

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

Philadelphia Field Services Group  
600 Arch Street, Room 3400  
Philadelphia, PA 19106-1596

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

**Appellants:** [appellant's name]

**Agency classification:** Production Clerk  
GS-303-5

**Organization:** [name] Division  
[name] Munitions Center  
[name] Army Ammunition Activity  
U.S. Army Munitions and Armament  
Command  
Department of the Army  
[name] Army Depot  
[location]

**OPM decision:** (titling at the discretion of the agency)  
GS-1101-5

**OPM decision number:** C-1101-05-03

/s/ Robert D. Hendler

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Robert D. Hendler  
Classification Appeals Officer

March 31, 2003

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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).

Since this decision changes the classification of the appealed position, it is to be effective no later than the beginning of the fourth pay period after the date of this decision (5 CFR 511.702). The servicing personnel office must submit a compliance report containing the corrected position description (PD) and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

### **Decision sent to:**

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

[representative's name]  
President, [union]  
[name] Army Depot  
[address]  
[location]

Deputy Assistant Secretary  
Civilian Personnel Policy/  
Civilian Personnel Director for Army  
Department of the Army  
Room 23681, Pentagon  
Washington, DC 20310-0300

Director, U.S. Army Civilian Personnel  
Evaluation Agency  
Department of the Army  
Crystal Mall 4, Suite 918  
1941 Jefferson Davis Highway  
Arlington, VA 22202-4508

Chief, Classification Appeals  
Adjudication Section  
Department of Defense  
Civilian Personnel Management Service  
1400 Key Boulevard, Suite B-200  
Arlington, VA 22209-5144

Chief, Position Management and  
Classification Branch  
Office of the Assistant Secretary  
Manpower and Reserve Affairs  
Department of the Army  
Attn.: SAMR-CPP-MP  
Hoffman Building II  
200 Stovall Street, Suite 5N35  
Alexandria, VA 22332-0340

Chief, Division 2  
Northeast Civilian Operations Center  
Department of the Army  
Office of the Assistant Secretary  
Manpower and Reserve Affairs  
314 Johnson Avenue  
Aberdeen Proving Ground, MD 21005-5283

## **Introduction**

On December 2, 2002, the Philadelphia Oversight Division, now the Philadelphia Field Services Group, of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant's name]. His position is currently classified as Production Clerk, GS-303-5. He believes the classification should be either GS-343-7 or GS-1150-7. We received the agency administrative report on January 3, 2003, the appellant's representative's comments on the report on January 27, and additional written information from the appellant on March 21. The appellant works in the [name] Division, [name] Munitions Center ([acronym]), [name] Army Ammunition Activity, U.S. Army Munitions and Armament Command, Department of the Army, [name] Army Depot, [location]. We accepted and decided this appeal under section 5112(b) of title 5, United States Code (U.S.C.).

## **General issues**

In his November 26, 2002, appeal letter, the appellant takes issue with how his agency analyzed his PD #[number]. In her January 21, 2003, letter commenting on the agency's administrative report, the appellant's representative questioned the process that the agency used in preparing its evaluation statement of the appellant's PD. As part of our March 21 telephone audit, the appellant faxed additional written comments on the classification of his position. He pointed to his work accuracy, diligence, and the quality of his teamwork. The appellant stated that he could not qualify for higher graded positions in his organization even though he believes that he performs nearly identical work. He said that his work mirrors the work performed by Production Assistant, GS-1101-8, positions in his activity.

These statements raise procedural issues that must be addressed. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM PCS's and guidelines (5 U.S.C. 5106, 5107, and 5112). Other methods or factors of evaluation are not authorized for use in determining the classification of a position, e.g., comparisons to the duties and responsibilities of other positions that may or may not be classified correctly. The quantity and quality of work are not germane to the position classification process. They are issues covered by the performance management and recognition systems.

