

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, CA 94105-0001

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

**Appellant:** [The appellant]

**Agency classification:** Administrative Officer  
GS-341-11

**Organization:** [Appellant's organization/location]  
Farm Service Agency  
U.S. Department of Agriculture

**OPM decision:** Administrative Officer  
GS-341-11

**OPM decision number:** C-0341-11-01

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Carlos A. Torrico  
Classification Appeals Officer

April 11, 2003  
Date

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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 address]

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## **Introduction**

On November 22, 2002, the San Francisco Oversight Division, now the San Francisco Field Services Group, of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [the appellant]. On December 18, 2002, the Division received the agency's administrative report concerning the appeal. Her position is currently classified as Administrative Officer, GS-341-11, but she believes it should be graded at the GS-12 level. The position is located in the [appellant's organization/location], Farm Service Agency (FSA), U.S. Department of Agriculture. We have accepted and decided this 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 appellant and her agency. In addition, to gather more information about the position, an OPM representative conducted separate telephone interviews with the appellant and her supervisor. Both the appellant and her supervisor have certified to the accuracy of the appellant's official position description (PD) [number].

## **General issues**

The appellant makes various statements about her agency and its evaluation of her position. She mentions duties that she previously performed that are now part of the duties performed by a higher graded position. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of her position. By law, OPM must make classification determinations solely by comparing the current duties and responsibilities of the position to OPM standards and guidelines (5 U.S.C. 5106, 5107, 5112). Since comparison to standards, not other positions or work performed in the past, is the intended and exclusive method for classifying positions, we may not consider the classification of other positions as a basis for deciding this appeal. Therefore, we have considered the appellant's statements concerning the agency's evaluation only insofar as they are relevant to our decision.

## **Position information**

The mission of the FSA is to stabilize farm income, help farmers conserve land and water resources, provide credit to new or disadvantaged farmers and ranchers, and help farm operations recover from the effects of disaster. The FSA system provides for administering Federal farm programs locally. Farmers who are eligible to participate in these programs elect a three- to five-person county committee, which reviews county office operations and makes decisions on how to apply the programs. This approach gives farmers a say in how Federal actions affect their communities and their individual operations.

Within the [appellant's organization/location], there are five full-time permanent General Schedule employees: State Executive Director (GS-15), Agricultural Program Manager (GS-13), Agricultural Program Specialist (GS-12), Administrative Officer (GS-11), and Program Technician (GS-6). The Office of the State Committee includes the Chairman and two other committee members, all of which are intermittent positions.

Along with the farmer elected committee members, each of the four county offices is filled by non-Federal positions, i.e., “county positions”. Appointments, adverse actions, compensation, grievance system, hours of work provisions, leave system, reduction-in-force procedures, training program, and ethics and employee conduct for county employees are essentially the same as their Federal counterpart. These positions are governed by authority of Title 7 of the *Secretary’s Regulations Governing County and Community Committee Operations (7CFR)*.

The appellant serves as the Administrative Officer at the [appellant's organization] State Office by managing all administrative and support activities (e.g., budget, personnel, procurement and contracting, leasing, and other general operational issues) for both the State Office and its four County Offices located in [county office locations]. Her specific functions are addressed below.

**Management Analysis and Advisory Service:** The appellant serves as a member of the State management team and provides technical administrative advice and service on decisions affecting activities supporting budget, personnel, procurement, contracting, leasing, and other general operational issues. Our fact-finding disclosed that she spends up to 70 percent of her time advising on issues concerning organization funding, operations, and other administrative matters.

**Human Resources (HR):** 25 percent of the appellant’s time is spent administering the HR management program and providing related advisory services for the State and County Offices. However, the method and practices in which the personnel program is administered for the State Office General Schedule (GS) employees is different from county office employees.

The FSA HR Division in Kansas City, Missouri, provides full HR administration and services for the five GS State Office employees. The appellant initiates SF-52 Request for Personnel Action for all State Office employee actions and reviews draft announcements. The appellant coordinates and acts as a liaison with the Kansas City servicing personnel office on the provisions of GS personnel services. Although the appellant does not have full responsibility for personnel administration, she is called upon by her supervisor to provide advice and guidance on both the procedural and technical aspects of a variety of personnel management programs including recruitment, merit staffing, classification, employee relations, incentive awards, and training.

For county office employees, the appellant performs the full range of personnel management activities including recruitment, staffing, processing, classification, employee relations, retirement, performance, training and awards. The appellant prepares vacancy announcements, reviews applications to determine basic eligibility, rates and ranks candidates, issues lists of certified candidates, and advises selection panels. For classification of positions, the appellant’s role is primarily limited to assisting the County Directors in making supplemental changes to standardized position descriptions developed by the FSA Headquarters HR Office. However, she is authorized to classify new positions, if required.

