

U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and ELSA Programs



San Francisco Oversight Division
120 Howard Street, Room 760
San Francisco, CA 94105

Classification Appeal Decision
Under Section 5112 of Title 5, United States Code

Appellant: [Appellant's Name]

Agency classification: Support Services Specialist
GS-342-11

Organization: [Division]
Office of the Regional Administrator
[Region]
Office of the Assistant Secretary
for Administration and Management
U.S. Department of Labor
[City, State]

Duty Station: [City, State]

OPM decision: Support Services Specialist
GS-342-11

OPM decision number: C- 0342-11-01

Signed by Denis J. Whitebook

Denis J. Whitebook
Classification Appeals Officer

January 15, 1998

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:

[Name of Appellant]
 [Division]
 Office of the Regional Administrator
 [Regional Office]
 Office of the Assistant Secretary
 for Administration and Management
 U.S. Department of Labor
 [Street Address]
 [City, State]

Personnel Officer
 Human Resources Division
 Office of the Assistant Secretary
 for Administration and Management
 U.S. Department of Labor
 [Street Address]
 [City, State]

Director
 Human Resource Services Center
 Office of the Assistant Secretary
 for Administration and Management
 U.S. Department of Labor
 200 Constitution Avenue, NW.
 Room C5516
 Washington, DC 20210

Director
 Human Resources Center
 U.S. Department of Labor
 Washington, DC 20210

Introduction

On October 21, 1997, the San Francisco Oversight Division of the U.S. Office of Personnel Management (OPM) received a classification appeal from [the appellant]. His position is currently classified as Support Services Specialist, GS-342-11. However, he believes the grade level should be GS-12. His organization is located in the [division],[regional office], Office of the Regional Administrator, Office of the Assistant Secretary for Administration and Management, U.S. Department of Labor, [city, state]. His duty station is [city, state]. We have accepted and decided his appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

The appellant requests that the grade of his position be determined by comparison to other similar positions in the Department of Labor (DOL) as well as the Administrative Analysis Grade-Evaluation Guide. By law, we must classify positions solely by comparing their 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, we cannot compare the appellant's position to other similar positions as a basis for deciding his appeal.

In reaching our classification decision, we have carefully reviewed all information furnished by the appellant and his agency, including his official position description (PD) VI01484001.

Position information

The appellant is stationed in Seattle, Washington, and is responsible for providing a comprehensive range of administrative and management services primarily to DOL field components located in [four states]. According to his PD, the appellant is responsible for planning and coordinating space management activities, studying and analyzing requirements for regional telecommunications services and providing telecommunications consultant services to DOL managers, serving as the Contracting Officer for [city]-based DOL field components, and providing various other administrative and management services. The appellant's PD and other material of record furnish much more information about his duties and responsibilities and how they are performed.

Series, title, and guide determination

We find that the appellant's position is best covered by the Support Services Administration Series, GS-342, is properly titled Support Services Specialist, and is best graded by means of the Administrative Analysis Grade-Evaluation Guide (the Guide). Neither the agency nor the appellant disagrees.

Grade determination

The Guide uses the Factor Evaluation System (FES), which employs nine factors. Under the FES, each factor level description in a standard or guide describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor level

description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level.

Neither the appellant nor his agency disagrees with our evaluation of factors 1, 3, and 6 through 9. We therefore discuss those factors very briefly, while discussing factors 2, 4, and 5 more thoroughly. Our evaluation with respect to the nine FES factors follows.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts required to do acceptable work and the nature and extent of skill necessary to apply this knowledge. To be used as a basis for selecting a level under this factor, knowledge must be required and applied.

The knowledge required by this position meets Level 1-7. For instance, at Level 1-7 positions require knowledge and skill in applying analytical and evaluative techniques to issues or studies concerning the efficiency and effectiveness of program operations carried out by administrative or professional personnel, or substantive administrative support functions; i.e., internal activities or functions such as supply, budget, procurement, or personnel which serve to facilitate line or program operations. Comparably, the appellant's position requires knowledge and skill in applying analytical and evaluative techniques to study the efficiency and effectiveness of space management, telecommunications services, and contracting and purchasing activities. The appellant reviews and analyzes agency requests for space, manages the space program in the northwestern states, and analyzes space requirements; he studies and analyzes requirements for regional communications services; and as the Contracting Officer for [city]-based DOL field components, he provides procurement analysis and contracting services to managers.

