

**U.S. Office of Personnel Management
Office of Merit Systems Oversight and
Effectiveness
Classification Appeal and FLSA Programs**

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

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

Appellant: [name]

Agency classification: Management Program Technician
GS-303-7

Organization: Resident Agent in Charge
Special Agent in Charge
Office of Investigation
U.S. Customs Service
Department of the Treasury
[location]

OPM decision: GS-303-7
(title at agency's discretion)

OPM decision number: C-0303-07-06

Bonnie J. Brandon
Classification Appeals Officer

5/8/01

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's name
and address]

Director, Human Resources
U.S. Customs Service
Department of the Treasury
Gelman Building, Room 6100
1301 Constitution Avenue
Washington, DC 20229

Director, Office of Personnel Policy
ATTN: Metropolitan Square, Room 6075
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1500 Pennsylvania Avenue, NW.
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Introduction

On January 12, 2001, the Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [name]. The appellant's position is currently classified as Management Program Technician, GS-303-7. The appellant believes that the position should be classified in the Miscellaneous Administration and Program Series, GS-301, and graded at the GS-9 level. The position is located in the office of the Resident Agent in Charge (RAIC), Special Agent in Charge (SAIC), Office of Investigation, U.S. Customs Service, Department of the Treasury, in [location]. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

To help decide the appeal, an OPM representative conducted telephone interviews with the appellant and her supervisor. To gain perspective on the scope of the appellant's work, we also interviewed the Management Program Officer (MPO) at the SAIC office in [location].

General issues

The appellant makes various statements about the agency and its evaluation of her position, including that the agency has stated that upgrading her position would not be in accordance with its "template" for the administrative staff within each of the agency's RAIC offices. She compares her duties to those of positions at other RAIC offices within the agency, which she believes are similar to her position but are higher graded. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of the appellant's position. By law, OPM must classify positions solely by comparing current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, 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. Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellant considers her position so similar to others that they all warrant the same classification, she may pursue the matter by writing to her agency's personnel headquarters. In doing so, she should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same as hers, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to the appellant the differences between her position and the others.

The appellant and her supervisor have not certified the accuracy of the position description (PD) # [number]. We view a PD as adequate for classification purposes when it is considered so by a person knowledgeable of the occupation and the classification standards and is supplemented by current information about the position's organization, functions, programs, and procedures. Based on our fact-finding, there are minor discrepancies within the PD as it relates to the

appellant's duties. However, these discrepancies are minor and not grade-controlling. We find that the PD describes the major duties and responsibilities of the appellant's position and includes information about the position that is significant to the classification. Therefore, the PD is appropriate for our purposes to accurately reflect the duties and responsibilities assigned to the appellant.

In discussing the appellant's position, the MPO talked about the experience of the appellant. If the appellant were not in the position, the MPO stated that she would treat the position as others within the SAIC, whose incumbents have only been there a short time and are not well versed in the administrative aspects of their organization. Years of experience and service do not affect the classification of the position. Therefore, we could not consider the appellant's experience and years of service in the organization, except insofar as they are required to perform the appellant's current duties and responsibilities. To the extent that they were needed for this purpose, we carefully considered them along with all other information provided by the appellant and her agency.

The supervisor also stated that the RAIC had three employees, including the appellant, in 1998 who performed the administrative support duties. Two of the employees have retired since then, leaving the appellant to perform the administrative support work. Even though the appellant may perform a larger amount of work, volume of work is not a factor considered in determining the grade level of a position. As previously stated, we must make a decision solely by comparing the current duties and responsibilities of the position to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112).

Position information

According to the agency's organization handbook, SAIC offices are responsible for the administration and management of all enforcement activities within the geographic boundaries of the office. These offices supervise all administrative responsibilities assigned to the office and ensure that a responsive internal controls program is developed. Each SAIC office is responsible for any subordinate field offices, which support the enforcement mission of the SAIC. These subordinate field offices, RAIC offices and Resident Agent offices, are responsible for managing enforcement activities within the geographic boundaries of the SAIC office.

