

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

Dallas Field Services Group
1100 Commerce Street, Room 441
Dallas, TX 75242

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

Appellant: [appellant]

Agency classification: Secretary (Office Automation)
GS-318-7

Organization: Office of the State Executive Director
[state] State Office
Deputy Administrator for
Field Operations
Farm Service Agency
U.S. Department of Agriculture
[city and state]

OPM decision: Secretary (Office Automation)
GS-318-7

OPM decision number: C-0318-07-05

/s/ Judith L. Frenzel

Judith L. Frenzel
Classification Appeals Officer

August 7, 2003

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:

[appellant's name and address]

Chief, Human Resources
Farm Service Agency
U.S. Department of Agriculture
[servicing personnel office address]

USDA-OHRM-OD
U.S. Department of Agriculture
J.S. Whitten Building, Room 47W
1400 Independence Avenue, SW.
Washington, DC 20250

Director, Human Resources Management
USDA-OHRM-PPPD
U.S. Department of Agriculture
J.S. Whitten Building, Room 302W
1400 Independence Avenue, SW.
Washington, DC 20250

Introduction

On April 15, 2003, the Dallas Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. We received the agency's administrative report on May 16, 2003. The appellant's position is currently classified as Secretary (Office Automation), GS-318-7, and is located in the Office of the State Executive Director, [state] State Office, Deputy Administrator for Field Operations, Farm Service Agency (FSA), U.S. Department of Agriculture, at [city and state]. The appellant does not dispute the title and series of her position, but believes it should be classified at the GS-8 grade level. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

Background information

The supervisor requested a classification review of the appellant's position through FSA's Kansas City Human Resources Division. Their March 2003 decision sustained the title, series, and grade of the position. The appellant subsequently filed an appeal with our office.

An OPM representative conducted a telephone audit with the appellant on June 19, 2003, and a telephone interview with her immediate supervisor on July 7, 2003, to help decide this appeal. In reaching our classification decision, we carefully considered all of the information gained from these interviews, as well as the written information furnished by the appellant and her agency.

General issues

The appellant and her supervisor certified to the accuracy of the duties described in the position description (PD) of record, number[number], and its addendum, which included duties performed in support of special emphasis programs, county office reviews, and electronic government activities. The appellant has stressed that her PD is not classified correctly, in part, because her agency's evaluation does not give sufficient recognition to the duties identified in the addendum.

By law, we must classify positions solely by comparing the current duties and responsibilities to OPM classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Position classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities assigned by management and performed by the employee. We classify an operating position, and not simply the PD. Therefore, this decision is based on the actual work assigned to and performed by the appellant.

Implicit in the appellant's rationale is that the increase in the workload should support the upgrading of her position. The assigning of more work, however, does not necessarily mean that the additional work is more difficult and complex. The duties described in the PD addendum; i.e., special emphasis programs, county office reviews, and e-government activities, each occupy less than seven percent of the appellant's time, according to the appellant. Only those duties that occupy at least 25 percent of an employee's time can affect the grade of a position (*Introduction to the Position Classification Standards*, section III.J). Therefore, these duties in and of

themselves, would not control the classification of the appellant's position. We will consider these duties in the course of applying OPM standards and guidelines to the appealed position.

Position information

The appellant serves as the secretary to the State Executive Director (SED), providing clerical and administrative support services to the Director and her staff of approximately 27 employees. This staff includes an administrative branch including four employees, and two agricultural program specialists and a program support clerk. The largest component, approximately 60 percent of the staff, are agricultural loan specialists, assigned to the farm loan program branch, three district offices and three USDA service centers located in various counties.

The appellant answers telephone calls and receives incoming mail. Inquiries involving technical matters are forwarded to the appropriate program specialist or to the SED, if the importance of the business or the rank of the inquirer is such as to require it. The appellant may, however, answer general inquiries or provide information that may be gathered from readily available sources. She supports office operations by performing duties including, but not limited to, processing time and attendance reports, making travel arrangements, maintaining travel records, tracking referred correspondence, maintaining filing systems, and reviewing various documents. For example, news releases are written by a specialist and forwarded to the appellant, who will review it for conformance with grammar, spelling, punctuation, and format, before forwarding it to the media. The appellant also gathers information for periodic reports, e.g., tracking vehicle mileage and credit cardholders delinquent in payment. To avoid possible scheduling conflicts because the SED makes most of her own appointments, the appellant may only tentatively set an appointment that will later be confirmed by the SED.

