

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



Dallas Oversight Division  
1100 Commerce Street, Room 4C22  
Dallas, TX 75242

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

**Appellant:** [The appellant]

**Agency classification:** Statistical Assistant  
GS-1531-7

**Organization:** Department of Interior  
Bureau of Land Management  
New Mexico State Office  
[exact location of appellant's  
Installation]

**OPM decision:** GS-1802-7  
title at agency discretion

**OPM decision number:** C-1802-07-01

/s/ \_\_\_\_\_

Bonnie J. Brandon  
Classification Appeals Officer

5/28/98 \_\_\_\_\_

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

**Decision sent to:**

[the appellant]

[the name and address  
of the appellant's servicing  
personnel office]

[the name and address of the  
appellant's higher level personnel  
officer]

Director of Personnel  
Department of Interior  
Washington, DC 20240

## **Introduction**

On April 4, 1997, the Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) received a classification appeal from [the appellant]. Her position is currently classified as Statistical Assistant, GS-1531-7. However, she believes its classification should be to either the GS-1801 or GS-511 series at the GS-11 grade level. She works in the Fluid Operations Team, [district office], New Mexico State Office, Bureau of Land Management (BLM), Department of Interior, [city and state of appellant's district office]. We have accepted and decided her appeal under section 5112 of title 5, United States Code.

To help decide the appeal, an Oversight Division representative conducted a phone audit of the appellant's position. The audit included interviews with the appellant and her immediate supervisor. In reaching our classification decision, we have reviewed the audit findings and all information of record furnished by the appellant and her agency, including her official position description 03868.

## **General issues**

In May 1996, the appellant's position was affected by a BLM classification consistency review of Oil and Gas Inspection and Production Accountability positions within the Bureau. The position was reclassified from Production Accountability Specialist, GS-1801-11, to Statistical Assistant, GS-1531-7. The appellant appealed this classification to the Department of Interior, which sustained the series and grade of the position.

## **Position information**

The Federal Oil and Gas Royalty Management Act of 1982 places emphasis on proper accountability of production from Federal and Indian oil and gas lease sites. The appellant's position is responsible for reviewing production records to verify the accuracy of oil and gas volumes reported by lease operators. These volumes determine the royalty payments that are due the public and Tribes from Federal and Indian leased land.

The appellant conducts production accountability reviews, generated either from field inspection reports or upon request from other sources such as the Bureau of Indian Affairs (BIA) or Minerals Management Service (MMS) who have noted possible reporting problems. In conducting a review, the appellant examines several Monthly Report of Operations (MRO), reports submitted by operators to the MMS reflecting monthly oil and gas production and sales figures on a lease or well, to insure production was reported and to identify anomalies such as large increases or decreases in production rates. Production reported on the MRO's is compared with production figures reported in Dwight's Energydata system, a public record source. The appellant calculates the actual number of barrels of oil and gas Mcfs produced on the day that a field inspection is conducted based on the measurement information recorded by the inspectors on Form MMS 3160. Barrels of oil are identified using a strapping table and the tank measurements, and gas Mcfs are computed by inputting data, such as the static and differential range, temperature, and gravity figures, into pre-programmed software. These daily production figures are compared with an average daily rate computed from total sales reported on that particular month's MRO. If irregularities in the production histories are noted, the appellant

determines the type of actual production records to request for review from the operator, e.g., pumpers' gauge records, oil run tickets, valve seal records, gas volume statements, etc., and determines how many months of records need to be reviewed in order to determine the extent of noncompliance. The appellant computes or identifies actual production volumes from these records and prepares a written notification to the operator outlining the periods of inaccurate reporting. When an operator provides additional documentation in support of the data initially reported, the appellant determines whether the response sufficiently explains the reason for the discrepancies and decides whether to close the case or require the operator to correct the original MRO production report. The appellant performs under the general supervision of a Supervisory Petroleum Engineer, who heads the Fluid Operations Team.

### **Series and title determination**

The agency has classified the position in the GS-1531 Statistical Assistant Series. This series includes positions which require primarily the application of knowledge of statistical methods, procedures, and techniques, to the collection processing, compilation, computation, analysis, editing, and presentation of statistical data. While the appellant collects, computes, and determines the accuracy of reported production figures, the work does not require a knowledge of statistical methods and techniques in order to perform the duties. Accordingly, classification to the GS-1531 series is not appropriate.