There are five organizational units reporting to the SAIC office in [location] -- three RAIC organizational units with one each in [three geographic locations] and two Resident Agent organizational units with one each in [two geographic locations]. Each of the five units services a different number of staff -- [location] services 39, [location] services 14, [location] services 6, [location] services 6, and [location] services 3.

The appealed position provides a variety of administrative services for the RAIC office in [location]. The position requires knowledge of the unique characteristics of the organization, especially the organization's budget processes. The appellant operates with a large degree of independence based on her experience; only formal budget and procurement requests and special reports require supervisory approval or signature, before being sent to the SAIC office.

The appealed position is characterized by the following duties and responsibilities:

- Develops budget requests by evaluating the RAIC office's operational and special needs and establishes internal procedures to ensure budget allocations are not exceeded.
- Utilizes established administrative systems to identify budgetary needs based on previous years' expenditures/allocations and monitors related reports on a quarterly basis and at the end of the fiscal year to ensure that all possible deobligations have been completed.
- Serves as the coordinator of the reimbursable state and local overtime agreements and secures the allocation of adequate funds. Resolves all discrepancies between state and local law enforcement agencies and the SAIC office's local assets sharing program.
- Is responsible for all procurements within the RAIC office, ensuring that requirements are met and budget allocations are not exceeded.
- Serves as Fleet Card Coordinator, certifying all vehicle fuel and repair charges and monitoring all travel and investigative expenses.
- Provides logistical support, identifying appropriate telephone and computer lines and coordinating the requirements for special needs requests.
- Serves as local property officer, executing the annual inventory, resolving discrepancies, and maintaining the validity of the Vehicle Maintenance Information System.
- Processes incoming and outgoing personnel, resolving payroll problems and OWCP claims processing.
- Conducts fact-finding and develops emergency plan for the RAIC office.
- Gathers factual evidence of administrative waste and abuse of noncompliance of agency regulations and participates in other agency initiatives toward excellence.

The appellant delineates the percentages of time spent on her major duties as follows:

- 55 percent: budget-related work
- 20 percent: logistics work, including computer and security
- 10 percent: personnel work
- 15 percent: miscellaneous management assistance work

Series, title, and standard determination

The determination of the correct series for the appealed position is largely dependent on whether the work performed is one- or two-grade interval in nature.

The Miscellaneous Administration and Program Series, GS-301, includes positions that perform, supervise, or manage nonprofessional, two-grade interval work for which no other series is appropriate. The work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives. The administrative work of this series involves skills, such as analytical, research, and writing ability, and the application of judgment typically demonstrated by substantial, responsible experience that is the equivalent of a college level education.

The Miscellaneous Clerk and Assistant Series, GS-303, includes positions that perform or supervise clerical, assistant, or technician one-grade interval work for which no other series is appropriate. The work requires knowledge of the procedures and techniques involved in carrying out the work of an organization and involves application of procedures and practices within the framework of established guidelines.

Classification guidance in the *Introduction to the Position Classification Standards* and *The Classifier's Handbook* (both dated August 1991) describes distinctions between positions properly classified in two-grade interval administrative series and positions classified in one-grade interval support series. Administrative positions (two-grade interval) are involved in work primarily requiring a high order of analytical ability. This ability is combined with a comprehensive knowledge of (1) the functions, processes, theories, and principles of management and (2) the methods used to gather, analyze, and evaluate information. These positions are typically involved with analyzing, evaluating, modifying, and developing the basic programs, policies, and procedures that facilitate the work of Federal agencies and programs. In contrast, support positions (one-grade interval) perform work that follows established methods, procedures, and guidelines and may require a high degree of technical skill, care, and precision. The work can be performed based on a practical knowledge of the purpose, operation, procedures, techniques, and guidelines of the specific program area or functional assignments.

