

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

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

**Agency classification:** Program Support Assistant  
(Office Automation)  
GS-303-6

**Organization:** Behavioral Medicine Service  
[name] Veterans  
Affairs Medical Center  
Veterans Health Administration  
U.S. Department of Veterans Affairs  
[city and state]

**OPM decision:** GS-303-6  
Title to be determined by agency  
(to include Office Automation)

**OPM decision number:** C-0303-06-14

Ana A. Mazzi for

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Robert D. Hendler  
Classification and Pay Claims  
Program Manager  
Merit System Audit and Compliance

7/13/2010

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Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a certificate which 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 (Introduction)*, appendix 4, Section G (address provided in appendix 4, section H).

As discussed in this decision, the appellant's position description (PD) of record must be revised to meet the PD standard of adequacy in the *Introduction*. The revised PD must be submitted to the U.S. Office of Personnel Management office that accepted this appeal within 30 calendar days of the date of this decision.

**Decision sent to:**

[appellant's name and address]

[servicing HR office name and address]

[servicing HR office name and address]

Director  
Compensation and Classification Service (055)  
Office of Human Resources Management  
U.S. Department of Veterans Affairs  
810 Vermont Avenue, NW, Room 240  
Washington, DC 20420

## **Introduction**

The Dallas Oversight of the U.S. Office of Personnel Management (OPM) accepted a classification appeal on January 15, 2010, from [name]. The appellant's position is currently classified as Program Support Assistant (Office Automation (OA)), GS-303-6, but she believes it should be classified at the GS-7 grade level. The position is located in the Behavioral Medicine Service (BMS), [name] Veterans Affairs Medical Center, Veterans Health Administration, U.S. Department of Veterans Affairs (VA), in [city and state]. We received the complete agency's administrative report on May 17, 2010. We have accepted and decided this appeal under section 5112 of title 5, United States Code.

## **Position information**

The appellant performs a range of clerical and assistance tasks in support of the BMS Chief and his staff. The official position description (PD), number [number], assigns the major duties to the following areas: administration and reports, acquisition management and budget, public affairs and communication, training, personnel, and automated data processing application (ADPA) and computer access. The appellant estimates she spends about 70 percent of her time on administration and reports with the remaining duties occupying about 30 percent of her time. A summary of the appellant's duties follows.

Administration and Reports. The appellant prepares various workload reports (including charts, tables, and spreadsheets) relating to performance measures for providing services to veterans. For example, she collects information regarding the flow of consults at clinics for veterans to determine whether the BMS is meeting established timeframes for scheduling appointments. The appellant reviews data and makes suggestions for improvements (e.g., changes in the appointment process). She also prepares data in different formats for recurring reports concerning performance improvement projects and projects associated with the Joint Commission on Accreditation of Healthcare Organizations (JCAHO).

Other administrative duties include scheduling appointments for her supervisor, coordinating staff and committee meetings, assisting in preparation of agenda and handout material, recording minutes of meetings, arranging for meeting space, and notifying BMS supervisors about decisions that will affect them. Duties relating to correspondence include drafting replies to general inquiries, reviewing correspondence for accuracy and completeness (grammar, punctuation, and format), gathering background information for replies to correspondence and preparation of reports, and distributing mail appropriately. The appellant may assist her immediate supervisor (Chief of the BMS) or the Administrative Officer (GS-341-12 position) in preparation of standard operating procedures and review of policy, which may result in issuance of an update of a Medical Center Memorandum or drafting a new Memorandum. To perform the administrative duties, the appellant uses OA technology such as word processing, spreadsheets, electronic calendars, desktop publishing, graphics, and electronic mail.

Acquisition Management and Budget. The appellant requests purchase orders (e.g., purchase of books and white noise machines), assists in compiling equipment cost comparisons, reconciles invoices, handles invoices for the compensated work therapy (CWT) program, and tracks funds

for the CWT payroll. She assists with fund control management and keeps track of equipment (e.g., computers, facsimile machines, and copy machines) and maintenance contracts used by BMS employees. The appellant's supervisor or other appropriate management official approves purchases.

