

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

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

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

Appellant: [appellant's name]

Agency classification: Control Clerk (Office Automation)
GS-303-5

Organization: U.S. Small Business Administration
[State name] District Office
[location]

OPM decision: (Title Optional) (Office Automation)
GS-303-4

OPM decision number: C-0303-04-02

Robert D. Hendler
Classification Appeals Officer

/s/ 2/17/99
Date

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

Decision sent to:

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Introduction

On September 18, 1998, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. Her position is classified currently as Control Clerk (Office Automation), GS-303-5, position description (PD) #B00080. The appellant, however, believes the classification should be Economic Development Assistant (Office Automation), GS-1101-5/6/7. The position is in the U.S. Small Business Administration (SBA), [State name], [location]. We have accepted and decided her appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

The appellant, in her correspondence to OPM dated September 14, 1998, stated that her basis for filing a classification appeal was to “establish that I have been and am required to perform higher graded duties without the benefit of proper compensation.” She cited brief excerpts from the OPM Grade Level Guide for Clerical and Assistance Work (Guide), one of the standards the agency used to classify her position, and expressed the opinion that her work was comparable to the GS-7 level descriptions in those excerpts. While she did not take specific issue with the accuracy of her current PD, other than it should reflect her personal contacts outside the organization, she declined to sign a statement attesting to the accuracy and completeness of her PD. She also submitted other information in her appeal that she performed duties not reflected in her PD.

In an earlier letter to OPM dated June 26, 1998, the appellant stated that her previous duties were clerical, but that her PD had been revised prior to her classification appeal to SBA to include “complex technical duties.” Her current PD had been established at the time SBA issued its appeal decision, dated June 11, 1998, affirming the current classification of her position. The appellant enclosed PD's for Loan Processing Assistant positions at the GS-6 and GS-7 levels, that she said contained technical duties similar to those in her PD. In her later letter, she stated that she had provided these for “review only, but not the basis for the classification appeal request.”

All positions subject to the Classification Law contained in 5 U.S.C., must be classified by comparison to published PCS's of OPM. Even though the appellant said that she was not making a direct comparison to the other positions she referenced, it is important to emphasize that other methods or factors of evaluation, such as comparison to other positions, are not authorized for use in determining the classification of a position. Such positions may or may not be classified correctly, or may differ significantly from the appealed position, even if apparently similar in some ways. For the same reason, we cannot compare the appellant's current duties to former duties as a basis for deciding her appeal.

In her appeal, the appellant outlined a number of duties not specified in her PD that she stated she either had performed or was performing currently. She also enclosed justifications to support her claim that these duties met the GS-7 level compared to both of the OPM PCS's the agency used to classify her position. In response, her supervisor submitted information disputing that these duties were either assigned by him, performed by the appellant, or evaluated in her performance appraisal.

When an employee questions the accuracy of the PD, and cannot resolve the disagreement with the agency, OPM will decide the appeal based on the actual duties and responsibilities assigned by management and performed by the employee, as provided in 5 CFR part 511, section 607(a)(1). Our analysis of the position is based on information obtained during a desk audit with the appellant on January 27, 1999, an interview with her immediate supervisor, [name], Supervisory Loan Specialist, on the same date, a February 2, 1999, telephone discussion with the appellant in which she provided additional information, and our independent review and analysis of the entire appeal record.

Position information

The appellant is assigned to the Finance Division of the SBA's [State name] District Office. The organization in which she works consists of her direct supervisor, two loan specialists, and a loan assistant. The appellant serves as the control point for SBA loan applications received in the District Office. She opens and date stamps all incoming loan application packages received from participating lenders, and screens them to insure that all required application and declaration forms and other related documents are included before assembling the loan application folder and forwarding to the processing loan specialist for review and action. She uses a loan screening checklist to indicate which documents are included in the application package, and adds comments on the checklist indicating if required documents or information are not included for follow up by a loan specialist or assistant. Besides the Application for Business Loan (SBA 4) itself, a complete loan application package also requires a Schedule of Collateral (Schedule A); Statement of Personal History (SBA Form 912) and Personal Financial Statement (SBA Form 413) from each individual with a 20 percent or greater partnership or stock interest in the business applying for the loan; evidence of the bank's approval to participate in the SBA lending program (SBA 4-1); and several other documents, such as a management resume, a statement of business history, and cash flow information and/or projection.

