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

San Francisco Field Services Group 120 Howard Street, Room 760 San Francisco, California 94105-0001

# **Classification Appeal Decision Under section 5112 of title 5, United States Code**

Appellants:	[Names of appellants]
Agency classification:	Human Resources Specialist (Labor and Employee Relations) GS-201-12
Organization:	[Appellants' organization/location] Department of Navy
OPM decision:	Human Resources Specialist GS-201-12 (Parenthetical title at discretion of agency)
OPM decision number:	C-0201-12-03

Carlos A. Torrico Classification Appeals Officer

<u>October 29, 2003</u> 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:**

[Names and addresses of appellants]

[Address of servicing human resources office]

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# Introduction

On June 25, 2003, the San Francisco Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a group classification appeal from [names of appellants]. On July 28, 2003, we received the agency's complete administrative report concerning the appeal. The appellants' position is currently classified as Human Resources Specialist (Labor and Employee Relations), GS-201-12. However, they believe their position should be graded at the GS-13 level using the grading criteria in the position classification standard for the General Attorney Series, GS-905. Their position is assigned to the [appellants' organization/location], Department of Navy. We have accepted and decided their appeal under section 5112 of title 5, United States Code (U.S.C.).

This appeal decision is based on a careful review of all information furnished by the appellants and their agency. In addition, to help decide the appeal we conducted separate telephone interviews with the two appellants and their supervisor.

# **General issues**

The appellants make various statements about the classification review process conducted by their agency, and compare their work to attorney positions in other agencies. They also cite the rationale in a previous OPM classification appeal decision covering a different position as a basis for upgrading their position. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of their position. Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellants' position to others (or to those addressed in other appeal decisions) as a basis for deciding their appeal. Instructions on the OPM web site state that the classification appeal decisions posted do not substitute for or add to position classification or job grading standards and guides and are not "case law." In addition to the prohibition on position-to-position comparison, the instructions state that the decisions do not provide enough information for direct application in the classification of other positions. Therefore, the OPM appeal decision discussed in the record may not be considered in our adjudication of their appeal. Because our decision sets aside any previous agency decision, the classification practices used by the appellants' agency in classifying their position are not germane to the classification appeal process.

# **Position information**

Both the appellants and their supervisor have certified to the accuracy of the appellants' official position description (PD) [number]. The appellants serve as the senior human resources specialists for labor and employee relations in [appellants' organization]. Serviced activities are located throughout [names of three states], and other bases operating support services with employees deployed world wide. They often deal with differing procedures, processes, cultures, union agreements and organizations. They represent the agency at litigation, third party hearings, and provide advice and guidance to the [name of region] on employee and labor relation matters. In doing so, they hope to arrive at settlement agreements favorable to the

agency, and avoid costly litigation and unfavorable decisions directed at the agency. The work requires the ability to review and analyze investigative reports and case records, conduct interviews and analyze complex labor and employee relations issues, prepare factual reports, and exercise sound judgment in making recommendations to agency managers.

The results of our interviews, the appellants' position description, and other material of record provide more information about their duties and responsibilities and how they are performed. We incorporate the position description of record by reference into this decision.

# Series, title and standard determination

The appellants' agency has classified their position to the Human Resources Management Series, GS-201, titling it Human Resources Specialist (Labor and Employee Relations), and the appellants do not disagree. We concur with the agency's determination of basic title and series. As noted in the Job Family Position Classification Standard for Administrative Work in the Human Resources Management Group, GS-0200, which covers work in the GS-201 series, agencies may assign parenthetical specialty titles in official position titles if individual circumstances dictate. Therefore, selection of a parenthetical title is at the discretion of the agency.

The appellants believe that their position should be graded by using the grading criteria in the standard for the General Attorney Series, GS-905, because they prepare arguments and represent their agency at administrative and third party hearings. The General Schedule (GS) classification system recognizes that some duties are performed by positions in multiple occupations. Human Resources Specialists, GS-201, Paralegal Specialists, GS-950, and Attorneys GS-905, prepare arguments and perform other work involved in representing agencies at administrative and third party hearings on human resource management issues. The proper series and, subsequently, the proper classification standard used to evaluate the work, are determined based on the paramount qualifications required, sources of recruitment and line of progression, the reason for establishing the position, and the background knowledge required.

