

Office of Merit Systems Oversight and Effectiveness Classification Appeals and FLSA Programs

> Philadelphia Oversight Division 600 Arch Street, Room 3400 Philadelphia, PA 19106-1596

# **Classification Appeal Decision** Under Section 5112 of Title 5, United States Code **Appellant:** [appellant's name] **Agency classification:** Secretary (Typing) GS-318-6 **Organization:** Social Work Service VA [name] Healthcare System U.S. Department of Veterans Affairs [location] **OPM decision:** Secretary (OA) GS-318-6 **OPM decision number**: C-0318-06-02

Robert D. Hendler Classification Appeals Officer

<u>/s/ 1/6/00</u> 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 position, it is to be effective no later than the beginning of the fourth pay period after the date of the decision (5 CFR 511.702). The servicing human resources 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] [address] [name] Chief, Human Resources Management Service U.S. Department of Veterans Affairs VA [name] Healthcare System [address]

Deputy Assistant Secretary for Human Resources Management U.S. Department of Veterans Affairs 810 Vermont Avenue, NW Washington, DC 20420

### Introduction

On October 5, 1999, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. Her position is classified currently as Secretary (Typing), GS-318-6, position description (PD) #017310. The appellant believes the classification should be Program Assistant, GS-303-7. The position is in the U.S. Department of Veterans Affairs (VA), VA [name][acronym] Healthcare System, Social Work Service (SWS), [location]. In 1995, the VA Medical Centers at [location] and [location] combined to form the [acronym] Healthcare System, headquartered at [location]. We have accepted and decided her appeal under section 5112 of title 5, United States Code (U.S.C.).

### **General issues**

The appellant's supervisor, the Assistant Chief, SWS, submitted a PD dated December 14, 1998, to the [acronym] Human Resources Management Service (HRMS) requesting an upgrade of the position from Secretary (Typing), GS-318-6 to Program Assistant, GS-303-7. Review of the PD, combined with interviews with the supervisor on March 25, 1999, led to the development of a position report and position evaluation statement dated April 5, 1999. These statements were discussed with the supervisor on May 5, 1999. The supervisor agreed with the HRMS suggestion that a desk audit of the work performed by the appellant was appropriate to correctly classify the position. The desk audit was conducted by the HRMS on April 30, 1999, and the supervisor was advised the upgrade was not warranted.

On May 24, 1999, the supervisor forwarded additional information she felt justified the upgrade. HRMS determined the additional information was not sufficient to justify the upgrade in light of the information gained during the desk audit. HRMS does not consider either PD "to be complete or accurate" in that both overstate the clinical involvement of the appellant. However, in an undated letter to OPM the appellant has stated: "The upgrade position description has been deemed accurate with duties performed by me."

The appellant makes various statements in her appeal about the adequacy of her agency's evaluation of her position. In her opinion, the [acronym] does not give full recognition that she: (1) has assumed the additional duties of Community/Customer Liaison; (2) provides assistance to the many walk-in veterans that goes beyond the expectations of a typical secretary's receptionist function; (3) "triages" patients beyond just reception and direction; (4) handles a large volume of telephone calls most of which are non-routine; (5) assesses and makes decisions for professional staff regarding spreadsheets that will best monitor their programs and projected budgets; (6) reviews and notifies proper officials to recommend approval or disapproval of leave for nonclinical staff; (7) must be familiar with SWS policies and procedures, [acronym] Healthcare policies, and VA directives and policies as they relate to the SWS areas of responsibility; and, (8) has authority to approve or disapprove budget fund requests in the absence of the Contract Nursing Home Care Coordinator. In a letter to OPM dated November 3, 1999, the appellant stated: "Since the merging of the two VA's into the [acronym] Healthcare System in July of 1995 my

workload doubled and in some cases tripled and level of responsibility and independent functioning has considerably increased. My level of responsibilities have considerably increased during these last 2 - 3 years."

These submissions have raised procedural issues warranting clarification. All positions subject to the Classification Law contained in 5 U.S.C., must be classified in conformance with PCS's of OPM or, if there are no directly applicable PCS's, consistently with PCS's for related kinds of work. Therefore, other methods or factors of evaluation, such as comparison to other positions that may or may not be classified correctly, such as the appellant's position before the addition of the above enumerated duties and responsibilities, are not authorized for use in determining the classification of a position. PCS grading criteria measure the difficulty, complexity and responsibility of work, and the qualifications required to perform that work. Implicit in the appellant's rationale is that the increase in the number of staff supported and the workload should support the upgrading of her position. The assigning of more work, however, does not necessarily mean the additional work is more difficult and complex.