The appellant suggests that her position should be classified in the GS-1801 General Inspection, Investigation, and Compliance Series. This series includes positions that primarily administer, coordinate, supervise, or perform inspectional, investigative, analytical, or advisory work to assure understanding of and compliance with Federal laws, regulations, or other mandatory guidelines when such work is not more appropriately classifiable in another series. This is a two-grade interval series. The GS-1801 standard explains the distinctions between one- and two-grade interval inspection work. A position is properly considered two-grade interval when there is a requirement for analysis and exercise of judgment beyond matching situations found to well-established precedents or clear-cut guidelines. Inspections where the work is of the two-grade interval variety generally combine several phases including, but not necessarily limited to, observation, interview, and examination of records. Judgments made by inspectors engaged in work typical of the two-grade interval pattern are ordinarily based on the interpretation and application of pertinent law and regulations to situations found during the course of an inspection. Situations found in inspections of the two-grade interval pattern are not susceptible to instant determinations of compliance or noncompliance. They require subsequent evaluation of inspection data, and findings are generally recorded in a written narrative.

The appellant's position is not of a two-grade interval nature. In conducting a production accountability review, the appellant is required to carefully examine records to determine if the actual production of oil and gas volumes matches the figures shown on MRO's. The appellant must consider a number of factors that may have affected the amounts of production reported, such as whether an amount of gas used on the lease was reasonable or if amounts of gas reported as flared and vented were within tolerance ranges or in accordance with conditions approved by BLM in a Sundry Notice filed by the operator. However, the appellant's decision as to whether the operator

is complying with the requirement to report accurately ultimately involves a comparison and matching of the production figures the appellant has computed and/or identified from the records with that reported by the operator. These decisions are more clear-cut and readily apparent than those encountered in two-grade interval inspections. Regulations and guidelines used by the appellant in conducting reviews are well established and do not require significant interpretation or adaptation to accomplish the work.

The appellant requests that consideration also be given to classifying the position in the GS-511 Auditor Series. This series includes positions that perform work consisting of a systematic examination and appraisal of financial records, financial and management reports, management controls, and policies and practices affecting or reflecting the financial condition and operating results of an activity. The work of positions included in this series requires the application of professional accounting knowledges, standards, and principles. Although the appellant examines records in order to reconstruct actual oil and gas volumes produced, this type of review does not require the application of professional accounting knowledges, standards, and procedures.

The GS-1802 Compliance Inspection and Support Series includes positions which perform or supervise inspectional or technical support work in assuring compliance with or enforcement of Federal law, regulations, or other mandatory guidelines and which are not classifiable in another, more specific occupational series. The work requires a knowledge of prescribed procedures, established techniques, directly applicable guidelines, and pertinent characteristics of regulated items or activities. The primary purpose of the appellant's position is to conduct the records review portion of inspections of oil and gas operations to ensure operators comply with Federal laws and regulations requiring the accurate reporting of oil and gas volumes produced. As indicated earlier, this work is of a one-grade interval nature in that determinations of compliance or noncompliance are made based on a comparison of the appellant's review of actual production records with those reported. The work requires a working knowledge of oil and gas operations, specifically as related to the production of petroleum products and the records used to determine volumes produced. We have determined that the appellant's position is properly classified to the GS-1802 series.

Since no titles are specified for positions in the GS-1802 series, the agency may establish a title consistent with the Office of Personnel Management's guidelines on titling practices in the Introduction to the Position Classification Standards.

### **Standard determination**

The standard for the GS-1802 Compliance Inspection and Support Series does not contain grade level criteria. Evaluation for nonsupervisory positions in this series is determined by reference to classification standards involving analogous knowledges and skills. We used two standards to determine the grade level: the Grade Level Guide for Clerical and Assistance Work and the GS-344, Management and Program Clerical and Assistance Series, standard.

## Grade determination

### *Evaluation using the Grade Level Guide for Clerical and Assistance Work*

The Grade Level Guide for Clerical and Assistance Work provides general criteria for use in determining the grade level of nonsupervisory clerical and assistance work. Assistance work is defined as technical work performed to support the administration or operation of the programs of an organizational unit. This work requires a working knowledge of the work processes and procedures of an administrative field and the mission and operational requirements of the unit. The appellant's review of production records is consistent with that defined as assistance work in that the work is performed in support of the Inspection and Enforcement Program and a working knowledge of the work processes and procedures involved in reporting production volumes is needed to determine the accuracy of reports. The work requires a knowledge of applicable laws, policies, and regulations relating to the reporting of oil and gas volumes.

