

**U.S. Office of Personnel Management
Classification Appeal Decision
Under section 5112 of title 5, United States Code**

Appellant: [appellant's name]

Agency classification: Associate Professor
(Physician Assistant/
Academic Coordinator)
GS-601-12

Organization: [Branch]
[Department]
[Activity]
U.S. Army Medical Command
[Installation]

OPM decision: GS-603-12
Title to be determined by agency

OPM decision number: C-0603-12-01

/s/ Judith Davis for

Ana A. Mazzi
Deputy Associate Director
Merit System Audit and Compliance

4/29/2011

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).

Since this decision changes the series 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, as permitted by 5 CFR 511.702. The servicing human resources office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted to the Dallas Oversight within 30 days from the effective date of the personnel action.

Decision sent to:

[appellant's name and address]

[name and address of appellant's servicing personnel office]

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Introduction

On November 30, 2010, the Dallas Oversight of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. The appellant's position is currently classified as Associate Professor (Physician Assistant (PA)/Academic Coordinator (AC)), GS-601-12, but he believes his duties should be classified as Supervisory Physician Assistant/Academic Coordinator, GS-603-13. The position is assigned to the [Branch], [Department], [Activity], U.S. Army Medical Command, at [Installation]. We received the agency's administrative report on December 29, 2010. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

Background

The appellant's position is assigned to the [organization], whose mission is to educate and train PAs for the uniformed services of the Army, Air Force, Navy, and Coast Guard. He previously occupied a Training Instructor, GS-1712-12, position within the [organization], but he began performing AC responsibilities at the request of the Program Director, his second-level supervisor, in September 2007.

A position description (PD), drafted specifically to include the additional AC responsibilities, was forwarded to the [organization's] civilian personnel advisory center (CPAC) for classification. At the time, the CPAC was evaluating the classification of all [organization] civilian GS-1712 training instructor positions, including the appellant's, to properly consider the position's combination of knowledge, education, and licensure requirements. On May 14, 2010, the appellant was officially assigned to a PD identifying the additional AC duties, classified in the GS-603 Physician Assistant Series, and graded at the GS-12 level. The appellant and his immediate supervisor requested additional position reviews. On August 15, 2010, the CPAC classified the appellant's position (PD number [number]) to the GS-601 General Health Science Series, graded at the GS-12 level. The appellant then filed an appeal with OPM.

General issues

The appellant's rationale for a higher grade is partly based on the AC duties requiring scheduling and evaluating work performed by the [organization's] civilian and military instructors. He forwarded internal memoranda to OPM describing this and other executive and program management responsibilities performed by the AC. The appellant and immediate supervisor believe a higher grade is needed to perform his AC work since his position, as a civilian employee of the same grade as other civilian instructors, does not accord him with the same level of authority inherent in the military positions (O-5s) previously performing AC responsibilities.

Military assignments are governed by the "rank-in-the-person" concept. In contrast, the General Schedule is a position-based classification system. By law, we must classify the appellant's position solely by comparing his current duties and responsibilities to OPM position classification standards (PCS) 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.

The appellant also states his position warrants a higher grade because he performs the AC work in addition to his instructor duties. Volume of work cannot be considered in determining the grade of a position (*The Classifier's Handbook*, chapter 5). Furthermore, the assigning of additional or different work does not necessarily mean the work is more difficult or complex as to warrant a higher grade. A grade level represents a range of responsibilities and difficulty, where the additional duties may fit within and support the grade level credited to a position. Our evaluation of the appellant's AC work is specifically addressed in the *Grade determination* section of this decision.

Position information

The [organization] is located at the [activity] in [installation], and affiliated with the [a university name]. The program is divided into two phases. In phase one, students completing the 64-weeks of classroom instruction conducted at the [activity] are awarded a Bachelor of Science degree. In phase two, students completing the 55-weeks of clinical training at various military medical treatment facilities are awarded a Master's degree by the [university name].

The [organization] is under the overall administrative and technical leadership of the Program Director, a military position. The [organization] faculty includes the appellant, [number] other GS-601-12 associate professors, and over [number] military instructors from all branches of the armed services. A Senior Service Representative (SSR) is assigned to each branch to represent the service's interest in [organization]-related matters. The appellant's first-level supervisor is the Army SSR.

