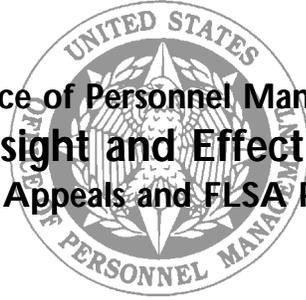


U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA Programs



San Francisco Oversight Division
120 Howard Street, Room 760
San Francisco, CA 94105

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

Appellants: {Names of appellants}

Agency classification: Medical Administrative Assistant
GS-303-7

Organization: [Appellants' organization]
Department of Veterans Affairs

OPM decision: GS-303-7
Title at agency discretion

OPM decision number: C-0303-07-04

Carlos A. Torrico
Classification Appeals Officer

February 7, 2000
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:

[Addresses of appellants]

[Name of servicing personnel office]
Department of Veterans Affairs

Mr. Ronald E. Cowles
Deputy Assistant Secretary for Personnel
and Labor Relations
Department of Veterans Affairs
Washington, DC 20420

Introduction

On March 15, 1999, the San Francisco Oversight Division of the U.S. Office of Personnel Management (OPM) received from [the appellants] an appeal of the classification of their position. The position is currently classified as Medical Administrative Assistant, GS-303-7. However, they believe that it should be classified in the Miscellaneous Administration and Program Series, GS-301, and graded at the GS-9 level. The appellants work in the [name and location of appellants' organization], Department of Veterans Affairs. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

This appeal decision is based on a review of all information submitted by the appellants and their agency, as well as telephone interviews with the appellants and their supervisor. Both the appellants and their supervisor have certified that the appellants' official position description (PD) number 01558A is accurate, but they believe that the duties warrant a higher grade. The appellants make various statements about their agency, and its evaluation of their position. They also compare their duties to those of other positions at other installations of the Department of Veterans Affairs, which they believe are similar to their jobs but are higher graded. Therefore, they believe their position should be higher graded. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of the appellants' position. By law, OPM must classify positions solely by comparing current duties and responsibilities to OPM standards and guidelines (5 U.S. Code 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellants' position to others as a basis for deciding this appeal, and we have considered their statements only insofar as they are relevant to making that comparison.

Position information

The appellants' duties and responsibilities include: representing the Director and the Clinic Administrator, [appellants' unit], on all administrative matters occurring during other than regular duty hours. These include acting on behalf of the [installation] Director in non-policy making administrative matters; providing technical guidance; interpreting VA rules and regulations; directly intervening in problems regarding patient activity; coordinating non-routine contacts; overseeing determination of applicant's eligibility; processing administrative issues involving suicides, assaults, beneficiary death, and elopements; providing administrative advice to Medical Officer of the Day and other clinical staff, assisting medical center staff with medically related legal problems; coordinating patient transfers and referrals; preparing daily Gains and Losses Sheet, daily report/log of all activities during tour of duty, and other statistical reports; maintaining current bed inventory and seriously ill roster; inputting information into VISTA and maintaining computer systems; initiating actions dealing with any disaster solutions; responding to emergencies; implementing search plans for missing patients; calling employees to fill behind absent employees, and in emergency cases calling in necessary employees on an overtime basis.

The principal purpose of the position is to provide coverage for 24 hours a day, every day, every night, weekends, and holidays. To meet that requirement the appellants rotate through various shifts.

The results of our interviews and other material of record furnish much more information about the appellants' duties and responsibilities and how their work is performed.

The [appellants' installation] is a stand alone, open campus facility run by the DVA and covering several acres. The main building consists of seven miles of hallways, tunnels, and attic spaces. There are also other buildings close by that are considered part of the hospital campus. Unlike many DVA Medical Centers, the [installation] has no auxiliary hospital attached to it. Therefore, there is no emergency medical care immediately available at the facility. The [installation] mainly houses alcohol and drug abuse patients and provides continuous care for incompetent patients (residential care program). It is a large facility that offers eligible ambulatory veterans appropriate continuing medical care in a therapeutic, institutional environment. The focus of this kind of care is on preparing the veteran to function at his/her highest level of independence consistent with acceptable quality of life. There is medical staff available onsite, however, for emergency care or critical care, patients have to be transported either to a hospital in [name of city] approximately 90 miles away or transported to the VAMC in [name of city] which is eight hours away by vehicle or an hour away by airplane. The patient population varies from season to season, ranging between 700-830 yearly.