The appellant has stressed that her PD is not classified correctly. A PD is the official record of the major duties and responsibilities assigned to a position by a responsible management official, i.e., a person with authority to assign work to a position. A **position** is the combined duties and responsibilities that make up the work performed by an employee. Title 5, U.S.C. 5106 prescribes the use of these duties and responsibilities, and the qualifications required by these duties and responsibilities, as the basis for determining the classification of a position. The Introduction to the PCS's (Introduction) further provides that "As a rule, a position is classified on the basis of the duties actually performed." Additionally, 5 CFR 511.607(a)(1), in discussing PD accuracy issues, provides that OPM will decide classification appeals based on the actual duties and responsibilities assigned by management **and** performed by the employee. The point here is that it is a real operating position that is classified, and not simply the PD.

The application of OPM PCS's must be accomplished within the confines of the position classification theories, principles, and practices established by OPM. The Introduction states that:

Some positions involve performing different kinds and levels of work which, when separately evaluated in terms of duties, responsibilities, and qualifications required, are at different grade levels. . . In most instances, the highest level of work assigned to and performed by the employee for the **majority of time** [emphasis added] is grade-determining. When the highest level of work is a smaller portion of the job, it may be grade controlling only if:

- The work is officially assigned to the position on a regular and recurring basis;

- It is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time); and
- The higher level of knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

The classification appeal process includes a determination as to the duties and responsibilities assigned to the appellant's position and performed by the appellant, and constitutes the proper application of PCS's to those duties and responsibilities. This decision sets aside any previous agency decision. We have evaluated the work assigned by management and performed by the appellant according to these requirements. In reaching our decision, we carefully reviewed the information provided by the appellant and her agency including information obtained during a telephone audit with the appellant, a telephone interview with her immediate supervisor, [name], Assistant Chief, SWS on November 22, 1999, and our independent review and analysis of the entire appeal record.

#### **Position information**

The appellant provides staff assistance and administrative support to the Chief and Assistant Chief, SWS and for implementing the SWS administrative office policies and procedures. The SWS has ten major programs: Respite; Homeless; Home Based Primary Care; Contract Nursing Home Care Program (CNHP); Adult Day Care; Home Health Aide; VA Supported Housing; Upbeat; Substance Abuse Day Treatment; and Community Support Day Treatment.

The appellant assists the Chief, and Assistant Chief, SWS and subsection program directors by advising all levels of SWS staff on personnel regulations and policies such as pay, leave, recruitment and hiring, grievances, performance evaluations, training, and other [acronym] and VA administrative policies and directives. She is responsible for setting overall staff support priorities, monitoring completion, and redistributing work to the other office staff. The appellant prepares annual and sick leave requests from nonclinical personnel and recommends approval or disapproval to the authorizing/certifying official.

The appellant provides administrative support to and coordinates activities in preparing for participating on, and following-up to the Joint Commission Accrediting Hospital Organization accreditation visits and for other external and internal program reviews. She ensures administrative office policies and procedures are accurate and current. She notifies the Chief or Assistant Chief, SWS of any deficiencies. If necessary, the appellant coordinates administrative procedures with other subsections of the SWS.

The appellant meets regularly with the Chief or Assistant Chief, SWS to coordinate administrative efforts, identify problems, discuss program activities, recommend solutions and collect information for adjusting workload among the SWS clerical staff. She prepares agenda for meetings of the SWS staff, prepares reports for the group and assures and documents follow-up on items requiring further action. These duties require the appellant to be knowledgeable and up to date on all pertinent VA, [acronym], and SWS polices and regulations.

As part of her budget responsibilities, the appellant participates in budget reviews, coordinates development of the data, drafts projected budgets, and is responsible for ensuring compliance with budget allocations. This involves understanding of the Veterans Equitable Resource Allocation Funding Model, funding control points, and other funding and expenditure mechanisms. She reviews SWS internal and external customers for compliance in their use of the seven million dollar CNHP budget. However, when problems arise and her requests for compliance with established program requirements are ignored, she directs them to the CNHP Coordinator or Chief, SWS for further action.

