U.S. Office of Personnel Management Division for Human Capital Leadership & Merit System Accountability Classification Appeals Program

Philadelphia Field Services Group 600 Arch Street, Room 3400 Philadelphia, PA 19106-1596

Classification Appeal Decision Under section 5112 of title 5, United States Code		
Appellants:	[appellant's name]	
Agency classification:	Social Worker GS-185-12	
Organization:	Homeless Veterans Programs Mental Health and Behavioral Sciences Service Veterans Affairs Medical Center VA [name] Healthcare System Veterans Health Administration Department of Veterans Affairs [location]	
OPM decision:	Social Worker GS-185-12	
OPM decision number:	C-0185-12-02	

/s/ Robert D. Hendler

Robert D. Hendler Classification Appeals Officer

September 12, 2003

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:

PERSONAL [appellant's name] Mental Health and Behavioral Sciences Service Department of Veterans Affairs Medical Center [address] [location]

Medical Center Director Department of Veterans Affairs Medical Center [address] [location]

Mr. William Ellison Department of Veterans Affairs Office of Human Resources Management (054B) 810 Vermont Avenue, NW. Washington, DC 20420

Ms. Ventris C. Gibson Deputy Assistant Secretary for Human Resources Management (05) Department of Veterans Affairs 810 Vermont Avenue, NW., Room 206 Washington, DC 20420

Introduction

On May 19, 2003, the Philadelphia Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant's name]. His position is currently classified as Social Worker, GS-185-12. He believes that it should be upgraded to GS-13. We received the complete agency administrative report on June 20, 2003. The appellant works in the Homeless Veterans Programs, Mental Health and Behavioral Sciences Service (MHBSS), Veterans Affairs Medical Center (VAMC), VA [name] Healthcare System (also know as Veterans Integrated Systems Network (VISN) [number]), Veterans Health Administration, Department of Veterans Affairs (DVA), [location]. We accepted and decided this appeal under section 5112(b) of title 5, United States Code (U.S.C.).

General issues

In the appeal memorandum, the appellant states that his position has become more complex and administrative in nature. He points to the increase in the number of beds managed without an increase in staff, additional responsibilities for supervising and managing VA Grant and Per Diem programs in Providence's geographic area, and participation in various projects. In support of his appeal, the appellant attached a position description (PD) for a Health Science Officer, GS-601-13, position at another VA medical center and stated that it was similar to his position in terms of principal duties, program management, program evaluation, supervisory responsibility, and program scope and effect. The appellant also points out that he is on call for consultation and crisis intervention 24 hours a day, seven days a week.

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). The law does not authorize use of other methods or factors of evaluation, such as comparison to other positions that may or may not be accurately described or classified correctly or the demands of being on call 24 hours a day, seven days a week.

Implicit in the appellant's rationale is that the increase in the program resources and programs managed should support the upgrading of his position. The assigning of more work, however, does not necessarily mean that the additional work is more difficult and complex. In addition, each grade level represents a band of difficulty and responsibility. Performing more difficult work than previously performed may still continue to fit within and support the same grade level previously credited to the position.

A PD is the official record of the major duties and responsibilities assigned to a position by a responsible management official; i.e., a person with authority to assign work to a position. A position is the duties and responsibilities that make up the work performed by an employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the duties assigned by management and performed by the employee. We classify a real operating position, and not simply the PD.

Like OPM, the appellant's agency must classify positions based on comparison to OPM PCS's and guidelines. Section 511.612 of title 5 of the CFR, requires that agencies review their own classification decisions for identical, similar, or related positions to ensure consistency with OPM certificates. Thus, the agency has the primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions.

The GS-601-13 PD contains duties that are substantially different from those listed in the appellant's PD. For example, the organization directed is managed through "subordinate supervisors/team leaders/program coordinators" and the employee "serves as principal investigator or co-investigator in Domiciliary based research projects." If the appellant believes that his position is classified inconsistently with others, he may pursue this matter by writing to his agency headquarters human resources office. In so doing, he should specify the precise organizational location, series, title, grade, duties, and responsibilities of the positions in question. The agency should explain to him the differences between his position and the others, or grade those positions in accordance with this appeal decision.