In reviewing individual documents in the application package, the appellant notes whether required blocks are completed and forms contain original signatures, and that all parties with a declared interest of more than 20 percent have submitted personal history and financial statements. She checks certain blocks to determine if associated forms have been submitted. For example, information provided on the loan application of individuals with 20 percent partnership or stock interest requires personal and financial declarations from each such person in the application package. Information on Statements of Personal History indicating indictments, arrests, or convictions by an applicant requires submission of that individual's fingerprints. The appellant notes any discrepancies of this nature at the bottom of the loan screening checklist for review and resolution by the processing loan specialist.

Following the initial screening of this information, the appellant uses a personal computer to enter factual information about the loan application, on a formatted screen, into the Loan Accounting Tracking System (LATS), a mainframe database. Examples of the type of information entered include company name, address, and similar identifying information, total amount requested, and several yes/no fields relating to factual information provided in the loan application package. She

then assembles the loan folder according to standard operating procedures, and forwards it, along with the loan screening checklist, to the processing loan specialist.

If the loan specialist determines that additional information is required from the lender or applicant, they instruct the appellant to suspend the information from LATS if the additional information they have requested is too long coming. The appellant's role in this process involves coding the information out of the system, and reentering the data once the requested information is received. Once a decision is made to fund the loan, the appellant enters a code into LATS that assigns the loan to District Counsel for closing. She must ensure that any modifications to the loan information (SBA Form 327) received from the loan specialist or assistant are input to LATS prior to closing by District Counsel.

The appellant verifies the amount of loan funding currently available to the division daily, by reviewing a screen in LATS providing that information. If the available funding appears too low to cover the total amount of loans pending approval in the division, she alerts the supervisor, and uses LATS to enter a request for additional funding if instructed to do so.

The position requires competitive keyboarding skills and use of a personal computer for inputting and retrieving data, forms, recurring reports, and routine letter preparation. In support of the loan program, the appellant uses Microsoft Word software to produce memorandums and other textual documents, Microsoft Access software to produce mailing labels for mail merges, and spreadsheet software to enter and maintain information of participating lending institutions. She also downloads information from an SBA mainframe database into a spreadsheet file format for division reports on a recurring basis by following established commands, and produces other recurring and one-time reports using Excel or Access software.

Our interviews with the appellant and her supervisor confirmed that, while the PD of record contains many of the major duties and responsibilities performed by the appellant, it also contains inaccurate and obsolete information. Examples of obsolete information include references to: (1) operating cathode ray tube equipment, which may imply just using a dumb terminal; (2) maintaining loan approval and related records by congressional district; (3) verifying available funding with budget officer, posting allotments received, and deducting in appropriate programs as loans are funded; (4) maintaining and compiling statistical data on loan production, processing time, and other data for reporting purposes; (5) time keeping duties; and (6) obsolete forms.

The degree of inaccurate information in the PD is more significant. For example, the appellant: (1) is not required to obtain information on incomplete personal history statements or alert the inspector general to any derogatory information noted; (2) does not, as stated in the PD, serve as liaison between the Financing Division and District Counsel; (3) does not make recommendations to her supervisor on modifications to loan authorizations, or coordinate major modifications with the processing loan officer; (4) does not originate "moderately complex Administrative Actions" such as interest rate changes, loan amount changes, and cancellations, but rather, completes an on screen SBA Form 327 based on information provided by others; (5) does not produce documents requiring

the use of advanced software functions and complex formats, including, as indicated in the PD, graphics or tables within text, indices, or automatic generation of aligned multiple columns; (6) is not required to “exercise judgment and tact in preparation of response to specific inquiries,” as she does not perform this function; and (7) does have contacts to obtain routine information with lending institution personnel that are not reflected in the PD. In addition, the Complexity factor in the PD describes a requirement to analyze and select from a depth and breadth of alternative methods and choices not reflected in the actual work the appellant is required to perform, as reflected in our findings above.

Series, title, and guide determination

The agency determined the appellant’s position is not covered by a specific published occupational series and, therefore, is appropriately classified to the GS-303 Miscellaneous Clerical and Assistance Series, with the constructed title Control Clerk (Office Automation). It used the Guide and the Office Automation Grade Evaluation Guide (OAGEG) to evaluate the grade of her position.