The appellant types PD's, performance standards and recommendations for awards. In addition, she assists SWS management in initiating and processing all administrative paperwork necessary for appointment, extension, reassignment, etc., of all members of the SWS staff. Also, the appellant monitors all professional staff for compliance with Credentialing requirements, which involves contacting the state through form letters to verify licenses for renewals and new appointees. She provides similar support to Privileging which involves recording the number of continuing education credits acquired by each social worker during the span of two years. She maintains the files, alerts and advises professional staff on requirement deficits, and forwards completed and accurate packages to the proper officials.

The appellant is responsible for having a thorough working knowledge of the SWS computer software. She provides training in SWS computer software to new and current staff and assists them with basic word processing and spreadsheet applications. The appellant inputs and extracts data independently for reports and data analysis at the request of SWS staff. She independently researches drafts and completes special reports and justifications which may include statistical data.

As part of her administrative responsibilities, the appellant provides liaison and coordination of SWS services and programs with community agencies. The appellant provides patients or their families with the information regarding resources available to meet their problem. She assists patients in contacting the appropriate program or service to assist them. Walk-in patients or family members needing both clinical and administrative assistance are often unclear as to the help or resources they require. She must interview the veteran or his or her family to clearly identify the issue or problem. The appellant is responsible for "triaging" these patients. Beyond just reception and direction, she must determine the nature of the problem, e.g., administrative or clinical, routine or emergency. This often involves calming distressed patients and family

members. Once that is done, she determines if the situation can be handled with office resources or if necessary to call and make referral/appointments with the appropriate hospital program or the proper community agency. In this process, the appellant must immediately notify the appropriate professional staff of severe emergencies or when suicidal or homicidal remarks are made by a patient or family member.

We find the PD of record contains the major duties and responsibilities performed by the appellant and incorporate it by reference into the decision. However, we find some of the language overstates the difficulty and complexity of the work she performs. As discussed previously, her "triage" functions involve recognizing emergency situations. The PD of record implies a higher level of technical treatment intervention. Similarly, the PD of record suggests a higher level of technical involvement in fiscal and human resources management matters that are under the control of those respective staff services. However, our analysis of the appealed position, and our use of the PD of record, must be based on the actual duties performed by the appellant as discussed above.

#### Series, title, and standard determination

The appellant's position is not classifiable to the Miscellaneous Clerk and Assistant Series, GS-303. The purpose of this series is to cover one-grade interval work that is not classifiable in any other series. Positions classified in the Miscellaneous Clerk and Assistant Series, GS-303 involve specialized work for which no appropriate occupational series has been established. Typically, positions in this series are too few of a kind to have been recognized as separate lines of work. Positions that involve work which requires knowledge of specialized processes or subject matter in established series are excluded from the Miscellaneous Clerk and Assistant Series, GS-303. As discussed below, the appellant's work is covered by an established series.

We find the primary and paramount work of the appellant's duties fall within the type of work covered by the Secretary Series, GS-318 PCS. This includes positions that assist one individual, and as in the appellant's case, the subordinate staff of that individual, by performing general office work auxiliary to the work of the organization. As provided by the GS-318 PCS, the appellant functions as the principal administrative and clerical support position in her organization, operating independently of any other such position in the office. She coordinates a comprehensive range of administrative and clerical support duties as noted in the Position Information section of this decision. Her duties require a general knowledge of administrative and clerical procedures and requirements, various office skills, and the ability to apply such skills in a way that increases the effectiveness of others. These duties require a general knowledge of the substantive work of the SWS, but not technical or professional knowledge in any specialized The title Secretary applies to all nonsupervisory positions in the GS-318 subject-matter area. occupation. Because the position requires significant knowledge of office automation systems (e.g., word processing) and competitive keyboard skills, the parenthetical Office Automation or OA is added to the title. Thus, the position is allocated properly as Secretary (OA), GS-318.