We find that the appellant's position does not involve work that is administrative, two-grade interval in nature. Although the appellant provides a variety of administrative support functions, it is only for a staff of [number] and does not pertain to a complete operating program within the agency. Based on the agency's organizational handbook, this responsibility is typically found at the SAIC office level. When queried for examples of the appellant's analytical tasks and her development of basic programs and policies, the appellant's development of the emergency plan, her reconciliation of local assets sharing expenditures for the RAIC office, her participation in a study on how to improve the organization's workers compensation program, and her determination of equipment and space needs for the RAIC office were provided as examples. However, this work does not require a high order of analytical ability or a comprehensive knowledge of management principles and theories or analytical methods and techniques to affect the agency's basic programs.

Assistance work (similar to the appellant's) involves performing technical work to support the administration or operation of the programs of an organizational unit. This work requires a working knowledge of the work processes and procedures of an administrative area and the mission and operational requirements of an organizational unit. The appellant's advisory work involves application of her expertise on the policies, guidelines, and procedures of the administrative programs for the RAIC office in [location]. The appellant's tenure in the position has resulted in her being the expert in these programs, but, unlike two-grade interval positions, her duties do not require her to analyze or use evaluative methods and techniques to assess program development or execution. There is also no requirement for the appellant to develop analytical presentations or reports on the management of the programs.

The appellant's work more closely matches one-grade interval technician work based on a practical knowledge of the purpose, operation, procedures, techniques, and guidelines of the

RAIC office and the corresponding functional assignments of the staff. For the preceding reasons, the appellant's duties are assigned to the GS-303 series.

The GS-303 series does not specify titles. Therefore, the agency may designate an appropriate title by following the guidance in the *Introduction to the Position Classification Standards*.

Grade determination

The classification standard for the GS-303 series (dated January 1979) contains no grading criteria. Therefore, the Grade Level Guide for Clerical and Assistance Work (dated June 1989) is used to grade the appellant's work. However, since the appellant's clerical and technician duties make up 55 percent of her work, we also used the Job Family Standard (JFS) for Clerical and Technical Accounting and Budget Work, GS-500 (dated December 1997), to grade that portion of the position. Evaluation of the budget work is presented first.

Evaluation using the GS-500 standard

The GS-500 standard uses classification criteria developed in the Factor Evaluation System (FES) format that contains nine grade-influencing factors. The standard contains illustrations as an integrated part of the factor level descriptions in Factor 1. Under FES, in order for a duty or responsibility to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor level. If the responsibility fails in any significant aspect to meet a particular factor level, the lower point value is assigned. In the FES, when a position exceeds the highest level for an individual factor in the applicable standard, the Primary Standard, supplemented by a related FES standard, may be used to point rate that particular factor. The following is a factor-by-factor analysis of the appellant's work.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts which the employee must understand to do acceptable work and the nature and extent of the skills needed to apply those knowledges.

Level 1-4 includes work that requires an in-depth or broad knowledge of a body of accounting, budget, or other financial management regulations, practices, procedures, and policies related to the specific financial management functions. This includes knowledge of various interrelated steps, conditions and procedures required to assemble, review, and maintain complex accounting, budget, or other fiscal transactions (e.g, reconciling accounts in accounting systems involving subdivision of accounts, frequent and varied adjustments to accounts, or extensive balancing and reconciling of detailed summary accounts; or resolving problems in balancing accounts, adjusting discrepancies, developing control records, verifying the accuracy of budgetary data, adjusting dollar amounts of accounts by line item and object class, and preparing reports on the status of funds). Knowledge is required of various accounting, budget, or other financial regulations, laws, and requirements such as pay and leave rules and administrative rules associated with recording and tracking budgetary transactions, tax laws, entitlement rules, documentation requirements, schedules, and deductions, to ensure compliance and recommend

action. Knowledge is required of a variety of accounting and budget functional areas and their relationships to other functions and knowledge of automated accounting and budget systems. This level also requires knowledge of extensive and diverse accounting, budget, or other financial regulations sufficient to resolve nonstandard transactions and complaints and provide advice as needed.