The PD addendum describes providing support for the county office reviews by tracking correspondence, collecting reports, and assuring distribution to the appropriate specialist. Work with special emphasis programs involves writing memorandums for the staff informing them of special events, e.g., Black History Month, as well as setting up displays and exhibits for these special events. Duties related to e-government include forwarding correspondence regarding e-government initiatives to the appropriate individuals and providing information to employees in State and county offices on e-forms and electronic signature capabilities.

A collaborative relationship exists between the State and the county offices, which are responsible for ensuring that State office services are delivered to the farming community. In addition to services provided to the State office, the appellant performs duties for the 19 autonomous and geographically dispersed county offices. The appellant performs work associated with the motor vehicles, periodically contacting employees to track vehicle mileage. Employees, in turn, contact her with repair and maintenance requests. The appellant also maintains a tickler system to ensure that the State office receives, by the deadline, the corrective action plans developed by the county offices to address the deficiencies identified during their office reviews by the State.

In addition, the appellant is the secretary for the three-person State committee, making travel and meeting arrangements, forwarding mail, compiling minutes, and assembling meeting materials.

She furnishes similar services to the State Emergency Board, as well. This includes making travel arrangements and preparing reports documenting disaster-related incidents. The appellant also supports the State Food and Agricultural Council and the State Outreach Council should the SED serve as the chair.

The appellant's PD and other material of record furnish more information about her duties and responsibilities and how they are performed.

Series, title, and standard determination

The position is properly classified in the Secretary Series, GS-318, and titled Secretary. The appellant's position requires significant knowledge of office automation systems and a fully qualified typist to perform word processing duties. As prescribed in the titling instructions of the Office Automation Grade Evaluation Guide, the parenthetical title "OA" is added to the position title. Applying this Guide, we determined that the appellant's Office Automation duties and responsibilities are graded at a lower level than her secretarial work. As a result, the appellant's position is properly evaluated using the position classification standard for the Secretary Series, GS-318. Neither the appellant nor the agency disagrees with the series or title of the position.

Grade determination

The GS-318 position classification standard is written in the 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 standard. Under the FES, each factor level description in a standard or guide describes the minimum characteristics needed to receive credit for the described level. 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.

The appellant disagrees with the agency's evaluation of Factors 1 and 2. We reviewed the agency's determination for Factors 3, 4, 5, 6, 7, 8, and 9, and concur with their findings. Our evaluation will address only those factors with which the appellant disagrees.

Factor 1, Knowledge required by the position

This factor is expressed in terms of two elements, Knowledge Type and Work Situation. Knowledge Type measures the nature and extent of information the employee must understand in order to do the work, and the skills needed to apply that knowledge. Work Situation refers to the complexity of the organization served (e.g., the immediate office in which the secretary works and any subordinate offices) which affects the extent of office rules, procedures, operations, and priorities the employee must apply to maintain a proper and smooth flow of work within the organization and between organizations.

The appellant states that her position warrants an upgrade, because she reviews news releases, supports the travel charge card program, and performs work associated with the motor vehicles leased by the General Services Administration (GSA).

Knowledge Type

The knowledge required by the appellant's position matches Knowledge Type III. Positions at this level require knowledge of the duties, priorities, commitments, policies, and program goals of the staff sufficient to perform non-routine assignments such as independently noting and following up on commitments made at meetings and conferences by staff members. Also at this level, the secretary is fully responsible for coordinating the work of the office with the work of other offices, and for recognizing the need for such coordination in various circumstances.

