

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

Appellant: [name]

Agency classification: Equal Employment Specialist
GS-260-13

Organization: Equal Employment Opportunity
and Diversity
Pension Benefit Guaranty Corporation
Washington, DC

OPM decision: Equal Employment Specialist
GS-260-9

OPM decision number: C-0260-09-01

//Judith A. Davis for

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

2/27/2013

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a classification 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 the conditions and time limits specified in title 5, Code of Federal Regulations, sections 511.605, 511.613, and 511.614, as cited in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

Since this decision lowers the grade of the appealed position, it is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The applicable provisions of parts 351, 432, 536, and 752 of title 5, Code of Federal Regulations, must be followed in implementing this decision. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented. 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 within 30 days from the effective date of the personnel action to the OPM office which accepted the appeal.

Decision sent to:

[claimant]

Ms. Arrie Etheridge
Director, Human Resources Department
Pension Benefit Guaranty Corporation
1200 K Street, N.W.
Washington, DC 20005-4026

Introduction

The U.S. Office of Personnel Management's (OPM) Merit System Audit and Compliance accepted this position classification appeal on January 25, 2012. The appellant occupies the position of Equal Employment Specialist, GS-260-13, in the Office of Equal Employment Opportunity (EEO) and Diversity at the Pension Benefit Guaranty Corporation (PBGC) in Washington, DC. She requests reclassification of her position as Special Emphasis Program Manager, GS-260-14. We accepted and decided this appeal under the provisions of section 5112 of title 5, United States Code.

The appellant initially requested review of her position by the servicing human resources division (HRD), which sustained its current classification by decision dated June 27, 2011. The appellant subsequently appealed the initial decision and the HRD conducted a second position review, which determined the position should be classified at the GS-12 level.

General Issues

The appellant believes her position warrants upgrading based partly on her understanding that special emphasis program positions in other agencies, and in particular the people with disabilities program, are classified at higher grade levels. 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 others as a basis for deciding her appeal.

However, we note that similar positions at different agencies may properly occupy a range of grade levels. The grade of a position is based on a number of elements relating to the difficulty, complexity, and responsibility of the work performed as determined or influenced by the organizational context within which it operates. For example, a special emphasis program position at the headquarters level of a large Department with subordinate bureaus and many field locations, with consequent responsibility for providing program direction, review, and evaluation to program staff at subordinate levels, would be expected to support a higher grade level than a counterpart position at a small organization with no subordinate levels, such as PBGC.

Position Information

The appellant is designated as the coordinator for PBGC's people with disabilities special emphasis program. In this capacity, she performs such assignments as providing input to EEO reports (e.g., EEO Management Directive 715); providing comments on HRD proposals such as recruitment initiatives for targeted groups and reasonable accommodation guidelines; preparing notices, speaking points, and other informational material to inform PBGC employees of upcoming special emphasis program events and observances; participating with HRD in coordinating the National Disability Employment Awareness Month (NDEAM) observance; and researching other Federal agency websites to obtain information on their policies, initiatives, and best practices and summarizing and conveying this information for PBGC management.

The appellant's position description (PD) does not accurately represent the work she performs. The PD (#1873) appears to have been crafted as a generic Equal Employment Specialist position covering the range of possible functions carried out within an EEO office, including processing EEO complaints; designing and conducting EEO training; and identifying, analyzing, and recommending solutions to systemic EEO problems. However, the appellant does not perform these duties. The work she performs within her primary area of responsibility, the people with disabilities program, is not specifically addressed, although some of the duties described are broadly applicable, such as reports submission. Further, the narrative descriptions under the various factors in the PD overstate the basic nature and characteristics of her assignments and generally portray her position as having a greater degree of authority, difficulty and complexity than can be supported by the actual work performed.

We conducted an on-site desk audit with the appellant and a subsequent interview with her first-level supervisor. We decided this appeal by considering the audit findings and all information of record furnished by the appellant and her agency, including her official PD and other material received in the agency administrative report, supplemented by work samples provided by the appellant and her supervisor.

