

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: Procurement Clerk
GS-1106-4

Organization: Administrative Services Unit
Office of the Assistant Secretary for
Administration and Management
(OASAM)
U.S. Department of Labor
[organizational name]
[location]

OPM decision: Procurement Clerk
GS-1106-4

OPM decision number: C-1106-04-01

/s/ Robert D. Hendler

Robert D. Hendler
Classification Appeals Officer

9/27/01

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* (PCS's), appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

PERSONAL

[appellant's name]

[appellant's address]

[name]

Team Leader

HRO, [organization]

U.S. Department of Labor

[address]

[name] Federal Building

[location]

Ms. Tali Stepp

Director, Human Resources Center

U.S. Department of Labor

200 Constitution Avenue, NW

Room C5526

Washington, DC 20210

Introduction

On June 12, 2001, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. Her position is currently classified as a Procurement Clerk, GS-1106-4. She believes the position should be classified as Procurement Clerk, GS-1106-7. The appellant works in the Administrative Services Unit, Office of the Assistant Secretary for Administration and Management (OASAM), U.S. Department of Labor (DOL), [organizational name], [location]. We have accepted and decided this appeal under section 5112(b) of title 5, United States Code (U.S.C.). We received the complete appeal administrative report on July 30, 2001.

General issues

In her appeal letter, dated June 5, 2001, the appellant states that she received a “multi-graded promotion 4/5” on May 13, 1999, but was not promoted to the grade 5 level after serving a year at grade 4. She further states that she believes her position should be classified at the GS-7 grade level.

OPM is required by law to classify positions on the basis of their duties, responsibilities, and qualification requirements by comparison to the criteria specified in the appropriate PCS or guide (5 U.S.C. 5106, 5107, and 5112). Whether a position has promotion potential is not reviewable under the classification appeals process. The law does not authorize use of other methods or factors of evaluation.

In response to a grievance the appellant filed on January 4, 2001, the agency revised her position description (PD) of record and reassigned her to the new position. The new PD, No. [number], was amended during the preparation of the appeal administrative report. The appellant and her supervisor certified the accuracy of the new PD on June 25, 2001. Our decision sets aside all previous agency decisions regarding the classification of the position in question.

Position Information

The appellant provides procurement support for the [name] OASAM. Procurement actions include General Services Administration (GSA) Federal Supply Schedule purchases and open market purchases. Purchase actions may involve equipment and furniture acquisition, real property, maintenance and renovation, or professional services. Most of the procurement actions are routine and repetitive, consisting of orders for office furniture, common office supplies, and meeting facilities.

Most purchases are processed through the GSA Federal Supply Schedule. The appellant processes requisitions received from DOL agencies within [organization]. Her duties include entering data from a requisition form into an automated procurement system, calling Dun and Bradstreet to obtain a tracking number, and printing the working copy of the award for supervisory approval. Upon approval, the appellant prints the final copy of the purchase order, obtains supervisory signature, and distributes copies of the finalized purchase order. The appellant

assigns and records purchase order numbers, using an established sequential series, and updates purchase order logs. She updates vendor files with the appropriate Dun and Bradstreet tracking number, mails and files the purchase orders, and reconciles the weekly UPS billing for [organizational name] using daily receipt documents. The appellant identifies and refers all billing discrepancies to her immediate supervisor for action.

The appellant identifies purchase order inconsistencies, e.g., incorrect accounting code, and assures that requisition forms are completed to permit automated system input. She presents her findings to her supervisor, who has authority to modify the work products. She also prints established [organizational name] purchase orders, obtains supervisory signature, and distributes the approved [organizational name] purchase orders to the [name] OASAM.

The appellant performs other support duties including payroll, finance, mail, and office coverage functions. She verifies contractor data entries within the transit fare subsidy database, distributes earning and leave statements for [organizational name] employees, sorts and distributes mail in the absence of the mail clerk. She acts as the front desk receptionist as required, and issues identification cards to new DOL employees and contractors.

We conducted a telephone audit with the appellant on August 9, 2001, and a telephone interview with her immediate supervisor, [name], on August 10, 2001. To reach a conclusion, we reviewed the audit findings and all information of record furnished by the appellant and her agency, including her official PD. The appellant did not provide requested work examples. Our audit confirmed that the PD of record contains the major duties and responsibilities of the appellant's position and we incorporate it by reference into this decision.

Series, title, and standard determination

The agency has placed the appellant's position in the Procurement Clerical and Technician Series, GS-1106, for which there is a published PCS, and titled it Procurement Clerk. The appellant agreed with the series determination and with the agency's use of the GS-1106 PCS for grade level analysis of her position. We concur with these determinations.