Consistent with Knowledge Type III, the appellant must possess knowledge of established policies and practices in a variety of administrative areas, e.g., time and attendance, internal and external communication, and travel. She also uses this knowledge to recognize problems with incomplete, missing, or inaccurate information. If she determines a corrective action plan is missing and follows up with the county office, the appellant must be sufficiently knowledgeable of established county office review procedure manuals to determine if an extension is warranted, should the county office request one. Her work dealing with requests for vehicle repairs by referring staff to the local, GSA-approved repair shop is consistent with Knowledge Type III, i.e., serving as primary contact with obtaining/providing services for her own and subordinate offices. Although the appellant resolves most issues involving motor vehicles, only the SED can initiate the acquisition of a vehicle from GSA. If she receives a request to acquire a vehicle, e.g., with the cruise control feature, the appellant can usually determine, based on past decisions, if the justification is sufficient to be approved by the SED.

The appellant must also be familiar with established policies in order to support county offices with completing the Damage Assessment Report, outlining the extent of agricultural losses resulting from disaster-related incidents. Similar to positions with Knowledge Type III, the appellant must possess a substantive knowledge of her organization's program goals, as well as the priorities and policies of the SED in order to perform non-routine assignments such as reviewing correspondence for her signature, not only for conformance with format, grammar, and punctuation, but also for consistency with the supervisor's viewpoints and previous decisions on administrative issues. The appellant also answers telephone calls and reviews incoming mail, directing inquiries to the appropriate staff. Consistent with type III knowledge, she must know the duties, functional assignments, and commitments of the subordinate staff in order to route callers and correspondence based on subject matter.

The position does not meet Knowledge Type IV. Positions at this level must have, as a continuing requirement, a basic foundation of administrative concepts, principles, and practices sufficient to perform independently such duties as eliminating conflict and duplication in extensive office procedures; skill in adapting policies or procedures to emergency situations and establishing practices or procedures to meet new situations; systematically studying and evaluating new office machines and recommending acceptance and rejection of their use; and studying the clerical activities of the office and subordinate offices and recommending a specific

restructuring of the way activities are carried out. The work also requires a comprehensive knowledge of the supervisor's policies and views on all significant matters affecting the organization, to perform such duties as developing material for the supervisor's use in public speaking engagements, and briefing staff members or outside parties on the supervisor's views on current issues affecting the organization.

The size and complexity of the appellant's organization is too limited to produce the administrative demands requiring application of Knowledge Type IV. The defined structure of the State and county offices and the presence of an Administrative Officer and his staff limit the appellant from regularly exercising organizational and administrative knowledge to eliminate administrative processes used by subordinate units and recommend restructuring of activities. Unlike the appellant's position, Knowledge Type IV requires the employee to apply a comprehensive knowledge of the supervisor's policies and views to perform such duties as developing material for the supervisor to use in speaking engagements, and briefing staff members or persons outside of the organization on the supervisor's views on current issues facing the organization. The appellant states that she participates in testing office equipment, but we determined this does not occur on a regular and recurring basis within the meaning of the position classification process nor is there any indication that the appellant's recommendations are given more weight in final decisions than those from other office users. Our audit also revealed that guidelines are available for almost every aspect of the appellant's work. She, as a result, may have to adapt guidelines, but she is not required to establish new practices and procedures, as envisioned at this level. The appellant's position is appropriately credited at Knowledge Type III.

Work Situation

The position's support of the combined State and county structure meets the threshold for Work Situation B. Consistent with the standard's description, the State office has 28 employees and is divided into subordinate units with different functional responsibilities and, consequently, different external contacts and relationships. State office units are assigned responsibility over a particular group of county offices. Whenever a county's corrective action plan is sent to the State office, the appellant must first decide which of the subordinate units is responsible for that specific county office and then forward it to the unit's specialist. The presence of subordinate units and supervisors in the State office, as well as the relationship with the county offices, places demands on the appellant that are significantly greater than those imposed on secretaries in Work Situation A, where organizations are smaller and of limited complexity.