The GS-905 series includes professional legal positions involved in preparing cases for trial and/or the trial of cases before a court or an administrative body or persons having quasi-judicial power; rendering legal advice and services with respect to questions, regulations, practices, or other matters falling within the purview of a Federal Government agency (this may include conducting investigations to obtain evidentiary data); preparing interpretive and administrative orders, rules, or regulations to give effect to the provisions of governing status or other requirements of law; drafting, negotiating, or examining contracts or other legal documents required by the agency's activities; drafting, preparing formal comments, or otherwise making substantive recommendations with respect to proposed legislation; editing and preparing for publication statutes enacted by Congress and opinions or decisions of a court, commission, or board; and drafting and reviewing decisions for consideration and adoption by agency officials. Positions in the GS-905 series require completion of professional education and admission to the bar.

The appellants' work does not require professional legal education, a degree in law, or admission to the bar. Their work does not encompass the full range of duties performed by attorneys, and does not necessitate the knowledge, skills and abilities acquired through completion of an education in law. Rather, they perform administrative work covering the full scope of duties in labor and employee relations. Therefore, it is inappropriate to apply the grading criteria in the GS-905 standard to the appellants' position. The grading criteria for positions in the GS-201 series, as described in the Job Family Position Classification Standard for Administrative Work in the Human Resources Management Group, GS-0200, are directly applicable to the appellants' position and must be used for grade level determination.

#### **Grade determination**

The GS-201 standard uses the Factor Evaluation System (FES), which employs nine factors. Under the FES, each factor level description in a standard describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. Each factor level has a corresponding point value. The total points assigned are converted to a grade by use of the grade conversion table in the standard.

# Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts that a worker must understand to do acceptable work, such as the steps, procedures, practices, rules, policies, theories, principles, and concepts; and the nature and extent of the skills necessary to apply that knowledge.

Assignments at Level 1-7 require knowledge of and skill in applying a wide range of Human Resource Management (HRM) concepts, laws, case law, policies, practices, analytical and diagnostic methods and techniques sufficient to solve a wide range of complex, interrelated HRM problems and issues. At this level, employees specializing in labor and employee relations apply knowledge and skill in applying a wide range of HR case law, principles, practices, and regulations sufficient to perform detailed analyses and draw conclusions on complex legal issues and problems. They exercise skill in legal research sufficient to locate, interpret, and analyze for applicability and appropriateness, precedent and substantive decisions and legal opinions of various courts and administrative bodies. They apply mediation techniques and other nonadversarial problem solving approaches to resolve problems, including conflict resolution to resolve highly contested case matters. At Level 1-7 the employee demonstrates oral and written communication techniques sufficient to formulate and present arguments and advisory opinions, and to prepare legal and case documents. Work illustrations at Level 1-7 include advising managers about appropriate disciplinary or other corrective techniques concerning conduct or performance problems; researching and applying administrative decisions so as to analyze and craft defensible solutions to problems where precedent cases are not always directly applicable; researching legal precedents and defining legal and parameters and issues of cases; filing necessary documents and representing management before third parties in quasi-judicial boards and commissions; advising negotiating committee members on interpretation of arbitration decisions and applying them to local situations; and serving as the authoritative local interpreter of labor relations law, regulation, Executive order, and decisions of labor relations formal bodies.