This factor is evaluated at Level 1-7 and 1250 points are credited.

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 review of completed work.

The appellant's position meets Level 2-4. For instance, at Level 2-4, the employee is responsible for planning and organizing the study, estimating costs, coordinating with staff and line management personnel, and conducting all phases of the project. This is similar to the information in the record which shows that the appellant is responsible for planning and carrying out the assignments, resolving most of the conflicts which arise, coordinating or delegating the work with others as necessary, and interpreting policy on his own initiative.

The appellant asserts that his position meets Level 2-5 because he deals with contractors and clients directly, has complete responsibility to plan and perform all his work, and because his work is usually not reviewed by his supervisor as it progresses or when it is completed. Although the appellant's

position may in some ways exceed Level 2-4 in that he functions independently in accomplishing his ongoing assignments and fulfilling his official responsibilities, the scope of those assignments and responsibilities is more limited than that envisioned at Level 2-5. At Level 2-5 analyses, evaluations, and recommendations developed by the employee normally influence broad agency policy objectives and program goals. While the word “agency” is sometimes used within DOL to refer to one of its components, in OPM standards and guides the word “agency” refers to an Executive department or comparable independent establishment, the same definition as that given it by 5 U.S.C. 105. The appellant’s assignments affect administrative and management services primarily within [four states] and are normally monitored in terms of effectiveness in satisfying client requirements and for compliance with accepted agency policy and budgetary constraints. However, they do not regularly influence broad policy objectives and program goals throughout the Department of Labor.

The factor relationship table on page 4 of the Guide illustrates which FES factor levels are typically assigned at various levels for administrative analysis positions. Typically, Level 2-4 is the highest level assigned for Level 1-7. Also, in *The Classifier’s Handbook* on page 16 there is a factor relationship table for all administrative occupations. Level 2-5 is not assigned until Level 1-8 is also assigned. As discussed above, the appellant’s work meets Level 1-7. A careful reading of the grade level criteria and these tables demonstrates that there is a direct correlation between the scope and importance of the subject studied and the factor levels assigned. While this typical pattern does not preclude assignment of Level 2-5 to a specific position where Knowledge required has been evaluated at Level 1-7, it would be unusual for a position to vary from the pattern.

This factor is assigned Level 2-4 and 450 points are credited.

Factor 3, Guidelines

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

At Level 3-3, guidelines consist of standard reference material, texts, and manuals covering the application of analytical methods and techniques; and instructions and manuals covering the subjects involved. Analytical methods contained in the guidelines are not always directly applicable to specific work assignments. Included at this level are work assignments covered by a wide variety of administrative regulations and procedural guidelines.

Comparable to Level 3-3, the appellant’s PD shows that Federal guidelines are provided which are generally applicable to the support services provided by the appellant. The record also indicates that the guidelines are not always directly applicable, and that the appellant must use judgment in choosing, interpreting, or adapting them to specific situations. In addition, the appellant’s work assignments are so varied that it requires a wide variety of administrative regulations and procedural guidelines to cover the range of support services he provides.

This factor is assigned Level 3-3 and 275 points are credited.

Factor 4, Complexity

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

At Level 4-4, the employee gathers information, identifies and analyzes issues, and develops recommendations to resolve substantive problems of effectiveness and efficiency of work operations. Likewise, the appellant works to resolve substantive problems which affect the ability of a wide range of DOL field components in [his regional office] to efficiently and effectively deliver services to the public.

Characteristic at Level 4-4 is originality in refining existing work methods and techniques to resolve problems. The information in the record gives examples of the appellant's use of originality to resolve problems when responding to requests for space management services from DOL field components such as those in the Employment and Training Administration and the Bureau of Apprenticeship and Training.

The position does not meet the complexity required at Level 4-5. In the first illustration provided at Level 4-5, assignments affect major administrative programs throughout an entire agency such as DOL. As discussed earlier, the appellant's assignments affect administrative and management services primarily within [four states]. In the second illustration, employees at Level 4-5 analyze and formulate agency (that is, DOL) requirements for systems that support a nationwide program. Again, the appellant's assignments affect programs primarily within [four states].

Also, in the factor level description as interpreted in light of the first illustration, employees at Level 4-5 typically develop detailed plans, goals, and objectives for the long-range (more than five years) implementation and administration of a major administrative program for an agency such as DOL. The appellant on the other hand typically develops more immediate plans, goals, and objectives which do not meet the long-range intent of Level 4-5, and are primarily for DOL field components in [four states].