The guide provides a general description of the characteristics of each grade level from GS-1 through GS-7 in a three-part format:

- (1) the definition of the grade level as spelled out in the law (5 U.S.C. 5104);
- (2) a description of grade level criteria pertaining to clerical and assistance work written in narrative format as expressed in two evaluation factors: *Nature of Assignment* (which includes the elements of knowledge required and complexity of the work), and the *Level of Responsibility* (which includes the elements of supervisory controls, guidelines, and contacts); and,
- (3) general work examples to illustrate each grade level.

The appropriate grade level is determined by applying the total criteria (i.e., the law, the evaluation factors, and the work examples) and assigning the highest level that matches the work being evaluated. Weaknesses as well as strengths are considered in matching work to the grade level criteria. The following is our evaluation of the appellant's position in terms of this guide.

#### *Nature of Assignment*

At the GS-6 level, the work requires considerable evaluative judgment within well-defined, commonly occurring aspects of an administrative program or function. The work involves continuing processes based on direct application of established policies, practices, and criteria. Assignments consist of a relatively narrow range of case situations that remain stable and resemble past problems or situations. The work requires practical knowledge of guidelines and skill to recognize the dimensions of a problem and express ideas in writing.

At the GS-7 level, the work consists of specialized duties with continuing responsibility for projects, questions, or problems that arise within an area of a program. Work assignments involve a wide variety of problems or situations common to the segment of the program of responsibility. Decisions or recommendations are based on the development and evaluation of information that comes from various sources. The work involves identifying and studying factors or conditions and determining their interrelationships as appropriate to the defined area of work. The work requires knowledge and skill to recognize the dimensions of the problems involved, collect the necessary information, establish the facts, and take or recommend action based upon application or interpretation of established guidelines.

The nature of the appellant's assignments exceeds the GS-6 level in that the work involves a broader range of situations and problems than described at this level. As at the GS-7 level, the appellant's work is specialized and involves continuing responsibility for planning and conducting in-depth reviews of production records which substantiate or dispute the oil and gas volumes reported by lease or well operators. In conducting the reviews, the appellant may encounter a variety of differing situations relating to the lease agreements which must be taken into consideration in determining the cause of reporting errors, such as the effects communitization agreements have on royalty distributions and reporting requirements, determining if production is carried out in accordance with approved sundry notices, reviewing site security plans to identify machinery in operation which may be using gas on the lease and determining whether the amounts are reasonable, etc. The appellant identifies discrepancies in the production reports and determines the type and amount of records which must be reviewed in order to determine the extent of the inaccuracies and advise the operator of the corrections needed to achieve compliance. A variety of records in varying formats relating to the production of oil and gas are reviewed to determine appropriate volumes, such as pumpers' gauge records, oil run tickets, valve seal records, gas integration charts, spill reports, hauling tickets, etc. The appellant notifies the operator, either orally or in writing, of the discrepancies, considers any response, and independently decides whether to require the operator to amend production reports.

#### *Level of Responsibility*

At the GS-6 level, the supervisor assists with precedent assignments by providing an interpretation of policy. Completed work is evaluated for appropriateness and effectiveness in meeting goals. Guidelines are available but often are not completely applicable to the assignment or have gaps in specificity. The employee uses judgment in interpreting and adapting guidelines, and bases decisions and recommendations on facts and conventional interpretations of guidelines rather than on theory or opinion. Personal contacts are with employees in the agency or in other agencies, with management, or with those using the services. The contacts are for the purpose of providing, receiving, or developing information in order to identify problems, needs, or issues or coordinate work efforts and resolve problems.

At the GS-7 level, the supervisor makes assignments in terms of objectives, priorities, and deadlines. The employee independently completes assignments in accordance with accepted practices, resolving most conflicts that arise. Completed work is evaluated for appropriateness and conformance to

policy. Guidelines for the work are more complex than at the GS-6 level because the employee encounters a variety of problems and situations which require choosing alternative responses. Guides tend to be general and descriptive of intent, but they do not cover all aspects of the assignments. Employees must use significant judgment and interpretation to apply the guides to specific cases. The contacts and purpose of contacts are generally the same as at the GS-6 level. However, to a greater degree, the employee serves as a central point of contact to provide authoritative explanations of requirements, regulations, and procedures and resolve operational problems or disagreements affecting assigned areas.