The appellants' position meets Level 1-7. Similar to that level they apply a wide range of HRM concepts, regulations, precedents and case law to resolve complex labor and employee relations They perform detailed analysis and interpretation, draw conclusions and make issues. recommendations involving HRM regulations and practices concerning priority placement procedures, reduction-in-force, competitive selection procedures, veterans' preference, workers compensation, discrimination, reasonable accommodation and adverse actions. They develop cases by reviewing facts and pertinent data, interpret and apply Federal sector precedents and/or otherwise devise legal theories consistent with precedent and controlling statutes, regulations, policies and labor contract requirements and management/agency interests and objectives. Similar to the illustrations at Level 1-7, the appellants use knowledge and skill to interpret and apply precedent case law from MSPB, EEOC, Federal Circuit Court and labor arbitrations to cases involving adverse actions and discrimination complaints. Their analysis focuses on case issues, weaknesses, strengths, legal factors and their agency's position. Case issues have included complaints filed by persons with disabilities claiming disparate treatment and seeking reasonable accommodation, requiring the appellants to develop the case strategy and a resolution plan covering the broader questions of the case such as right to remedy. Like Level 1-7, the appellants have resolved EEO complaints and other cases through non-adversarial methods such as mediation. They have served as negotiators and/or advisors to management on negotiability and interpretation of specific articles in collective bargaining agreements. For administrative proceedings they prepare briefs, file necessary documents and motions, and present oral arguments on behalf of their agency before third parties and quasi-judicial boards.

At Level 1-8 employees apply a mastery of advanced HRM principles, concepts, regulations, and practices, analytical methods and techniques, and seasoned consultative skill sufficient to resolve HRM problems not susceptible to treatment by standard methods. Specialists at this level provide authoritative advisory service and plan, organize, and conduct research of complex legal problems that involve major areas of uncertainty in approach to identify appropriate courses of action. They evaluate and make recommendations concerning overall plans and proposals for HR projects, and prepare recommendations to significantly change or modify one or more major programs. They evaluate the content of new legislation for impact on agency programs and/or to translate legislation into program goals and objectives. Work illustrations at Level 1-8 include HR specialists in labor and employee relations who serve as agency or equivalent level senior consultants; review policy and procedures to ensure consistency in their application and recommend modifications; analyze and solve particularly complex and sensitive problems and issues, such as those involving conflicting laws or untested areas of case law, where policy decisions and case strategy guidance have impact throughout the agency. Specialists in labor relations provide staff advisory services on command-wide issues, and develop command methods of measurement that provide a valid measurement of the success of the program. They furnish advice on organization-wide strategic plans and organizational issues such as multiple reductions-in-force, outsourcing, reconfigurations of mission workload, and develop the future vision of the labor relations program.

The appellants' position does not meet Level 1-8. In contrast to that level they do not apply nonstandard methods in researching and analyzing case law and precedents, and in preparing for and participating in mediation. Our fact-finding disclosed that the supervisor, in collaboration with higher agency level specialists, is responsible for performing assignments that develop authoritative policy interpretation, evaluate and recommend overall plans for HR projects, evaluate proposed or new legislation and regulations for it's impact on the agency region, and those projects involving developing overall polices that affect the [name of region] labor and employee relations policies and procedures.

This factor is assigned Level 1-7 and 1250 points are credited.

# Factor 2, Supervisory controls

This factor measures the nature and extent of supervision exercised over the position, the employee's responsibility, and the review of completed work

At Level 2-4, the overall objectives and available resources are outlined by the supervisor. Both the supervisor and employee discuss timeframes and scope of the assignment, including possible stages and approaches. It is the employee's responsibility to determine the appropriate principles, practices, and methods to apply in all phases of assignments, including the approach to be taken and depth of research in management advisories. Employees at Level 2-4 interpret regulations on their own initiative, apply new methods to resolve complex issues and problems, and keep the supervisor informed of progress and of potentially controversial matters. Work is reviewed for soundness of overall approach, and effectiveness in meeting requirements. The supervisor does not usually review methods used.

The appellants' position meets Level 2-4. Similar to that level, the supervisor specifies the overall objectives of assignments and timeframes, and the appellants plan the methods, processes and direction of their work covering their assigned organizational activities. They develop case theory, determine evidence exhibits and witnesses, and decide when to engage in settlement discussions or oppose a case. The supervisor is periodically briefed on the progress of a case and of the potential for controversy of significant high profile cases. The supervisor reviews completed work for achievement of results and adequacy of recommendations, but does not review the methods used.

At Level 2-5, the supervisor provides administrative and policy direction in terms of broadly defined missions or functions of the organization. The employee is responsible for a significant program or function, defining objectives, interpreting policies promulgated by authorities senior to the immediate supervisor and determining their effect on program needs. Employees at this level independently plan, design, and carry out their work and are technical authorities. Work is reviewed for potential impact on broad agency policy objectives and program goals, is considered technically correct, and accepted without significant change.