The appellant said her position should be classified in the GS-1101 General Business and Industry Series, but has not disagreed with the agency’s use of the Guide to evaluate her program related duties. The appellant also agreed with the agency’s determination that she performs OA duties, and does not dispute the agency’s use of the OAGEG to evaluate the grade of that aspect of her work.

The OAGEG states that it can be used in combination with other standards or guides to evaluate positions when office automation (OA) duties, which include use of word processing and other software, are assigned to those positions. The parenthetical title OA is added to the title of positions when such positions require significant knowledge of OA systems and a fully qualified typist to perform word processing duties.

Based on our review of the appeal file and our on site fact-finding, we concur that these two guides are appropriate to determine the grade of the position. The GS-1101 Series includes positions properly classifiable in the GS-1100 Business and Industry Group for which no other series has been provided. This group includes positions that “. . . perform work pertaining to and requiring a knowledge of business and trade practices characteristics, and use of equipment, products, or property . . .” As we found the appellant’s work to be procedural in nature, it falls short of requiring the degree of subject matter knowledge anticipated by the coverage requirements of the GS-1100 Group. Based on the primary and paramount specialized loan processing functions of the position, we agree with the agency’s placement of the position in the GS-303 series, title at the agency’s discretion, with (OA) added parenthetically.

Grade determination

Evaluation using the Guide

The work the appellant performs in support of the loan application process is not covered by a specific PCS. It is therefore properly evaluated by reference to the Guide that is to be used in the absence of more specific classification criteria. The Guide covers such clerical work as preparing, receiving, reviewing, and verifying documents, maintaining records, locating and compiling information from files, and compiling information for reports. It also covers technical support work requiring a working knowledge of the work processes and procedures of an administrative field. The Guide provides criteria for evaluation of positions for GS-1 through GS-7 based on three elements: the *law* (5 U.S.C. 5104), a narrative description each level concept consisting of two factors: *Nature of Assignment* and *Level of Responsibility*, and general work examples to illustrate each level.

Nature of Assignment

The appellant's assignments compare most favorably to those described at the GS-4 level in the Guide. They consist of performing a full range of standard clerical assignments and resolving recurring problems. As at this level, her work consists of related steps, processes, or methods which require her to identify and recognize differences among a variety of recurring situations. Actions to be taken or responses to be made differ in nature and sequence because of differences in the particular characteristics of each case or transaction.

In addition to knowledge of how to carry out procedures, the work, like that described at the GS-4 level, requires some subject-matter knowledge of the organization's programs and operations. For example, she requires a limited knowledge of terminology associated with the small business loan programs, and of the flow of loan applications from borrowers through participating lending institution through SBA's approval process. She also must know a body of standardized rules and processes to determine what action needs to be taken in various situations where there may be some differences in the circumstances of each. For example, as previously discussed, she must recognize the need for personal and financial declarations to be provided in the loan application package from each individual with 20 percent partnership or stock interest in the company applying for the loan, and the requirement for fingerprint submissions from any such individual who indicated they had been indicted or arrested for, or convicted of a crime.

The nature of the appellant's assignments is comparable to those in the work example provided to illustrate this grade concept. The example describes the performance of a variety of record keeping, reporting, and informational duties in support of a security organization's program, including compiling, maintaining, and updating data, lists, and reports. The example describes a work situation that is also similar to the appellant's, requiring a knowledge of the organization's procedures, processes, and rules.

By contrast, work at the GS-5 level consists of performing a full range of standard and nonstandard clerical assignments and resolving a variety of nonrecurring problems. Work at this level includes a variety of assignments involving different and unrelated steps, processes, or methods. The process of screening loan applications for completion and forwarding to a specialist is essentially the same each time, subject to a limited number of easily recognizable circumstances in which documentation requirements differ. As such, completion of each transaction typically does not require the appellant to select a course of action from a number of possibilities, as is typical at the GS-5 level. Neither is she required, to the extent intended at this level, to identify and understand the issues involved in each assignment and determine what steps and procedures are necessary and the order of their performance. Because the appellant's assignments do not involve the complex, interrelated, or unique clerical processing procedures typical of the GS-5 level, her work does not require her to apply an *extensive* knowledge of the organization's rules, procedures, operations, or business practices, as described at this level.