Series Determination

The appellant's position is properly assigned to the Equal Employment Opportunity Series, GS-260, which covers positions concerned with developing, administering, evaluating, or advising on the Federal Government's internal EEO program within Federal agencies, including managers or coordinators of special emphasis programs. Neither the appellant nor the agency disagrees.

Title Determination

The appellant requests that her position be titled Special Emphasis Program Manager. The GS-260 series standard instructs that the Equal Employment Manager title is used for positions that have primary responsibility for a total EEO program or an identifiable part of the program (e.g., Federal women's program, Hispanic employment program, etc.). The term "managerial" as it relates to program management responsibility, including EEO program management responsibility, is defined in OPM's General Schedule Supervisory Guide as follows:

The authority vested in some positions under the General Schedule which direct the work of an organizational unit, are held accountable for the success of specific line or staff functions, monitor and evaluate the progress of the organization toward meeting goals, and make adjustments in objectives, work plans, schedules, and commitment of resources. As described in 5 U.S.C. [United States Code] 5104, such positions may serve as head or assistant head of a major organization within a bureau; or direct a specialized program of marked difficulty, responsibility, and national significance.

The GS-260 series standard refers users to OPM's Digest of Significant Classification Decisions, Number 3 (Digest 3), for additional guidance on distinguishing between "specialist" and

“manager” positions. This guidance includes the below discussion which expands upon the above “managerial” definition within the context of an EEO program:

[OPM] has held that primary responsibility [for a program or identifiable part of a program] includes accountability for performance of the assigned program; e.g., planning, organizing, directing, staffing, coordinating, reviewing, and evaluating the program. More specifically, seven or all eight of the following program management responsibilities should be included to warrant managerial titling:

1. development of recommendations to management on the level and mix of resources (staff, money, space and equipment) to be assigned to the program;
2. allocation of assigned resources within the program to meet program objectives;
3. assignment, direction, and review of the equal employment opportunity program work of collaterally assigned or subordinate employees;
4. explaining to and gaining the support of the workforce for management’s equal employment opportunity policies and goals;
5. coordination of program activities with other staff offices and with line managers to achieve mutual objectives;
6. systematic evaluation of program activities and functions to measure the degree of success of program efforts;
7. recommending changes in program methods and approaches based on evaluation results; and
8. periodic assessment of the applicability of current local equal employment opportunity program objectives and recommending changes.

Thus, the terms “management” or “program management” by definition refer to the management of people, money, and other resources. In order for a position to be titled “manager” or “program manager,” it must include responsibility for managing a staff and budget. The GS-260 standard, in its titling instructions, makes this distinction clear by recognizing that positions may be organizationally titled within their agencies as, for example, Federal Women’s Program *Manager* or Hispanic Employment Program *Coordinator*, depending on the types of responsibilities delegated to the employee and permitted by the size and structure of the program or program segment.

The appellant performs a range of assignments related to the people with disabilities segment of the PBGC EEO program. However, these assignments are self-contained and do not involve assigning, directing, and reviewing the work of others, either collaterally assigned or subordinate employees, nor does this segment of the program have a separate budget allocation under the appellant's control. She performs certain limited assignments involving coordination with HRD, but there is no indication she is responsible for coordinating program activities with line managers to further mutual objectives, nor is she responsible for systematically evaluating the success of program efforts and recommending changes in program methodology and approaches based on this program assessment. In short, notwithstanding any unofficial organizational title her position may be called within the agency, she does not perform functions that can be considered “managerial” in nature and the official title Equal Employment Manager is thus not appropriate.

The appellant's position is correctly titled as Equal Employment Specialist, which is the authorized title for nonsupervisory, nonmanagerial positions in this series.

Grade Determination

The position was evaluated by application of the grade-level criteria provided in the standard for the Equal Employment Opportunity Series, GS-260. This standard is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade conversion table provided in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails in any significant aspect to meet a particular factor-level description, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

The appellant contests the agency's evaluation of Factors 2 and 5. She does not contest the agency's evaluation of Factors 1, 3, 4, 6, 7, 8, and 9. After careful review of the record, we disagree with the agency's factor-level assignments for Factors 1 through 7 as discussed below.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of information an employee must understand in order to do the work, and the skills needed to apply that knowledge.

