

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

**Chicago Oversight Division
230 South Dearborn Street, DPN 30-6
Chicago, Illinois 60604**

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

Appellant: [Name]

Agency Classification: Voluntary Services Officer
GS-301-12

Organization: Department of Veterans Affairs
Medical & Regional Office Center
Clinical Operations
Voluntary Service
[City, State]

OPM decision: **Supervisory Public Affairs Specialist**
GS-1035-12

OPM decision number: **C-1035-12-02**

/s/

Douglas K. Schauer
Classification Appeals Officer

March 29, 2001

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).

This decision is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The servicing personnel office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

Decision sent to:

[appellant's name and address]

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

[name and address of the Director at the VAMC & Regional Office Center]

Ms. Ventris Gibson
Deputy Assistant Secretary for
Human Resources Management
Department of Veterans Affairs
Washington, DC 20420

Introduction

On May 4, 2000, the Chicago Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [Name]. The appellant contests the agency's classification of her position as Voluntary Services Officer, GS-301-12. The position is located in the Department of Veterans Affairs (DVA), Medical & Regional Office Center, Clinical Operations, Voluntary Service, [City, State]. The appellant believes her position description accurately describes her major duties and responsibilities, but feels her work warrants higher credit and a higher grade for newly assigned duties and responsibilities. She also feels that the title of the position is not an accurate depiction of the duties and responsibilities she performs. We accepted and decided her appeal under section 5112 of Title 5, United States Code (U.S.C).

General Issues

The agency classified this position using an agency developed "Guide for the Classification of Chiefs of Voluntary Service." The agency standard also prescribes grade level guidance in the Factor Evaluation System (FES) format. It appears that the agency standard was written using the OPM Public Affairs Series GS-1035 Position Classification Standard (PCS) as a model. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112).

The appellant first appealed her classification to the appellant authority within the DVA. Utilizing the same agency "Guide for the Classification of Chiefs of Voluntary Service" mentioned above, the DVA appellant authority sustained the classification as Voluntary Service Officer, GS-301-12.

Position Information

The appellant serves as Chief of the Voluntary Service organization at the [City, State] VA Medical Center (VAMC). The [City] VAMC itself is an approximately 100 bed hospital and an outpatient clinic. The regional area for which the [City] Regional Office Center provides services and exercises DVA management control includes all of [State], [area] [State], [area] [State], and part of [area] [State]. In addition to the [City] VAMC, there are three and soon to be four outlying clinics. The [City] VAMC and the regional area clinics experienced a patient workload for the year 2000 of 100,500 patient visits.

The appellant accomplishes the public affairs, network marketing, and community outreach programs, voluntary services programs, and recreational therapy programs for the VAMC and/or Regional Office Center. The appellant directs and supervises a permanent workforce that includes two Recreation Assistants, GS-189-6, a Recreation Aide, GS-189-3, and a Secretary, GS-318-5. The appellant also recruits, trains, and administratively supervises approximately 450 to 500 voluntary workers. The appellant's overall work is broken down as follows:

Public Affairs

The appellant serves as the center's and regional office's spokeswoman in dealing with the community, the media and other outside parties. She is also the primary means by which the internal public, VAMC personnel are provided information of general interest. She deals with many community organizations for the purposes of providing information, soliciting donations and funds, and attracting volunteers. She prepares and delivers speeches to various audiences throughout the serviced region, and attends numerous community events as the representative of the Director of the VAMC and the Regional Center. She markets VAMC medical and regional administrative services to civic groups and Veterans Services Organizations (VSOs) throughout the region. She serves as the region's representative on the Veterans Integrated Service Network (VISN), an internal DVA administrative information network. She raises approximately \$250,000 annually for products and services for the facility and the veterans. Approximately 65-70% of the work time is occupied in public affairs efforts.

Voluntary Service Programs

The appellant is responsible for recruiting, training, and supervising approximately 450-500 volunteers who perform tasks and functions critical to the operation of the VAMC. She recruits the volunteers, personally screens them, provides or arranges for mandatory training, personally supervises some, and administratively manages them all. The volunteers accomplish tasks within the VAMC that the facility is not funded or staffed to accomplish, yet are critical to its successful operation. The volunteer service function occupies about 20-25% of the incumbent's time.

Recreation Therapy

This work is a companion function of physical and occupational therapies, usually involving the return to normalcy of patients who have suffered debilitating illnesses such as strokes. Including managing the three permanent workers assigned, this work occupies about 10% of the work time.