Position information

The appellant is responsible for developing, implementing, and managing all VA homeless programs for the VAMC's area of responsibility which consists of [geographic area]. The Health Care for Homeless Veterans (HCHV) Programs that are nationally monitored includes the Homeless and Chronically Mentally III (HCMI) Veterans Program, the Supported Housing Program, the Contract Residential Program, Project CHALENG (Community Homeless Assessment, Local Education, and Networking Groups), and the Homeless Grant and Per Diem Programs.

The HCMI Program provides a broad range of clinical and support services to homeless veterans with mental health problems including substance abuse. The program provides extensive outreach, physical and psychiatric exams, treatment, referrals, and ongoing case management. As appropriate, the program places homeless veterans needing longer-term treatment into community-based facilities. The Supported Housing Program provides ongoing case management services to homeless veterans with an emphasis on helping them find permanent housing and providing the clinical support needed to keep them in permanent housing. The Contract Residential Program provides care to homeless veterans with mental health and substance abuse issues. Project CHALENG is a nationwide initiative in which VA medical centers and regional offices work with other Federal, state, local agencies, and nonprofit organizations to assess the needs of homeless veterans, develop action plans to meet identified needs, and develop directories that contain local community resources to be used by homeless veterans.

The Homeless Grant and Per Diem Programs fund community agencies that provide services to homeless veterans. Grants are awarded for the construction, acquisition, or renovation of facilities or to purchase vans to provide outreach services to veterans. Per diem payments provide partial operating funds for programs. Currently two community based agencies in [state name] provide transitional residential services to homeless veterans.

The appellant manages the Veterans Transitional Support Program (VTSP). This is a 25-bed domiciliary program at the State [name]'s Veterans Home. The program is housed in a wing of the home. The state provides all services other than mental health. As part of community outreach efforts, the appellant and his staff visit shelters and meal sites to contact homeless veterans suitable for placement in the domiciliary residential treatment program.

The appellant has arranged to use additional bed space at the home as transitional housing for veterans who are in the Veterans Industries/Compensated Work Therapy (VI/CWT) Program but who have not yet been placed in or found community housing. VI/CWT is intended to provide a program of vocational rehabilitation in the form of work therapy which supports the transition to independent living and/or optimal quality for life for homeless veterans. Services are provided through sheltered workshops and community based employment. In addition to supporting domiciliary residents, the appellant coordinates VI/CWT for the community based Veterans Resource Center that is managed by another MHBSS staff member. In his coordinator capacity, the appellant serves as the point of contact with firms who employ the services of the veterans enrolled in the program, and is responsible for developing, negotiating, and implementing those agreements.

The appellant is responsible for developing and implementing local policies for nationally and locally monitored HCHV programs. He is responsible for developing, implementing, monitoring, evaluating, and controlling program operations. This includes ongoing community outreach with State and local governmental organizations, community and veterans' service organizations, and coordination within the agency at the VISN [number], [name] Healthcare System, and national levels. For example, he coordinates VA, state and community based agencies in planning and staffing the [state name] annual Operation Stand Down which gives homeless veterans one to three days of safety and security where they can obtain food, shelter, clothing, and a range of other types of assistance included VA provided health care, benefits certification, and linkages to other programs. His program oversight responsibilities include evaluating community agency applications for the Homeless Grant and Per Diem Programs, including management of its fund control points, and direct annual inspections of all approved agencies within his geographic area of responsibility. The appellant is authorized to approve the allocation and distribution of funds in the organization's VI/CWT budget.

The appellant's subordinate staff consists of two Social Workers, GS-185-11, who occupy identical additional positions, and one Vocational Rehabilitation Specialist, GS-1715-9. His organization receives clerical support services from an employee who reports to another MHBSS supervisor.