The appellant's position performs two major responsibilities. He estimates spending 25 to 30 percent on AC duties, and 20 to 25 percent on classroom instruction. His major duties will be discussed in detail later in the decision.

The appellant's remaining percentage of time is spent on other duties including conducting clinical practice; counseling and evaluating students; evaluating the classroom instruction techniques of [organization] faculty; serving on various committees; and functioning as the main point of contact with accrediting bodies and coordinating accreditation activities. None of the duties occupy more than 10 percent of his time, but the accreditation-related work may increase significantly every six years when the [organization] undergoes a re-accreditation process.

The appellant and immediate supervisor certified to the accuracy of the duties described in his official PD. The PD and other material of record furnish much more information about his duties and responsibilities and how they are performed. The PD is adequate for classification purposes and we incorporate it by reference into this decision. To help decide this appeal, we conducted a telephone audit with the appellant on January 28, 2011, and a follow-up conversation with him on April 6, 2011. We also conducted a telephone interview with the immediate supervisor on January 28, 2011. In reaching our classification decision, we carefully considered all of the information gained from these interviews, as well as the written information furnished by the appellant and his agency.

Series and title determination

The appellant disagrees with his agency's assignment of his position to the GS-601 series. The GS-601 series covers positions involving research or other professional and scientific work that is health-oriented in character, when the work is of such generalized or miscellaneous specialized nature that the positions are not more appropriately classifiable in any of the existing series in this or any other group.

In contrast to the GS-601 series, the appellant's position requires the extensive knowledge and skills of a PA certified by the National Commission on Certification of Physician Assistants (NCCPA) to perform his instructor and clinical care work. His position's education and certification requirements, related to that of a PA, are identical to GS-603 positions. The GS-603 series is a professional series (i.e., it has a positive education requirement) that covers positions involving assisting a physician by providing diagnostic and therapeutic medical care and services under the guidance of the physician. Work requires knowledge of specific observation and examination procedures, and ability to perform diagnostic and therapeutic tasks. PAs assist in the examination and observation of patients by performing such duties as taking case inventories, conducting physical examinations, and ordering laboratory studies during hospital rounds and clinic visits.

As a certified PA in a training mission-oriented organization, the primary purpose of the appellant's position is to educate students by preparing them to function as certified PAs. Teaching requires facilitating student understanding and mastering delivery of education in a classroom setting, a knowledge and skill separate and distinct from GS-603 positions. However, the appellant's position does not require professional-level competence in the education field. Evidence for this is found in the [organization's] affiliating agreement with the [university name]. The university established standards for faculty members as a condition of the affiliating agreement (e.g., instructors are required to be NCCPA certified; earned a master's degree; and either possess a graduate education degree or have six years experience teaching at a graduate-level PA program, a medical school, or the equivalent). Consequently, professional-level education skills may facilitate performance of his work but are not actually required.

The appellant's position requires the basic education and certification requirements of GS-603 positions. The GS-603 series imposes a specific qualification requirement serving as the basis for recruitment. Therefore, the professional qualifications for the GS-603 series take precedence over the education-related skills.

The GS-603 series does not have published titles, so the agency may assign a title following the guidance in the *Introduction*.

Standard and grade determination

The GS-603 series does not contain grade-level criteria. As directed by the *Introduction*, an appropriate general classification guide or criteria in a PCS for related work should be used if there are no specific grade-level criteria.

In his initial request to OPM, the appellant states, “The main argument for reclassification and upgrading this PD is that supervisory duties and responsibilities have been assigned without the requisite authority and grade.” He also said his position should be titled Supervisory Physician Assistant/Academic Coordinator. Implicit in the appellant’s rationale is that his position is supervisory because he spends 25 percent of his time supervising [organization] staff and that the General Schedule Supervisory Guide (GSSG) should be used to evaluate the position’s grade level.