Series and Title Determination

The appellant serves as both Chief of Voluntary Service and as public affairs officer for the center. The public affairs work occupies the majority of the incumbent's work, and much of the volunteer services work and the marketing work are also closely related to public affairs work as defined. The work involved in managing the voluntary service program and the recreational therapy operation, while important components of the job, is not controlling in terms of either series or grade.

The DVA developed an agency guideline for classification of positions such as these entitled "Guide for the Classification of Chiefs of Voluntary Service." As noted, this document is an agency classification guideline and does not constitute mandatory guidance for the classification of positions covered by OPM Position Classification Standards (PCS). The VA guidance places voluntary service chief positions in the

Miscellaneous Administration and Program Series, GS-301, arguing that they perform a variety of tasks which taken together are not easily classifiable to any specific occupational series.

We do not agree that this position should be placed in the GS-301 occupational series. We find that the great majority of the incumbent's time is occupied in work specifically covered by the GS-1035 Public Affairs Series. The GS-1035 series includes positions responsible for or performing work involved in establishing and maintaining mutual communication between Federal agencies and a variety of publics or audiences. We do not find that the knowledge of VAMC policies, programs and operations constitutes such a separate body of knowledge as to be placed in a different occupational series. Recruitment, training and supervision of the volunteer workforce is not grade controlling work. That is, it is not predominant in terms of majority of time, grade, or qualifications required. Indeed, analysis of the overall work of the position indicates that the public affairs work is predominant in all three aspects. The basic title for positions covered by the GS-1035 Public Affairs Series is Public Affairs Specialist. The appellant also supervises the recreational therapy operation at the Medical Center and the three persons who perform the work, and exercises varying degrees of supervisory responsibilities over the large volunteer workforce. The supervisory responsibilities taken as a whole appear to meet the minimum criteria for coverage by the General Schedule Supervisory Guide. Therefore, the "Supervisory" designation will be added to the basic title.

Grade Determination

The public affairs, community relations and internal information duties will be graded by comparison to the Public Affairs Series, GS-1035 PCS. This is a Factor Evaluation System (FES) PCS whereby nine separate factors are identified as being components of the job. The position is compared to each factor and is assigned to a factor level corresponding to the specific job characteristics identified for that factor level. Each factor level is assigned a point value, and the sum of points for all nine factors is compared to a grade conversion chart in the standard to arrive at a final grade. Under FES, factor level descriptions mark the lower end of ranges for the indicated factor level. This means that a position must fully meet the characteristics described at a factor level in order to be credited at that level. If a position fails in any significant aspect to meet a particular level in the PCS, the next lower level and its corresponding lower point value must be assigned unless an equally important aspect that meets a higher level balances the deficiency. Because the appellant did not specify which factors with which she disagreed, we will discuss all pertinent factors.

Knowledge Required by the Position

At Level 1-7, positions possess and utilize knowledge of a wide range of oral and written communications principles, practices, techniques and methods, analytical methods, and interpersonal relations practices. Such knowledges and skills are used in the modification of standard methods and adaptation of approaches in developing new information materials aimed at enhancing the understanding of groups or individuals of the significant issues of an agency's program. This level of knowledge and skill is also used to explain

significant issues to generally responsive groups or individuals interested in the agency's programs, and to assess and evaluate the public's understanding of those programs. Typical of this level are specialists who perform all aspects of a public affairs program at a military installation or equivalent or those who are responsible for one aspect of a public affairs program at an agency headquarters activity.

Level 1-8 is appropriate for positions that require and use a mastery of communication principles, methods, practices and techniques, analytical methods, and interpersonal relations practices in their work. Such skill is used in developing new approaches to the most difficult and complex public affairs problems of an agency by developing or evaluating information programs enhancing the understanding among publics opposed or indifferent to agency programs. Level 1-8 specialists may typically analyze the public reaction to agency programs and policies and develop recommendations that significantly modify an agency's major programs or policies. They integrate diverse points of view in comprehensive communications plans designed to establish and maintain mutual understanding with various agency publics.

The appellant utilizes knowledges and skills consistent with the 1-7 level. As at that level she plans and accomplishes a complete public affairs program for both a facility located in one city and a small region consisting of portions of several states. She has an extensive program of meetings with local VSOs and fraternal organizations, but these groups are usually neither opposed nor indifferent to what she has to say as is typical of the higher level 1-8. The comprehensiveness and complexity of her program is significant; however, this is tempered by the fact that most public affairs information and program objectives are dictated at a higher level within the DVA. The appellant utilizes great skill in presenting the programs and operations of her particular organization in a most advantageous way to the interested publics.

Level 1-7, 1250 points.