To help decide this appeal, we conducted telephone audits on August 6 and September 9, 2003, with the appellant, a telephone interview with his immediate supervisor, [name], Associate Chief, MHBSS, on August 20, and a telephone interview on September 4 with [name], VISN [number] Homeless Veterans Program Coordinator. In reaching our decision, we reviewed the audit findings and all information of record furnished by the appellant and his agency, including PD (#[number], Supervisory Social Worker, GS-185-12). Our audit confirmed that this PD, certified as current and accurate by the appellant and his supervisor, contains the major duties and responsibilities of the appellant's position and we incorporate it by reference into this

decision. However, the record shows that the appellant has not yet been reassigned to this PD and continues to occupy PD #[number] (Social Worker, GS-185-12).

Series, title, and standard determination

The agency has placed the appellant's position in the Social Work Series, GS-185, titled it Supervisory Social Worker, and graded it by application of the General Schedule Supervisory Guide (GSS), with which the appellant agrees.

The record shows that the PD of record does not identify percentages of time spent on major duties. The appellant estimated that he spends 25 percent of his time supervising his staff. He said that he is in constant communication with his staff about client issues and program matters. The appellant's supervisor, however, estimated that the appellant spends at most three or four hours per week; i.e., 10 percent of his time, performing formal supervisory functions. The appellant and his supervisor agreed that both of the appellant's subordinate Social Workers are licensed practitioners who operate independently. This independence is described and has been certified as current and accurate in their PD of record (PD #[number]) by the appellant and the Chief, MHBSS; i.e., relying on their own professional expertise to determine the approach and methodology for handling casework and community system problems, consulting with the appellant on complex or unusual situations, keeping the appellant informed of the status of work, and using the appellant in developing short- and long-term objectives. The Vocational Rehabilitation Specialist's PD of record (PD #[number]), certified as current and accurate by the appellant and the Chief, MHBSS, states that appellant works under the general supervision of the appellant and works independently in seeking contracts, arranging work schedules for patients, and making necessary modifications in methods and equipment. It is inappropriate to equate collegial peer-to-peer discussions on clients and their case issues as formal supervision within the meaning of the General Schedule (GS) classification system. Doing so would fail to recognize the team nature of the work and undermine the grade level worth of the subordinates' positions.

As discussed below, the GS-185 PCS also recognizes the limited level of supervision inherent in GS-11 grade level Social Worker positions. It provides a criterion for classifying positions to the GS-12 grade level that supervise at least three GS-185-11, positions without reference to or application of the GSSG. Therefore, we find that the appellant does not spend 25 percent or more of his time on supervisory duties within the meaning of the GS classification system.

The GSSG is directly applicable for grading purposes to positions in which supervisory and related managerial responsibilities occupy at least 25 percent of the position's time. Because the appellant's position does not meet this threshold, the GSSG may not be directly used for grading purposes.

The appellant's position is properly evaluated by application of the Social Work Series, GS-185, PCS which covers positions that require application of a professional knowledge of the principles and practices of social work. The grading criteria in the standard cover a wide range of work assignments including those that involve supervising subordinate staff and/or exercising significant program responsibilities. However, we will apply the GSSG for cross series

comparison to confirm the grade of the appellant's work and respond to the classification issues that he has raised. Therefore, the appellant's position is properly allocated as Social Worker, GS-185.

Grade determination

The GS-185 standard uses two basic elements to define assignment characteristics, assignment content and supervisory control. Two basic variables that affect the grade levels of positions are (1) the character of the caseload and (2) the freedom of practice characteristic of performance. The first refers to the difficulty of problems present in the assignment and the degree of professional skill and judgment required by the social work decisions and the services they involve. The second reflects the recognition of the social worker's competence through decreased supervisory control that allows independent performance of work. These variables are considered in concert when making grade level determinations.