Grade determination

The GS-1106 PCS is written in Factor Evaluation System (FES) format. Positions graded under the FES format are compared to nine factors. Levels are assigned for each factor and the points associated with the assigned levels are totaled and converted to a grade level by application of the Grade Conversion Table contained in the PCS. Under the FES, factor level descriptions mark the floor threshold for the indicated factor level. If a position fails in any significant aspect to meet a particular level in the standard, the next lower level and its lower point value must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

In her appeal letter, the appellant stated that her position should be graded at GS-7. The appellant provided no further justification. The agency credited Levels 1-2, 2-2, 3-2, 4-2, 5-2, 6/7-2B, 8-1, and 9-1. Since the appellant did not dispute the agency's evaluation of specific factors, our analysis will address all factors.

Factor 1: Knowledge Required by the Position

This factor measures the nature and extent of information or facts that employees must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts) and the nature and extent of the skills needed to apply that knowledge.

As at Level 1-2, the appellant's contract-related support work requires that she understands and interprets basic and well-established procurement procedures. With few exceptions, the tasks that she performs are routine and repetitive. The position requires familiarity with basic procurement terminology, knowledge of simple arithmetic, and knowledge of basic forms used in the preparation, distribution, and filing of routine purchase documentation. It requires knowledge of basic routine and repetitive functions of the pre-award, award, and post-award phases of procurement.

Level 1-3 requires knowledge of a body of standardized procurement regulations, procedures, and operations related to one or more procurement phases or functions. This knowledge is typically acquired through considerable training and experience and is applied to the full range of standard clerical assignments and to resolve recurring problems. The position does not require knowledge of standardized procurement regulations to support a full range of procurement activities listed at Level 3. The position does not require the appellant to perform duties related to procurement support that would justify Level 1-3, e.g., maintain source lists, resolve shipment discrepancies, prepare amendments to solicitations. Therefore, we evaluate this factor at Level 1-2 (200 points).

Factor 2: Supervisory Controls

This factor covers the nature and extent of direct and indirect controls exercised by the supervisor. Employee responsibilities, as well as the review of completed work, are included. Employee responsibility depends upon the extent to which the employee is expected to develop the sequence and timing of various aspects of the work, to modify or recommend modification of instructions, and to participate in establishing priorities and defining objectives. The degree of review of completed work depends upon the nature and extent of the review.

As at Level 2-2, the appellant deals with standard, recurring problems by following accepted practices, previous experience, and work policies. Although standardized work such as hers may appear to be performed with a high level of independence, her work products are tightly controlled. Standard operating procedures and previous supervisory instructions control the work methods that she uses. Regardless of her knowledge of program objectives, alternatives, local priorities, and operating policies, the appellant may not usually deviate from standard operating procedures on any significant matter without supervisory approval. The manner in which she works is controlled by instructions and guidelines that permit the judgment and independence of action typical of Level 2-2.

At Level 2-3, the supervisor provides guidance for unusually involved situations. Procurement clerks at this level plan and carry out successive steps necessary to accomplish their work and to resolve problems and deviations where standard operating procedures do not apply. Work is

reviewed for technical soundness, appropriateness, and conformity to policy and requirements. The appellant stresses that she works independently in preparing all documentation related to procurements. However, her specialized work involves mostly routine and standardized tasks associated with the day-to-day contract support, rather than unusual situations lacking clear precedents, typical of Level 2-3. Therefore, we evaluate this factor at Level 2-2 (125 points).

Factor 3: Guidelines

This factor covers the nature of guidelines for the work and the judgment needed to apply them. Guides used in this occupation include agency policies, directives, manuals, and handbooks. Individual jobs vary in the specificity, applicability, and availability of the guidelines for performance of assignments. Consequently, the constraints and judgmental demands placed upon employees also vary.

As at Level 3-2, the appellant's duties require that she understands and interprets basic and well-established procurement procedures and guidelines. She must decide which precedents or guidelines are most pertinent and use some judgment and initiative in situations not completely covered by guidance to resolve limited problems. Any situation requiring significant deviation from existing guidance is referred to the supervisor.

At Level 3-3, guidelines are not completely applicable to many aspects of the work because of the unique or complicating nature of the requirements or circumstances. Employees must use judgment to interpret guidelines, adapt procedures, decide approaches, and resolve specific problems. They analyze the results of guideline application and recommend changes. The appellant does not regularly incur problems or situations where she must rely on analysis and judgment rather than specific guides and precedents to reconstruct files, identify sources of information, determine what transpired, or make similar judgments. Therefore, we evaluate this factor at Level 3-2 (125 points).