To apply the GSSG, a supervisory position must meet all three of the following positions: (1) requires accomplishment of work through combined technical and administrative direction of others; (2) constitutes a major duty occupying at least 25 percent of the position’s time; and (3) meets at least the lowest level of Factor 3 in the GSSG. The appellant said he spends less than 10 percent on supervising [organization] staff, far less than the 25 percent minimum required by the GSSG. The immediate supervisor also confirmed the appellant does not have technical or administrative direction of the [organization] staff, as covered by the GSSG. The appellant observes and evaluates all [organization] instructors, providing feedback on improving teaching methods and techniques. He also provides performance feedback to each of the instructor’s immediate supervisors, but he does not serve as the rating official on any instructor performance evaluations as they are not his subordinate employees. Therefore, we do not find the appellant’s position meets the GSSG’s minimum coverage requirements.

The agency applied the grading criteria in the Primary Standard, the Factor Evaluation System’s (FES) “standard-for-standards” in Appendix 3 of the *Introduction*. The appellant also applied the Primary Standard in his appeal rationale. The *Introduction* specifically prohibits use of the Primary Standard in this manner: “The Primary Standard may not be used alone to classify a position except when evaluating an individual FES factor which falls below the lowest or above the highest factor level described in the applicable FES standard.” Therefore, we will not address the appellant’s rationale further.

The *Introduction* states that if the work assigned to a position is not covered by criteria in a standard for a specific occupational series, classification is to be accomplished by using an appropriate general classification guide or criteria in a standard or standards for related kinds of work. In using other standards, the criteria selected as the basis for comparison should be for a kind of work as similar as possible to the position to be evaluated with respect to: (1) the kind of work processes, functions, or subject matter of work performed, (2) the qualifications required to do the work, (3) the level of difficulty and responsibility, and (4) the combination of classification factors which have the greatest influence on the grade level.

We find the Grade Level Guide for Instructional Work (GLGIW) is appropriate grading criteria for the appellant’s position. The GLGIW describes work, like the appellant’s, developing programs of instruction and providing instruction to students in a wide range of education and training programs operated by Federal agencies.

The GLGIW is written in a narrative format and divided in two parts. Part I is used to evaluate instructor positions and Part II is used to evaluate instructional specialist positions (work activities include ascertaining training needs, determining training objectives and the scope of courses, developing or revising course materials, and evaluating education and training

programs). Each part uses two factors for evaluation purposes: *Nature of Assignment* (which includes knowledge required and complexity of the work) and *Level of Responsibility* (which includes supervisory controls, guidelines, and contacts).

The appellant's instructor work is best evaluated by Part I and his AC work by Part II. Our evaluation addressing both parts follows.

Evaluation using Part I, Instructor Work

Nature of Assignment

At the GS-12 level, courses taught that are graduate level or comparable courses are similar to those at the GS-13 level, but the GS-12 instructor's role in course design and development is limited. The courses usually cover subject areas for which there is an abundance of source information; however, the information may be scattered, unorganized, and require supplemental research, coordination, and adaptation.

At the GS-13 level, instructors design, develop, revise, and conduct courses covering subject-matter areas comparable to graduate school levels. Courses are in subject areas that are unusually broad and highly complex, e.g., courses in highly advanced areas of scientific, engineering, legal, medical, or comparable technical or specialized fields that are highly theoretical, abstract, and frequently controversial and/or in a continuous state of rapid growth, development, or change. Courses are frequently in newly emerging or rapidly changing areas, are highly innovative, require extensive authoritative knowledge of the specialty field, and often require interdisciplinary knowledges. Reference sources and materials for these courses may be nonexistent or obsolete, and GS-13 instructors typically carry out course-related original research, i.e., research adding significantly to the existing knowledge of the field, or presenting a new viewpoint or a synthesis of previously unrelated data or ideas. Research findings are frequently published.