At the GS-12 grade level, the highest level described in the PCS, social worker positions are of two general types: (1) supervisory positions that include full technical and administrative responsibility for the accomplishment of the work of a unit of three or more subordinate professional workers when the base level of the unit fully meets the GS-11 grade level as defined in the GS-185 PCS, and (2) positions which are classified at this level in recognition of program responsibilities which are significant enough to justify grade GS-12 with or without the presence of professional subordinates. Illustrative of positions of this type are those of social workers in charge of the social work program at a separate installation or organizational component where they are responsible for development and maintenance of professional standards of service, initiating and effecting changes in methods that will promote efficient practice, and coordination of social work services with other program at conferences and in contacts with other agencies and the public.

Work is subject to regulation and procedural direction from the program directors in the central office of the agency and to the local management control of the directors of the institution, such as a hospital or clinic. Social workers at this level may also serve various beneficiary groups over a large geographical area when assignments include direct social work practice in cases with complex problems, organization of community services on behalf of those beneficiaries, development and coordination of procedures for the use of these community services by related staffs and satellite facilities, and development and maintenance of working relationships and agreements with other organizations have responsibilities for the same groups of people.

Because the appellant's subordinate professional staff consists of two GS-11 Social Workers, the appealed position does not compare favorably with the first GS-12 grade level example. Based on the record, we find that that appellant's position compares favorably with, but does not exceed, the second GS-12 grade level type of position based on the scope, breadth, and complexity of his HCHV program demands. Program records show that the appellant and his staff provide the full range of program services to an average of 200 to 225 homeless veterans each year; i.e., veterans who receive a psych-social assessment. This includes veterans who are assessed as part of Operation Stand Down and directly referred to community housing, those

who are placed in grant and per diem settings, those who enter the domiciliary (VTSP), and those who enter the VI/CWT. The domiciliary usually is at or close to full capacity (25 beds), and average lengths of stay typically ranged from approximately 130 to 200 days.

The appellant receives agency policy directives and program updates from the VISN Homeless Veterans Program Coordinator. In turn, the appellant then develops and issues local program policy and procedures, e.g., VAMC policy on the VI/CWT program and a handbook for domiciliary residents. The supervisor relies on the appellant for proper interpretation of agency policy for the Medical Center and for implementation recommendations. The appellant provides quarterly reports on program status to VAMC management and is held accountable for program effectiveness through reporting of performance measures and program results to the VISN 1 and program data reported to the VA's Northeast Program Evaluation Center. The information in this database is used to measure the performance of the program and VAMC management. If problems are identified, the appellant is responsible for identifying and evaluating program deficiencies, developing action plans to correct identified problems, and implementation of corrective actions to improve the program's effectiveness, efficiency, and resulting patient care delivery.

The appellant represents the program by organizing and coordinating community outreach and services. He must develop and maintain working relationships and agreements for resources with other organizations having responsibilities for and interest in the homeless veterans program. For example, the appellant briefs the [state name] Governor's Advisory Counsel on Veterans quarterly. He and his staff work with community shelters to place veterans into transitional or permanent housing and receive furniture and or/other donations for the program. They assist veterans who seek such support as housing certificates for the [state name] Veterans Action Center, applying for Section 8 housing certificates from the Town of Bristol, and social security and/or VA disability benefits. Typical of the GS-12 grade level, the appellant represents the program at conferences by attending and making presentations on the program, e.g., VISN conferences and state and local organizations.

Evaluation using the GSSG

The GSSG uses a factor-point evaluation approach that uses six factors common to all supervisory positions. Each factor level in the 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 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. Each factor level has a corresponding point value. The total points are converted to a grade by use of the grade conversion chart in the standard.

The agency credited the position with Levels 1-3, 2-1, 3-2, 4A-2, 4B-2, 5-6, and 6-4. The appellant did not address any individual factor level, but stresses the increase in the size of his program and the representational functions that he performs. Our evaluation addresses all of the factors.