Supervisory Controls

Employees at Level 2-4 receive assignments from the supervisor in terms of overall objectives and resources available. The supervisor and employee jointly develop deadlines, projects and nature of the planned assignments. The employee independently plans and carries out the assignments including resolving most problems that occur, coordinating the work with others, interpreting policy, and determining the approach, methods and procedures. They keep the supervisor informed of progress, potential controversies, and wide-ranging implications. Their work is reviewed in terms of results achieved and conformance to agency policy.

At Level 2-5, employees receive only administrative direction and assignments in terms of the broadly defined mission or function of the public affairs program. They independently plan, design and carry out public affairs programs, campaigns, projects, etc., keeping the supervisor informed of progress as appropriate. Their work is not normally reviewed, and when it is reviewed the review concerns such matters as fulfillment of program objectives or the effect of the specialist's advice in facilitating achievement of the functional program's objectives. Recommendations for new projects and shifts in public affairs

program objectives are evaluated in terms of resources available, program goals or agency-wide priorities.

The supervisory controls exercised over the appellant have some similarities to that described at Level 2-5.

She exercises great authority in independently planning, designing and carrying out the public affairs program. She makes frequent visits to groups and organizations throughout the region where she represents the Director in marketing VAMC, clinic and regional center services, solicits funds, provides information, and solicits volunteer workers for the VAMC. Her work is considered technically authoritative and is not normally reviewed by the supervisor. It is, rather, evaluated in terms of the success of the program in projecting or promoting or marketing the VAMC or region's programs, and the success in soliciting funds and volunteers.

The appellant's public affairs activities do not operate as separate, stand-alone entities, however. The public affairs program is the responsibility of the center Director. As the Director stated, the program is his responsibility, but the appellant is so good at managing it that he lets her run it. He assigns her to speak for the VAMC and regional center and meet with interested groups on his behalf because she is so good at it, but he makes the assignments. The Director stated that she independently manages most aspects of her program. He normally reviews only those actions with high visibility such as Congressional responses and major stories. She also receives guidance from the Director in her dealings with the VSOs. These are characteristics described at Level 2-4, and do not meet the intent of the next higher level.

As noted previously, a position must meet all aspects of a particular factor level to be credited at that level.

The appellant's position does not fully meet Level 2-5 for Factor 2, Supervisory Controls; therefore, it is credited at Level 2-4 and 450 points.

Guidelines

Work at Level 3-4 is covered by guidelines consisting of agency policy statements or broad precedents which are applicable in establishing a general program direction or setting a tone, but are not totally sufficient for dealing specifically with the more complex, intricate or unusual situations. The specialists at this level are required to develop new ways to communicate the agency's message on controversial and sensitive issues where public reaction has been indifferent and understanding of the agency's mission is essential to the success of the mission.

At Level 3-5, specialists are guided by general policy statements and statutes, but there are no precedents applicable to unusual or sensitive public issues or problems encountered. They must exercise considerable judgment in interpreting and adapting existing precedents and using them as a foundation for developing new approaches that coordinate and integrate various aspects of the agency's mission in creating a unified public affairs strategy or plan. Frequently, the public affairs specialist is recognized as the agency's authority in the development and interpretation of guidelines in the public affairs area.

The guidelines available and applicable to the appellant's position are a match to Level 3-4. Consistent with

Level 3-4 there are few guidelines available covering the applicant's work. Those that are available usually are of an informational or policy nature rather than procedural or practical. The appellant uses great judgment in applying general policy guidance from the agency or VAMC Director to specific situations.

Indeed, not infrequently she must improvise answers to unexpected questions posed by members of an audience. The purpose of her public affairs program is not only informational, it is also critical to obtaining the volunteers and funds to operate the VAMC at the current operation level. While the audiences to which she makes presentations are not hostile or indifferent, they are uninformed and her objective is to increase their understanding and/or to solicit funds and volunteers.

The employee's position is not a match to Level 3-5. There is no evidence that the typical public affairs work engaged in by the appellant is so unique or unusual that there are no precedents covering the work.

While it appears she is well known within the DVA public affairs staff community, she is not recognized as the agency's authority in the development and interpretation of guidelines in the public affairs area.

Level 3-4, 450 points.

Complexity

Level 4-4 work requires application of advanced communication and analytical practices, methods and techniques to the solution of complex public affairs problems. Decisions regarding what needs to be done are based on an analysis of the information needs of the various publics served. Completed projects or work products require deviating from both the content and means of providing information to the interested publics.

Positions working at Level 4-5 complexity develop new methods, strategies and communication plans covering the complete spectrum of the organization's programs. Decisions regarding what needs to be done include evaluating the appropriateness of existing strategies and plans in the light of changes in program emphasis or content, including statutory or technological changes, and shifts in public reaction to or understanding of the programs. The work requires developing new ways of gathering input from a variety of individuals and groups with conflicting views and interests, and developing and initiating varied approaches and strategies in communicating the agency's objectives to groups opposed or indifferent to agency programs.