Series, title and standard determination

The Miscellaneous Administration and Program Series, GS-301, includes positions that perform, supervise, or manage nonprofessional, two-grade interval work for which no other series is appropriate. The work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives. The administrative work of this series involves skills such as analytical, research, and writing ability, and requires the application of judgment typically demonstrated by substantial, responsible experience, or that equivalent of a college level education.

The Miscellaneous Clerk and Assistant Series, GS-303, includes positions that perform or supervise clerical, assistant, or technician, one-grade interval work for which no other series is appropriate. The work requires a knowledge of the procedures and techniques involved in carrying out the work of an organization and involves application of procedures and practices within the framework of established guidelines.

Classification guidance in The Introduction to the Position Classification Standards and The Classifier's Handbook (both dated August 1991) describes distinctions between positions properly classified in two-grade interval administrative series and positions classified in one-grade interval support series. Administrative positions (two-grade interval) are involved in work primarily requiring a high order of analytical ability. This ability is combined with a comprehensive

knowledge of (1) the functions, processes, theories, and principles of management; and (2) the methods used to gather, analyze, and evaluate information. Administrative positions are involved with analyzing, evaluating, modifying, and developing the basic programs, policies, and procedures that facilitate the work of Federal agencies and programs.

Support positions (one-grade interval) perform work that follows established methods, procedures, and guidelines, and may require a high degree of technical skill, care, and precision. The work can be performed based on a practical knowledge of the purpose, operation, procedures, techniques, and guidelines of the specific program area or functional assignments. Support personnel typically learn to do the work on the job.

We find that the appellants' position does not involve work that is administrative, two-grade interval in nature. The work does not require a high order of analytical ability or a comprehensive knowledge of management principles and theories or analytical methods and techniques. Most of the analytical abilities are used in situational crises such as: a veteran has arrived at the airport and the hospital facilities are closed and the appellant must analyze where to send the veteran depending upon his medical needs and the accommodations available in the area; a violent altercation occurs and patients need to be separately housed in different areas or need to be sent to an emergency hospital; or the water at the hospital has become contaminated and patients and staff need to be notified and a noncontaminated water source has to be found. This type of situational analysis does not meet the intent of two-grade interval administrative work, and more closely matches one-grade interval technician work based on a practical knowledge of the purpose, operation, procedures, techniques, and guidelines of the [installation] and the corresponding functional assignments of the medical staff. For the preceding reasons the appellants' miscellaneous assistant duties are assigned to the GS-303 series.

The position classification standard for the GS-303 series (dated November 1979) does not provide titles for positions within the series. However, it does advise against using the word "administrative" in titles to avoid confusion with the Administrative Officer Series, GS-341. Therefore, although the title is at the agency's discretion, in constructing the title for this position, the agency should avoid using that term and follow the titling guidance discussed in the Introduction to the Position Classification Standards.

The classification standard for the GS-303 series does not include grade-level criteria. The standard instructs that positions in this series be evaluated by reference to other standards for occupations with analogous knowledge and skills. We find that the appellants' medical administrative support work is best evaluated by application of the grading criteria in the Grade Level Guide for Clerical and Assistance Work (dated June 1989). In addition, although they do not perform the full scope of contact representative duties, we have evaluated their work involving contacts with the public/veterans (which is not the primary purpose of the position but rather an extension of their medical administrative duties) to explain certain DVA benefits by cross reference to the grading criteria in the standard for the Contact Representative Series, GS-962 (dated April 1971). Our evaluation of the grade level of this position follows.

