U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA 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:	Procurement Technician (OA) GS-1106-6
Organization:	[name] Team Defense Contract Management (DCM) [location] DCM Contract Management [location] DCM District East (DCMDE) DCM Agency (DCMA) [location]
OPM decision:	Procurement Technician (OA) GS-1106-6
OPM decision number:	C-1106-06-03

/s/ Robert D. Hendler

Robert D. Hendler
Classification Appeals Officer

April 12, 2001

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

Decision sent to:

[appellant's name]
[appellant's address]

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Introduction

On November 15, 2000, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. Her position is currently classified as a Procurement Technician (Office Automation (OA)), GS-1106-6. She believes the position should be classified as Procurement Technician (OA), GS-1106-7. The appellant works in the [name] Team, Defense Contract Management (DCM) Contract Management [name], DCM Contract Management [name], DCM District East (DCMDE), DCM Agency (DCMA), [location]. We have accepted and decided this appeal under section 5112(b) of title 5, United States Code (U.S.C.).

General issues

In her appeal letter, the appellant states that she believes that the demands of her position have increased over the past five years and support the GS-7 grade level. She says that her supervisor initially supported her request for an upgrade. The appellant says that people most familiar with her work were not interviewed when her agency audited her position and raises other concerns about agency practices in reviewing her position.

These statements raise procedural issues that must be addressed. OPM is required by law to classify positions on the basis of their duties, responsibilities, and qualification requirements by comparison to the criteria specified in the appropriate PCS or guide (5 U.S.C. 5106, 5107, and 5112). The law does not authorize use of other methods or factors of evaluation, such as comparing the work that the appellant currently performs with the work that she previously performed. Our decision sets aside all previous agency decisions regarding the classification of the position in question.

Because of questions about position description (PD) accuracy, the agency revised the appellant's PD of record and reassigned her to the new position [PD number] on December 31, 2000. The appellant and her supervisor certified the accuracy of the new PD on January 16 and January 10, 2001, respectively.

Position Information

The appellant provides procurement support to her contract administration team on both simple and complex contracts. A majority of the contracts are for critical and/or complex military components, assemblies, or systems. She performs initial contract review, assuring that clauses requiring special attention are highlighted, e.g., patent clearance and Government furnished property, and that contract abstract data is reviewed and corrected. The appellant identifies internal inconsistencies, e.g., inspection acceptance at destination in one section and at origin in another section, and assures that line items are written to permit automated system input. She presents her findings to the Administrative Contracting Officer (ACO), who has authority to modify administrative aspects of the contract, e.g., correcting shipping addresses. He may authorize the appellant to contact the Procurement Contracting Officer (PCO) from the buying command, for changes in terms and conditions needed to implement the contract, e.g., when the production date was set before the first article testing date.

The appellant establishes contract abstracts against which she tracks contract execution. She reviews shipping documents and contract disbursements, identifies discrepancies, and contacts vendors, the ACO, and/or the disbursing activities to resolve documentation errors. The appellant assures that documentation is available to move contracts from the activation through closeout. This includes researching data discrepancies in the various automated systems, e.g., the Mechanized On-line Contract Administrative Services (MOCAS) system and the Electronic Data Warehouse.

The appellant is the MOCAS point of contact for DCM Reading. She trains, advises, and assists other Procurement Technicians on MOCAS issues and problems. She uses OA software to type memoranda, letters, contract documents, and reports.

To help decide this appeal, we conducted a telephone audit with the appellant on April 6, a telephone interview on April 9 with her immediate supervisor, [name], and a telephone interview on April 10, 2001, with [name], Team ACO. In reaching our decision, we reviewed the audit findings and all information of record furnished by the appellant and her agency, including her official PD and work examples that she provided at our request. Our audit confirmed that the PD of record contains the major duties and responsibilities of the appellant's position and we incorporate it by reference into this decision.

Series, title, and standard determination

The agency has placed the appellant's position in the Procurement Technician Series, GS-1106, for which there is a published PCS, and titled it Procurement Technician (OA). The appellant agreed with the series determination and with the agency's use of the GS-1106 PCS for grade level analysis of her procurement support and the Office Automation Grade Evaluation Guide (OAGEG) to evaluate her computer support work. We concur with these determinations.

Grade determination

The GS-1106 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.

In her appeal letter, the appellant says that she agrees with the agency's crediting of Levels 1-4, 2-3, 4-3, 8-1, and 9-1. She says that her position should also be credited at Levels 3-3, 5-3, and 6/7 2b. The appellant's January 16, 2001, certification statement says that she disagrees with Factors 3, 6, and 7. The record shows, however, that the agency credited Levels 5-3 and 6-2 in its December 31, 2000, evaluation of her position of record. Based on our analysis of the record, we concur with the agency's crediting of Levels 1-4, 2-3, 4-3, 5-3, 6-2, 8-1, and 9-1 and have so credited the position. Our evaluation of her position, therefore, focuses on the remaining factors.