The appellant's level of responsibility exceeds the GS-6 level in that she operates with more independence and receives less assistance from the supervisor than described at that level. Based on overall program objectives, the appellant selects cases for review and determines when to expand the scope. Although the appellant occasionally seeks the advice of an engineer on any highly technical aspects of the work not previously encountered, the appellant conducts and concludes production reviews independently. Completed work is reviewed in terms of the soundness of conclusions and consistency with established objectives. Guidelines used by the appellant include the Federal Oil and Gas Royalty Management Act; Code of Federal Regulations, including BLM Onshore Orders; and internal instruction memoranda and guidance material. The appellant recognizes situations encountered during the reviews that are not in compliance with requirements and advises operators of their responsibilities, e.g., advises operators of the requirements relating to classification of oil as slop oil, timely disposition of oil production, obtaining approval of off-lease measurement, storage, and surface commingling, etc. The appellant is a central point of contact within her office concerning the conduct of the production reviews. Contacts are established with representatives from other Federal agencies and operators or their representatives, such as accountants and attorneys, to resolve discrepancies and obtain compliance with reporting requirements. The appellant's level of responsibility is consistent with that depicted at the GS-7 level.

#### *Grade Summary*

Based on application of this guide, GS-7 is determined to be the proper grade of the position since both factors, *Nature of Assignments* and *Level of Responsibility*, meet that level.

#### ***Evaluation using the GS-344, Management and Program Clerical and Assistance Series, standard***

The GS-344 series includes positions involved in supervising or performing clerical and technical work in support of management analysis and program analysis, the purposes of which are to evaluate and improve the efficiency, effectiveness, and productivity of organizations and programs. The grading criteria in the GS-344 series standard may be used to determine the grade of a position in another series when the nature of the work is equivalent to the intent of the factor level descriptions and work illustrations in this standard. Although the appellant's work is not appropriately classified in this series, the kind of work processes and functions involved in the appellant's duties, as well as the level of difficulty and responsibility of her work, are sufficiently comparable to those outlined in the GS-344 standard to support application of the criteria. This standard is published in the Factor



Evaluation System (FES) format. Under the FES, positions are evaluated by comparing the duties, responsibilities, and qualifications required with nine factors common to nonsupervisory General Schedule positions. A point value is assigned to each factor in accordance with the factor-level descriptions. For each factor, the full intent of the level must be met to credit the points for that level. The total points assigned for the nine factors are converted to a grade by reference to the grade conversion table in the standard. A factor-by-factor analysis of the appealed work is provided.

*Factor 1, Knowledge required by the position*

This factor measures the nature and extent of information or facts a worker must understand in order to do acceptable work and the nature and extent of skills needed to apply these knowledges.

Work at Level 1-3 requires a practical knowledge of a body of established clerical or technical procedures and requirements related to the assigned management and/or program analysis duty or task. It also requires a general knowledge of one or a few similar, established, and relatively stable management or program operations. In addition, some of the work requires one or more of the following: skill in compiling readily available data from prescribed sources and recognizing and correcting obvious discrepancies and data omissions; knowledge of the basic principles of arithmetic to use established formulas to make routine calculations such as standard production rates, staff hours, or funding use; or familiarity with one or more established automated systems to enter, correct, and retrieve factual information, compile reports, produce charts and graphs, or monitor project or program status. Employees use this knowledge to perform a full range of standard duties, tasks, or assignments and to resolve recurring problems.

Level 1-4 requires knowledge of an extensive body of management and/or program analysis technical rules, guidelines, regulations, and precedents. It also requires knowledge of the basic objectives and policies governing various management or program operations. Some work also requires skill in basic data gathering methods, such as standard interviewing, to collect various types of factual information. Some employees also apply knowledge of the standardized processes and procedures for evaluating management or program operations to perform duties such as planning the steps to take to complete assignments, identifying problems from collected data, and selecting solutions from alternatives in guidelines and precedent cases. Some employees also use writing skills to prepare clear, concise reports that describe the data collection techniques and other processes and procedures used, conditions of management or program operations, and recommended improvements. Employees apply this knowledge to individual, nonstandard technical assignments whether the nature of these assignments stems from a changing mix of work or represents diversity within a defined management or program operation. Assignments may involve limited aspects of higher level work.

The knowledge required and nature of skills needed by the appellant to perform her work fully meet but do not exceed Level 1-4. The appellant must apply a working knowledge of oil and gas operations relating to the production measurement of petroleum products and the records used to determine volumes produced, and must have knowledge of the objectives and policies of the Inspection and Enforcement Program in order to determine compliance with reporting requirements

by lease operators. The appellant plans the scope of the production accountability reviews and identifies anomalies and discrepancies in the production data reported. To gather and clarify information concerning the data, the appellant must correspond, both orally and in writing, with operators.