The agency initially assigned Level 1-8 under this factor, but changed it to Level 1-7 in its appeal decision.

At Level 1-6, the work requires knowledge of the principles, concepts, legal requirements, and methodology of the Federal EEO program, and skill in applying this knowledge to perform independent assignments for which there are precedents. This includes practical knowledge and skill in interpreting and applying a body of law, regulations, and procedures; skill in applying conventional factfinding, analytical, and problem solving methods; knowledge of the common policies, practices, and operations of the Federal personnel system and the functions and structure of Federal agencies; and skill in analyzing facts, identifying problems, reporting findings, making conclusions, and recommending corrective action. The following example of Level 1-6 knowledge requirements is provided in the standard:

- Equal employment opportunity specialists provide advice to management concerning preparation and monitoring of detailed affirmative action plans for organizational segments of a Federal agency. They make recommendations based on their analysis of workforce characteristics, organizational structure, and utilization of employees by age, race, gender, religion, national origin, handicapping condition, and other bases.

At Level 1-7, the work requires comprehensive and thorough knowledge of EEO laws, regulations, and court decisions; knowledge of the organizational structure and management

policies and practices of the agency, including personnel regulations and practices related to recruitment, selection, labor relations, and job evaluation; and skill in identifying complex EEO problems and developing concrete action plans to solve these problems and to advise managers on appropriate courses of action to eliminate barriers to equal employment opportunity.

The GS-260 standard contains several benchmark descriptions which depict typical work situations, with the factors point-rated using the factor-level descriptions in the standard. One of these benchmarks, a position for a GS-11 Equal Employment Manager of an installation-level Hispanic employment program, credits Level 1-7 knowledge requirements in connection with performance of the following duties:

- Advises the installation equal employment manager, the installation director, and other line and staff managers on problems affecting the promotion, development, training, and recruitment of Hispanic employees and applicants;
- Provides training for managers and supervisors concerning their responsibilities in the implementation of the Hispanic employment program. Serves as the organization's resource person and principal staff advisor on the unique concerns of Hispanic employees and job applicants;
- Plays an active role in the design and implementation of the organization's efforts to recruit more Hispanic employees;
- Assists individual employees (in conjunction with their supervisors and members of the HR staff) in development of individual development plans to fit their needs;
- Works with the installation equal employment manager and equal employment opportunity counselors on policy and case background on discrimination complaints;
- Participates in recruitment planning to develop ways of eliminating underrepresentation of Hispanic employees in professional, supervisory, and managerial positions and in the organization in general.

The distinction between Levels 1-6 and 1-7 lies in the degree to which the employee is actively engaged in identifying and resolving issues related to underrepresentation of the targeted group. At Level 1-6, the employee is confined largely to activities involving publicizing or explaining the special emphasis program and determining the attainment of equal employment objectives through basic factfinding methods, such as by monitoring affirmative action plans (as described in the Level 1-6 example above) to determine whether hiring targets have been met or whether the grade distribution of employees in the targeted group is comparable to that of the general workforce. In contrast, Level 1-7 requires a higher order of knowledge and analytical skills to delve into the deeper causes for underrepresentation not only in hiring but also in the advancement of employees, thus requiring knowledge of a broader spectrum of HR practices as they affect the targeted group to determine, for example, disparities in training and development or other barriers affecting promotion.

The knowledge required by the appellant's position, based on the work she has performed to date, is comparable to Level 1-6. As at this level, the appellant's work has consisted largely of activities involved in either publicizing or reporting on the program where precedents are available (e.g., planning the NDEAM observance). It requires knowledge of the program actions mandated by EEO laws and regulations as they relate to the special emphasis program; sufficient

knowledge of HR practices and operations to provide comments on their special emphasis-related initiatives (such as reasonable accommodation guidelines); and skill in researching other agency practices and relating these to PBGC efforts to increase recruitment of persons with disabilities.