The appellants' position does not meet Level 2-5. Unlike that level the supervisor assigns work with more specific instructions than just administrative and policy direction. The appellants are not responsible for a significant program or function, and do not define program objectives. Those responsibilities are held by the supervisor. While they work independently on individual cases, they do not interpret the impact of policies on overall program needs. The supervisor

reviews completed work products more closely than just for its impact on broad agency policy objectives and program goals.

This factor is evaluated at Level 2-4 and 450 points are assigned.

# Factor 3, Guidelines

This factor measures the nature of guidelines and the judgment needed to apply them.

At Level 3-4, employees use guidelines and precedents that are very general regarding agency policy statements and objectives. Guidelines specific to assignments are often scarce, inapplicable or have gaps in specificity that require considerable interpretation and/or adaptation for application to issues and problems. At Level 3-4 employees use judgment, initiative, and resourcefulness in deviating from established methods to modify, adapt, and/or refine broader guidelines to resolve specific complex and/or intricate issues and problems. They research trends and patterns, and may propose new methods and practices.

The appellants' position meets Level 3-4. Their guidelines include general agency directives, precedent cases, labor agreements, and decisions of arbitrators. They are often inapplicable or have gaps requiring the appellants to interpret or adapt them to specific issues or problems. In applying the guidelines they exercise judgment, particularly in interpreting case law and determining how points made support the agency's case. In addition, records of existing case litigation may be limited in usefulness in resolving issues at hand.

At Level 3-5, employees use guidelines that are often ambiguous and express conflicting or incompatible goals and objectives, requiring extensive interpretation. Employees use judgment and ingenuity and exercise broad latitude to determine the intent of applicable guidelines, develop policy and guidelines for specific areas of work, and formulate interpretations that may take the form of policy statements and guidelines. At Level 3-5, top agency management officials and senior staff recognize the employee as a technical expert.

The appellants' position does not meet Level 3-5. Unlike that level, although their guidelines can be inconsistent or vague in relation to particular cases, they are not so conflicting that they require extensive interpretation. They are not involved in developing policy and guidelines for specific areas of their work, and do not formulate interpretations that may become policy statements. Such tasks are the responsibility of positions above the appellants' in the agency.

This factor is evaluated at Level 3-4 and 450 points are credited.

# Factor 4, Complexity

This factor measures 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.

At Level 4-4, the work consists of resolving problems and issues that often involve conflicting or incomplete information; applying analytical techniques that frequently require modification to accommodate a wide range of variables; and addressing substantive technical issues that are characterized by complex, controversial and or sensitive matters that contain several interrelated issues. Employees at Level 4-4 conduct detailed planning to gather and interpret information and data for assessing complex problems; analyze the effects of changes in law and regulations; identify and clarify problems and issues so as to propose recommendations; and define problems in terms of compatibility with appropriate laws, policies or regulations.

Illustrative assignments at Level 4-4 for specialists engaged in employee and labor relations include work analyzing a variety of employee conduct and performance-based problems where the specialist assists parties in problem definition and assessment of alternative approaches to resolve problems; conducting fact-finding to provide context and resolve disputes; ensuring that managers are aware of the interaction of different laws and help them to identify actions that are consistent with the facts when proposing disciplinary actions; developing case strategy including considering relevant precedents; and representing the organization in formal administrative proceedings involving various motions, pleadings and arguments, and the negotiation of settlements. Labor relations assignments include providing services to satellite offices from an HR advisory center; participating in labor management negotiations and advising managers on labor management issues; representing the agency in cases before third parties and conducting extensive research into facts and case law; and making technical recommendations regarding settlements.

The appellants' position meets Level 4-4. Similar to that level, cases dealt with involve conflicting or incomplete information, and address substantive technical issues that are complex and sensitive where facts and concerns are interrelated. The appellants are involved in reviewing, analyzing and recommending the course of adverse action cases that may involve numerous conflicting facts and issues. For example, they cited a complex case involving a complaint of discrimination based on both race and disability, where there were contradictions in witness testimony, and the applicability of regulations in staffing and workers compensation. They were tasked with gathering and interpreting all relevant information, analyzing the effects of various laws and regulations, and proposing recommendations to resolve the issues.