Factor 1, Program scope and effect

This factor assesses the general complexity, breadth, and impact of the program areas and work directed, including its organizational and geographic coverage. It also assesses the effect of the work both within and outside of the immediate organization. All work, for which the supervisor is both technically and administratively responsible, including work accomplished through subordinates, military personnel, and contractors is considered. To receive credit for a given level, the separate criteria specified for both scope and effect must be met at that factor level.

The levels of this factor describe two situations: agency line programs, e.g., providing services to the public; and support programs, e.g., providing administrative or other complex support services within an agency. As a threshold PCS, each successively higher factor level description represents additional demands beyond those expressed at the next lower level. The appellant's position falls under the first situation since his organization provides agency services to veterans; i.e., it provides mental health and related services to homeless veterans and performs outreach to homeless veterans.

Subfactor 1a: Scope

Scope addresses complexity and breadth of the program or work directed, including the geographic and organizational coverage within the agency structure. It has two elements: (a) the program (or program segment) directed and (b) the work directed, the products produced, or the services delivered. In evaluating the population affected under this factor, we may only consider the total population serviced directly and significantly by a program. We cannot count the total population in the geographic area potentially covered by a program. Scope also considers how the activities directed relate to the agency's mission and to outside entities, and the complexity and intensity of the services provided.

At Level 1-2 of this subfactor, the program segment or work directed is administrative, technical, complex clerical, or comparable in nature. The functions, activities, or services provided have limited geographic coverage and support most of the activities comprising a typical agency field office, an area office, a small to medium military installation, or comparable activities within agency program segments. Illustrative of line program work is a field office providing services to the general public, in which the office furnishes a portion of such services, often on a case basis, to a small population of clients. The size of the population serviced by the field office is the equivalent of all citizens or businesses in a portion of a small city. Depending on the nature of the service provided, however, the serviced population may be concentrated in one city or spread over a wider geographic area.

In contrast, at Level 1-3 the supervisor directs a program segment that performs technical, administrative, protective, investigative, or professional work. The program segment and work directed typically have coverage which encompasses a major metropolitan area, a State, or a small region of several States; or when most of an area's taxpayers or businesses are covered, coverage comparable to a small city. Illustrative of providing services directly to the general public is furnishing a significant portion of the agency's line program to a moderate-sized population of clients. The size of the population serviced by the position is the equivalent of a

group of citizens and/or businesses in several rural counties, a small city, or a portion of a larger metropolitan area. Depending on total population serviced by the agency and the complexity and intensity of the service itself, however, the serviced population may be concentrated in one specific geographic area, or involve a significant portion of a multistate population, or be composed of a comparable group.

As at Level 1-2, the appellant directs a professional staff involved with delivering intensive social work and related services to a small group of clients and potential clients, typically 200 each year from an estimated annual eligible homeless veteran population of approximately 300-400 in the VAMC's program area. The appellant and his staff do not directly service the larger population of clients required at Level 1-3. Therefore, this Subfactor is credited at Level 1-2.

Subfactor 1b: Effect

Effect addresses the impact of the work, the products, and/or the programs described under "Scope" on the mission, the agency, other agencies, the general public, or others.

At Level 1-2 of this subfactor, the services or products support and significantly affect installation, area office, or field office operations and objectives or comparable program segments; or provide services to a moderate, local or limited population of clients or users comparable to a major portion of a small city or rural county. In contrast, at Level 1-3, activities, functions, or services accomplished directly and significantly impact a wide range of agency activities, the work of other agencies, or the operations of outside interests (e.g., a segment of a regulated industry), or the general public.

As discussed previously, the appellant's program does not service a moderate-sized population of clients as defined at Level 1-3 of this subfactor. The services **directly** provided by the appellant involve one part of the MHBSS and larger VA mission, e.g., psychiatric and other medical services are provided by other VA and/or non-VA organizations. Thus, the appellant's program cannot be credited as furnishing a significant portion of the agency's line program to the serviced population as required at Level 1-3. Therefore, this subfactor must be credited at Level 1-2.

Level 1-2 is assigned for 350 points.