The appellant's position meets the GS-12 level based on his graduate-level course instruction¹. As at this level, he instructs graduate-level classes, in a classroom and clinical setting, to individuals intended for deployment as PAs to military bases worldwide to conduct clinical outpatient, inpatient, and battlefield care. The appellant provides instruction on dermatology, endocrinology, clinical correlations, and other courses. Similar to the GS-12 level, he is

¹The [university name] awards Master of PA Studies degrees to students completing the two-phased program of coursework instruction and clinical rotations. The [university name] requires applicants to successfully complete a bachelor's degree at an accredited college or university prior to being admitted into their PA program. In contrast, [organization] applicants are not required to have completed a bachelor's degree as an admissions prerequisite, only that they have completed a specific number and variety of undergraduate-level coursework. [University's name] requires students earn bachelor's degrees before the university confers master's degrees upon completing phase II clinical rotations. Therefore, the bachelor's degree is awarded to [organization] students after they complete phase I coursework although courses are equivalent to the graduate level and part of the Master of PA Studies program.

responsible for maintaining the teaching materials used in the assigned courses and making determinations regarding the most effective training methods to use or identifying needed content changes. Extensive course materials are provided by the [university name] but may require some adaptations as expected at the GS-12 level. With the PA profession continually changing from emerging technology, the appellant's position requires researching different subject-matter sources for the purpose of identifying needed modifications to existing training materials. His instructor work also involves counseling students, evaluating student performance, administering tests, safeguarding records, and other tasks performed by instructors at the GS-12 level.

The appellant's position does not meet the GS-13 level. He instructs graduate-level courses similar to instructors at the GS-13 level, but his classes are related to a PA curriculum rather than to a subject area distinguished by its unusual breadth and complexity comparable to the GLGIW's example of courses at the GS-13 grade level. The [organization] curriculum covers the current, innovative techniques accepted by the medical field as it relates to the PA's work. Unlike the GS-13 level, reference sources and materials for these courses are neither nonexistent nor obsolete. Instead, the appellant examines available reference materials and sources to identify needed modifications to current course materials. This work, involving conducting research of existing reference materials for furthering the [organization] curriculum, does not require executing original research significantly adding to the PA specialty field as described at the GS-13 level.

This factor is evaluated at the GS-12 level.

Level of Responsibility

At the GS-12 level, instructors teaching graduate-level courses are responsible for the development and adequacy of specific course content. Usually, a curriculum committee, academic department head, or a higher level instructor determines the specific topics to be covered in the course, often with the GS-12 instructor participating in the determinations. Work is reviewed for accomplishment of objectives. Course development in critical subject areas may be reviewed for content, emphasis, clarity, proposed method and approach, and consistency with program policies.

At the GS-13 level, course objectives may be proposed by the instructor or a committee and are usually subject to the approval of the training department head. Based on approved course objectives, instructors at this level devise the original plan and design for the basic concepts of their courses. They also determine the extent of their research and contacts with others. Instructors at this level are relied upon as authoritative technical experts in their areas of competence and must ensure that their courses mesh with related courses in the organization. They perform professorial functions such as coordinating curriculum development, carrying out research, coordinating student research, or participating in or chairing faculty committees. In performing these functions they provide educational leadership regarding broad academic policy requirements such as academic standards, admission standards, and advanced degree requirements. Plans proposed by GS-13 instructors are reviewed for consistency with budget

resources and policy objectives. Completed work is reviewed for accomplishment of course objectives.

The appellant's position meets the GS-12 level. He teaches graduate-level courses to individuals enrolled in phase I, [name of specific] training, of the [organization]. His courses are based on the objectives determined by the Interservice Training Review Organization (ITRO), a joint-service committee providing overall direction to the program. Like the GS-12 level, the appellant reviews course curriculum and recommends substantive changes to the [organization's] curriculum committee. His instructor work requires developing lesson plans to guide course content so that objectives are adequately covered during classroom presentation or through assigned readings. The appellant ensures the administered tests comply with course objectives while adequately monitoring student understanding and knowledge of the material presented. He also develops additional instructional materials and aids as needed (e.g., providing medical literature to assist students with their understanding of topics). As at the GS-12 level, the appellant's supervisor reviews his work as an instructor for overall soundness, effectiveness in meeting course objectives, and policy compliance.

The appellant's position does not meet the GS-13 level. Unlike this level, he is not responsible for devising the plan and design for the basic concepts of the courses taught. The appellant performs some of the professorial functions described at the GS-13 level, e.g., chairing and participating in various [organization] faculty committees for curriculum development, test development, etc. He also works with clinical staff to assist students in preparing research topics required in phase II, [name of specific] training, of the [organization]. Regardless, the appellant does not perform these professorial functions to the extent expected at the GS-13 level. His work does not involve making substantive changes to program content, structure, or eligibility and admission requirements, as these and other standards are decided by the [university name], various accreditation bodies, ITRO, and by the services.