Similar to the Level 4-4 work illustrations, the appellants conduct fact-finding to provide necessary context for resolving disputes and issues in employee relations cases, EEO complaints, or employee grievances, advise managers of their obligations regarding different laws involving HRM, review draft adverse action proposals and decisions for procedural corrections and adequacy of approach, and develop case strategy taking into account relevant precedents. When processing cases, the appellants interview witnesses, investigate facts and applicable laws, rules and regulations to identify potential documents useful as exhibits, sort out conflicting witness testimony, and determine whether the agency should settle or pursue the issue at third party hearings. They represent their agency at various third party hearings and forums, and serve as points-of-contact at a regional HR office servicing a number of naval activities in the region.

At Level 4-5 work consists of addressing issues that significantly affect long-range implementation of substantive operational and/or policy programs throughout an agency, bureau, service, or major

military command. Specialists at this level resolve different and unrelated problems and issues that affect long-range implementation and administration of substantive interrelated mission-oriented programs, and conduct studies to develop responses to management on new requirements in program operations, legislation, or agency regulations. Illustrative assignments at Level 4-5 for specialists engaged in employee and labor relations include advising top management officials of the agency on issues related to conduct and performance, serving as the principal focal point providing labor relations advisory services on command-wide issues to headquarters staff and HR officials, or being responsible for labor relations program development and evaluation and staff advisory functions.

The appellants' position does not meet Level 4-5. Unlike that level they are not responsible for addressing issues and resolving different and unrelated problems that affect long-range implementation of substantive operational and/or policy programs throughout the agency, i.e., Department of the Navy. They do not conduct studies to determine the impact of new legislation agency wide. Unlike the illustrative work examples under Level 4-5, the focus of their position is on labor and employee relations activities in a region, rather than at the agency headquarters level. The record shows that the appellants are not responsible for the development of the labor relations program, to include evaluating its effectiveness and providing overall staff advisory functions of the scope and complexity defined at Level 4-5.

This factor is evaluated at Level 4-4 and 225 points are assigned.

# Factor 5, Scope and effect

This factor covers the relationships between the nature of 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.

At Level 5-4, the work involves resolving or advising on complex problems and issues that typically require analyzing and/or troubleshooting a wide range of unusual conditions that affect the objectives and effectiveness of the HR mission and program operations. The assessment, analysis, and ultimate resolution of problems promote the overall quality, effectiveness, and efficiency of program operations. Illustrative assignments at Level 5-4 of specialists engaged in employee and labor relations include providing management advisory services, and developing and assessing program effectiveness, as well as evaluating and analyzing a variety of complex problems associated with casework. Recommendations serve as a basis for commitment to specific courses of action and results of advice may give rise to precedent-setting decisions by third parties.

Like Level 5-4 the purpose of the appellants' work is to provide guidance to management on a variety of labor and employee relations issues, and represent the agency in third party hearings. The work involves planning, researching, analyzing and strategizing case approach and making recommendations on best courses of action. In doing so, they seek to avoid costly litigation and unfavorable decisions to the agency and arrive at settlement agreements advantageous to the [name of region]. The appellants work affects the effectiveness and efficiency of the region's HR operations.

The appellants' position does not meet Level 5-5 where the work involves developing major aspects of agency wide HR programs, requiring isolating and defining unknown conditions, resolving critical problems, or developing new concepts and methodologies. At Level 5-5 work establishes precedents for other technical experts to follow, and findings and recommendations are typically of major significance to agency management officials and often serve as the basis for new legislation, regulations, or programs. Unlike Level 5-5 the appellants' work does not involve the scope and impact typical of that level. They are not involved in developing major aspects of the Navy's HR or labor and employee relations programs, and their work does not regularly and recurringly establish precedents for others to follow. Their analyses, recommendations, and decisions affect serviced activities within the [name of region] area of responsibility.