Like OPM, the appellant's agency must classify positions based on comparison to OPM PCS's and guidelines. Section 511.612 of title 5 of the CFR, requires that agencies review their own classification decisions for identical, similar, or related positions to ensure consistency with OPM certificates. Thus, the agency has the primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellant believes that his position is classified inconsistently with others, he may pursue this matter by writing to his agency headquarters human resources office. In so doing, he should specify the precise organizational location, series, title, grade, duties, and responsibilities of the positions in question. The agency should explain to him the differences between his position and the others, or grade those positions in accordance with this appeal decision.

A PD is the official record of the major duties and responsibilities assigned to a position or job 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. Classification appeal regulations permit OPM to

investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities currently assigned by management and performed by the employee. An OPM appeal decision classifies a real operating position, and not simply the PD. This decision is based on the work currently assigned to and performed by the appellant and sets aside any previous agency decision. Therefore, the classification practices used by the appellant's agency in classifying his position are not germane to the classification appeal process.

### **Position information**

The appellant certified on November 26, 2002, and his immediate supervisor certified on November 18 that the appellant's PD of record is current and accurate. Based on our March 21, 2003, telephone audit of the position with the appellant and our March 25 interview with the supervisor, we find that the PD of record contains the major duties and responsibilities assigned to and performed by the appellant. The PD implies that the appellant performs analytical work of substantial depth. For example, the PD states that the appellant analyzes feeder information and records to locate trends in operation, e.g., studying long-term operating trends to isolate potential problem areas in industrial planning and operations. However, our fact-finding shows that the appellant reviews data to identify short-term reporting issues, e.g., mismatches between the hours of labor charged for the units produced which involves limited analysis.

The appellant supports work control and tracking functions involved in the planning, scheduling, and control of the receipt, issue, storage, maintenance, demilitarization, packaging, and preservation of ammunition at [acronym]. These functions are performed on a reimbursable basis under the Army Working Capital Fund. The operating divisions of the [acronym] provide cost estimates to customers. Upon approval, the responsible [acronym] Ammunition Analyst receives the funding in the form of a Procurement Request Order Number (PRON). The Ammunition Analyst then establishes a Production Control Number (PCN) against which direct labor costs are charged and creates an Ammunition Field Instruction (AFI) which is issued to the [acronym] operating division and is used to feed back charges. Operating division timekeepers or supervisors input labor charges through the automated time and attendance system. The [acronym] typically has 100 PRON's open at any time and more than half of them are usually active.

The appellant is primarily responsible for putting production data into the Standard Depot System (SDS). The SDS automatically feeds the Army Workload and Performance System (AWPS) which links planning, time keeping, payroll, and scheduling system data. The appellant tracks document input and system reports to prevent and/or resolve errors. He reviews AWPS for discrepancies, performs IBC3W inquiries to trace overages in hours and errors in reporting, and uses BC4V dimes transaction registers to verify hours by individual. He compares monthly production totals with the operating divisions to verify reporting totals reported in the Metric Management Reporting System.

The appellant reviews daily labor production reports for proper pin, hours, and production reported from approximately seven work areas. He uses the PRON Master Lists to verify AFI specifications, quantities, and total program hours. The appellant also maintains a master file of daily production input from the start of a program until completion. When faced with discrepancies, he typically contacts operating division supervisors, work leaders, and production

controllers to resolve them, e.g., the labor hours recorded do not mesh with the number of units typically produced in that number of hours, the hours charged against a PCN are from a work area that does not work on that item, and production exceeds the number of available hours. The PD contains more information about his duties and responsibilities and how they are performed and is incorporated by reference into this decision.

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

The agency has placed the appellant's position in the Miscellaneous Clerk and Assistance Series, GS-303, titled it Production Clerk, and used the Grade Level Guide for Clerical and Assistance Work (Guide) for grade level analysis. The appellant believes that his position is two-grade interval in nature, that it is covered by either the GS-343 Management and Program Analysis Series or the GS-1150 Industrial Specialist Series, and that the Factor Evaluation System (FES) should be applied to evaluate his position as prescribed by the *Classifier's Handbook* and the *Introduction to the PCS's*.