Factor 2, Organizational setting

This factor considers the organizational situation of the supervisory position in relation to higher level management.

As at Level 2-1, the position is accountable to a position that is two or more reporting levels below the first SES, flag or general officer, or equivalent higher level position in the direct supervisory chain. The appellant reports to the Associate Chief, MHBSS, a GS-185-13 position which, in turn, reports to the Service Chief, a VM-602-15 position. This reporting relationship fails to meet Level 2-2 where the position is accountable to a position that is one reporting level

below the first SES, flag or general officer, or equivalent or higher level position in the direct supervisory chain. Therefore, Level 2-1 is assigned for 100 points.

Factor 3, Supervisory and managerial authority exercised

This factor covers the delegated supervisory and managerial authorities which are exercised on a recurring basis. To be credited with a level under this factor, a position must meet the authorities and responsibilities to the extent described for the specific level.

In order to meet Level 3-2, a position must meet any one of the conditions described in paragraphs a, b, or c under this factor level. The appellant's position meets Level 3-2c at which supervisors at that level must carry out at least three of the first four, and a total of six or more of the 10 responsibilities listed at that level in the GSSG. These responsibilities include: (1) planning work to be accomplished by subordinates, set and adjust short-term priorities, and prepare schedules for completion of work; (2) assigning work to subordinates based on priorities, selective consideration of the difficulty and requirements of assignments, and the capabilities of employees; (3) Evaluating work performance of subordinates; (4) giving advice, counsel, or instruction to employees on both work and administrative matters; (5) interviewing candidates for positions in the unit; recommend appointment, promotion, or reassignment to such positions; (6) hearing and resolving complaints from employees, referring group grievances and more serious unresolved complaints to a higher level supervisor or manager; (7) effecting minor disciplinary measures, such as warnings and reprimands, recommending other action in more serious cases; (8) identifying developmental and training needs of employees, providing or arranging for needed development and training; (9) finding ways to improve production or increase the quality of the work directed; and, (10) developing performance standards. The appellant carries out all 10 authorities and responsibilities.

In order to fully meet Level 3-3, a position must meet the conditions described in paragraphs a or b, under this factor level.

Under Level 3-3a, the incumbent of a position must exercise the delegated managerial authority to set long range plans with goals and objectives; assure implementation of the plans by subordinate organizational units; determine which objectives require additional emphasis; and determine solutions to and resolve issues created by budget and staff requirements, including contracting out. In contrast, the appellant serves as a first-level supervisor whose organization does not involve the degree of delegated managerial authority or involve subordinate organizational units or subordinate supervisors as is envisioned of an organizational setting at Level 3-3a.

At Level 3-3b, a supervisor must exercise all or nearly all of the supervisory responsibilities and authorities described at Level 3-2c, plus at least 8 of the 15 responsibilities listed under Level 3-3b of the GSSG. As noted, the appellant's position exercises all 10 of the responsibilities described at Level 3-2c. Responsibilities 1, 3, 5, 6, and 8 refer to situations where work is accomplished through subordinate supervisors, team leaders, or other similar personnel. Supervisors at this level exercise these responsibilities through *multiple* subordinate supervisors or team leaders. Responsibility 2 is credited because the appellant exercises significant

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responsibilities in dealing with officials of other units and in advising management officials of higher rank, i.e., VAMC managers on Homeless Veterans Program issues. Responsibility 4 is not credited because the appellant does not direct a program with multimillion-dollar resources. Responsibility 7 is credited in that he makes selections for subordinate nonsupervisory positions.