The appellant's work has not, however, required the exercise of the type of knowledge described at Level 1-7, nor has she demonstrated performance of the range of duties with the associated knowledge requirements described at Level 1-7, and in particular those commonly associated with special emphasis program coordinators as depicted in the benchmark cited above. The record, including work samples provided by the appellant and her supervisor, shows no evidence of work assignments that require "comprehensive and thorough knowledge of equal employment opportunity laws, regulations, and court decisions" to, for example, advise management and provide training on the requirements and limitations of reasonable accommodation, or to participate in the development of "policy and case background on discrimination complaints" from employees with disabilities. The record includes no assignments that require "knowledge of the organizational structure and management policies and practices of the agency, including personnel regulations and practices related to recruitment, selection, labor relations, and job evaluation" to, for example, identify opportunities for the advancement of employees in the targeted group or identify barriers to that advancement. The record includes no assignments that require "skill in identifying complex EEO problems and developing concrete action plans to solve these problems" by, for example, playing "an *active* role in the design and implementation" of recruitment efforts and participating in recruitment planning to eliminate underrepresentation. In short, the appellant has been engaged in activities that contribute to promoting and publicizing PBGC's persons with disabilities program, and in gathering information on other Federal agency initiatives and best practices and communicating these for consideration by PBGC management. However, her work has not demonstrated the performance of the types of in-depth and concrete problem analysis and resolution that provide the context for the exercise of Level 1-7 knowledge requirements.

Level 1-6 is credited (950 points).

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 agency assigned Level 2-4 under this factor. The appellant believes Level 2-5 should be credited.

At Level 2-3, the supervisor defines objectives, sets priorities and deadlines, advises on potential problems, and assists the employee with unusual situations which do not have clear precedents. The employee executes the project or task according to accepted practices and within the established policy framework and guidelines of the organization, but has latitude to alter the sequence of steps and coverage of factfinding to accomplish the assignment. Completed work such as complaint investigation reports, developing affirmative action plans, conducting discussions on changing employment practices, or other projects are reviewed for technical

soundness, appropriateness, and conformance to policy and requirements, with review focusing on the soundness of end results rather than the adequacy of the methods employed.

At Level 2-4, the supervisor sets the overall objectives and resources available. The supervisor and employee collaborate in developing deadlines and approaches to unusual or particularly sensitive problems. The employee plans and carries out the work, advising the supervisor of major unexpected problems or significant controversial issues. Completed work is reviewed for fulfillment of objectives within established target dates.

Thus, at Level 2-3 the employee works on assigned “projects or tasks” independently to the extent that precedents are available, whereas at Level 2-4 the employee carries out the work associated with an assigned area of responsibility within the “overall objectives and resources available.” Further, the distinction between Levels 2-3 and 2-4 relates not only to the degree of supervisory controls exercised but also the extent of the employee's responsibility, which in turn is directly related to the nature of the work performed. Thus, at Level 2-3 the work consists primarily of written products (such as complaint investigation reports or affirmative action plans) or other projects of a more concrete nature that lend themselves to the type of technical review described at this level. In contrast, at Level 2-4 the work potentially involves "unusual, particularly sensitive, or major problems" or "significant controversial issues" which provide the context for the nature of the more general supervision exercised; i.e., initial discussion of the problems or issues expected with review basically limited to whether a positive outcome was achieved. In short, Level 2-4 supervision and review are predicated on work geared more toward problem resolution than on factfinding or other projects of a relatively noncontroversial nature.

The appellant's supervisory controls meet Level 2-3. For the most part, the appellant completes “projects or tasks” that are either specifically assigned or suggested by the supervisor in accordance with established practices, such as providing input to recurring reports or preparing promotional materials for special emphasis program events where source material is available for reference. Completed work is reviewed for accomplishment and for the acceptability of the end products.

The appellant's work does not involve either the level of responsibility or the performance of the types of work that would support crediting of Level 2-4. The appellant has submitted no work samples demonstrating that she has independently initiated or undertaken projects involving the resolution of "unusual or major problems" or "significant controversial issues" that would lend themselves to this type of supervision and review. The limited written work products presented for our review do not extend beyond information transmittal; e.g., promotional materials for various special emphasis program observances, such as National Deaf History Month, and summaries of other Federal agencies' best practices. Level 2-4 contemplates situations where the employee works independently in resolving problems and controversial situations encountered in the course of the carrying out an area of responsibility. If the work does not involve in-depth problem resolution, then this level of responsibility is not applicable.