The appellant's position is a match to Level 4-4. As stated previously, the employee manages a complete public affairs program for the VAMC and Regional Center, and this entails developing the program to cater to the various interested publics. Whether it is to satisfy the information needs of VAMC employees, VSOs, or other community interests, or to solicit funds and volunteers, she must adapt her specific activities to meet the expectations of each group and the objectives of her presentation. While receiving some specific assignments and objectives from the Director, she still must analyze her expected audience to determine the best approach to effect the most desirous results, and then to design and make the presentation accordingly.

The appellant's work does not meet Level 4-5 in that she does not develop new methods, strategies and communication plans covering the complete spectrum of the VAMC's programs. Her public affairs program does not have the breadth described at this level, such as making recommendations on the formulation and articulation of agency policy in communicating agency programs more effectively. Also, where this level is identified with positions who make presentations with groups opposed or indifferent to the agency's programs, the appellant's presentations are almost always with groups sympathetic to or at the least unknowledgeable of the organization's operations, goals and objectives.

Level 4-4, 225 points.

Scope and Effect

The appellant's position was assigned Level 5-3 by the agency. Positions at Level 5-3 perform duties of a recurring nature in dealing with precedent public affairs matters such as responding to media questions on standard agency policies, explaining benefits to interested groups, or developing parts of a communication plan for an organization. The work affects the development or operation of the communication plan or impacts the social or physical well-being of individuals served by the organization.

At Level 5-4 the work involves the development of complete communication plans for an organization. The work contributes to the achievement of program objectives by clarifying the issues and alternatives facing agency managers in achieving a meaningful communication between the agency and the various affected publics.

At Level 5-5 the work entails identification of problems concerned with public misunderstanding or indifference to agency programs and policies and the development of alternative communication strategies that enable the agency to establish and maintain mutual understanding with the various publics. The work affects the successful achievement of major agency programs and the social and economic well-being of substantial numbers of people in the groups affected.

The appellant's position matches Level 5-4 for this factor. As at Level 5-4 she develops the complete communication plan for the [City] VAMC and Regional Center, and the impact of her work contributes to the organization's objectives in serving the veteran and community. It does not meet Level 5-5 because her public affairs programs do not require the development of alternative communication strategies nor do they have agency-wide implications.

Level 5-4, 225 points.

Personal Contacts

For this factor, the appellant's position is a match to Level 6-3. Contacts are with specialized groups or individuals from outside the agency, the contacts are not always routine, and the purpose of each contact is different. They even include Congressmen and Congressional staffers. This exceeds Level 6-2 where contacts are typically with employees within the same agency, or are of a very structured nature. It does not meet Level 6-4 where contacts are regularly with nationally or internationally known groups or individuals, where the contact is not routinely or easily established.

Level 6-3, 60 points.

Purpose of Contacts

The relationship of Factors 6 and 7 presumes that the same contacts will be evaluated under both factors. The appellant's position meets Level 7-3 whereby the purpose is to clarify agency activities or policies to specialized groups, the general population, and representatives of the news media. It does not meet the next higher level because, unlike that described at Level 7-4, the purpose is not to explain or defend significant or controversial agency actions, or to negotiate or mediate among groups or individuals with divergent viewpoints, or convince agency program managers to change or modify decisions involving significant or controversial issues.

Level 7-3, 120 points.

Physical Demands

There is no indication that the appellant's physical effort involves anything out of the ordinary. The position meets Level 8-1, 5 points.

Work Environment

The appellant's regular and recurring work takes place in locations that are adequately lighted, heated/cooled or ventilated. The position meets Level 9-1, 5 points.

FACTOR LEVEL POINT SUMMARY

Factor	Level	Points
1	1-7	1250
2	2-4	450
3	3-4	450
4	4-4	225
5	5-4	225
6	6-3	60
7	7-3	120
8	8-1	5
9	9-1	5
	Total:	2790

In accordance with the Grade Conversion Chart on page 10 of the GS-1035 PCS, 2790 points falls within the GS-12 (range 2755-3150).

Comparison to the General Schedule Supervisory Guide

As noted in the **Series and Title Determination** section of this evaluation, the position meets the minimum requirements for inclusion in the GSSG and titling as a supervisor. The GSSG evaluation is not included here, however, because the supervisory duties by themselves are graded significantly lower than the public affairs duties and responsibilities.

Decision

The correct classification of the position is Supervisory Public Affairs Specialist, GS-1035-12.