This factor is evaluated at the GS-12 level.

Evaluation using Part II, Instructional Specialist Work

Nature of Assignment

At the GS-12 level, instructional specialists establish instructional design, development, or evaluative criteria through the analysis of educational or instructional problems or questions. Assignments may be in a functional specialty area of education and training (e.g., instructor development), in a subject-matter area (e.g., advanced electronics), or may involve a grouping of courses. Assignments cut across a variety of specialty areas in education and training for a given organization, geographic area, or program area. Assignments are characterized by complicating factors such as changing situations or educational developments in the field that outdated established guideline material, or the need to pull together two different but partially related fields, that requires the employee to have knowledge of more than one field. Employees at this level often deal with matters that are controversial, unconventional, or novel. Assignments frequently require substantial adaptations or extensions of available guides and established

procedures or, in some instances, the development of new approaches, methods, or techniques for specific applications.

At the GS-13 level, instructional specialists are recognized as authoritative consultants who plan and develop experimental programs, evaluate results, and use the findings in planning, developing, and installing new or modified programs. Assignments often involve program innovations or modifications that result in the need to provide training to staff who will be using the new programs or products. Troubleshooting duties frequently require providing problem-solving assistance to, and technical review and leadership over, other employees or other facets of the agency's, or major military command's, education and training organization. Employees at the GS-13 level resolve matters that are often controversial, complicated, or set general precedent; involve coordinating or negotiating matters of considerable consequence; or affect prominent and fundamental policy issues in the subject-matter field. Assignments typically require the development and application of new program methods, approaches, and technology. The employee's conclusions, recommendations, or determinations may result in setting official policy or obligating substantial program resources.

The appellant's position meets the GS-12 level. He reviews course materials and teaching aids from his classes to ensure currency and compliance with the guidelines from various professional and accrediting bodies. As at the GS-12 level, the appellant reviews and modifies [organization] course materials and/or instruction methods based on student and instructor feedback. If, for example, students identify static visual presentations as an ineffective presentation tool, he may rework courses to incorporate video presentations instead. As AC, the appellant serves on the [organization's] Executive Committee (EC), meeting regularly with other members including the Program Director; the Clinical Director responsible for coordinating the compliance and standardization of phase II training; and the Medical Director responsible for ensuring phase I curriculum includes basic science skills, clinical instruction in all major medical and surgical specialties, and physical examination skills. The appellant ensures any changes and modifications comply with [university name], NCCPA, and other guidelines prior to his substantially altering the curriculum's organization, delivery, content, etc. based on decisions of the EC or the curriculum committee.

The appellant's review of the [organization] curriculum in light of changing requirements is also consistent with the GS-12 level. For instance, in collaboration with the curriculum committee, he communicates concerns to the [university name] when new course requirements are considered unsuitable to the [organization] (e.g., a course covering the nursing home environment). Also at the GS-12 level, the appellant evaluates and identifies issues involving the different admission requirements of each service (e.g., a service requiring individuals to submit a video with their admission application, a practice not previously approved by ITRO as required). This and other work in evaluating established procedures is consistent with the GS-12 level.

The appellant's position does not meet the GS-13 level. His position is not involved with work comparable to planning and developing experimental programs, evaluating results, and using findings for new or modified programs as described at the GS-13 level. Instead, his AC decisions typically involve resolving the day-to-day issues with scheduling course assignments for civilian and military instructors by considering instructor availability and capability. These

decisions do not extend to making changes to the actual academic calendar nor to other decisions impacting [organization's] official policies or committing substantial resources as expected at the GS-13 level. The appellant has provided input to the Program Director concerning changes to the duration and cost of the [organization's] program of instruction. However, this or any actual change to the academic calendar, clinical requirements, etc. are approved by the Program Director, ITRO, or others responsible for making the controversial, complicated, or precedent-setting decisions consistent with the GS-13 level. Furthermore, the appellant's curriculum work is based on ensuring the [organization's] course content complies with the established requirements and guidelines of the [university name] and the accrediting bodies; course content cannot be developed by the appellant as would be expected at the GS-13 level.