The appellant's position parallels Level 1-4. The appellant exercises extensive knowledge of the organization and a comprehensive knowledge of the principles of account management, cost trend analysis, and planning that she applies to daily operations. The appellant utilizes her knowledge to process requests for allotments to cover different accounts. Programs and funds are allocated on an annual basis, but they fluctuate throughout the budget year. This requires adjustments and change in estimates by the appellant. Monitoring and execution of these accounts requires that the appellant use knowledge of operational distinctions between various types of accounts. These accounts require application of different methods and procedures to transfer funds between accounts and object classes (e.g., supplies, equipment, fleet maintenance, contracted services). The appellant applies her knowledge of the organizational mission to justify the need for additional funds and to submit requests to the SAIC office after supervisory approval. The appellant identifies and extracts budgetary information from many different source documents such as accounting records, contract agreements, and historical data. She uses this information to compile, consolidate, organize, and summarize information about the different accounts or appropriations for inclusion in annual budget estimates and a variety of one-time recurring reports that are submitted to the supervisor for approval. She also establishes internal recurring obligations to fund telephone usage as well as vehicle/fleet fuel, maintenance, and repair.

The position does not meet Level 1-5 which requires all of the knowledge described at Level 1-4, plus a broad, in-depth practical knowledge of accounting or other financial management technical methods, techniques, precedent cases, and procedures to resolve especially difficult or sensitive problems. Employees at this level use knowledge of accounting methods, procedures, and techniques to conduct difficult and responsible analysis and determinations within a complete accounting system to validate transactions and to perform research to resolve inconsistencies. This level also requires knowledge of the interrelationships of various accounting system applications and computer file systems and content to resolve problems of processed transactions (e.g., knowledge of computer master file systems, document processing, and the effect of transactions on existing records to modify normal automated processes in existing accounts while protecting historical data). The modifications may be characterized by complicated adjustments and require the employee to have knowledge of related financial regulations and rulings covering diverse types of transactions to typically function as a technical authority for the resolution of an extensive range of issues or problems. An illustration of this level is an employee who works with systems development personnel to locate and resolve accounting transaction problems in the accounting system or one who evaluates and verifies the range of accounting transactions to determine the adequacy of the system and/or assist in the development of new accounting and management systems.

The level of knowledge and skill required at Level 1-5 clearly exceeds that expected of the appealed position. The appellant uses her knowledge and understanding of program element

codes and accounting codes to retrieve sufficient information. The appellant uses database systems to obtain historical data for special reports and submissions to the supervisor. The appellant's use of accounting systems and techniques facilitates her own work processes and reporting requirements as the budgetary liaison between the RAIC office in [location] and the SAIC office in [location]. She makes initial checks for accuracy of data content on a variety of documents before they are forwarded to the SAIC office.

However, the appellant's position does not require the knowledge envisioned at Level 1-5, e.g., evaluating and troubleshooting the parameters of accounting transactions, compiling extensive worksheets to study causes, or conducting analysis for new system developments. The appellant is not required to deal with especially difficult and sensitive problems. These duties along with the in-depth analysis that is described by the standard at this level are not required by the appellant's position; they are either the responsibility of the SAIC office or the agency's financial center in Indianapolis. Basic trend analysis derived from historical data or predicted, scheduled expenditures are sufficient to accomplish the appellant's resource tasks.

Level 1-4 is credited (550 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 extent of review of completed work.

At Level 2-3, the highest level described in this standard, the supervisor or other designated employee assigns work with standing instructions on objectives, priorities, and deadlines and provides guidance for unusually involved situations. The employee works with independence in performance of the most difficult procedural and technical tasks or actions and handles problems and deviations in accordance with guidelines, policies, previous training, and practices. The work is reviewed at this level for overall technical soundness and conformance to agency policies or legal or system requirements rather than the methods used to complete the assignments.