The duties and responsibilities assigned to a position flow from the mission assigned to the organization in which the position is located. The positions created to perform the assigned mission must be considered in relation to one another. The appellant is not delegated authority or responsibility for performing two-grade interval analytical work. Other positions in the Division, including the Ammunition Analysts and Production Controllers whom the appellant supports, perform these duties, e.g., determining the requirements for supplies, facilities, manpower, and funds to maintain, demilitarize, package, and preserve ammunition. Therefore, the appellant's position may not be placed in the two-grade interval occupations identified in his appeal rationale.

Based on our fact-finding and review of the record, we find that the appellant performs clerical production documents processing and support work. He assures that the records used by staff members to manage [acronym] reimbursable operations are internally consistent and provide management with the information that they need to ensure that funds are charged and accounted for properly. Based on his familiarity with the nature of [acronym] industrial operations and control processes, he must recognize when documents are inconsistent, as previously discussed. The appellant uses standard data inquiries to obtain information used by higher graded staff members to analyze production and cost issues, e.g., alerting the responsible Ammunition Analyst when PRON funds are running low, extracting indirect labor charges or other charges for specific PRON's, and displaying costs on spreadsheets by month or other requested timeframe.

The GS-303 series excludes positions that cannot be identified with a specialized series, but are covered by another occupational group that has a general or miscellaneous series. The appellant performs industrial production support work requiring specialized knowledge of Army Working Capital Fund production tracking and reporting processes and techniques to assist positions primarily engaged in General Business and Industry Group, GS-1100 functions, i.e., managing the industrial maintenance, overhaul, repair and demilitarization of munitions. The General Business and Industry Series, GS-1101, covers this work since it includes positions, like the appellant's, that perform work properly classified in the GS-1100 Group for which there is no

established series. Because the GS-1101 series does not have published titles, the agency may construct a descriptive title using the titling practices in the *Introduction to the PCS's*.

The *Introduction to the PCS's* and the *Classifier's Handbook* do not require that all PD's be written in FES format or that they be evaluated by FES standards. Chapter 3 of the *Classifier's Handbook* states that PD's are written in one of two basic formats: narrative or FES. Narrative descriptions are most often used when classification standard(s) covering the work are written in narrative. FES format should be used when the grade of the position is determined by application of an FES standard. The appellant's work is properly evaluated by application of the Guide which is written in narrative format. The Guide provides general criteria for use in determining the grade level of nonsupervisory clerical and assistance work. Administrative support of the kind described in the Guide is performed in offices, shops, laboratories, hospitals, and numerous other settings in all Federal agencies.

### **Grade determination**

The Guide describes the general characteristics of each grade level from GS-1 through GS-7 and uses two criteria for grading purposes: *Nature of assignment* (which includes the knowledge required and complexity of the work) and *Level of responsibility* (which includes supervisory controls, guidelines, and contacts). The appellant's rationale is written in FES format without identifying the standard used. We will consider the information provided only insofar as it addresses the criteria contained in the Guide.

#### *Nature of assignment*

As at the GS-5 grade level, the appellant performs a full range of standard and nonstandard clerical assignments and resolves a variety of nonrecurring reporting problems. He receives a variety of assignments that involve different and unrelated steps, processes, or methods, e.g., extracting system reports for various types of information and timeframes; deciding when to contact operating division personnel on questionable production data; reconciling labor, time, and attendance data; and monitoring indirect charges and overtime hours expended for their impact on funds available. The appellant assures that production data submitted agrees with specific AFI requirements and that PRON's are opened and closed properly. As at the GS-5 grade level, he must identify and understand the issues involved in each assignment and determine what steps and procedures are necessary and the order of their performance. Based on his knowledge of the production control and related business reporting systems, he resolves most issues on his own, e.g., substantial labor charges against a project for a timeframe in which little production is reported. He refers issues that he cannot resolve to the responsible Ammunition Analyst or his supervisor.

Characteristic of the GS-5 grade level, each transaction typically involves selecting a course of action from a number of possibilities. For example, the appellant determines when report data is better displayed using an automated spreadsheet. Based on his knowledge of PCN specifics, he tracks all specific [acronym] functions for which charges can be made including shipping, receiving, re-warehousing, transportation, inventory, renovation, demilitarization, testing and assembly of guided missiles, and ammunition surveillance. Typical of the GS-5 grade level, the work requires extensive knowledge of an organization's rules, procedures, operations, or

business practices to perform the more complex, interrelated, or one-of-a kind clerical processing procedures, e.g., determining which data is pertinent to a report request and deciding on the most effective way to display the extracted data for production meetings and PRON reviews.