#### **Grade determination**

The Secretary Series, GS-318 PCS is written in the factor evaluation system (FES) format. Positions graded under the FES format are compared to nine factors. Levels are assigned for each factor and the points associated with the assigned levels are totaled and converted to a grade level by application of the Grade Conversion Table contained in the PCS. Under the FES, factor level descriptions (FLD's) mark the lower end; i.e., the floor, of the ranges for the indicated factor level. If a position fails in any significant aspect to meet a particular level in the PCS, the next lower level and its lower point value must be assigned unless the deficiency is balanced by an equally important aspect that meets a higher level. 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 which the secretary must understand to do acceptable work and the nature and extent of the skills needed to apply those knowledges. In addition, the extent of knowledge required is related, in part, to the work situation in which the position is found. Consequently, in order to assign a factor level, our analysis includes the determination of both the Knowledge Type (KT) and the Work Situation (WS).

KT-II is defined as knowledge of an extensive body of rules, procedures, or operations applied to clerical assignments, and knowledge of the organization and functions of the office in order to perform the procedural work of the office. This includes knowledge to carry out and coordinate, in a timely and effective manner, many different procedures, each of which might have numerous steps, such as all of those needed to: (1) obtain and monitor a full range of office support services such as printing, maintenance, and supply services; (2) request various types of personnel, training actions or services; and, (3) prepare a wide variety of recurring reports and documents from information obtained from staff, files, and other sources.

KT-III is defined as a level of knowledge which includes all of the knowledge included in KT-II with the additional requirement that the incumbent possess knowledge of duties, priorities, commitments, policies, and program goals of the staff sufficient to perform nonroutine assignments such as: independently noting and following-up on commitments made at meetings and conferences by staff members; shifting clerical staff in subordinate offices to take care of fluctuating workloads; or locating and summarizing information from files and documents when this requires recognizing which information is or is not relevant to the problem at hand. The secretary is fully responsible for coordinating the work of the office with other offices, and for recognizing the need for such coordination in various circumstances, which may include advising secretaries in subordinate organizations concerning such matters as the information to be provided by the subordinate organizations for use in conferences and reports.

The record shows that the position reflects the application of skills and knowledges that meet the intent of KT-III. These include extensive knowledge pertaining to the rules and regulations governing [acronym] policies in order to provide information and advice to the Chief and Assistant Chief, SWS and the other Coordinators/Supervisors of the SWS. The appellant independently inputs and extracts data for reports and data analysis by SWS staff. She reviews and controls reports prepared for the SWS, assuring the reports are prioritized and completed timely. She advises the professional staff regarding available spreadsheets that will best monitor their programs and projected budgets. She must have the knowledge to deal with a wide variety of contacts within the SWS staff, community service organizations, city and state welfare agencies, housing and homeless shelters, and other Federal agencies. She applies a knowledge of [acronym] and SWS personnel policies as they pertain to appointments, promotions, details, reassignments, terminations and Credentialing and Privileging requirements and procedures. The appellant is responsible for maintaining the office record system in accordance with [acronym] and SWS requirements; preparing a wide variety of recurring reports by extracting information from the office automated systems; applying knowledge of the work of the office sufficient to screen requests for information; personally providing authorized information from files and records; advising on established procedures; and referring nonroutine requests to the appropriate staff She applies knowledge of standard processing procedures and formats, and the member. distribution and retention policies for correspondence or reports produced, advising other support staff on these policies and processes.

The appellant independently deals with patients and/or their families on issues that do not warrant attention by professional staff members. She provides general information concerning the operation of the SWS. She is expected to triage walk-in patients by assessing their problems, making decisions about their needs, referring them to the appropriate internal, external or community resource. The appellant must be able to recognize pathological symptoms and distinguish between emergency and non-emergency situations, identify patients at risk, and determine when professional or clinical assessment or intervention is warranted. She notifies staff members on more complex patient requests, questions, or concerns. Based on the appeal record, we find the growth of the program functions stressed by the appellant in her appeal rationale support the conclusion that work entailing the application of KT-III described above currently occupies more than 25 percent of her work time.

The position does not meet KT-IV. The PCS states that employees at this level must have as a continuing requirement a basic foundation of administrative concepts, principles, and practices sufficient to perform independently such duties as eliminating conflict and duplication in extensive office procedures; determining when new procedures are needed; systematically studying and evaluating new office machines and recommending acceptance or rejection of their use; studying the clerical activities of the office and subordinate offices and recommending a specific restructuring of the way activities are carried out; skill in adapting policies or procedures to emergency situations and establishing practices or procedures to meet new situations; and skill in recognizing how and when certain policies, procedures, or guidelines will be confusing to others.