Responsibilities 9, 10, 11, 13, and 14 may not be credited as the authority to make those decisions has not been delegated to the appellant's position. Responsibility 12 is not creditable in that the decisions on contracted work do not exceed those credited at Level 3-2, e.g., inspection of work performed under the Grants and Per Diem Programs. The size of the organization and workload directed preclude responsibility 15 from being performed on a regular and recurring basis as intended by the GSSG, e.g., substantially changing business practices and work flow. The size of the organization does not routinely provide the opportunity to deal with group grievances and serious employee complaints in responsibility 9. For responsibility 10, the appellant acts as the proposing official for serious disciplinary actions, but a higher level supervisor acts as the deciding official. The size of the organization would not routinely provide the appellant with the opportunity to make decisions on nonroutine, costly, or controversial training needs and his is not delegated the authority to do so. Therefore, responsibility 11 cannot be credited. Responsibility 13 is not fully met since the appellant does not routinely approve expenses for extensive overtime, and employee travel. Because of the limited size of the organization, number of positions, and nature of work performed, the position cannot be credited with routinely recommending changes in position classification required in responsibility 14.

Because the appellant's position does not meet Level 3-3a, nor are 8 of the 15 responsibilities listed in Level 3-3b met, Level 3-2 is assigned for 450 points.

Factor 4, Personal contacts

This is a two part factor that assesses the nature and purpose of personal contacts related to supervisory and managerial responsibilities. The contacts used to determine credit level under one subfactor must be the same used to determine credit under the other subfactor.

Subfactor 4A: Nature of contacts

This subfactor covers the organizational relationships, authority or influence level, setting, and preparation difficulty involved in the supervisor's work. To be credited, contacts must be direct and recurring, contribute to the successful performance of the work, and have a demonstrable impact on the difficulty and responsibility of the position.

At Level 4A-2, the employee has frequent contacts with members of the business community, the general public, higher ranking managers, supervisors, and staff of program, administrative, or other work units and activities throughout the installation, command (below major command level) or major organization level of the agency; representatives of local public interest groups; case workers in congressional district offices; technical or operating level employees of State and local governments; and reporters for local and other limited media outlets reaching a small, general population. Contacts may be informal, occur in conferences and meetings, take place by telephone, teleconference, radio, or similar means, and sometimes require special preparation.

In contrast, Level 4A-3 involves frequent contacts with high ranking military or civilian managers, supervisors, and technical staff at bureau and major organization levels of the agency; with agency headquarters administrative support staff; or with comparable personnel in other Federal agencies; key staff of public interest groups (usually in formal briefings) with significant political influence or media coverage; journalists representing influential city or county newspapers or comparable radio or television coverage; congressional committee and subcommittee staff assistants below staff director or chief counsel levels; contracting officials and high level technical staff of large industrial firms; local officers of regional or national trade associations, public action groups, or professional organizations; and/or State and local government managers doing business with the agency. Contacts include those which take place in meetings and conferences and unplanned contacts for which the employee is designated as a contact point by higher management. They often require extensive preparation of briefing materials or up-to-date technical familiarity with complex subject matter.

The appellant's frequent contacts with other VAMC employees, program clients, community organizations (e.g., shelter and community housing), veterans service and support organizations, State employees in the RI Veterans Home, and other Federal agencies (e.g., those who partner in Operation Stand Down and CHALENG). They are of the nature and require the preparation typical of Level 4A-2, e.g., contacting local businesses on behalf of the VI/CWT program. The appellant has some contacts characteristic of Level 4A-3, e.g., briefing the [state name] Governor's Advisory Counsel quarterly. However, these contacts are not frequent within the meaning of the GSSG and do not require the more extensive preparation or entail the other complications envisioned at Level 4A-3. For example, contacts with Congressional representatives and higher level interest group leaders typically are informational and do not require the extensive preparation or discussion of highly technical matters found at Level 4A-3. Because the position does not fully meet Level 4A-3, we must assign Level 4A-2 and 50 points.

Subfactor 4B: Purpose of contacts

This subfactor includes the advisory, representational, negotiating, and commitment responsibilities related to the supervisor's contacts credited under the previous subfactor.