Illustrative of a GS-5 level assignment is an employee who provides specialized clerical assistance to several Customs Inspectors by controlling inbound manifests for air and sea cargo, and inbound storage. In addition to examining documents for completeness, discrepancies, and other special requirements, and preparing official and office workload reports, the employee also identifies entries that may involve fraud, smuggling, etc., *based on available intelligence data*. Other substantive duties include *authorizing* order extensions and *resolving* manifest and entry discrepancies. Performance of this work requires a knowledge of pertinent sections of the Tariff Act, the Inspectors Manual, and other guides, and a substantial knowledge of the functions of other divisions and branches within the district to accomplish the procedural and processing functions necessary to import cargo. It also requires application of *reasoned judgment* to discern entries in the agency's data base that require further analysis by inspectors because of possible fraud, controlled substances, and prohibited cargo.

The functions currently assigned to the appellant do not require applying the depth and breadth of knowledge or involve assignments entailing problems and issues of the complexity supportive of the GS-5 level. Her assignments do not require considerable training and other experience, nor involve a variety of nonrecurring problems. For example, she is expected to verify that required documents are submitted with applications for small business loans, that applicants have completed the required blocks in various SBA forms, and that the forms contain original signatures. These are recurring situations for which she must follow related steps and processes to identify and resolve discrepancies that may differ in nature and sequence because of the differences in the particular characteristics of each application. However, they do not involve the degree of judgment and discretion described at the GS-5 level. Accordingly, the nature of the appellant's assignment is evaluated properly at the GS-4 level.

Level of Responsibility

The appellant's level of responsibility is also comparable to that described at the GS-4 level in the Guide. Because the clerical assignments associated with the loan application process do not vary

substantially, the supervisor's assistance is seldom required on these recurring assignments. The appellant uses initiative to complete work according to established office practices. Unusual situations may require the assistance of the supervisor or a higher level employee, and the completed work may be reviewed more closely. Procedures for doing the work have been established and a number of specific guidelines are available, including standing instructions and SBA circulars and notices. As at the GS-4 level, the number and similarity of guidelines and work situations may require judgment in locating and selecting the most appropriate processes and procedures, and to make minor deviations to adapt to circumstances in specific cases. Employees at this level have contact with co-workers and those outside the organization to exchange information, and in some cases to resolve problems in connection with the immediate assignment. Similarly, the appellant has contacts with loan specialists and assistants in the office for this purpose, and occasional contacts with participating lending institutions to obtain such factual information as address changes or when name changes have occurred as a result of mergers.

This level of responsibility is illustrated in the Guide by the example of the security clerk, referred to above, whose work is assigned in terms of methods to follow and results expected. The employee works independently in carrying out assignments of a continuing nature (e.g., preparing recurring reports and maintaining lists). The available guidelines include agency administrative procedures, handbooks, and specific instructions. The employee memorizes most guidelines, selects and interprets from a few others to fit specific situations, and exercises judgment in determining when deviations are appropriate, or when situations are not covered directly by guidelines or instructions and should be referred to the supervisor. This approximates the appellant's level of responsibility.

By comparison, at the GS-5 level, work is assigned in terms of objectives, priorities and deadlines, and guidance is provided on assignments that do not have clear precedents. The employee works according to accepted practices and completed work is evaluated for technical soundness, appropriateness, and effectiveness in meeting goals. Extensive guides in the form of instructions, manuals, regulations and precedents apply to the work. Because of the number and similarity of guidelines, the employee must use judgment in locating and selecting the most appropriate guidelines for application and adapt them according to the circumstance of the specific case or transaction. Procedural problems may arise that also require interpretation and adaptation of established guides.

Often the employee must determine which of several alternative guidelines to use. If existing guidelines cannot be applied, the employee refers the matter to the supervisor or a higher-graded employee. Contacts with a variety of people within and outside the agency are for receiving or providing information relating to the work or for the purpose of resolving operating problems in connection with recurring responsibilities.