Level 1-4 is credited for this factor and 550 points are assigned.

### *Factor 2 - Supervisory controls*

This factor considers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

At Level 2-2, the supervisor provides general instructions on what is to be done, procedures and methods to follow, data and information required, quality and quantity of work expected, and deadlines. The employee independently carries out recurring tasks or assignments without specific instructions. The supervisor assures that finished work and methods used are technically accurate and in compliance with established instructions, methods, procedures, and deadlines.

At Level 2-3, the supervisor defines the objectives, priorities, and deadlines for projects or assignments and assists the employee with unusual situations, problems, or studies that do not have clear precedents. The employee plans and carries out the successive steps of technical projects and assignments and handles problems in accordance with policies or accepted practices. The supervisor evaluates completed work for technical soundness, appropriateness of conclusions or recommendations, consistency, relevance of support material, and compliance with policies and requirements. The methods used in arriving at the end results are not reviewed in detail.

Supervisory controls over the appealed position fully meet but do not exceed those described in Level 2-3. The supervisor makes the assignments as established in the overall goals. The appellant independently plans and develops the production accountability reviews and resolves problems identified with operators. The appellant is accountable for effective and accurate completion of production accountability reviews. The supervisor does not review the specific methods used by the appellant to determine compliance with reporting requirements, but evaluates completed work in terms of the soundness of conclusions and consistency with established objectives.

Level 2-3 and 275 points are assigned.

### *Factor 3, Guidelines*

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

At Level 3-2, a number of established instructions and procedures for doing the work are readily available and clearly applicable to most assignments. The number and similarity of guidelines and work situations require the employee to use judgment in locating, selecting, and applying the most

appropriate instructions, references or procedures to technical assignments. The employee refers situations involving significant deviations from established guidelines to the supervisor for guidance or resolution.

At Level 3-3, guidelines lack specificity or are not completely applicable to the work requirements, circumstances, or problems because of the unique or complicating characteristics of the assignments. The employee uses judgment in interpreting and adapting guidelines to apply to specific situations such as determining the cause or extent of deviations from established production rates or resource use, or determining whether an organization's proposed directives, publications, or functional statements are within the scope of its established delegated authority or assigned function.

Guidelines used by the appellant include the Federal Oil and Gas Royalty Management Act; Code of Federal Regulations, including BLM Onshore Orders; and internal instruction memoranda and guidance material. The appellant is required to use judgment in applying the guidelines to the specifics involved in each unique case in order to identify the appropriate types and amounts of actual production records to review and determine the extent to which production reporting is inaccurate. As previously indicated, the appellant must decide whether operators are in compliance with regulatory requirements, such as timely disposition of oil production, obtaining approval of off-lease measurement, storage, and surface commingling, etc.

The guidelines used and the judgment required to apply them in the appellant's position fully meet but do not exceed Level 3-3. 275 points are assigned.

#### *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.

The work at Level 4-2 consists of duties involving related procedures, processes, or methods to perform individual technical assignments or tasks. The employee decides what needs to be done by identifying easily recognizable differences in the basic characteristics and nature of one or a few similar program operations. The operations involve easily identifiable steps and procedures or clear-cut processes, structures, and workflow. The employee identifies the basic instructions and procedures to follow from among a few established procedural alternatives related to the specific function. The employee considers the nature of the duty, basic purposes and other characteristics of the operations involved, or readily available sources of information to complete routine or standards assignments.

At Level 4-3, the work consists of various duties, projects, or assignments involving different and unrelated technical processes and procedures. Assignments involve various actions or steps that are not completely standardized or prescribed in precedent cases, adaptation or modification of established procedures and methods, various types and sources of information, nonrecurring

problems, trends, or issues, etc. The employee decides what needs to be done by considering the characteristics, practices, objectives, and interrelationships of various program operations. The employee studies and analyzes issues such as the nature of the assignments; the various sources of information; the nature and requirements of the operations; and the applicability of precedent cases, rules, and objectives. The employee selects, adapts, and applies the most suitable practices, procedures, methods, and precedents to collect and analyze various types of information, formulate conclusions, define needs, and/or make recommendations for resolving problems to higher level employees.

