

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

Appellant: [Appellant's Name]

Agency classification: Accountant (Internal Review Evaluator)
GS-510-12

Organization: [Appellant's Unit]
[Appellant's Branch]
U.S. Department of Army
[Location]

OPM decision: Auditor
GS-511-12

OPM decision number: C-0511-12-05

/s/

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

10/27/10/

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*, appendix 4, section G (address provided in appendix 4, section H).

As this decision changes the classification of the appealed position, it is to be effective no later than the beginning of the fourth pay period after the date of this decision (5 CFR 511.702). As indicated in this decision, our findings also show that the appellant's official position description (PD) does not meet the standard of adequacy described on pages 10 – 11 of the *Introduction to the Position Classification Standards*. Therefore, the agency must revise the appellant's PD. The servicing Human Resources Office must submit a compliance report containing the corrected PD and an SF 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action to Atlanta Oversight.

Decision sent to:

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Introduction

On October 23, 2009, the Atlanta Oversight and Accountability Group (now Atlanta Oversight) of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [Appellant's Name]. On January 8, 2010, we received an incomplete agency administrative report (AAR) and to date have not received the complete AAR. The appellant occupies a position currently classified as Accountant (Internal Review Evaluator), GS-510-12, in the [Appellant's Unit and Branch] U.S. Department of Army (DA), in [City and State]. The appellant believes the position should be classified as Auditor, GS-511-12. We have accepted and decided this appeal under section 5221 of title 5, United States Code (U.S.C.)

To decide this appeal, we conducted a telephone audit with the appellant on April 7, 2010, and a telephone interview with his/her immediate supervisor on June 7, 2010. In reaching our classification decision, we carefully considered all the information gained from the interviews, as well as written information furnished by the appellant and his/her agency, including his/her official position description (PD).

Background

The agency reclassified the appellant's position to the GS-510 series based on a July 21, 2003 directive issued to all DA components by the Acting Secretary of the Army. The DA-wide reclassification occurred when a proposed consolidation of the Army Audit Agency (AAA) and DA's IR functions were terminated. According to the Deputy District Commander, the merger had been discussed for years to remedy conflicting statutory authority whereby only AAA was supposed to be tasked with "auditing." The directive stated that without exception, only positions in the AAA could be placed in the Auditing Series, GS-511, for classification purposes. As a result, all Auditor positions in DA divisions were reclassified. Accordingly, IR moved its staff into the Accounting series, GS-510. The appellant's position was reclassified from Auditor, GS-511-12, to Accounting (Internal Review Evaluator), GS-510-12, with PD number AGIR0005, on November 2004.

The first-level supervisor, deputy district commander, states his/her predecessor requested an exception to the directed reclassification, adding DA did not grant it, and the District complied with the directive. The Commander also states he/she requested an Agency classification review through the Civilian Personnel Operations Center (CPOC) because the PD did not reflect the duties and responsibilities performed by the appellant. In an email dated July 23, 2008, the CPOC maintains the current PD can not be changed because of the DA directive.

General issues

The appellant's supervisor did not certify the PD of record as complete and accurate because major duties listed within the PD are not performed by the appellant. Specifically, he/she states the appellant does not advise lower graded staff on difficult problems nor does he/she provide input to supervisors on performance and/or conduct related matters. He/she further states the appellant: does not review automated accounting and auditing practices with difficult problems; does not review automated accounting and financial systems to identify changes to enhance

system capabilities; does not evaluate system logic and guidance used to develop analytical accounting system software; does not propose changes to current and future systems; and does not make recommendations to management officials on equipment and software requirements. The appellant states he/she does not perform the duties in the Accounting series and his/her actual job duties instead are those of an auditor.

A PD is the official record of the major duties and responsibilities assigned to a position by an official with the authority to assign work. A position is the duties and responsibilities that make up the work performed by an employee. Position classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities assigned by management and performed by the employee. An OPM appeal decision classifies an operating position not the PD. We are aware of DA's efforts to limit the existence of GS-511 positions to the AAA; however, management intention in establishing a position may be considered only to the extent it does not interfere with the proper application of published position classification standards (PCS). Therefore, this decision is based on the work currently assigned to and performed by the appellant.

By law, we must classify positions solely by comparing current duties and responsibilities to OPM PCSs and guidelines (5 U.S.C. 5106, 5107, and 5112). In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of his/her position. Because our decision sets aside all previous agency decisions, the appellant's concerns regarding his/her agency's classification review process are not germane to this decision.