In addition, the work requires a comprehensive knowledge of the supervisor's policies and views on all significant matters affecting the organization that would enable the secretary to perform duties such as: developing material for supervisor's use in public speaking engagements, including developing background information and preparing the outline for speeches; and, briefing or advising staff members or persons outside the organization on supervisor's views on current issues facing the organization, e.g., views that a proposed reorganization would increase the effectiveness of the program because it reduces some administrative burdens.

The position does not require the appellant to do studies or to make significant adaptations to current procedures. The organization's structure is too limited to produce the extensive administrative demands requiring the application of KT-IV. The appellant provides a triage to walk-in patients to determine what their needs are. If they are clinical she directs or escorts them to the appropriate SWS clinician or the appropriate clinic. The Assistant Chief, SWS provides supervision and is involved in the triage if actual clinical intervention is needed. The appellant assists the Chief or Assistant Chief, SWS by orienting and advising staff on pay, leave or other personnel actions. However, complicated issues and decisions are directed to the Chief or Assistant Chief, SWS for resolution. In addition, she is not the authorizing/certifying official for leave, for the non-clinical staff, but is expected to review and notify the proper official recommending approval or disapproval of leave. The work of the appellant does not require knowledge of such matters as major program procedural changes or extensive administrative changes for the size and scale of the organization supported at KT-IV.

To complete the analysis of Factor 1, the WS in which the employee works must be considered. The WS is defined by three levels: A, B, and C. This element measures the complexity of the clerical and administrative demands placed on the secretarial position.

The PCS states that WS-A covers organizations that are small and of limited complexity. Although the organization may include several subordinate sections or subgroups, the employee's supervisor directs the staff primarily through face-to-face meetings. Internal procedures and administrative controls are simple and informal. Within the supervisor's organization, there are few complicated problems of coordination requiring formal procedures and controls for adequate solution.

This is in contrast to WS-B organizations in which the staff is organized into subordinate segments which may in turn be further divided requiring a system of formal internal procedures and administrative controls, and a formal production or process reporting system. Coordination among subordinate units is sufficiently complex to require **continuous** attention. Direction of the staff is exercised through intermediate supervisors, and the subordinate groups differ from each other in such aspects as subject matter, functions, relationships with other organizations, and administrative requirements in ways that place demands upon the secretary that are significantly greater than those described in WS-A.

Also at WS-B are organizations described at WS-A in terms of internal coordination when they have extensive responsibility for coordinating work outside of the organization and the coordination of that work requires procedural and administrative controls equivalent to those typical of WS-B. Interpretive guidance on the GS-318 PCS indicates that organizations which **potentially** reflect these characteristics include Congressional liaison offices, public affairs' offices, and offices of general counsel that have extensive contact outside organizations, and organizations at higher levels within the agency.

The incumbent reports directly to the Chief and Assistant Chief, SWS. The SWS is composed of the appellant, the Chief, and Assistant Chief, SWS, 13 Social Work Coordinators (MSW) who provide clinical social work services, supervision and program administration, 2 Program Assistants, 2 secretaries, (including the appellant), 3 Social Work Associates (BSW), and 33 MSW Social Workers for a total of 55 staff. The SWS staff is divided among the [name] Campus, the Community Care Center, and the [name] VA Medical Center. Although relatively small in size, SWS administrative support demands are complicated by the number of separate and distinct programs and the geographically dispersed work sites supported. In addition, the appellant must provide guidance on clerical or administrative issues to the other SWS secretaries in the Community Care Center and [name] Campus. The administrative demands of the position are also amplified by the appellant's direction of two or three part-time volunteers performing clerical work. This direction is complicated by the fact that they often are patients with psychiatric disorders. These internal coordination demands, complicated by the appellant's frequent external program contacts with contract health care providers, meet the minimum requirements for crediting WS-B. With the combination of KT-III and WS-B, the position is credited properly at Level 1-4 (550 points).

### Factor 2, Supervisory controls

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the secretary's responsibility, and the review of completed work. Controls are exercised by the supervisor in the way assignments are made, instructions are given, priorities and deadlines are set, and objectives and boundaries are defined. The responsibility of the secretary depends upon the extent to which the supervisor expects the secretary to develop the sequence and timing of various aspects of the work, to modify or recommend modifications of instructions, and to participate in establishing priorities and defining objectives. The degree of review of completed work depends upon the nature and extent of the review, e.g., close and detailed review of each phase of the assignment; detailed review of the finished assignment; spot-check of finished work for accuracy; or review only for adherence to policy.