Illustrative of such work is specialized clerical assistance in support of one functional area; i.e., customs inspection. The position supports several customs inspectors as discussed above, receiving work as to objectives, priorities and deadlines. Work is carried out independently according to the specific requirements of each case. Inspectors are kept informed of unusual situations and help with unusual problems. Completed work is evaluated for appropriateness and effectiveness. Guidelines covering processing procedures are specific, but others, such as the Tariff Act, require judgment to

select and use effectively. Judgment is exercised in discovering problems for referral to the inspectors, in authorizing lay order extensions, and in answering substantive questions from importers. Contacts are with co-workers and the importing public, and are to exchange information and resolve problems in meeting the importing requirements of the Tariff Act.

The appellant's work does not involve applying extensive guidelines, as discussed previously. The guidelines she uses do not require adaption routinely to deal with special cases and transactions as found at the GS-5 level. Rather, her work is clearly covered by established procedures and practices as is typical of the GS-4 level. In performing her assignments, the appellant also functions with the level of responsibility typical of the GS-4 level; i.e., independently carrying out assignments of a continuing nature, such screening loan packages for submission of basic required information before forwarding to loan specialists for further review and action. Her agency contacts are typically within her own unit. Contacts outside the agency are not varied, and involve obtaining routine information from participating lenders. Accordingly, we find this factor is evaluated properly at the GS-4 level.

In summary, since both factors are credited properly at the GS-4 level, we find that portion of the appellant's work covered by the Guide is evaluated properly at the GS-4 level.

Evaluation Using the OAGEG

The appellant's OA duties, which include use of word processing, data base, spreadsheet, and other software programs, are evaluated by application of the OAGEG. This Guide is used in combination with other standards or guides to evaluate positions that perform OA work. The agency appeal decision indicated application of the OAGEG to evaluate the appellant's OA duties, and provided a summary of the factor levels it credited. However, there was no information in the appeal record indicating how the agency determined the applicability of those factor levels to the OA work performed by the appellant.

The OAGEG uses the Factor Evaluation System (FES), which employs nine factors. Under the FES, each factor level description in a standard describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. The appellant did not disagree with the agency's crediting of Levels 8-1 and 9-1. We agree with those levels and have so credited the position. Our evaluation of the remaining FES factors follows.

Factor 1, Knowledge Required by the Position

Evaluation of this factor requires identification of the actual demands placed on workers. The mere use of certain software is not enough to determine the knowledge required of a position. For example, some employees may use only the basic features of a software package, not its more advanced features. By the same token, an individual's personal knowledge of software is only

considered if required by the duties and responsibilities assigned and performed for a substantial portion of time. What counts is actual use of knowledge and skill.

The agency credited the position at Level 1-3. The appellant believes her OA work warrants Level 1-4. The appellant's PD states that her position requires "knowledge of various types of office automation software . . . to produce a wide range of documents requiring use of varied and advance [sic] software functions . . . to meet needs of complex formats such as graphics or tables within text."

It further states that the work requires knowledge "to execute a substantial range of advance [sic] functions indices and tables . . ." However, our fact-finding revealed that this description of the OA work required of the position is inaccurate.

The actual requirements of the position do not exceed Level 1-2. While the appellant uses different types of software, she performs a limited range of functions in each. For example, she inputs recurring loan application data into LATS using established screens and a few specialized codes; inputs and updates lender identification information in Excel by entering data into cells in an existing spreadsheet, and generates recurring, routine reports from information in the system, sometimes using a few established sort commands; enters information into preestablished forms (e.g., SBA Form 327, for cancellation of loans) using SBA forms software; and types routine textual correspondence using Microsoft Word. The OA work performed involves a few related steps covered by specific procedures or instructions found at Level 1-2.

The work does not require the level of knowledge described at Level 1-3. At this level, OA work requires knowledge of: varied and advanced functions of one software type; a substantial range of functions of more than one software type; or other equivalent knowledge of automated systems to perform the work assigned. Examples of advanced software functions include: automatic generation of indices and tables of contents; importation of graphics, tables or special symbols within text; creation of glossaries; precise alignment of multiple columns, and similar complex formats. The word processing products produced by the appellant do not require the use of advanced software functions, and her use of the other software types requires knowledge of a limited, rather than varied or substantial range of functions in each.

Factor 2, Supervisory Controls

The agency credited Level 2-3 for this factor, and the appellant agrees. However, we find that the controls over her OA work do not meet that level due to the limited and prescribed nature of the OA work she is required to perform. The controls are more comparable to those described at Level 2-2.