Level 2-3 is credited (275 points).

Factor 3, Guidelines

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

The agency assigned Level 3-4 under this factor.

At Level 3-3, guidelines include laws, Executive Orders, regulations, directives, written instructions, and manuals. However, many significant factual situations and problems are encountered which are not specifically covered by guidelines. The employee exercises judgment in interpreting, adapting, or extrapolating from existing guidelines to arrive at a finding or conclusion or to decide to take a particular course of action.

At Level 3-4, guidelines include laws, Executive Orders, policy statements, governmentwide or agency directives, and broadly-stated procedural manuals. These guidelines are often inadequate in dealing with unusual cases such as developing EEO programs or materially redesigning existing programs to meet new objectives. The employee uses initiative and resourcefulness in extending or redefining guidelines in such assignments as, for example, solving unique EEO problems or developing guidelines, criteria, and methods for carrying out an EEO program.

The distinction between Levels 3-3 and 3-4 is that at Level 3-3 the employee interprets and applies existing guidelines whereas at Level 3-4, the employee extends or develops new guidelines for application by others. Within this context, the appellant's use of guidelines meets Level 3-3. The appellant presented no work products that can be construed as representing guidelines or criteria for developing or carrying out the special emphasis program. Although she has researched other Federal agency practices and made recommendations for their adoption by PBGC, she presented no work samples demonstrating her active participation in the implementation of any such initiatives.

Level 3-3 is credited (275 points).

Factor 4, Complexity

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

The agency assigned Level 4-4 under this factor.

At Level 4-3, employees perform complete assignments requiring use of a variety of analytical and other techniques to solve a problem or arrive at a conclusion. The employee must choose from several courses of action depending on the facts and issues involved and the objectives of the assignment, and selects the appropriate factfinding or analytical techniques based on the nature of the problem, although standard analytical techniques must be modified somewhat to deal with particular issues. A typical assignment described in the standard at Level 4-3 is the "investigation or review of charges of discrimination involving many interrelated facts and one or more issues such as failure to hire an applicant or failure to promote an employee," or "the

review, evaluation, and updating of affirmative action plans for various organizations within an agency.”

At Level 4-4, employees perform complete assignments with widely varying duties including the complete cycle of factfinding, problem definition and identification, determining cause and effect relationships, making conclusions, and recommending a decision or proposing action. For example, they may perform comprehensive analyses of broad policies and practices of complex organizations, such as “compliance reviews of (or investigations of complaints of discrimination on the part of) employers concerning a broad range of improper policies and systemic practices including a number of fundamental activities (e.g., hiring, promotion, and treatment of employees on the part of an employer)” as depicted in the benchmark description cited under Factor 1. More specific to the position of special emphasis program coordinator, assignments focus on solving the special problems faced by the targeted group by identifying local employment policies and practices that need to be changed to meet program goals and objectives, identifying priority problems by analyzing workforce composition by occupations, grade levels, and career ladders, and performing management advisory services including one-on-one consulting and seminars to explain the program and develop managers' awareness of their responsibilities in its implementation.

The complexity of the appellant's work is consistent with Level 4-3 in that it involves the exercise of standard factfinding and analytical techniques, such as gathering data for reports and researching other agency websites.

The appellant's work does not involve the degree of complexity that would support crediting of Level 4-4. The record includes no examples of projects involving the comprehensive analysis of agency employment policies and practices, the analysis of workforce composition, the conduct of management advisory services, or any other work that would involve the degree of factfinding, problem definition and identification, determining cause and effect, and drawing conclusions and recommending actions as described at this level. The analysis and recommendations involved in the appellant's work do not extend beyond gathering information about other Federal agency initiatives and presenting them to PBGC management for possible adoption. The appellant has not demonstrated that she has, for example, tailored these initiatives to fit PBGC circumstances, or presented any written work samples displaying the conduct of analyses of an equivalent level of complexity.