Comparable to Level 2-3, the appellant's supervisor is available to provide guidance and direction in terms of program requirements, expectations, goals, and deadlines. The appellant independently plans and carries out the most difficult procedural and technical processing of budgetary transactions in accordance with available guidelines and precedents. The supervisor may provide guidance on such issues as unfunded requirements and variances that have final RAIC level approval. Review of the appellant's work comes from discussing funding status, controversial issues, and recommendations with the supervisor.

Reference is made to the Primary Standard for Level 2-4. At this level, the supervisor, in consultation with the employee, develops deadlines, projects, and work to be done. The employee, having developed expertise in the line of work, is responsible for planning and carrying out assignments, resolving most conflicts that arise, coordinating the work with others as necessary, and interpreting policy on own initiative in terms of established objectives.

The appealed position fails to meet Level 2-4 for supervisory controls. Although the appellant independently performs her assignments, the results are gauged by preset funding targets and policy interpretations that have been set at higher levels in the agency, either at the SAIC office level or at the agency's financial center in Indianapolis. When the supervisor was queried for examples of policy interpretation conducted by the appellant, he stated that the appellant ensures that due dates are met for responding to requests from the SAIC office and that she researches agency policies on a specific issue and provides the information to the staff. Based on its program responsibility, any clarification of policy comes from the SAIC office. The appellant's position does not meet the breadth of responsibility that is fully required at Level 2-4.

Level 2-3 is credited (275 points).

Factor 3, Guidelines

This factor covers the nature of guidelines and the judgment needed to apply them.

Level 3-3 guidelines described by the standard are the same as those described at Level 3-2 but because of the complexity of the assignments, they lack specificity, frequently change, or are not completely applicable to the work requirements, circumstances, or problems. As a result, the employee may have to rely on experienced judgment, rather than guides, to fill in gaps, identify sources of information, and make working assumptions about what transpired. The employee analyzes the results of applying guidelines and recommends changes. These changes may include suggestions for specific changes to the guidelines, development of control mechanisms, additional training for employees, or specific guidance related to handling of documents and information.

In performance of her responsibilities, the appellant uses guidelines for account codes and program element codes and procedures for obtaining, transferring, and distributing funds. Most of the guidelines are fairly easy to interpret; however, the appellant is required to use judgment to fit special circumstances not covered by guidelines or precedents. The appellant is required to apply a thorough understanding of procedures for the formulation and/or execution of budgets when interpreting and applying guides. Although guidelines used by the appellant may have gaps in specificity, for the most part they are applicable to the work she performs. The appellant's position matches Level 3-3 of the standard.

The appellant's position does not meet Level 3-4 of the Primary Standard. At this level, administrative policies and precedents are stated only in general terms, and guidance is scarce and of limited use. Initiative and resourcefulness are used in deviating from traditional methods or researching trends and patterns to develop new methods, criteria, or propose new policies. Because of the uniqueness of the staff, the appellant may make recommendations to the supervisor on funds that may be adapted for use elsewhere but such recommendations are not of a policy-setting nature. When asked for examples where the appellant developed methodology or proposed policy, the supervisor stated that the appellant established work schedules and duty rosters and recommended more training for the staff. The MPO stated that the appellant would not propose any new policies; the issuance of policy comes from the agency's financial center.

Consequently, we find no evidence where the appellant's position researches trends to develop new methods or propose new policies.

Level 3-3 is assigned (275 points).

Factor 4, Complexity

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

At Level 4-3, the work involves performing various accounting, budget, or financial management support related duties or assignments that use different and unrelated processes, procedures, or methods. The use of different procedures may result because transactions are not completely standardized; deadlines are continually changing; functions assigned are relatively broad and varied; or transactions are interrelated with other systems and require extensive coordination with other personnel. The employee at this level determines what needs to be done based on the nature of the problem or issue to be solved. The employee considers different sources of information (oral and written) and reviews regulations and manuals. Previous actions are considered to understand how they differ from or compare to current issues or problems before deciding on an approach. Actions, recommendations, or financial determinations are based on a case-by-case review of the pertinent regulations, documents, or issues involved in each assignment or situation. For example, employees use different established procedures to review and reconcile various financial documents and records; resolve a variety of problems through coordination with vendors, employees, or taxpayers; and review and reconcile various types of transactions involving multiple funds or a number of different control accounts, or numerous modifications to contracts.