At Level 4B-2, the purpose of contacts is to ensure that information provided to outside parties is accurate and consistent, to plan and coordinate the work directed with that of others outside the subordinate organization, and/or to resolve differences of opinion among managers, supervisors, employees, contractors, or others. In contrast, the purpose of Level 4B-3 contacts is to justify, defend, or negotiate in representing the project, program segment(s), or organizational unit(s) directed, in obtaining or committing resources, *and* in gaining compliance with established policies, regulations, or contracts. Contacts at this level usually involve active participation in conferences, meetings, hearings, or presentations involving problems or issues of considerable consequence or importance to the program or program segment(s) managed.

As at Level 4B-2, the purpose of the appellant's contacts is to plan and coordinate his program's work with that of other VAMC components and others who provide services and support to homeless veterans. They also involve resolving treatment and support issues for homeless

veterans. Unlike Level 4B-3, the appellant's frequent contacts do not *typically* require him to justify, defend, or negotiate his program's work, to obtain or commit resources, *and* to gain compliance. The appellant's program advocacy typically is with audiences who support program goals and are receptive to and cooperate in advancing program initiatives. While the appellant performs grant and per diem program oversight functions, the providers of those and other reimbursable services are similarly motivated to comply with program requirements and remain in the program. Therefore, we assign Level 4B-2 and 75 points.

Factor 5, Difficulty of typical work directed

This factor covers the difficulty and complexity of the basic work most typical of the organization directed, as well as other line, staff, or contracted work for which the supervisor has technical or oversight responsibility (either directly or through subordinate supervisors, team leaders, or others). The level credited for this factor normally must constitute at least 25 percent of the workload of the organization supervised. Excluded from consideration is: (1) work of lower level positions that primarily support the basic work of the unit, (2) work that is graded based upon the supervisory or leader guides, (3) work that is graded higher than normal because of extraordinary independence from supervision, and (4) work for which the supervisor does not have the responsibilities defined under Factor 3.

Based on the two GS-11 and one GS-9 positions directly supervised, we find that GS-11 is the highest level of work directed under the criteria defined in Factor 5. Therefore, Level 5-6 is credited for 800 points.

Factor 6, Other conditions

This factor measures the extent to which various conditions contribute to the difficulty and complexity of carrying out supervisory duties, authorities, and responsibilities. Conditions affecting work for which the supervisor is responsible may be considered if they increase the difficulty of carrying out assigned supervisory or managerial duties and authorities. These Special Situations are considered if the factor level initially credited is less than Level 6-4.

Level 6-4 of the guide addresses complications arising from the supervision of work comparable in difficulty to the GS-11 grade level *and* requiring substantial coordination and integration of a number of major assignments or projects.

Level 6-5 addresses complications arising from the supervision of work comparable in difficulty to the GS-12 grade level *and* requiring significant and extensive coordination and integration. At Level 6-5, the supervisor's coordination and integration occur at the overall organizational level rather than the installation level and involve policy formulation for a program rather than development of local (or installation) policy to implement or clarify program policy. None of the provisions of Level 6-5 apply to the appellant's position.

Comparable to Level 6-4, the appellant supervises professional GS-11 grade level work. He is expected to coordinate and integrate the program functions performed by his staff ranging from direct patient care to community outreach and program development. As at Level 6-4, he is

expected to make recommendations and participate in determinations regarding program projects to be initiated, dropped or curtailed. The position does not involve supervision of GS-12 grade level work nor the significant recommendation and coordination of the level typical of Level 6-5. Therefore, Level 6-4 is assigned with 1,120 points.

Summary

	Factor	Level	Points
1.	Program scope and effect	1-2	350
2.	Organizational setting	2-1	100
3.	Supervisory and managerial authority exercised	3-2	450
4.	Personal contacts		
	A. Nature	4A-2	50
	B. Purpose	4B-2	75
5.	Difficulty of typical work directed	5-6	800
6.	Other conditions	6-4	<u>1,120</u>
		Total	2,945

A total of 2,945 points is credited. Using the grade conversion table in the GSSG standard, 2,945 points fall in the GS-12 range (2,755-3,150).

Decision

The position is properly classified as Social Worker, GS-185-12.