Public Affairs and Communication. The appellant ensures procedures and policies, such as the 14-day timeframe for scheduling appointments, are communicated to staff throughout the BMS and other services as appropriate. As needed, she talks with veterans or family members regarding appointments, complaints, or other issues and may resolve their concerns based on parameters established by the supervisor or agency policy. For example, the appellant may explain VA regulations and policies to the veterans or their families.

Training. The appellant provides information to staff members regarding educational opportunities available through the VA's Learning Management System. Upon completion of the training, she enters appropriate information into the agency's automated database for tracking training. The appellant uses the database to monitor completion of mandatory training and to extract data for preparation of periodic reports.

Personnel. As BMS's timekeeper, the appellant posts data in the VA's time and attendance system, resolves discrepancies, and ensures all forms are complete and filed appropriately. She also tracks compensatory time and overtime. The appellant informs staff about personnel policies and procedures, assists in preparation of competencies and performance standards, reviews documents for the credentialing and privileging program, and notifies employees of renewal dates for licensure.

ADPA and Computer Access. The appellant ensures employees sign an Information Security Agreement and submits the forms to the Information Resources Management (IRM) Service and notifies IRM when privileges need to be rescinded. She briefs new personnel on protection of sensitive data and monitors compliance with policies and procedures. The appellant performs minor troubleshooting of hardware or software problems and contacts IRM as needed.

The appellant and her immediate supervisor certified to the currency and accuracy of the appellant's PD. Nevertheless, the PD includes a knowledge requirement not supportable either by the duties described in the record or information obtained during the telephone interviews, i.e., expert knowledge of qualitative and quantitative techniques for analyzing and measuring the effectiveness, efficiency, and productivity of various mental health programs. The requirement for knowledge of these techniques and the responsibility for analyzing the programs are included in the PD for the Administrative Officer, who also reports directly to the Chief of the BMS. The appellant's analyses of problems and data are not so substantive as to require expert knowledge of qualitative and quantitative techniques. We find the PD of record covers the major duties assigned to and performed by the appellant. However, because PDs must meet the minimum standard of adequacy as described in the *Introduction* and *The Classifier's Handbook*, the appellant's PD must be updated so that there is a clear understanding of the duties and responsibilities that represent the approved classification. Regardless, an OPM decision classifies a real operating position and not simply a PD. We have decided this appeal based on an assessment of the actual work assigned to and performed by the appellant.

To help decide this appeal, we conducted a telephone audit with the appellant on May 25, 2010, and a telephone interview with her immediate supervisor on May 27, 2010. In deciding this appeal, we fully considered the interview findings and all information of record provided by the appellant and her agency, including current work assignments and the PD.

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

The appellant's work time is divided among a variety of functions and activities including office clerical and administrative, OA, purchasing and budget, communications with staff and veterans, personnel, timekeeping, and computer-related support work. Because the appellant's position is assigned responsibility for performing work grouped under several series, we evaluate it in terms of the paramount knowledge required to do the work and the primary purpose for the position's existence to determine its proper series placement.

The agency assigned the appellant's position to the Miscellaneous Clerk and Assistant Series, GS-303. This series includes positions the duties of which are to perform or supervise clerical, assistant, or technician 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 involve application of procedures and practices within the framework of established guidelines. The purpose of the appellant's position is principally to perform specialized clerical and assistance work associated with the operations of the BMS. She performs a number of support functions requiring knowledge of clerical and administrative procedures, instructions, regulations, and directives as they relate to her employing organization. The GS-303 series best represents the position's primary purpose.

Although the appellant's position requires possession of OA skills, the position does not exist primarily to prepare work products for others by using OA skills. Rather, the appellant uses those skills and knowledge to facilitate her own work. We evaluated the appellant's OA duties against the criteria in the Office Automation Grade Evaluation Guide and found those duties are not grade controlling. Since those duties do not affect the position's grade, we will not discuss them further.

No titles are specified for positions in the GS-303 series. The agency may construct a title in accordance with instructions in the *Introduction*. The resultant title should include the parenthetical "Office Automation" or "OA" as the position requires a qualified typist and knowledge of OA to present information in various formats such as charts, tables, and spreadsheets.

