



# United States Office of Personnel Management

## **Office of Merit Systems Oversight and Effectiveness**

### ***Digest of Significant Classification Decisions and Opinions***

December 2002

Article No. 29-05

**Standard:** Paralegal Specialist, GS-950, (August 1986) [\[PDF\]](#) [\[TXT\]](#)

**Factor:** N/A

**Issue:** Classifying FOIA coordinator positions

### **Identification of the Classification Issue**

The appellant's position was classified as Information Release Specialist, GS-301. She believed that her position should be classified at a higher grade level.

### **Resolution**

The appellant processed Freedom of Information Act (FOIA) requests for material contained in Office of the Inspector General (OIG) investigative files and inspection reports at the agency level. She determined what information was not releasable, redacted it from the material, and prepared the response to the requestor. The appellant was regarded as the agency expert on the FOIA as it relates to IG records, and she regularly answered questions from field personnel on redaction issues. She updated agency instructions on IG records release, and conducted training for new IG action officers and other field personnel on processing FOIA requests.

The agency used the Administrative Analysis Grade Evaluation Guide (AAGEG) to evaluate the position. OPM found that this was not the best source of grade-level criteria given that the AAGEG is designed specifically to evaluate staff analytical, planning, and evaluative work unrelated to the type of work performed by the appellant. References to evaluating requests for information under the FOIA are found in the GS-950 standard, allowing for direct grade level comparison to the appellant's duties. The position was found supportable at its current grade level.

### **“Back to the Basics”**

The Administrative Analysis Grade Evaluation Guide is a useful tool for evaluating work for which no directly-applicable grade level criteria are available. However, if it is used to evaluate work that is functionally very different from the type of project-oriented evaluative work for which it is intended, there may not be enough common elements in the work to make a valid comparison. Also, the classification analysis will be so generalized that the basis for the conclusions may not be convincing or understandable to the employee. In such instances, it is preferable to use a standard that addresses work in either a related occupation or that involves the performance of directly analogous functions.