At Level 2-3 (75 points), the supervisor defines overall objectives and priorities in the office and assists the secretary with some special assignments. The secretary plans and carries out the work of the office and handles problems and deviations in accordance with established instructions,

priorities, policies, commitments and program goals of the supervisor, and accepted practices in the occupation.

We find the supervisory controls meet Level 2-3 as described in the PCS. The appellant assists the Chief and Assistant Chief, SWS in the procedural aspects of expediting the work of the office including such matters as shifting clerical help in the [name] Campus and the Community Care Center to take care of fluctuating workload. She helps the Social Work Coordinators implement the Chief and Assistant Chief's, SWS instructions regarding procedural or administrative requirements. The appellant explains reporting requirements and arranges with subordinate staff for the collection and submission of data. For her immediate supervisor and higher echelons within the [acronym], the appellant prepares data into general reports for the total work of the SWS. The methods used by the appellant are almost never reviewed in detail. Completed work is evaluated by adequacy, appropriateness, and conformance to established policy. By its very nature, much of the work cannot be reviewed in detail.

The appellant's position does not meet Level 2-4 (450 points). At this level, the supervisor and secretary **consult** on developing deadlines and the work to be done. The secretary handles a wide variety of situations and conflicts "likely to be found in organizations of such size and scope that many complex office problems arise which cannot be brought to the attention of the supervisor," and that "completed work is reviewed **only** for overall effectiveness." For example, the secretary informs the staff of commitments made by the supervisor at meetings, and arranges for the staff to implement them; reviews correspondence for the supervisor's signature and attempts to resolve any conflicts before the matter is presented to the supervisor; arranges for subordinates to represent the supervisor on conferences based on knowledge of the supervisor's views; search for information that is difficult to locate dealing with subject matter that is generally specialized, not a matter of widespread knowledge, or is complicated because it is scattered in numerous documents. As discussed previously, the SWS is limited in organization size and complexity and does not present the administrative work planning and related decision-making demands found at Level 2-4. Therefore, the position is evaluated properly at Level 2-3 (275 points).

### Factor 3, Guidelines

This factor covers the nature of guidelines and judgments needed to apply them. Guides used in this occupation include, for example, reference materials such as dictionaries and style manuals, agency instructions concerning correspondence, and operating procedures of the organization served. Individual jobs vary in the specificity, applicability, and availability of the guidelines for performance of assignments. Consequently, the constraints and judgmental demands placed upon secretaries also vary. For example, the existence of specific instructions, procedures, and policies may limit the opportunity of the secretary to make or recommend decisions or actions. However, secretaries may use considerable judgment in applying generally stated policies or objectives to individual cases.

The appellant performs a large portion of her work within the guidelines typical of Level 3-2 (125 points). At that level, the typical guidelines used in secretarial work are dictionaries, style manuals, agency instructions, and operating policies of the supervisor or organization served. They are located and selected based on specific case needs. Situations to which the existing guidelines are not applicable are referred to the supervisor. The secretary may also determine which of the established alternative to use. The guidelines available to the appellant include: general VA, [acronym], SWS, and Medical Center regulations, directives, memorandum, bulletins, and policy statements. The appellant provides guidance to staff members who are in off-site locations, e.g., the [name] Campus and the Community Care Center, and must have information relayed to them to insure the consistent application of guidelines typical of Level 3-2. As at that level, the appellant must be conversant with established SWS policies and procedures to disseminate this information to the appropriate staff.

The appellant does not work with the less directly applicable guidelines and with the greater exercise of judgment found at Level 3-3 (275 points). Work at Level 3-3 entails using a large body of unwritten policies, precedents, and practices which are not completely applicable to the work or are not specific and which deal with matters relating to judgment, efficiency, and relative priorities rather than with procedural concerns. The secretary applies and adapts guidelines, such as regulations or the supervisor's policies, to specific problems for which guidelines are not clearly applicable. In contrast, the appellant chooses from well-established alternatives to fit individual patient needs as they occur. For example, when the situation warrants, the appellant can authorize monies from the indigent fund for necessary transportation for a veteran. Her triage work involves dealing with clearly recognizable situations. Decisions requiring Level 3-3 judgment, e.g., CNHP compliance disputes, are referred to others for resolution. Therefore, the position is evaluated properly at Level 3-2 (125 points).