This factor is evaluated at Level 4-4 and 225 points are credited.

Factor 5, Scope and effect

This factor covers the relationship between the nature of the work and the effect of the work products or services.

The appellant's position meets Level 5-3. For instance, at that level, completed reports and recommendations influence decisions by managers concerning the internal administrative operations of the organizations and activities studied. Further, the work may involve identifying problems, studying, analyzing, and making recommendations concerning the efficiency and productivity of

administrative operations in different components of an organization. Likewise, the appellant directly influences decisions by managers of DOL field components concerning their administrative operations primarily in space management, telecommunications, and procurement which concern the efficiency and productivity of these operations.

The appellant's position does not meet Level 5-4. The appellant asserts that his work meets Level 5-4 because he is responsible for all administrative support in the four-state area, ranging from regional offices to various field stations, and because the goal of any move is to contribute to a more efficient movement and flow of work which is taken into consideration when planning or analyzing a proposed layout. The Primary Standard (see *Introduction to the Position Classification Standards*, appendix 3) can help us interpret what is intended at Level 5-4 in the Guide, since criteria in the Guide are derived from those in the Primary Standard. According to the Primary Standard, the work product or service at Level 5-4 must affect a wide range of agency activities, major activities or industrial concerns, or the operations of other agencies. This helps explain why the second illustration at Level 5-4 in the Guide discusses how completed assignments contribute to a range of agency activities. It also explains why the second paragraph under Level 5-4 in the Guide states that work may affect the nature of administrative work done in components of other agencies. We recognize that the appellant's work affects a range of activities within the four-state area. However, it does not regularly affect as wide a range of DOL activities, major industrial concerns, or the operations of agencies outside DOL as intended at Level 5-4.

This factor is evaluated at Level 5-3 and 150 points are credited.

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

Factor 6 covers the people and conditions or settings under which contacts are made. It includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. Factor 7 covers the reasons for the contacts described in Factor 6.

The appellant's personal contacts are evaluated at Level 3. At that level, contacts include persons outside DOL which may include consultants, contractors, or business executives in a moderately unstructured setting. This level may also include contacts with the head of DOL or program officials several managerial levels removed from the employee when such contacts occur on an ad-hoc basis. This is comparable to the appellant's contacts which include principal field representatives of DOL field components, GSA staff and private building managers, the Federal Protective Service, local fire and police officials, and representatives of contractors.

Factor 7 is evaluated at Level c. At Level c, contacts typically are for the purpose of influencing managers or other officials to accept and implement findings and recommendations on organizational improvement or program effectiveness. Resistance may be encountered due to such issues as organizational conflict, competing objectives, or resource problems. Similarly, the record indicates that the purpose of the appellant's contacts is to influence, motivate, counsel, and guide managers and officials; and to negotiate with and influence contractors to provide acceptable services.

Factor 6 is evaluated at Level 3 and Factor 7 at Level c. According to the chart on page 25 of the Guide, a total of 180 points is credited to the appellant’s position based on this combination of levels.

Factor 8, Physical demands

The physical demands on the appellant meet Level 8-2. As is typical at this level, the appellant’s work assignments regularly involve long periods of standing, bending, and stooping. The appellant must inspect facilities being remodeled or renovated, inspect work related to running communications or data cable, and examine property and items in storage.

This factor is evaluated at Level 8-2 and awarded 20 points.

Factor 9, Work environment

The appellant’s work environment is best evaluated at 9-1. As is typical at this level, the appellant’s work is usually performed in adequately lighted and climate controlled work spaces.

This factor is evaluated at Level 9-1 and awarded 5 points.

Summary

In summary, we have evaluated the appellant’s position as follows:

Factor	Level	Points
1. Knowledge required by the position	1-7	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and effect	5-3	150
6. Personal contacts	} 6-3 7-c	180
7. Purpose of contacts		
8. Physical demands	8-2	20
9. Work environment	9-1	<u>5</u>
Total Points:		2555

The appellant’s position warrants 2555 total points. Therefore, in accordance with the grade conversion table on page 3 of the Guide, his position is properly graded at GS-11.

We note that even if the appellant’s position had been evaluated at Levels 4-5 and 5-4, an additional 175 points, it would not have affected the grade.

Decision

The appellant's position is properly classified as Support Services Specialist, GS-342-11.