Position information

The primary purpose of the appellant's position is to administer the District's IR program to ensure compliance with internal Army regulations and external appropriation and statutory requirements. The appellant spends the preponderance of time conducting internal audits and review studies to assess program efficiency, effectiveness, and compliance with applicable laws and regulations. Specifically, the appellant: develops and executes the District's annual audit review plan; prepares and submits reports in accordance with auditing standards and policies; maintains a system to monitor and report on audit findings and recommendations; and performs follow-up reviews on findings noted during previous reviews and audits.

The appellant coordinates and provides liaison support for the District's external audits and investigations with the [Agencies Serviced by the Appellant], and AAA. In this capacity, he/she develops tools instrumental in consolidating and analyzing data in support of audits. He/she also serves as dispute mediator and keeps the commander informed of audit issues and concerns which surface during external audits. He/she schedules entrance and exit conferences and briefings, and upon audit completion he/she briefs commander and senior staff of audit findings.

The appellant uses the Government Accountability Office's (GAO's) Government Auditing Standards (also known as "The Yellow Book") to ensure his/her work reports comply with generally accepted Government auditing standards (GAGAS). The Yellow Book contains standards for audits of Government organizations, programs, activities, and functions, and of Government assistance received by contractors, nonprofit organizations, and other non-

Governmental organizations. GAGAS are followed by auditors and audit organizations as required by law, regulation, agreement, contract, or policy. They are also applied by evaluators, analysts, and specialists in other occupations who perform audits. They pertain to auditor professional qualifications, the quality of audit efforts, and the characteristics of professional and meaningful audit reports.

Series, title, and standard Determination

The agency evaluated the appellant's position by comparison to the grade-level criteria contained in the Job Family Position Classification Standard (JFS) for Professional and Administrative Work in the Accounting and Budget Group, GS-500, and placed the appellant's position in the Accounting series, GS-510. The appellant disagrees, stating he/she does not perform accounting work as defined in the GS-510 series definitions, and his/her work closely matches "performance audit" work defined and performed in the Auditing Series, GS-511. Both the GS-510 and GS-511 series perform work requiring application of professional accounting work theories, principles, concepts, and standards.

The Accounting series, GS-510, covers positions which advise on or administer, supervise, or perform professional accounting work that requires application of accounting theories, principles, and standards. The work can include a combination of designing, developing, operating, or inspecting accounting systems; prescribing accounting standards, policies, and requirements; examining, analyzing, and interpreting accounting data, records, and reports; or advising or assisting management on accounting and financial management matters. Certain aspects of the appellant's work seem similar to the latter two tasks; i.e., he/she reviews accounting records and advises management on accounting issues to ensure compliance as a part of his/her comprehensive work product. However, these duties are not performed as part of the accounting operations of the organization under review nor does the appellant function as a management advisor within the organizations reviewed.

GS-510 series positions apply specific accounting theories, concepts, and principles that address such duties as: determining the boundaries of an accounting entity; recognizing and measuring revenues; matching revenues and expenses by applying accounting methodologies; defining and measuring costs by applying accounting methodologies; and full disclosure on financial statements. Of these, the appellant does not perform any on a regular basis and only parts occasionally. For example, he/she supported the Resources Management Division in Certified Financial Officer monthly compliance reviews by assessing the Corrective Action Plans. The reviews resulted in directing resources to improve processes and internal controls in support of financial management for the District's civil works program.

The title of "Accountant" for GS-510 positions is used when the work performed includes a combination for the following activities or for combinations of different accounting work when none is paramount: preparing, analyzing, interpreting, and presenting accounting data; operating, maintaining, and modifying accounting systems; using accounting information to recommend solutions to management problems and structuring of organization programs; managing, operating, and analyzing cost activities in connection with manufacturing or other business activities; or designing, implementing, and assessing internal control processes and

systems. The appellant performs accounting activities in relation to assigned reviews/audits, but he/she does not perform any of the four broad types of work of Federal accountants covered by the 500 Job Grading Standard. These include the generic title, "Accountant," which is used for positions that include combinations of different work when none is paramount. Other more specific established titles are used as follows: "Cost Accountant" for positions which design appropriate costing methodologies to recognize, determine, accumulate, and report costs of activities on a regular basis for management information purposes; "Staff Accountant" for a variety of positions which study and advise on accounting and financial management matters; and "System Accountant" for positions which design, adapt, or install financial accounting and related systems.