Grade determination

Evaluation of Medical Administrative Support Duties

The Grade Level Guide for Clerical and Assistance Work provides grade level criteria for administrative support work. Clerical work is defined by examples of preparing, receiving, reviewing, and verifying documents; maintaining office records; and compiling information for reports. Assistance work is defined as technical work that supports the administration or operation of the programs of an organizational unit, and requires a working knowledge of the work processes and procedures of an administrative field and the mission and operational requirements of the unit. The guide describes positions in terms of two factors: (1) Nature of Assignment, and (2) Level of Responsibility.

The appellants are responsible for medical administrative matters occurring after-hours. This work maintains the continuity of the functions and operations of the [installation]. Although the position involves some clerical work, its primary purpose is to provide technical advice and support in medical administrative areas, which is technical/assistant work. This requires a knowledge of applicable laws, policies, and regulations. The following is our evaluation of the technical/assistant administrative support work performed in the position.

Nature of Assignment

At the GS-6 level (described on page 16 of the guide), the work requires considerable evaluative judgment within well-defined, commonly occurring aspects of an administrative program or function. The work is involved with continuing processes based on direct application of established policies, practices, and criteria. Assignments consist of a relatively narrow range of case situations; require evaluative judgment; or involve problems or situations that usually 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 (page 19), which is the highest level for this factor described in the guide, 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 or function for which the employee is responsible. 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 and take or recommend action based upon application or interpretation of established guidelines.

The nature of the appellants' assignments exceeds the GS-6 level in that the work involves a broader range of situations and problems than described at that level. As at the GS-7 level, the appellants' assignments involve continuing responsibility for providing guidance, advice, and

solutions in the area of medical administrative matters. The appellants ensure that administrative, procedural, and legal requirements and functions are accomplished. They apply a practical knowledge of the operations, regulations, and peculiarities of the medical administrative program and functions at the [installation], gained through increasingly difficult on-the-job training and experience.

After-hours, the appellants represent the [installation] Director and the chief of [appellants' unit] in dealing with a wide range of administrative issues, including: beneficiary death, seriously ill cases, deaths on arrival, code blue, cost recovery issues, facility repairs, travel eligibility, involuntary commitments, orders of protective custody, unruly or severely disturbed patients, determination of eligibility for benefits, required reports, computer problems, elopements, and investigations of unusual incidents. Given that the guide provides general classification criteria, it does not specifically address the complexities involved with this institution and the resulting effect on the appellants' position.

As previously mentioned, the [installation] is the only stand alone DVA facility in the nation. It has no major hospital attached to it, and is not located in a major metropolitan area. The closest town, [local city], about seven miles away, has a population of about 46,000 and has the closest airport. There are no emergency facilities close by. [Name of town] is 90 miles away (only handles small surgeries) and [name of city] is about eight hours away via ambulance. In after-hours situations, there are only two policemen available onsite and one is usually patrolling the grounds. There is one physician on duty. The grounds cover several acres with no fences. The facility itself is quite large with 7 miles of hallways. There are approximately two to three altercations a week with unruly or severely disturbed patients (mostly alcohol and substance abuse patients), and two to three elopements per month. An elopement at this facility (covering extensive grounds) is exacerbated by the rural environment surrounding the [installation]. In inclement weather, very likely during winter months, the eloper has a limited survival period due to hyperthermia. Also, the bad weather has resulted in many occasions of power loss. The power outage is usually about six to seven hours in duration, but has continued for up to two days. The appellants stay in contact by radio. They check the fuel in generators to keep the facility in operation. There are no admissions after business hours. Scheduling of tests and lab work are only done during the day. Veterans have to apply for admittance to the [installation]. The appellants mention that they generally know approximately when a veteran is scheduled to arrive, however, veterans arrive at any time. For example, a veteran may call the appellants from a bus station or the airport at 10:00 p.m. The appellants have to get the veteran transportation from the station/airport to some place where they can be lodged overnight and provided a meal. In a small town where everything closes early, or during inclement winter weather, it is very difficult to find places to lodge the veteran. In some cases the veteran is ill upon arrival, or suffering from lack of medication, which causes him/her to be out of control. Consequently, the appellants have to find special accommodations where the veteran can be treated and observed. Of the substance abusers, a number of them have criminal records and special attention must be considered to avoid injuries and risks to other individuals. Thus the location and limitations of the institution, and the nature of its clients adds to the complexity, breadth, and depth of the assignments and increases