This factor is evaluated at the GS-12 level.

Level of Responsibility

At the GS-12 level, assignments may be made on a project or continuing basis; or they may be self-initiated on the basis of apparent need, in which case the supervisor is consulted for approval. Employees are relied upon to perform services, develop products, and take actions that are technically sound and valid. Supervisory review of completed work is primarily to determine general effectiveness and consistency with the educational philosophy and objectives of the program and with the policies of the organization. The products and services of GS-12 level work affect a considerable number and variety of users (e.g., teachers in the elementary and secondary schools of a geographic area, instructors in a large technical service school that gives a wide variety of courses at various levels of complexity, or students in a large number of schools).

At the GS-13 level, instructional specialists typically ascertain the need for and generate surveys and studies. Supervisory review of initial plans is primarily to assess priorities, the feasibility of program and project proposals, and the availability of budget and other resources. Employees independently carry projects through to their conclusion. Completed work products are relied upon for soundness, accuracy, and adequacy of technical detail, and are normally not reviewed for such purposes. Review of work performance at the GS-13 level is primarily for accomplishment of project and program objectives; for consistency with agency or major military command policies, philosophy, and goals; and for the quality of contributions to education and training programs. To stay abreast of developments within their specialty area, GS-13 specialists establish and maintain professional contacts with leading practitioners, researchers, and others in education and training institutions, research organizations, and industry. Work projects typically have a significant impact on a broad segment of the staff and student body in the education and training program that is evident throughout the agency or major military command. Products may radically change the training content or the education and training techniques and methods used in the teaching of certain subjects to specific segments of the student population.

The appellant's position meets the GS-12 level. He performs the AC work independently including, but not limited to, scheduling phase I courses; evaluating performance of civilian and military instructors; serving as point of contact for curriculum changes requested by instructors and others; and serving as [organization] representative during accreditation visits, ITRO

meetings, and with local military medical facilities in arranging clinical experiences for PA students. Similar to the GS-12 level, the supervisor relies on the appellant to perform technically sound AC work, reviewing end results for general effectiveness and consistency with program objectives. For example, his supervisor reviews his scheduling of course assignments for over 40 military and civilian instructors only to ensure the program has adequate coverage of instructors to meet the [organization's] training objectives. The appellant's AC work affects a considerable number of users ranging from the instructors benefiting from his feedback on their delivery of education products, modifications to the curriculum as requested, and scheduling of course work; to the students benefiting from the improved teaching methods and materials. This work is consistent with the GS-12 level.

The appellant's position does not meet the GS-13 level. He uses feedback from instructors and student critiques to modify instructional content or presentation methods to better serve the students, but his position does not involve performing work comparable to generating surveys or studies comparable to that described at the GS-13 level. The GLGIW provides examples of GS-13 work including serving as chief education specialist for a regional area involving several education and training centers providing highly individualized programs of basic and general education and vocational training. In contrast, the appellant is responsible for the [organization's] compliance with [university's name] contractual agreements and standards of the various accrediting bodies. The appellant serves as the liaison for instructors with the [organization] management, as well as for [organization] management with the [university name] and accrediting organizations. He chairs and/or participates in the curriculum committee responsible for academic content and delivery of content; the student evaluation plan committee responsible for establishing policies and prescribing procedures for student management; the academic review committee responsible for reviewing the academic progress of students; and the EC. Working on these and other committees, the appellant participates in validating the currency and relevancy of the program of instruction, textbooks, tests, additional instructional materials, curriculum, etc. However, his decisions are not characterized by the same scope or magnitude described at the GS-13 level, where decisions are so substantive as to impact the broad segment of the staff and student body by radically changing training content, education and training techniques, etc.

This factor is evaluated at the GS-12 level.

Summary

The appellant's duties and responsibilities equate to the GS-12 by reference to Parts I and II of the GLGIW.

Decision

The position is properly classified as GS-603-12. The title is at the agency's discretion.