Because for the most part, the OA products are recurring or routine, preestablished instructions or methods are generally available. If any new, unusual, or difficult assignments occur, more specific instructions are provided on how the work is to be accomplished. Within this routine, the appellant works independently in carrying out familiar assignments according to previous instructions, standard procedures for creating documents or entering or retrieving data, and established use of specific software programs.

Level 2-3 is not creditable to the position because there is little or no need to plan the steps to be carried out in completing OA assignments. The standardization of the OA procedures the appellant follows provides little or no opportunity to deviate from established practices that might permit the degree of initiative contemplated at this level, e.g., to resolve OA problems and coordinate efforts with other employees involved in or affected by nonstandard procedures. While the methods the appellant uses to produce work normally are not reviewed, nominal review of work that is clear cut and recurring in nature does not imply any significant increase in responsibility. This principle is well established in The Classifier's Handbook that states:

it is not just the degree of independence that is evaluated, but also the degree to which the nature of the work allows the employee to make decisions and commitments and to exercise judgment. For example, many clerical employees perform their work with considerable independence and receive very general review. This work is evaluated, however, at the lower levels of this factor because there is limited opportunity to exercise judgment and initiative.

Factor 3, Guidelines

In her appeal, the appellant said that this factor warranted credit at Level 3-3. The agency's appeal evaluation credited Level 3-2, which our review also found appropriate. Procedures for accomplishing the office automation tasks required of the appellant are relatively standard, with little need to deviate. For example, the required formats for the forms, spreadsheets, and reports she produces are predetermined. Step-by-step instructions are provided for downloading information from SBA's mainframe database into Excel. Word processing products are relatively straightforward and well precedented. As at Level 3-2, this limits the extent to which the appellant must review manuals and select methods for accomplishing the work. She applies judgment in choosing alternative procedures for accomplishing a particular function such as choosing which editing procedure to use, depending on the nature and extent of the changes required.

By contrast, much of the work at Level 3-3 requires adapting available guides, such as users' manuals, to meet requirements for new tasks or to solve processing problems. Judgment is required to search manuals for methods that can be applied and to adapt those methods to specific requirements. This is not characteristic of the appellant's OA work assignments. She is not typically required to deviate from existing instructions or practices to resolve operating problems or to develop more efficient processing procedures. The illustrations provided in the OAGEG, e.g., modifying electronic file storage procedures to resolve problems; creating macros to simplify formatting of reports; or selecting the most appropriate software for automating office work based on the nature of the work, do not characterize the requirements of her OA assignments.

Factor 4, Complexity

The appellant believes this factor should be credited at Level 4-3. In applying this factor, word processing documents produced must be evaluated in terms of the intricacy of the formats involved

and the extent of adjustments that must be made. The establishing or maintaining of electronic records such as databases or spreadsheets must be evaluated in terms of the degree of responsibility for selecting and categorizing data entries and the functions involved with entering, retrieving, and printing data. Similarly, the variety of OA equipment and software used must be evaluated in terms of the variety and intricacy of the functions performed with each, and the extent to which the employee makes choices as to how each is used. Applying the varying software types together in interrelated ways also adds to the difficulty of the work. For example, converting a spreadsheet into a graph and importing it electronically into a word processing document is more difficult than simply printing out the spreadsheet and attaching it to a word processing document as a separate page.

The complexity of the appellant's OA duties and responsibilities compares most favorably to Level 4-2, in that the documents, formats, and specific processing functions she uses require a varying number and sequence of steps, and the use of different functions from one assignment to another. In deciding how to proceed, she must recognize differences in existing procedures and applications and make choices from among established alternatives. For example, she must decide the specific software package to use, or the specific format for different types of documents. The steps she uses to complete her assignments vary based on type of software used, the type of document or report to be produced or edited, the specific formatting required for a document, the existence of prerecorded formats, and other differences of a factual nature. The appellant's duties fall well within the illustrations provided for Level 4-2.