The appellant's position fully meets Level 4-3 in that the appellant works with appropriations that are subject to different rules, regulations, and procedures. The uniqueness of the staff contributes to the diversity in the type of accounts or contracts monitored by the appellant. Accounts include supplies, equipment, operations, and vehicle fleet maintenance. Scheduled replacements and associated costs are taken into account by the appellant when developing short- and long-range funding requirements and when tracking accounts throughout the budget execution cycle. The appellant extracts and arranges budgetary data from a wide variety of forms and records based on the purpose of the final product. She uses automated budgetary systems and computer-generated products to gather and consolidate information from historical data. These sources are used to prepare reports and provide input for the budget through submission of forecasting requirements. She provides funding levels and other budget information to the supervisor for review and prioritization. The appellant determines net funds available, current needs, and projected needs before making a recommendation for prioritizing needs, transferring funds, or requesting a variance. She considers the variables in account requirements or when looking for alternative funding sources.

Level 4-4 is distinguished from Level 4-3 by (1) more variety and complexity of examinations, transactions, or systems involved; (2) the nature and variety of problems encountered and

resolved; and (3) the nature of independent decisions made by the employee. Typically, the work at Level 4-4 is characterized by an employee who analyzes and tests a variety of established techniques and methods for use by others. The work involves application of many different and unrelated processes and methods relating to examination or analysis of complex and unusual transactions requiring substantial research and a thorough understanding of a wide variety of transactions and accounts. Decisions regarding what needs to be done include assessing unusual circumstances or conditions; interpreting considerable data to identify problems; and dealing with incomplete, unreliable, or conflicting data. The work requires making decisions, devising solutions, and taking actions based on program knowledge.

The appellant's work does not meet the full intent of Level 4-4. Although the appellant's budget formulation and administration duties require consideration of variables and relationships in accounts and accounting transactions, the work does not entail unreliable or conflicting data and broad program considerations as envisioned at Level 4-4. While the appellant makes independent decisions and uses judgment, her activities are guided by timeframes, budget reports, plans, and schedules that have been predefined and established. The appellant may develop alternative methods that are used elsewhere, but these occurrences are more isolated and less complex than those described at Level 4-4. Further, the interpretation, testing, and analysis expected at Level 4-4 exceed the appealed position.

Level 4-3 is credited (150 points).

Factor 5, Scope and effect

This factor covers the relationship between the nature of the work in terms of the purpose and the effect of work products or services both within and outside the organization.

At Level 5-3, the purpose of the work is to apply conventional practices to treat a variety of problems in accounting, budget, or financial management transactions. For example, issues might be the result of a need for more information about a specific transaction or more efficient processing procedures or more rapid expedition of cases. The employee treats these or similar problems in accordance with established procedures. The work affects the quality, quantity, and accuracy of the organization's records, program operations, and service to clients. For example, the work affects the overall general ledger, its basic design and the adequacy of the overall operation of the accounting system and various operating programs, the amount and timely availability of money allocated for services; economic well-being of serviced employees; or compliance with legal and regulatory requirements.

The appellant's position meets Level 5-3. The appellant is responsible for the overall review, coordination, and consolidation of budgetary activities for the RAIC office. The purpose of the appellant's work is to use standardized procedures and practices to organize and maintain an extensive system of budgetary information relating to accounts, appropriations, funding requirements, and reporting requirements. If left unresolved, procedural problems encountered by the appellant could adversely reflect on the RAIC office and affect submissions to the SAIC office and higher levels. Further, the appellant's work could affect the accuracy of agency records and the timely distribution of allotments of funds to the RAIC office or submission of

budget estimates covering annual operating expenses for the RAIC office. The appellant's position is comparable to the examples provided in the standard for Level 5-3.