The GS-303 series does not contain grade-level criteria, but it instructs using the Grade Level Guide for Clerical and Assistance Work (Guide) when grading positions like the appellant's. Since the appellant estimates that 70 percent of her time is spent on duties related to "administration and reports," the Guide is appropriate to determine the grade level for the appellant's position. None of the other duties constitute at least 25 percent of the appellant's work or require a set of knowledge and skills affecting the grade of the position.

## **Grade determination**

The Guide provides general criteria to use in determining the grade level of nonsupervisory clerical and assistance work being performed in offices, shops, laboratories, hospitals, and other settings in Federal agencies. The Guide describes the general characteristics of each grade level from GS-1 through GS-7 and uses the two following criteria for grading purposes: *Nature of Assignment* (which includes knowledge required and complexity of the work) and *Level of Responsibility* (which includes supervisory controls, guidelines, and contacts).

### *Nature of Assignment*

At the GS-6 level, work typically requires considerable evaluative judgment within well-defined, commonly occurring aspects of an administrative program or function. The work may involve responsibility for a stream of products or continuing processes based on direct application of established policies, practices, and criteria. Assignments involve a relatively narrow range of case situations occurring in a broad administrative program or function. Work typically involves identifying issues, problems, or conditions and seeking alternative solutions based on evaluation of the intent of applicable rules, regulations, and procedures. The employee usually deals with problems or situations that remain stable and resemble past problems or situations. Assignments often involve problems or situations where there is not one absolutely correct solution, only a best or most appropriate one. The work requires practical knowledge of guidelines and precedent case actions relating to a particular program area equal to that acquired through considerable work experience or specialized training. The work also requires skill to recognize the dimensions of a problem and express ideas in writing.

At the GS-7 level, work consists of specialized duties with continuing responsibilities for projects, questions, or problems arising within an area of a program or functional specialty. Assignments consist of a series of related actions or decisions prior to final completion, and the decisions or recommendations are based on the development and evaluation of information from various sources. The work involves identifying and studying factors or conditions and determining their interrelationships as appropriate to the defined area of work. 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. The work requires practical knowledge, learned through on-the-job training and experience, to deal with the operations, regulations, principles, and peculiarities of the assigned program, function, or activity.

The appellant's position is comparable to the GS-6 level. Within boundaries set by the supervisor, the appellant collects information and compiles data and prepares a variety of reports relating to the BMS's performance measures, performance improvement projects, and JCAHO projects. As at the GS-6 level, she identifies issues or problems and recommends changes (e.g., to the appointment process so as to ensure scheduling within established timeframes), looking for options based on a practical knowledge of the VA regulations, policies, and guidelines and on situations previously encountered. Typical of this grade level, the appellant's work often involves problems or situations where there is not one absolutely correct solution, only a best or most appropriate one. For example, the appellant decides the best method to (a) capture

information relating to consults for veterans and (b) present results in a format showing whether performance measures (e.g., agency timeframes for scheduling appointments) are met.

In addition, the appellant's purchasing and budget work is similar to illustrations at the GS-6 level, where the employee consolidates funding estimates and prepares required supporting documentation for expenditures such as training, office equipment, and supplies. The appellant's assignments compare favorably with the illustration where the work requires an in-depth practical knowledge of the organization's activities, operations, and established guidelines relating to work measurement functions, statistical reporting and records systems, and the budget process. Further, the work described in the illustration requires skill to compile and summarize information and data, identify inaccuracies or anomalies in the information, and make written recommendations to resolve discrepancies based on interpretation of applicable regulations and procedures. The employee must extract and analyze a considerable volume of information to arrive at an end product. Overall, the appellant's work related to extracting information from various sources (such as local or VA databases) and preparing reports, providing information to staff members and veterans, tracking expenditures, and preparing purchase requests and reconciling invoices fully meets the GS-6 level.