The complexity of the appellant's work fully meets but does not exceed that described at Level 4-3. The appellant's performance of production accountability reviews involves various actions and steps that are not completely standardized. She must identify anomalies and discrepancies in the operators' production reports and select the appropriate types and sources of data needed to determine the accuracy of the reports. Steps taken to calculate the actual production volumes vary. The appellant is required to identify probable causes of discrepancies, such as recognizing situations in which different State and Federal pressure bases for sale of gas are used in the calculations or whether the amount of gas used on leases or vented/flared is reasonable. From her analysis of the production records, the appellant decides whether the oil company has properly reported its oil and gas production volumes and, if not, requires the operator to amend the production reports.

Level 4-3 and 150 points are assigned.

#### *Factor 5, Scope and effect*

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

At Level 5-2, the purpose of the work is to apply specific rules, regulations, or procedures to perform a full range of clerical and technical tasks, duties, and assignments. These assignments typically comprise a complete segment of a broad project, study, or process. The work affects the accuracy, reliability, quality, and timeliness of products, recommendations, studies, projects, and processes.

At Level 5-3, the purpose of the work is to plan and carry out assignments or projects to improve the efficiency and productivity of program operations. Employees use established methods, practices, and criteria to identify, study, and recommend solutions for resolving conventional problems or questions. The work affects the evaluation and improvement of operating program efficiency and effectiveness and the use and management of staff, funding, equipment, and other resources.

The scope and effect of the appellant's position fully meet but do not exceed that depicted at Level 5-3. The appellant plans and carries out detailed production accountability reviews designed to improve compliance and increase accuracy in production reporting which results in the recovery of lost royalty revenues due the public and Tribes from Federal and Indian leased land.

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

These factors include face-to-face contacts and telephone dialogue with persons not in the supervisory chain, and pertain to the reasons the contacts are made.

The standard describes two levels of persons contacted. At Level 1, contacts are with employees within the immediate organization, office, project, or work unit. The contacts typically include other support personnel, management analysts, program analysts, administrative officers, or managers. Some positions at this level may involve contacts with members of the general public in very structured situations. At Level 2, contacts are with employees in the same agency, but outside the immediate organization. Persons contacted are managers, employees, and other representatives of the programs involved or organizations served. Some positions at this level may involve contacts with members of the general public, as individuals, or groups, in moderately structured settings.

The standard also describes two levels for the purpose of contacts. At Level a, the purpose of the contacts is to obtain, clarify, or provide facts or information. At Level b, the purpose of the contacts is to plan, coordinate, or advise on work efforts; discuss significant findings; or resolve operating problems by influencing or motivating individuals or groups who are working toward mutual goals.

The appellant has contacts with representatives from other Federal agencies and operators or their representatives, such as accountants and attorneys. These equate to those described in Level 2 under Persons Contacted. The purpose of the appellant's contacts is to exchange information concerning production reporting figures, resolve discrepancies, and obtain compliance with reporting requirements. This is equivalent to Level b under Purpose of Contacts. Reference to the chart outlined in the standard reflects that 75 points are credited for these factors when Level 2b is assigned.

*Factor 8, Physical demands*

This factor covers the requirements and physical demands placed on the employee by the work assignments. This includes physical characteristics and abilities and the physical exertion involved in the work.

The physical requirements involved in the appellant's work is a match for Level 8-1. The work requires no special physical demands. It may involve some walking, standing, bending, or carrying of light items. 5 points are assigned.

*Factor 9, Work environment*

This factor considers the risks and discomforts in the employee's physical surroundings and the safety regulations required.

The work environment of the appellant's position compares to Level 9-1. The work is performed in an office requiring normal safety precautions against everyday risks or discomforts. 5 points are assigned.

### *Summary*

In accordance with the criteria published in the standard for the GS-0344 series, the appellant's position is evaluated as follows:

<b>Factor</b>	<b>Level</b>	<b>Points</b>
<b>1. Knowledge Required by the Position</b>	1-4	550
<b>2. Supervisory Controls</b>	2-3	275
<b>3. Guidelines</b>	3-3	275
<b>4. Complexity</b>	4-3	150
<b>5. Scope and Effect</b>	5-3	150
<b>6. and 7. Personal Contacts and Purpose of Contacts</b>	2-b	75
<b>8. Physical Demands</b>	8-1	5
<b>9. Work Environment</b>	9-1	5
<b>TOTAL POINTS</b>		1485

The assignment of 1485 points falls within the range of GS-7 (1355-1600 points) in the grade conversion table published in the standard.

### **Decision**

Application of both the Grade Level Guide for Clerical and Assistance Work and the Management and Program Clerical and Assistance Series, GS-344, standard results in a determination that GS-7 is the appropriate grade level. Accordingly, the appellant's position is properly classified as GS-1802-7. Titling is at the discretion of the agency.