This factor is evaluated at Level 5-4 and 225 points are credited.

# Factors 6 and 7, Personal contacts and Purpose of contacts

These factors measure the type of personal contacts that occur in the work and the purpose of those contacts. These factors include face-to-face contacts and telephone dialogue with persons not in the supervisory chain. Levels described under these factors are based on what is required to make the initial contact, the difficulty of communicating with those contacted, how well the employee and those contacted recognize their relative roles and authorities, the reason for the communication and the context or environment in which the communication takes place.

These factors are inter-dependent. The appropriate level for Personal Contacts and the corresponding level for Purpose of Contacts are determined by applying the point assignment chart for Factors 6 and 7.

# Personal contacts

At Level 6-3, contacts are with persons from outside the employing agency in moderately unstructured settings and may be with agency officials who are several managerial levels removed from the employee. The employee must recognize or learn the role and authority of each party during the course of the meeting.

The appellants' position meets Level 6-3 by having direct and frequent contacts with persons outside the agency including attorneys and union officials. In addition, the appellants have contact on an ad hoc basis with senior level managers in their agency. The position does not meet Level 6-4 where contacts are with high-ranking officials from outside the agency at national or international levels, in highly unstructured settings. Such contacts typically include the heads of other agencies, Members of Congress, mayors of major cities, etc. The record shows that the appellants do not have contacts with such individuals.

# Purpose of contacts

At Level 7-C, the purpose is to influence and persuade managers to accept and implement findings and recommendations. The employee may encounter resistance due to such issues as organizational conflict, competing objectives, or resource problems. At this level employees

must be skillful in approaching contacts to obtain the desired effect; e.g., gaining compliance with established policies and regulations by persuasion or negotiation.

The appellants' position meets Level 7-C. Like that level they influence and persuade employees and managers to accept the results of negotiations, and recommend to managers the reasons why they should proceed with or settle a variety of complaints and grievances. They frequently encounter resistance to their recommendations, and must be persuasive to avoid unfavorable precedent decisions by third parties, which could yield costly or negative results to the agency.

The purpose of contacts at Level 7-D is to present, justify, defend, negotiate, or settle matters involving significant or controversial issues; e.g., recommendations affecting major programs, dealing with substantial expenditures, or significantly changing the nature and scope of organizations.

The appellants' position does not meet Level 7-D. Unlike that level, the purpose of their contacts is not to justify, defend, negotiate, or settle matters involving significant or controversial issues of the type described at Level 7-D. They are primarily concerned with individual case work covering labor and employee relations issues, rather than making recommendations regarding the overall HR program, or changes in the nature and scope of organizations in the region.

Factors 6 and 7 are assigned Level 3-C, and a total of 180 points is credited.

# Factor 8, Physical demands

This factor measures the physical requirements placed on the employee by the work assignment.

The appellants' position matches Level 8-1, the highest level for this factor described in the standard. Similar to that level their work is sedentary, with some walking in industrial areas. Their work does not require any special physical effort.

This factor is credited at Level 8-1 and 5 points are assigned.

# Factor 9, Work environment

This factor measures the risks and discomforts in the employee's physical surroundings.

The appellants' position meets Level 9-1, which is the highest level for this factor described in the standard. Similar to that level, their work area is adequately lighted, heated, and ventilated, requiring only normal safety precautions.

This factor is credited at Level 9-1 and 5 points are assigned.

Summary of FES factors			
Factor	Level	Points	
1. Knowledge required by the position	1-7	1250	
2. Supervisory controls	2-4	450	
3. Guidelines	3-4	450	
4. Complexity	4-4	225	
5. Scope and effect	5-4	225	
6. and 7. Nature of contacts/Purpose of contacts	3-C	180	
8. Physical demands	8-1	5	
9. Work environment	9-1	5	
Total		2790	

A total of 2790 points falls within the GS-12 range (2755-3150) on the grade conversion table in the standard. Therefore, the appellants' duties are graded at the GS-12 level.

# Decision

The appellants' position is properly classified as Human Resources Specialist, GS-201-12. Selection of an appropriate parenthetical title is at the discretion of the agency.