The agency acknowledges while there are some elements characteristic of GS-510 positions not found in the appellant's position (e.g. designing, developing, operating accounting systems or prescribing accounting standards, policies and requirements), there are sufficient duties that do fall within the coverage of the 510 series to warrant classification of this position as a GS-510 Accountant. The record shows some aspects of the appellant's work are similar to certain activities of GS-510 work; however, these are relatively limited in scope, are performed in support of the actual nature and purpose of his/her work, and are not the paramount requirements of the position or the primary mission of the IR office.

Our fact-finding reveals the appellant is rated on the results of his/her audit analysis work which flows from the mission and function of the organizational entity to which he/she is assigned, none which refers or relates to the performance of major accounting work. The appellant's current PD is similar to his/her previous Auditor PD; however, it includes accounting duties which both he/she and his/her supervisor confirm he/she does not perform. For example, his/her current PD states he/she provides recommendations in the solution of accounting operational problems and implements new and changed regulations and procedures. It also states he/she conducts analysis of automated systems and performs complex professional accounting tasks. However, our review reveals these responsibilities are not associated with the appellant's day to day work assignments.

The record shows the appellant does not perform about half the work described in his/her current standardized PD. As discussed previously, this includes several major duties which the appellant neither performs nor is held accountable for in his/her official performance standards. Therefore, we find the PD does not meet the standards of PD adequacy addressed on pages 10 and 11 of the Introduction to the PCS. Since the appellant's PD does not adequately address the actual duties and responsibilities of his/her position, it must be revised accordingly.

The Auditing series, GS-511, covers positions which apply professional accounting and auditing knowledge, standards, and principles to the systematic examination and appraisal of financial records, financial and management reports, management controls, policies and practices affecting or reflecting the financial condition, and operating results of an activity; analyzing work related to the developing and executing audit policies and programs; conducting performance audits; or conducting activities related to the detection of fraud, waste, and abuse.

Audits are described as either financial or performance types. To conduct either, an individual must apply professional accounting and auditing knowledge, standards, and principles. For GS-511 work, accounting knowledge is applied as a tool to evaluating financial programs as opposed to being used to create accounting products. To conduct a performance review, the individual must have the knowledge, skills, and ability to review all aspects of a program. This includes researching the specific industry and operations of the program, analyzing cost to determine if the program costs are reasonable and accurate, interviewing all levels of staff from the program personnel to senior managers and writing comprehensive, yet easily understandable evaluation reports that both describe any problems and provide possible solutions. The auditor must be versed in the details of the program and be able to identify abnormalities and bottlenecks. Financial audits render an opinion on whether the existing financial statements are accurate and were performed using generally accepted accounting principles, requiring the ability to use accounting knowledge.

As discussed previously, our fact finding reveals the appellant performs audits of programs' effectiveness rather than of financial reviews. A review of the appellant's performance standards shows he/she established an audit plan guide for the District and completed five scheduled audits and two unscheduled audits. The guide is also used to educate staff members of specific objectives, procedures, and expectations involved in audits. As reflective of auditing work assignments, the appellant audited the District's Health Fitness program which involved researching public law, Comptroller General Decisions, Army regulations and COE Health Fitness program policies. He/she interviewed the program manager to determine appropriate audit program to orchestrate and addressed objectives. He/she also interviewed employees to ensure financial data reports, work operations, and processes were consistent and accurate.

Both the supervisor and appellant report the appellant performs the full range of the GS-511 duties as an integral portion of his/her position (as discussed previously in this decision). Our fact-finding reveals the appellant performs all phases of a performance audit and aspects of the performance and financial audits. Therefore, we find the appellant's primary and paramount work is covered by the GS-511 series, and his/her position is properly titled as Auditor, GS-511. It is covered by the JFS for Professional and Administrative Work in the Accounting and Budget Group, GS-500 for grade level determination.

Grade determination

The appellant did not appeal the grade level of his/her position or contest the factor levels assigned by the agency: Levels 1-7, 2-4, 3-4, 4-4, 5-4, 6/7-3c, 8-1, and 9-1. After careful review of the record, we concur with the levels assigned and have credited the position as follows:

Summary

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-7	1250
Supervisory Controls	2-4	450
Guidelines	3-4	450
Complexity	4-4	225

Scope and Effect	5-4	225
Personal Contacts/Purpose of Contacts	6/7 3-c	180
Physical Demands	8-1	5
Work Environment	9-1	<u>5</u>
Total		2790

The total of 2790 points falls within the GS-12 range (2755 – 3150) on the grade conversion table.

Decision

The appellant's position is properly classified as Auditor, GS-511-12.