argument would allow that it would seem you were not talking about the same position that we reviewed. As a matter of fact, the job as described seems to exceed in some aspects the nature of assignment and level of responsibility that we credited. For that reason, I took advantage of your request to reconsider our decision.

I have concluded that there are several factors at play here. First, it appears that line management has, in effect, placed [the appellant] on a career ladder. They have given her training in the concepts of management analysis which, if applied, should be expected to "bridge" her from the assistant career path to the administrative career path. Management has assigned her to a position description which includes work involved with establishing performance measures, developing strategic plans, and identifying process improvements. All of these duties are consistent with classification to an analytical occupation, and the mention in the position description of acting as a team leader for studies in such areas indicates a fairly senior level of responsibility. I gather from the installation evaluation statement and your evaluation that management may not have had the full support of agency classifiers for establishing this position in the manner they did, but that does not change the reality of their action. OPM found [the appellant] at a point on her developmental track which falls short of the full range of duties described, but we did find her applying the knowledges and skills typical of the GS-343 occupation for which she was trained.

Another factor at play is the impact of Quality principles and methods on position responsibility. One of the principal tenets of the Quality approach is to shift away from hierarchical decision-making by moving improvement decisions down to the working level. If, as your argument seems to suggest, Air Force has established the structure for Quality management (e.g., process action teams) but maintained the "lengthy climb through the management infrastructure to the point where decision authority rests," it has created a paradox. However, we are satisfied that, in the work examples presented to us during a site audit and two telephone interviews, we saw analytical assignments carried through to completion, and it was those assignments upon which our decision was based. It may be that, as with establishing the career ladder position, management was not authorized by the official table of organization and delegations of responsibility to do this, but they acted like they were so authorized, and they assigned the work to [the appellant].

We are mindful that [the appellant's] position description often describes her work in terms that suggest she is expected to function as kind of a "Quality process specialist," an expert in the techniques of Quality who imparts those techniques to those line workers who have substantive knowledge of the processes under study. Thus, we see that her position provides "strategic

planning *services"* (emphasis added), which could be construed to indicate technique without substance. It strikes us that such a dichotomous concept is probably not very realistic for the long run. [the appellant] provided us some examples of strategic planning meetings that she had "facilitated," and these did, indeed, seem to require only cursory involvement for her in the substance of the meetings. However, [the appellant]'s Protocol study assignment also involved Quality techniques, and it demonstrated an intense, in-depth study of the substance of the Protocol process. This type of involvement in a study of any length is probably a more realistic expectation, and it is consistent with the position description, too, particularly those aspects which describe acting as a project leader.

This brings us to your alternative evaluation of the Protocol study itself. As described to us during our audits, this particular assignment involved reengineering the Protocol function used to document visitors to the AFSPC. It consumed a large portion of [the appellant]'s time for the better part of a year. Briefly, [the appellant] reviewed how the various organizations were documenting visitors to the base. She found that several different software applications were being used, resulting in a data integrity problem since data had to be entered several different times. She interviewed all customers who used the system and found out what their information needs were. She benchmarked other commands and other organizations (including the White House) to identify best business practices used in documenting visitors. She mapped out the "as is" process, identified redundant or unnecessary steps that could be eliminated, and prepared a spreadsheet consisting of products and required data elements. Based on an analysis of all information gathered, she recommended to the Directorate of Protocol a revised process for tracking visitors that included a single computer application that could be used for data sharing. Once approved by the Directorate, she developed the data requirements that a contractor is using to develop the application program.

Your analysis compares the Protocol process to the procedures and duties described in the GS-318 Secretary Series: "Receives visitors to the office including all appointments. This includes setting up appointments, securing building clearance, and arranging for additional appointments with bureau and office senior staff." We cannot accept this comparison. The description above reflects our evaluation of the Protocol process, and we affirm the conclusion reached in our decision: the subject matter of this study was/is an administrative process typical of Factor Level Definitions 1-6 and 4-3 of the Administrative Analysis Grade-Evaluation Guide.

Your analysis reasserts a claim by the installation classifier that the GS-344 Series is more appropriate by providing an example out of the standard that you believe is comparable to the appellant's work. The example describes

employees who review and track progress in meeting objectives and use of resources through the use of data base records of forecasted milestones and funding. Information tracked is submitted to higher-level employees for further study. As demonstrated during our audits and described in our decision, [the appellant]'s assignments go well beyond tracking the progress of projects in that she is responsible for independent factfinding and analysis. She does not refer information to higher-level employees for project completion, but, rather, accomplishes entire projects from beginning to end. She does not merely provide support to higher-level analysts, as contemplated in the GS-344 series.

Under Factor 2, Supervisory Controls, our evaluation statement explains in detail [the appellant]'s responsibility with respect to the projects she is assigned. It spells out how projects are assigned and how all projects must be presented and approved by a Business Process Working Group and Network Steering Committee. While a project is in progress, [the appellant] may obtain feedback and assistance from her supervisor or other members of her organization. Overall, however, she independently plans and carries out her assignments, providing recommended solutions to her customers. Her customers may include process action teams in other organizations that request assistance from the Functional Process Improvement Section, but, whether her assignments evolve from a process action team or not, her responsibilities and the services she provides are the same. Specifically, she discusses needs or problems with the customer, charts how the process currently functions using various software or modeling methodologies, analyzes all available data, identifies possible problem areas, and recommends a solution.

It seems that your evaluation places too much emphasis on where [the appellant] is located in the organizational structure and not enough on what she actually does. You claim we over-valued the nature of her assignments by failing to recognize the functional limitations of her unit, and her inability to impact organizational mission or functions. However, we credited Level 1-6 which involves knowledge sufficient to deal with problems of a procedural or factual nature. Level 1-7 was not credited because it involves knowledge of missions and organizations in order to conduct studies concerning the efficiency and effectiveness of program operations. This determination is clearly supported by the facts as we have outlined them. Likewise, we assigned Level 5-3 which involves assignments that affect internal administrative operations only. Level 5-4 was not assigned because the appellant's assignments do not impact the efficiency of program operations. You say that [the appellant] could not have final decision authority because of where she works within the chain of command, but, under Factor 2, we credited her only with recommending solutions for the projects she is assigned, with decision authority vested in the customers who request her services. This is in keeping with the criteria in the Administrative Analysis Grade-Evaluation Guide.

Our classification of the appealed position as Management Analyst, GS-343-09, is affirmed.

Sincerely,

Peter D. Dickson
Director
Dallas Oversight Division

cc: [the appellant]

Gary T. Beavers
Civilian Personnel Officer
21 MSS/DPC
620 Mitchell St Ste 18
Peterson AFB, CO 80914-1182

Chief, Classification Branch
Field Advisory Services Division
Defense Civilian Personnel Management Service
1400 Key Blvd Ste B-200
Arlington VA 22209-5144

HQ AFPC/DPCFL
550 C Street West Ste 57
Randolph AFB, TX 78150-4759