the difficulty of performing the work of this position. The wide variety of circumstances dealt with requires that the appellants collect the necessary information and establish the facts, and make decisions and take actions based on their evaluation of the situation, the condition of the veteran, and their interpretation and application of established guidelines. Like the GS-7 level, they make decisions based on developing and evaluating all relevant information, and applying it to the medical administrative procedures and practices governing their functional area.

Level of Responsibility

At the GS-6 level (page 17), the supervisor assists with precedent assignments by providing an interpretation of policy. Completed work is evaluated for appropriateness and effectiveness in meeting goals. Guidelines such as regulations and agency instructions 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. Personal contacts are with employees in the agency or in other agencies, with management, or with those using the agency's 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 (page 19), which is the highest level for this factor described in the guide, 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 wider variety of problems and situations which require choosing alternative responses. Guidelines apply less to specific actions and more to the operational characteristics and procedural requirements of the program or function. They tend to be general and descriptive of intent, but do not specifically cover all aspects of the assignments. Thus employees must use significant judgment and interpretation to apply the guides to specific cases, and adapt or improvise procedures to accommodate unusual situations. 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 appellants' level of responsibility exceeds the GS-6 level in that they operate with more independence and receive less assistance from the supervisor than described at that level, and are expected to independently complete assignments and resolve most conflicts that arise. Guidelines used are more general and less descriptive than the GS-6 level because of the "stand alone" situation of the [installation]. They do not provide specific guidance on the variety of procedures and processes needed to handle the unusual patient situations previously mentioned. The appellants perform their work after-hours with no supervision and must act as the authority in administrative matters. The appellants do not have the full authority of the service chief or the installation director in all administrative areas, but do act for them in most medical administrative support matters. They have frequent contact with the medical staff, the Medical Officer of the Day,

various medical center personnel, patients and families, law enforcement and fire officers, personnel from other Veterans Affairs medical centers and health facilities, other hospitals, and military personnel. These contacts are for the purpose of providing authoritative guidance and advice in accordance with administrative regulations and requirements and resolving conflicts or problems that arise during the tour of duty. The appellants' work is reviewed for appropriateness and conformance to policies, regulations, laws, and established procedures.

By application of the grade level criteria in the Grade Level Guide for Clerical and Assistance Work, we find that the appellants' nature of assignments and level of responsibility meet the GS-7 level. Therefore, the appellants' duties and responsibilities involving technical work in support of the medical administrative functions of the [installation] during their assigned tours of duty are graded at that level.

Evaluation of Public Contact Duties

As previously noted, one aspect of the appellants' work is to carry out contacts with the public/veterans, providing them with some DVA benefits information. Although those duties do not require application of the full scope of contact representative knowledge and skills, and they are not required to possess comprehensive knowledge of DVA benefits, their contact work is best evaluated by cross reference to the grading criteria in the standard for the Contact Representative Series, GS-962 (dated April 1971). The position classification standard for the GS-962 series includes positions that primarily involve personal contacts with the public for the purpose of (1) providing information on rights, benefits, privileges, or obligations under a body of law; (2) explaining pertinent legal provisions, regulations, and related administrative practices and their application to specific cases; and (3) assisting individuals in developing needed evidence and preparing required documents or resolving errors, delays, or other problems in obtaining benefits or fulfilling obligations. The work requires (1) a high degree of skill in oral communication; and (2) a good working knowledge of, and ability to apply governing laws, regulations, precedents, and agency procedures. The standard describes positions in terms of two factors, nature of contacts and level of responsibility. The following is our evaluation of the appellants' duties and responsibilities involving contacts with veterans and the general public regarding patient eligibility and benefits and explanations of legal and regulatory provisions.