The appellant's position does not meet the GS-7 level. The nature of her assignments does not require the broader program aspects and increasingly difficult transactions described at the GS-7 level. The appellant's assignments associated with (a) obtaining data and information needed for recurring reports, (b) reconciling invoices and timekeeping discrepancies, and (c) purchasing and budget are more repetitive in terms of problems to be handled and regulations and procedures to be applied than work at the GS-7 level. While the appellant makes judgments concerning how to accomplish her work, her assignments are significantly more limited or segmented than those described at the GS-7 level. For example, she has limited involvement in the budget process and is not required to maintain and transfer funds between several unrelated appropriated and revolving fund accounts that are subject to different regulations and procedures as described in an illustration at the GS-7 level. The appellant does not perform a range of technical work requiring a comprehensive knowledge of special and complex subjects as required at the GS-7 level.

This factor is properly evaluated at the GS-6 level.

#### *Level of Responsibility*

At the GS-6 level, the supervisor assists with precedent assignments by providing an interpretation of policy or the concepts and theories of the work. Completed work is evaluated for appropriateness and effectiveness in meeting goals. Assistants work under a framework of numerous and varied guidelines, but these are often not completely applicable to the assignment or have gaps in specificity. Employees at this level use judgment in interpreting and adapting guidelines and base their decisions and recommendations on facts and conventional interpretation of guidelines rather than on theory or opinion. Contacts with others are to provide, receive, or develop information in order to identify problems, needs, or issues, and/or to coordinate work efforts or resolve problems.

At the GS-7 level, the supervisor makes assignments by defining objectives, priorities, and deadlines. Employees work independently, using a general understanding of the expected outcomes and the scope of the assignments, and draw upon experience in resolving the more difficult situations which arise. Completed work is evaluated for appropriateness and conformance to policy. Guides, such as regulations, policy statements, and precedent cases, tend to be general and descriptive of intent, and they do not specifically cover all aspects of the assignments. Guidelines apply less to specific actions and more to the operational characteristics and procedural requirements of the program or function. Although personal contacts for GS-7 employees are often the same as those for GS-6 employees, the GS-7 employees serve as a central point of contact to provide authoritative explanations of requirements, regulations, and procedures and to resolve operational problems or disagreements affecting assigned areas.

The appellant works with the freedom from supervision typical of the GS-6 level. As at this level, her supervisor defines objectives, priorities, and deadlines and provides guidance and instructions with special or precedent assignments. Completed work is evaluated for adequacy, appropriateness, and conformance to established policy. Similar to the GS-6 level, the appellant's guidelines such as VA regulations, policies, instructions, and precedents are often not completely or clearly applicable to the assignment. She uses judgment to adapt guidelines in accordance with established instructions, priorities, commitments, and program goals of the supervisor. Contacts are with VA employees, vendors, veterans, and visitors for the purpose of developing and exchanging information, advising on efforts to resolve problems associated with the administration and operation of the BMS, making recommendations related to the assignment, and arranging meetings.

The appellant's position does not meet the GS-7 level. Although she makes day-to-day decisions on which procedures to use in performing her work, the level of responsibility the appellant exercises does not meet the full intent of the GS-7 level. For instance, the appellant is not required to make significant departures from previously established approaches, and there is a limit to the modifications she may make to accommodate unusual or one-of-a-kind situations. Although the personal contacts for GS-7 employees are often the same as those for GS-6 employees, GS-7 employees serve as a central point of contact to provide authoritative explanations of requirements, regulations, and procedures and to resolve operational problems or disagreements affecting assigned areas. The appellant is the point of contact within the BMS for staff members, various vendors, and others, but her level of visibility and problem-solving responsibility falls short of the GS-7 level's description of providing authoritative explanations and resolving operational problems. Moreover, careful reading of the Guide and other published OPM guidance indicates that for a person's level of responsibility to meet GS-7 criteria, the responsibilities should be exercised within the context of GS-7 assignments. As discussed previously, the appellant's assignments are properly graded at the GS-6 level.

This factor is properly evaluated at the GS-6 level.

### *Summary*

Since both factors are evaluated at the GS-6 level, the position is properly evaluated at the GS-6 level.



**Decision**

The appellant's position is properly classified as GS-303-6. The position title is at the agency's discretion with the parenthetical "Office Automation."