### Factor 4, Complexity

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

We find that a majority of the appellant's work does not exceed Level 4-2 (75 points). At that level, the work includes duties that involve various related steps, processes, or methods. The secretary performs a full range of procedural duties in support of the complex work of the office, and decides what needs to be done through various choices which requires the secretary to recognize the existence of and differences among **clearly** recognizable situations, e.g., requisitioning supplies, printing or maintenance services; filling out various travel forms for staff members; arranging for meeting rooms; and preparing schedules and reports from information readily available in the files. Actions and responses may differ in such things as the sources of information, the kinds of transaction or entries, or other readily verifiable differences. Decisions are based on a knowledge of the procedural requirements of the work coupled with an awareness

of the specific functions and staff assignments of the office. Much of the appellant's administrative support functions closely match these demands.

Our fact-finding revealed, however, that a substantial portion; i.e., 25 percent or more, of the appellant's work meets Level 4-3 (150 points). At that level, work includes assorted duties involving dissimilar and unrelated processes and methods, e.g., preparing one-of-a-kind reports from information in various documents that requires reading correspondence and reports to identify relevant items, and decisions that are based on a familiarity with the issues involved and the relationships between various types of information. The information is used to decide what needs to be done and how to accomplish tasks by analysis of the subject, phase or issue involved; the chosen courses are selected from many alternatives.

The appellant's position is one that includes dissimilar and unrelated processes within the meaning of the PCS; it includes tasks which are diverse. For example, the appellant prepares fiscal and administrative reports, and extracts information from a variety of sources in support of SWS program operations. At the direction of the Chief, SWS, the appellant participates in CNHP budget reviews by reviewing and providing information on customer compliance with CNHP spending levels. She coordinates budget data calls from the various units and drafts projected SWS budgets based on established guidelines. The appellant independently researches drafts and completes special reports and justifications that include SWS statistical data. The degree of independence with which the appellant operates in supporting the operations of the SWS affords her the opportunity of making decisions regarding what needs to be done, as is described at Level 4-3, which is the highest level described in the GS-318 PCS. Therefore, the position is evaluated properly at Level 4-3 (150 points).

### Factor 5, Scope and effect

This factor covers the relationship between the nature of the work; i.e., the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization. Only the effect of properly performed work is considered.

We find that the scope and purpose of the clerical and administrative support work performed by the appellant compare closely to Level 5-2 (75 points). At Level 5-2, the work performed affects the accuracy and reliability of further processes accomplished by the staff. In addition to the routine processes found at Level 5-1 (25 points), e.g., timekeeping, preparing correspondence, referring callers, maintaining files, preparing reports, and other functions, the appellant also allocates a significant portion of the work time, to duties that reflect the performance of a wide range of routine administrative and clerical work supporting the accuracy and reliability of further processes found at Level 5-2. The appellant's functions include arranging meetings, providing statistical data and completed reports to the Chief and Assistant Chief, SWS. The appellant coordinates and organizes the administrative functions within the SWS. She arranges and supplies support services for veteran patients and their families.

The position does not meet Level 5-3 (150 points) in that the work does not require the appellant to "modify and devise methods and procedures that significantly and consistently affect the accomplishment of the mission of the office." As discussed above, the work is preponderantly performed within the parameters of defined methods, procedures, and internal policies. Additionally, the appellant is not required, on a regular and recurring basis and for a sufficient portion of the time for classification purposes, to "identify and resolve various problems and situations that affect the orderly and efficient flow of work in transactions with parties outside the organization." These functions are performed by the Chief and Assistant Chief, SWS. The appellant's work does not entail the depth and breadth of problem solving and similarly significant mission impact found at Level 5-3. Therefore, the position is evaluated properly at Level 5-2 (75 points).

#### Factor 6, Personal contacts

This factor includes face-to-face contacts and telephone and E-mail correspondence with persons not in the supervisory chain. The levels for this factor are based on what is required to make the initial contact, the difficulty in communicating with those contacted, and the setting in which the contacts take place, e.g., the degree to which the employee and those contacted recognize their relative roles and authorities.