The appellant's position does not meet Work Situation C. Unlike the appellant's organization, Work Situation C is characterized by significantly greater organizational complexity, such as three or more subordinate levels with several organizations at each level and with specialists in fields including personnel, finance, and management analysis. In addition, it is characterized by having programs that are interlocked with the programs of other agencies; are directly affected by widely varying conditions and undergo frequent change; or require the supervisor to devote a substantial portion of time in personal contacts with citizen groups, the media, and State and local government officials. While the appellant's organization has one aspect illustrated in the standard at Work Situation C, i.e., the supervisor occupies significant portions of her time with

farm groups and State and local government officials, the appellant's overall work situation does not have the organizational complexity expected at the higher level. The appellant's position is, therefore, credited with Work Situation B.

A combination of Knowledge Type III and Work Situation B is evaluated at Level 1-4 and 550 points are assigned.

Factor 2, Supervisory controls

This factor covers the nature and extent of supervision exercised over the position. Controls measured by this factor include the way assignments are made, the way priorities and deadlines are set, and the way work is reviewed.

The supervisory controls over the appellant's position meet Level 2-3. The appellant independently plans and carries out the day-to-day administrative work of the office, handling problems and deviations based on established instructions, priorities, policies, commitments, and program goals of the SED. Typical of Level 2-3, the appellant answers the telephone and reviews incoming mail, referring technical issues to the appropriate staff while personally dealing with those not requiring technical intervention. Due to its nature, the work cannot be reviewed in detail, but rather is evaluated for adequacy, appropriateness, and conformance with established policy. The appellant's work receives the limited review found at Level 2-3.

Also consistent with this level, the appellant advises the staff on new instructions regarding travel procedures or reimbursement rates. She also forwards information on electronic government activities to the applicable staff members. As at Level 2-3, the appellant assembles information from office files based on her knowledge of the organization. For instance, FSA's Executive Director for State Operations occasionally forwards to the SED a list of nominees for a state delegation, e.g., the National Pork Producers Council. The appellant contacts the county offices to determine if the nominee has an outstanding FSA claim or loan delinquency, then forwards the information gathered to the requestor.

The appellant's position does not meet Level 2-4, where the organization is of such size and scope that many complex office problems arise that cannot be brought to the supervisor's attention. Although she works with a great deal of independence due to her supervisor's frequent travel and is relied upon to take care of many matters on her own initiative, the small immediate staff, coupled with the existing organizational structure, limits the types of duties that she may perform. Under this factor, the levels do not simply represent a progression of decreasing supervisory oversight over the work. They also represent responsibility for carrying out progressively more complex duties with a corresponding greater degree of independence. Therefore, routing relatively simple assignments would not be classifiable at Level 2-4, even if the secretary carried them out with virtually no supervision or review, since they would not impose significant demands on the secretary in terms of developing the sequence and timing of the work, modifying instructions, or establishing priorities and defining objectives.

The SED directs staff primarily through face-to-face contacts. While secretaries at Level 2-4 typically inform the staff of commitments made by the supervisor at meetings and arrange for the

staff to implement them, the SED deals directly with her subordinates and assigns work herself. The appellant's position also does not meet Level 2-4 in that secretaries at this level must regularly and independently handle a wider variety of more difficult situations. For instance, unlike the appellant's position, secretaries at Level 2-4 must often obtain information, when resolving issues, from sources which are not initially known, on subject matter that is specialized or is highly complicated because it is scattered in numerous or obscure documents. While the appellant provides materials from the office files, the appellant is not required to perform the extensive fact gathering and review of information found at Level 2-4.

This factor is evaluated at Level 2-3 and 275 points are credited.

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-4	550
2. Supervisory controls	2-3	275
3. Guidelines	3-3	275
4. Complexity	4-3	150
5. Scope and effect	5-2	75
6. Personal contacts	6-3	60
7. Purpose of contacts	7-2	50
8. Physical demands	8-1	5
9. Work environment	9-1	5
<i>Total</i>		1,445

A total of 1,445 points falls within the GS-7 grade level point range of 1,355 – 1,600 points on the Grade Conversion Table.

Decision

The position is properly classified as Secretary (OA), GS-318-7.