Factor 3, Guidelines

This factor covers the nature of guidelines for the work and the judgment needed to apply them. Guides used in this occupation include agency policies, directives, manuals, and handbooks. Individual jobs vary in the specificity, applicability, and availability of the guidelines for performance of assignments. Consequently, the constraints and judgmental demands placed upon employees also vary. For example, the existence of specific instructions, procedures, and policies may limit the employee's opportunity to make or recommend decisions or actions. However, lacking procedures or under broadly stated objectives, employees may use considerable judgment in researching literature and developing new methods.

The appellant says that she applies established procedures, desk guides, manuals, and acquisition regulations. She states that she independently reviews documents and is expected to correct the errors that she finds. The appellant says that she researches available guidelines before responding to contracts, the disbursing activities, and the PCO's. In situations that are not covered by guidelines, she applies experience to adapt current procedures and policies, initiate a correct approach, and take action. She has learned and provides training on the automation used in the office.

As at Level 3-2, a number of established procedures and specific guidelines are available in the form of desk procedures, commercial catalogs, Federal supply code manuals, specific acquisition regulations, and coding and processing manuals. Because of the number and similarity of guidelines and work situations, the appellant must use judgment to identify and select the most appropriate procedures to use, choose from among several established alternatives, or decide which precedent actions to follow as a model. For example, the appellant explores the possibility of arranging for inspection acceptance at the receiving site with the PCO so that the contractor will not have to pay for return shipping when the item was supposed to be inspected and accepted prior to shipment. There may be omissions in guidelines, and the employee is expected to use some judgment and initiative to handle aspects of the work that are not completely covered, e.g., responding to vendor questions on returning shipping documents that are necessary for processing disbursements. As at Level 3-2, the appellant refers situations requiring significant judgment to the ACO for resolution.

At Level 3-3, guidelines are the same as Level 3-2 but are not completely applicable to many aspects of the work because of the problem solving or complicated nature of the assignments. For example, in gathering material to respond to a contractor's protest or to resolve problems encountered in acquisition closeout, the employee determines relevant information by reviewing and reading various documents in contract files and procurement records. When reconstructing an incomplete contract file, the employee may have to rely on experienced judgment, rather than guides, to fill in gaps, identify sources for information, and make working assumptions about what transpired. The employee uses judgment to interpret guidelines, adapt procedures, decide approaches, and resolve specific problems, e.g., using judgment to reconstruct incomplete contract files, devise more efficient methods for procedural processing, gather and organize information for protests or inquiries, or resolve problems referred by others. The employee analyzes the results of applying guidelines and recommends changes. These changes may include, for example, suggesting the development of controls, training, or specific guidance related to the procedural handling of documents and information.

While the appellant has to reconstruct contracts, the work primarily involves obtaining copies of documents that are clearly missing from the file, e.g., shipping documents that support funds disbursements, contract modifications used to disburse funds, and establishing the status of unliquidated funds. The need for these documents is based on established contracting requirements, e.g., accounting for Government furnished equipment, obtaining a final patent report for a contract with a patent clause, and obtaining demilitarization certification for scrap materials for contracts that require demilitarization. Unlike Level 3-3, established contract processing procedures are directly applicable to most aspects of her work. The appellant's contract reconstruction work does not routinely require interpreting guidelines, adapting procedures, or deciding on approaches to the extent found at Level 3-3. Therefore, this factor is credited at Level 3-2.

Factor 7, Purpose of contacts

The appellant states that her contacts within and outside the organization are to request or provide information for correcting databases and assisting in compliance with contract provisions. She resolves issues with the buying commands, e.g., modifications, shipping, clarification, expediting actions, and resolves payment and closeout issues with disbursing activities.

As at Level b, the purpose of the appellant's regular and recurring contacts with contractors, disbursing activities, and buying commands includes coordinating her work efforts with these others and seeking their cooperation in resolving delays, misunderstandings, and complaints. For example, she helps resolve shipment inspection problems with buying commands and payment record corrections with disbursing activities. The purpose of her contacts does not include settling disputes and explaining decisions through negotiation and persuasion, typical of higher levels. Therefore, this factor is credited at Level b.

Summary

In summary, we have credited the position as follows:

Factor	Level	Points
1. Knowledge required by the position	1-4	550
2. Supervisory controls	2-3	275
3. Guidelines	3-2	125
4. Complexity	4-3	150
5. Scope and effect	5-3	150
6. Personal contacts and 7. Purpose of contacts	2b	75
8. Physical demands	8-1	5
9. Work environment	9-1	5
Total points:		1,335

A total of 1,335 points falls within the GS-6 grade level point range of 1,105-1,350 points on the Grade Conversion Table in the GS-1106 PCS.

The appellant's OA duties are evaluated using the OAGEG. Her OA duties, however, cannot be higher graded than her procurement support duties since they do not routinely involve a wide variety of nonstandard automation problems or assignments requiring knowledge of *advanced* functions of more than one type of software, e.g., developing methods for automating complex administrative reports, including the detailed functional procedures needed to automate the data. The appellant uses a variety of standard software functions, resulting in evaluation of her OA work at a lower grade level than the GS-1106 work. Therefore, her OA work does not impact the final grade level worth of the position.

Decision

The position is properly classified as Procurement Technician (OA), GS-1106-6.