The appellant's contacts include professional and nonprofessional employees of the SWS and professional and administrative personnel throughout the Medical Center and off-site locations. She maintains contacts with veteran patients, family members, nursing homes, community resources, and local, state, and Federal agencies. The contacts are performed within the moderately structured setting of Level 6-2 (25 points), e.g., personal contacts occur at the employee's work place, and are generally routine, although the role and authority of each party may need to be clarified.

The position does not meet the intent of Level 6-3 (60 points) which includes contacts with individuals or groups from outside the employing organization in a moderately unstructured setting, e.g., contacts are not established on a routine basis requiring the secretary to identify and locate the appropriate person to contact. The purpose and extent of each contact are different and the role and authority of each party must be identified and developed during the course of the contacts, e.g., attorneys, contractors, the news media, or public action groups, when the office deals with them on a variety of issues. The record does not reflect that the appellant's contacts with persons outside the agency are on the diversity of matters or with the difficulty of establishing roles and authorities found at Level 6-3. Accordingly, this factor is evaluated properly at Level 6-2 (25 points).

Factor 7, Purpose of contacts

This factor measures the purpose of the contacts made with the contacts discussed in Factor 6. The purpose of personal contacts can range from strictly exchanges of factual information to resolving problems affecting the efficient operation of the office. The purpose of the contacts that serve as a basis for this factor must be the same as the contacts that are the basis for the level awarded for Factor 6.

The appellant obtains, clarifies and gives facts and information typical of Level 7-1 (20 points), e.g., telephone and receptionist services. However, as at Level 7-2 (50 points) the purpose of her contacts is to plan, coordinate and expedite the work of the Chief and Assistant Chief, SWS. Additional purposes include triaging of patients beyond just reception and direction; ensuring good public relations with the general public, patients and their family members; giving and obtaining information; scheduling meetings, and ensuring that correspondence and reports are completed promptly, accurately and submitted to and by the staff on time and in the proper format. The contacts outside the office are to provide, exchange, or obtain information directly related to the work. This fully meets, but does not exceed, Level 7-2 which is the highest level described in the GS-318 PCS. Therefore, the position is evaluated properly at Level 7-2 (50 points).

## Factor 8, Physical demands

This factor covers the requirements and physical demands placed on the employee by the work assignment. It includes both the physical characteristics and abilities as well as the physical exertion involved in the work.

The appellant's position meets Level 8-1 (5 points), the only level described in the GS-318 PCS, which covers demands typical of an office setting including some walking, standing, bending, and carrying light items. The appellant's work is mostly sedentary; however bending and standing is required to retrieve files. Some walking and driving are required between various offices and buildings on the [acronym] Healthcare System campuses. Therefore, the position is evaluated properly at Level 8-1 (5 points).

### Factor 9, Work environment

This factor describes the physical surroundings in which the employee works and any special safety regulations or precautions that the employee must observe to avoid mishaps or discomfort.

The appellant's position fully meets Level 9-1 (5 points), the only level described in the GS-318 PCS, which covers work in an office setting and involves minimal risks and observance of safety precautions typical of office settings. The appellant's work is performed in an office setting and conference rooms, both within SWS and in other areas of the facility. Therefore, the position is evaluated properly at Level 9-1 (5 points).

# Summary

In summary, we have credited the appellant's position as follows:

Factor	Level	Points
1. Knowledge required by the position	KT-III, WS-B 1-4	550
2. Supervisory controls	2-3	275
3. Guidelines	3-2	125
4. Complexity	4-3	150
5. Scope and effect	5-2	75
6. Personal contacts	6-2	25
7. Purpose of contacts	7-2	50
8. Physical demands	8-1	5
9. Work environment	9-1	5
Total points:		1,260

The total of 1,260 points falls within the GS-6 grade level point range of 1,105-1,350 points on the Grade Conversion Table in the GS-318 PCS.

The appellant's office automation duties are evaluated using the OPM *Office Automation Grade Evaluation Guide*. Her office automation duties, however, cannot be higher graded than her secretarial duties since they do not routinely involve a wide variety of non-standard automation problems or assignments requiring knowledge of *advanced* functions of more than one type of software, e.g., developing methods for automating complex administrative reports, including the detailed functional procedures needed to automate the data. The appellant used a variety of standard software functions, resulting in evaluation of her OA work at a lower grade level than the GS-318 work. Therefore, her OA work does not impact the final grade level worth of the position.

### Decision

The position is classified properly as Secretary (OA), GS-318-6.