Level 5-4 of the Primary Standard is not met. The appellant's work does not involve establishing criteria; formulating projects; assessing program effectiveness; or investigating or analyzing a variety of unusual conditions, problems, or questions expected at this level. Rather, the appellant operates within parameters (e.g., timetables, goals) passed down from the SAIC office that affect the budget, programs, and interests of the RAIC office. The appellant's work products do not affect a wide range of agency activities, major activities or industrial concerns, or the operations of other agencies as described at Level 5-4.

Level 5-3 is credited (150 points).

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

These factors cover the relationship between the nature of the work and the effect of the work products or services both within and outside the organization.

Personal contacts include face-to-face and telephone contacts with persons not in the supervisory chain. These contacts are based on what is required to make initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place. Level 2 describes contacts that are with employees within the same agency but outside the immediate organization, such as contacts in other functional areas. At this level, contacts may be with other agency employees who are providing requested information and/or with members of the general public in a moderately structured setting. For example, contacts may be with individuals who are attempting to expedite transactions. Contacts at Level 3 are with members of the general public such as attorneys, contractors, public action groups, or congressional staff members. These contacts must be established each time to determine the nature and extent of information that can be released.

The appellant's primary contacts include RAIC staff, SAIC administrative personnel, and other administrative personnel involved in logistics, procurement, and vehicle maintenance matters. Because of the appellant's involvement in procurements and contracted services, she also deals with private contractors. These contacts are similar to those described at Level 2. The appellant's contacts do not fully meet Level 3 where contacts are with individuals from outside the agency who represent the budget and program interests of other Federal agencies, contractors, or congressional staff members.

The purpose of contacts may range from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives. The appealed position matches Level b where contacts are made to plan and coordinate actions to correct or prevent errors, delays, or other complications occurring during the transaction cycle. At this level, the purpose may be to obtain customer cooperation in submitting paperwork or other information, to request correction of documentation or data entry errors, or to assist others in locating information. Similarly, the appellant's contacts are for the purpose of coordinating the timely submission of information needed to compile budget submission and programming

documents and to provide advice and assistance on budgetary data to others within the RAIC office and to the SAIC office. The purpose of the appellant's contacts does not exceed Level b. That is, the appellant is not required to use persuasion to obtain information or take corrective action in situations described at Level c where individuals are skeptical, uncooperative, or threatening.

Level 2b is credited (75 Points).

Factor 8, Physical demands

This factor covers the requirements and physical demands placed on the employee by the work assignment. The appellant's work is primarily sedentary and requires no special physical ability. This matches Level 8-1 where work is sedentary and no special physical effort or ability is required to perform the work.

Level 8-1 is credited (5 points).

Factor 9, Work environment

This factor covers the requirements of physical demands placed on the employee by the work assignment. The appellant performs work in an office environment with no unusual risks or discomfort. This is equivalent to Level 9-1 where the work environment includes common risks and discomforts normally found in offices, conference rooms, and similar settings in public buildings.

Level 9-1 is credited (5 points).

Summary

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

Factor	Level	Points
1. Knowledge required by the position	1-4	550
2. Supervisory controls	2-3	275
3. Guidelines	3-3	275
4. Complexity	4-3	150
5. Scope and effect	5-3	150
6. and 7. Personal contacts and Purpose of contacts	2b	75
8. Physical demands	8-1	5
9. Work environment	9-1	5
Total points		1,485

The point total for the nine factors is 1,485. By comparison to the standard's grade conversion table, this total converts to the GS-7 grade level (point range of 1355 - 1600).

Evaluation using the Grade Level Guide for Clerical and Assistance Work

The Guide uses two factors to grade positions: (1) Nature of assignment and (2) Level of responsibility.