Level 4-3 is credited (150 points).

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 both within and outside the organization.

The agency assigned Level 5-5 under this factor, but changed it to Level 5-4 in its appeal decision. The appellant believes Level 5-6 should be credited.

At Level 5-3, employees investigate or analyze individual EEO problems, and/or recommend or negotiate resolution of the problems. The work results in resolution of individual complaint cases or the presentation of factual information to be used by others in altering agency practice. The work affects specific practices of Federal installations or organizational segments of Federal agencies.

At Level 5-4, employees conduct projects to solve broad, difficult, and complex EEO problems through systematic factfinding, analysis, and consulting efforts. The work results in the resolution of a wide variety of problems ranging from individual complaints to elimination of systemic barriers to EEO, such as policies or widespread practices in a segment of a Federal agency. The work affects the equal employment opportunity of many persons.

The scope and effect of the appellant's work is comparable to Level 5-3, particularly as it relates to presenting "factual information to be used by others in altering agency practice" through, for example, providing input to reports or researching other Federal agencies' policies and practices.

Level 5-4 is not met. The record fails to show the appellant performs "systematic factfinding, analysis, and consulting" to resolve broad and complex EEO problems. She presented no work samples demonstrating a systematic approach to improve representation for the targeted groups, or technical assistance provided to managers affecting the equal employment opportunity of the targeted groups.

Level 5-3 is credited (150 points).

Factor 6, Personal Contacts

This factor includes face-to-face and telephone contact and other dialogue with persons not in the supervisory chain.

The agency assigned Level 6-3 under this factor.

At Level 6-2, contacts are with employees within the agency but outside the immediate work unit, such as attorneys, HR specialists, or agency program managers, where the content of each contact is different and the role or authority of each party is identified and developed during the course of the contact.

The appellant's personal contacts match Level 6-2 in that the majority of her contacts are internal to the agency.

At Level 6-3, contacts are with persons outside the employing agency such as attorneys, equal employment specialists from other agencies, union officials, or community organization representatives, or with employees and managers within the same agency when these contacts are moderately unstructured, such as in adversarial situations or where the employee is providing consulting services to agency managers when the issues are sensitive, the meetings are not routine, and the roles and authorities of the parties must be determined during the initial contacts. This level typically occurs when the employee is an in-house consultant and the inherent

communication barriers in relationships with persons of the same agency are analogous to communication barriers in relationships with persons from outside the agency.

Level 6-3 is not met. The appellant has only occasional contacts with EEO or HR staff at other agencies, and she has presented no examples of contacts she has had within PBGC that are adversarial in nature.

Level 6-2 is credited (25 points).

Factor 7, Purpose of Contacts

This factor covers the purpose of the contacts identified under Factor 6.

At Level 7-2, the purpose of the contacts is to advise on programs, consult and assist individuals and officials of organizations on issues, questions, and programs when the goals of the person contacted are essentially similar to those of the employee.

The agency assigned Level 7-3 under this factor.

The purpose of the appellant's contacts matches Level 7-2 in that her contacts are primarily to provide advice and assistance.

At Level 7-3, the purpose of the contacts is to negotiate on procedural points, conduct formal interviews, or to persuade individuals.

Level 7-3 is not met. The appellant has presented no examples of instances where she has been involved in negotiations, conducted formal interviews, or otherwise engaged in work that involves direct personal contacts in persuading others to adopt a particular course of action.

Level 7-2 is credited (50 points).

Summary

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-6	950
Supervisory Controls	2-3	275
Guidelines	3-3	275
Complexity	4-3	150
Scope and Effect	5-3	150
Personal Contacts	6-2	25
Purpose of Contacts	7-2	50
Physical Demands	8-1	5
Work Environment	9-1	<u>5</u>
Total		1885

The total of 1885 points falls within the GS-9 point range (1855-2100) on the grade conversion table provided in the standard.

Decision

The position is properly classified as Equal Employment Specialist, GS-260-9.