Factor 4: Complexity

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

Typical of Level 4-2, the appellant uses varied, related steps in providing procurement support. Tasks include verification of requisition and procurement data, mathematical reconciliation, and simple problem solving techniques applied to routine processes. While her tasks are varied, e.g., procurement support, billing reconciliation, data verification, each is defined by a set of distinguishable guidelines. As at Level 4-2, the appellant performs related procedural duties and makes factual determinations and decisions, choosing from among clearly recognizable alternatives. She must consider factors such as appropriate format, content, or processing requirements.

At Level 4-3, employees utilize varied and unrelated procedures and methods. They analyze issues or problems and obtain additional information where necessary in order to determine the appropriate course of action when several alternatives may apply. The appellant does not

perform tasks requiring the level of analysis and discernment of interrelationships found at Level 4-3. Therefore, we evaluate this factor at Level 4-2 (75 points).

Factor 5: Scope and Effect

This factor covers the relationship between the nature of the work (i.e., the purpose, breadth, and depth of the assignment) and the effect of work products or services both within and outside the organization. In this context, effect measures whether the work performed facilitates the work of others, provides timely services of a personal nature, or impacts the adequacy of research conclusions. Only the effect of properly performed work is considered.

As at Level 5-2, the appellant applies standard procedures to processing procurement actions and maintaining procurement files for her office. Her work involves the execution of specific procedures. Her work products affect the accuracy and reliability of further processes e.g., UPS billing, procurement awards, etc. Typical of Level 5-2, her work involves the execution of specific rules, regulations, or procedures, and affects the accuracy and reliability of further processes or services rendered by others.

At Level 5-3, the purpose is to apply conventional practices to treat a variety of conventional problems. Work results in recommendations or reports that directly affect customer or contractor relations or operations. Unlike Level 5-3, the appellant's work does not result in recommendations, solutions, or reports that directly affect customer or vendor relations or operations. Any problems identified as requiring outside intervention are referred to the supervisor, who is responsible for coordinating necessary corrective actions. Therefore, we evaluate this factor at Level 5-2 (75 points).

Factor 6: Personal Contacts

The GS-1106 PCS considers Factors 6 and 7 together. Contacts credited under Personal Contacts must be the same contacts considered under Purpose of Contacts.

As at Level 2, the highest level in the PCS, the appellant's regular and recurring personal contacts are with employees outside the immediate organization including vendors, Dun and Bradstreet associates, and UPS employees. The contacts occur in a moderately structured setting and are generally routine. Level 2 contacts are with employees outside the immediate organization. Therefore, we evaluate Personal Contacts at Level 2.

Factor 7: Purpose of Contacts

As at Level A, the purpose of the appellant's regular and recurring contacts is to obtain information and to correct or prevent informational errors in the processing of procurement actions. For example, she clarifies requisition and procurement data through personal contact with Region 1 DOL agencies and vendors. Due to her limited involvement in the procurement process, she does not deal with the scope of errors, delays, or other procurement cycle problems found at Level B. Therefore, we evaluate Purpose of Contacts at Level A.

The combination of these factors results in the crediting of 45 points.

Factor 8: Physical Demands

This factor covers the requirements and physical demands placed on the employee by the work assignment. This includes physical characteristics and abilities, as well as the extent of physical exertion involved in the work.

As at Level 8-1, the only level described in the PCS, the appellant's work is sedentary and free of special physical demands. Therefore, we evaluate this factor at Level 8-1 (5 points).

Factor 9: Work Environment

This factor considers the risks and discomforts in the employee's physical surroundings. Additionally, any safety regulations related to the work assigned are considered.

As at Level 9-1, the only level described in the PCS, the appellant's work environment consists of an office setting and involves everyday risks or discomforts requiring normal safety precautions typical of offices, meeting rooms, training rooms, residences, etc. Therefore, we evaluate this factor at Level 9-1 (5points).

Summary

In summary, we have credited the position 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	5-2	75
6. Personal Contacts and 7. Purpose of Contacts	2A	45
8. Physical Demands	8-1	5
9. Work Environment	9-1	<u>5</u>
	Total Points	655

A total of 655 points falls within the GS-4 grade level point range of 655-850 points on the Grade Conversion Table in the GS-1106 PCS.

Our analysis fully considers the appellant's other duties that are performed in direct support of her GS-1106 functions. They involve controlled judgment in using directly applicable guidelines, methods, and procedures. These functions fall short of the difficulty and complexity of the procurement support work credited to the position and do not impact the final grade of the position.

Decision

The position is properly classified as Procurement Clerk, GS-1106-4.