Nature of assignment

At the GS-7 level, which is the highest level for this factor described in the guide, the work consists of specialized duties with continuing responsibility for projects, questions, or problems that arise within an area of a program as defined by management. Assignments involve a wide variety of problems or situations common to the segment of the program or function for which the employee is responsible. Each assignment typically consists of a series of related actions or decisions prior to final completion. Decisions or recommendations are based on the development and evaluation of information that comes from various sources. The work involves identifying and studying factors or conditions and determining their interrelationships as appropriate to the defined area of work. The employee must be concerned about taking or recommending actions that are consistent with the objectives and requirements of the program. This work requires knowledge and skill to recognize the dimensions of the problems involved, collect the necessary information, establish the facts, and take or recommend action based upon application or interpretation of established guidelines. This work also requires practical knowledge, developed through increasingly difficult, on-the-job experience dealing with the operations, regulations, principles, and peculiarities of the assigned program, function, or activity.

As at the GS-7 level, the appellant performs specialized duties involving personnel, logistics, and miscellaneous management assistance activities. Similar to the GS-7 level, her assignments involve a series of related actions encompassing a wide variety of problems or situations, which require development, identification, and evaluation of information from various sources. The appellant recommends or initiates actions that are consistent with the objectives and requirements of the program. Illustrative assignments include gathering factual evidence of administrative waste and abuse and noncompliance of agency regulations, developing sole source justifications for procurement requests to the supervisor, serving as the local property officer and the self-inspection coordinator, and participating in the agency's initiatives toward excellence. She developed the RAIC office's plan in preparation for emergency measures, which was more complex due to the RAIC office's physical location on an island. She has also assisted in three office moves, coordinating telephone service requirements and securing computer lines and alarm systems while adhering to the specific requirements of the [location] Historical Foundation. Similar to the GS-7 level, the preceding assignments require practical knowledge and on-the-job experience dealing with the operations, regulations, principles, and peculiarities of the assigned program and functions. The appellant has acquired this practical knowledge through many years of experience with her assigned programs. The position fully meets but does not exceed the GS-7 level.

GS-7 is credited.

Level of responsibility

At the GS-7 level, which is the highest level for this factor described in the standard, the supervisor makes assignments in terms of objectives, priorities, and deadlines. The assignments are completed independently in accordance with accepted practices with the employee resolving most conflicts that arise. Completed work is evaluated for appropriateness and conformance to policy. Guidelines at this level are complex because a wider variety of problems and situations are encountered that require choosing alternative responses. Guides such as regulations and policy statements tend to be general and descriptive of intent, but they do not specifically cover all aspects of the assignments. These guidelines apply more to the operational characteristics and procedural requirements of the program or function rather than specific actions. Employees use significant judgment and interpretation in applying guides to specific cases and adapt or improvise procedures to accommodate unusual situations. At this level, the employee serves as a central point of contact to provide authoritative explanations of requirements, regulations, and procedures and to resolve operational problems affecting assigned areas.

The appellant has many years of experience in this position. Consequently, although the supervisor may outline the overall objectives of assignments, the appellant knows what the objectives, priorities, and deadlines are and operates independently. Like the GS-7 level, the appellant's completed work is evaluated on her ability to meet program objectives and comply with policies and directives. Guidelines used are complex in that there are many in number, some of which overlap. They also differ for the different programs. Thus, the appellant uses judgment in interpreting, adapting, and applying guides to research problems and resolve problems within the RAIC office in [location]. Similar to the GS-7 level, the appellant is the central point of contact for the Customs Automated Travel System, for all personnel-related items for the RAIC office including workers compensation cases and payroll problems, and for all office equipment maintenance and repair. She is the in-house expert on the policies, directives, guides, and instructions for these programs. Her supervisor depends on her to resolve issues and problems within her programs with little or no assistance. The appellant keeps the supervisor, the MPO, and the staff apprised of any controversial issues and/or situations. The position fully meets but does not exceed the GS-7 level.

GS-7 is credited.

Decision

Using both the JFS for Clerical and Technical Accounting and Budget Work and the Grade Evaluation Guide for Clerical and Assistance Work, an overall assessment of the position results in a grade of GS-7. The appellant's position is properly classified as GS-303-7 with the title at the agency's discretion.