Although the work does involve the use of several types of software packages for different office needs, the appellant's assignments do not typically include the broad range of OA duties contemplated at Level 4-3. Her OA assignments, while varied, are more clearly established than envisioned at this level. For example, in deciding how to proceed, she does not need to consider varied factors that are not always clearly established. Her assignments do not require her to consider, for example, the nature and capability of different software types, or software packages of the same type, in deciding which to use for an assignment, because the software used in each assignment is well established. Her work does not require integrating software products or information in ways that would require consideration of the similarities, differences, and integration compatibilities between software types and software packages. The judgment she applies in her OA work is also not of the degree illustrated at this level, which involves considering and selecting from among many different software types in light of the range and peculiarities of the unit's information processing capabilities and requirements. There is also no requirement that the appellant regularly develop methods and procedures for OA tasks, or identify and solve problems in existing OA methods or procedures.

Factor 5, Scope and Effect

The purpose of the appellant's OA work is to maintain electronic records of lender and loan status information in spreadsheets and data bases by entering data from several sources; type standard correspondence and memos; and produce recurring reports and forms from information provided or from data in electronic records. She performs specific, recurring tasks, including steps such as: selecting and adhering to the proper format; determining the spacing and arrangement of material;

and making entries to and retrieving data from electronic records. The OA work facilitates the work of the originators of the documents and users of the data maintained. This essentially matches Level 5-1, which the agency credited.

The position falls short of Level 5-2, which the appellant states is the proper level. She is not required to collect, select, organize, and provide information in oral or written form that involves the variety of sources and methods illustrated at this level. In addition, her OA work does not affect the way in which other employees document, store, receive, or transmit information, the effect required for crediting Level 5-2.

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

These factors are considered together and consist of two elements: persons contacted and the purpose of the contacts. The agency properly credited this factor at Level 1-A. The appellant stated that Level 2-B should apply. We concur with the agency's determination that Level 1-A is appropriate.

The persons contacted element meets level 1. The appellant's OA contacts are within the immediate work unit or related support units such as points-of-contact and document originators. It does not meet Level 2, in that the appellant's regular contacts do not extend to employees at various levels throughout the agency who are involved in or affected by integrating or changing automated office procedures. As discussed previously, these are not functions that the appellant performs.

The purpose of contacts element meets Level A. The appellant's OA contacts are typically to exchange information about the assignment or methods to be used to complete the assignment. They are not typical of Level B, where the purpose is to plan, coordinate, and integrate work processes or work methods for office automation between and among related work units. Again, these functions are not performed by the appellant.

Summary of OAGEG evaluation

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

| Factor | Level | Points |
|--|--------------|---------------|
| 1. Knowledge required by the position | 1-2 | 200 |
| 2. Supervisory controls | 2-2 | 125 |
| 3. Guidelines | 3-2 | 125 |
| 4. Complexity | 4-2 | 75 |
| 5. Scope and effect | 5-1 | 25 |
| 6. Personal contacts 7. Purpose of contacts | 1-A | 30 |
| 8. Physical demands | 8-1 | 5 |
| 9. Work environment | 9-1 | 5 |
| Total points: | | 590 |

The total of 590 points falls within the GS-3 grade level point range of 455 - 650 points on the Grade Conversion Table in the OAGEG. Since our analysis of the OA duties results in a lower grade level than the GS-303 work, it does not affect the final grade level worth of the position.

Decision

Based on the above analysis, the appellant's position is classified properly to the Miscellaneous Clerical and Assistance Series, GS-303, graded at GS-4, and titled at the agency's discretion, with the parenthetical (OA) added to the agency's title. Under the provisions of the classification law, OPM has the responsibility to determine whether positions are placed properly in classes and grades in conformance and consistent with published PCS's. When misclassifications are found, we have no choice but to direct corrective action.

This decision constitutes a classification certificate under the authority of section 5112(b) of 5 U.S.C. This certificate is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. In accordance with 5 CFR 511.701, we are suspending implementation of this certificate and the attendant corrective and compliance action. By copy of this decision, we are directing the servicing personnel office to inform us in a compliance report, within 45 days of the date for this decision, what action the agency has taken to either: (1) assign duties to the position that would support the current grade, in light of the inaccuracies found in the appellant's current PD, and other potential duties discussed in the appeal record that we found were not assigned

to or performed by her; or (2) take appropriate corrective action regarding both the appellant and her position based on the duties and responsibilities currently assigned to and performed by her.