Nature of contacts

At the GS-6 level (pages 11-12), employees complete contacts relating to agency programs that involve a body of law and regulations that cover one or two distinct types of benefits; criteria that must be interpreted in light of individual circumstances; and problems that are resolved through established procedures.

At the GS-7 level (pages 13-16), contacts relate to agency programs involving a variety of benefits that are closely related. The mixture of benefits, deadlines, reporting requirements, exemptions, and optional choices that apply to individuals who are affected by programs requires the employee

to give consideration to alternatives and special circumstances. At this grade level, employees evaluate the nature of each inquiry and the way it is presented so they can provide information that is appropriate to the unique circumstances of each individual.

The appellants' contacts with veterans and others involve a broader range of benefits and services than described at the GS-6 level. Similar to the GS-7 level, the appellants counsel veterans and make determinations regarding their eligibility for a variety of benefits and services that are closely related. They evaluate each case by interviewing the veteran or family member, reviewing various documents, and making contacts with other agencies or facilities to verify or obtain necessary information. They must thoroughly consider program alternatives and the special circumstances impacting on the veteran's situation. The appellants explain complex regulations, requirements, and qualifying conditions to family members and others.

Level of responsibility

At the GS-6 level (pages 12-13), contact representatives provide direct responses to specific inquiries regarding the program benefits, services, or obligations administered by the agency. The employees seek help from the supervisor when trying to solve problems or when individuals question their interpretation of guidelines. The work is reviewed through general observation and periodic monitoring of contacts, review of written work products, and discussion on problems observed or referred to the supervisor for assistance.

At the GS-7 level (pages 16-17), in relation to the range of benefits, options, and regulatory requirements typical of this level, contact representatives go beyond providing specific information in response to specific questions. GS-7 level employees help the client to understand the full range of alternatives open to him/her, so the client can decide on a course of action. This requires greater judgment and resourcefulness in developing an approach or line of questioning for each unique situation than at the GS-6 level. When individuals are adversely affected by agency decisions, representatives are responsible for discussing the action and helping them develop other plans. In these situations, individuals may be upset; thus, agency representatives must be tactful, restrained, yet firm in reconstructing the facts and explaining the basis for the agency decision. The supervisor is available to give help in resolving exceptionally complex problems. The work is reviewed through observation and monitoring of contacts and products.

The appellants' level of responsibility exceeds the GS-6 level in that they are responsible for using greater judgment, responding to more vague kinds of questions and situations, and working more independently than at that level. As at the GS-7 level, the appellants go beyond just responding to specific questions, and they thoroughly explain benefits and options to veterans and families. Each client's circumstances is different, requiring the appellants to use judgment in obtaining information from various sources and developing pertinent questions. The appellants sometimes deal with veterans who are hostile, emotionally disturbed, irritated, or under the influence of various substances. In these cases, decisions adversely affecting veterans and alternatives must be explained with great tact and sensitivity. When working on other than the regular day shift,

the appellants make decisions independently, as they are the administrative authority after-hours. However, like the GS-7 level the supervisor is available by telephone to help resolve exceptionally difficult problems. The appellants' work is reviewed for effectiveness through observation of contacts, review of written products, etc.

By application of the grading criteria in the standard for the Contact Representative Series, GS-962, the appellants' nature of contacts and level of responsibility meet the GS-7 grade level. Therefore, the appellants' duties and responsibilities involving contacts with and assistance to veterans and families regarding patient eligibility, benefits, and services are evaluated at that level.

Summary

By application of the grading criteria in the Grade Level Guide for Clerical and Assistance Work, and cross reference to the criteria in the standard for the Contact Representative Series, GS-962, we have determined that the appellants' position meets the GS-7 grade level. Therefore, the position is graded at GS-7.

Decision

This position is properly classified in the GS-303 series and graded at the GS-7 level. Selection of an appropriate title is at the agency's discretion.