The appellant's work does not meet the GS-6 grade level. He does not process a wide variety of transactions for more than one type of assigned activity or functional specialization. While the [acronym] usually has more than 50 active PRON's, the appellant's program support work is a single functional specialization; i.e., supporting Army Working Capital production and labor management. The work is covered by a basic set of processes and procedures, including related SDS, AFI, AWPS data input, query, and reporting procedures. In contrast, GS-6 grade level assignments typically consist of wide variety of transactions for more than one type of assigned activity or functional specialization that are subject to different sets of rules, regulations, and procedures. The appellant's identifying and resolving of data discrepancies; running of data inquiries to identify and back out erroneous charges; compiling of charges for labor, overtime, and for such services as shipping and receiving; and compiling historical information for others to use in estimating future workload requirements are all part of the labor and production program management process and do not constitute other functional specializations within the meaning of the Guide.

Unlike the GS-6 grade level where deciding on a course of action has a substantive impact on the outcome of the work, the appellant's assignments affect [acronym] procedural issues, e.g., assuring that labor and production are charged against the proper PRON. While the appellant's work requires comprehensive knowledge of processes, procedures, and other guidelines relating to completing assignments in the assigned program similar to the GS-6 grade level, his duties do not involve the increasingly difficult complicated transactions intended to credit that grade level. The appellant's data tracking and reporting actions are repetitive in terms of the processes and procedures to be applied and problems to be handled. His decisions are based on information readily available such as forms, records, and instructions for data system entry, inquiry, and report extraction processes. His program duties, e.g., tracking AFI status and charges, including program status reports, are for the purpose of assuring that [acronym] records meet established program requirements. Therefore, this factor is credited at the GS-5 grade level.

#### *Level of responsibility*

As at the GS-5 grade level, the appellant's supervisor assigns work by defining objectives, priorities, and deadlines and provides guidance on assignments which do not have clear precedents, e.g., identifying the types of information needed for special reports. Typical of this level, his work is reviewed for compliance with instructions and practices, e.g., whether report spreadsheets contain the necessary information. While the appellant is viewed as the activity authority on the data systems that he uses and the reports that he produces typical of the GS-6 grade level, the work is covered by extensive guides in the form of established processes, procedures, system manuals, and precedents typical of the GS-5 grade level. As at the GS-5 grade level, the number and similarity of guidelines and work situations require the appellant to use judgment in locating and selecting the most appropriate guidelines for application and adapting them according to circumstances of the specific case or transaction. For example, based on his familiarity with [acronym] operations, AFI content, and labor/production charging procedures and practices, the appellant reviews production and labor reports typically for more



than 50 active PRON's with varying conditions to assure that the data reported is consistent and can be reconciled.

Typical of the GS-5 grade level, procedural problems may arise that require interpreting and adapting established guides. For example, he must decide whether the number of units reported against an AFI mesh with labor report information, whether operating division staff input reflects that they are charging properly to indirect codes, and whether production reports show that projects can be completed within authorized funding. As at the GS-5 grade level, the appellant's supervisor is available for guidance if existing guidelines and practices do not cover the situation. Typical of this grade level, his contacts with a variety of people are to receive or provide information relating to the work or to resolve problems in connection with recurring responsibilities, e.g., data accuracy problems. As discussed previously, the appellant also does not work within the complicated framework of established procedures and guidelines found at the GS-6 grade level where there often are no clear precedents and where guidelines are conflicting or unusable. Unlike the GS-6 grade level, his contacts do not entail resolving transactions or issues with these same complicating characteristics. Therefore, this factor is credited at the GS-5 grade level.

Since both factors are evaluated at the GS-5 grade level, the work covered by the Guide is credited at the GS-5 grade level.

### **Decision**

The appellant's position is properly classified as GS-1101-5, with titling at the discretion of the agency.