The remaining duties that the appellant performs (e.g., property accountability) are ancillary to her work and occupy too small a portion of her time to affect the classification of the position. She also monitors the work of another employee.

The appellant reports to the State Executive Director. She independently plans, designs, and carries out her duties and responsibilities, and resolves any issues without reference to the supervisor, in accordance with accepted office policies, precedents, and guidelines.

The results of our interviews, the appellant's PD, and other material of record, provide more information about the appellant's duties and responsibilities and how they are performed.

### **Series, title, guide and standard determination**

The agency has classified the appellant's position in the Administrative Officer Series, GS-341, titling it Administrative Officer, and the appellant does not disagree. We concur with the agency's title and series determination.

The standard for the GS-341 series does not contain grading criteria. It instructs that positions in that series may be evaluated using various standards for other series, depending on the position's content and work environment. To evaluate the principal functions of the appellant's position we have applied the Administrative Analysis Grade-Evaluation Guide to assess her administrative analysis and advisory work. Although some of her duties (e.g., procuring supplies, property accountability) could be assessed through application of distinct subject-matter occupational standards, they occupy only a small portion of her time and we have considered them as part of the broader aspects of her administrative analysis work in our application of the Guide. To assess her personnel management responsibilities we have applied the Job Family Position Classification Standard for Administrative Work in the Human Resources Management (HRM) Group, GS-0200. While she monitors the work of another employee, this work occupies too small a portion of her time to meet the criteria for classification as a supervisor or evaluation of that work by application of the General Schedule Supervisory Guide.

### **Grade determination**

#### ***Evaluation using the Administrative Analysis Grade-Evaluation Guide***

The guide 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, unless an equally important aspect that meets a higher level balances the deficiency. 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.

The appellant disagrees with the agency's evaluation of Factors 2, 3, 4, and 5. After careful review, we concur with the agency's evaluation of Factor 1, and Factors 6 through 9. Therefore, we have confined our analysis to the disputed Factors 2 through 5.

### *Factor 2, Supervisory controls*

This factor covers how the work is assigned, the extent to which the employee is responsible for carrying it out, and how the work is reviewed.

At Level 2-4, the employee and supervisor develop mutually acceptable project plans, which typically include identification of the work to be done, the scope of the project, and deadlines for completion. Within the parameters of the project, the employee is responsible for planning and organizing the project steps, estimating costs, coordinating with staff and line management personnel, and conducting all phases of the project. This frequently involves the definitive interpretation of regulations and study procedures. The employee informs the supervisor of potentially controversial findings, issues or problems with widespread impact. Completed projects are reviewed by the supervisor for compatibility with organizational goals, guidelines, and effectiveness in achieving intended objectives. Completed work is also reviewed critically by staff and line management officials whose programs and employees would be affected by implementation of the employee's recommendations.

At Level 2-5, the employee is the recognized authority in the analysis and evaluation of programs and issues and the work is subject only to administrative and policy direction concerning overall project priorities. The employee is typically delegated complete responsibility and authority to plan, schedule and carry out major projects concerned with the evaluation of programs or organizational effectiveness. At this level, the employee typically exercises discretion and judgment in determining whether to broaden or narrow the scope of the project. The employee's analyses, evaluations and recommendations are normally reviewed by management officials for potential influence on broad agency (i.e., department or subordinate agency/bureau) policy objectives and program goals. Findings and recommendations are normally accepted without significant change.

The appellant's position meets Level 2-4, but falls short of fully meeting Level 2-5. Like Level 2-4, she independently plans and organizes her work, informing the supervisor of only potentially controversial issues or problems. As necessary, she collaborates with the supervisor in developing administrative support program plans, including the scope, cost, and projected funding of administrative support services, e.g., personnel services, procurement, contracting. While she is considered the authority for administrative matters in the State Office, unlike Level 2-5 the supervisor reviews her work for achievement of organizational goals and objectives, rather than just for potential impact on broad agency policy objectives. The limited size and structure of the organization serviced does not require the appellant to perform the scope of projects or studies envisioned at Level 2-5.

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

### *Factor 3, Guidelines*

This factor covers the nature and extent of guidelines for performing the work and the judgment needed to apply the guidelines or develop new guidelines.

At the Level 3-3, guidelines consist of standard reference material, texts, and manuals covering the application of analytical methods and techniques (statistical, descriptive or evaluative) and instructions and manuals covering the subjects involved (e.g. organizations, equipment, procedures, policies, and regulations). The employee uses judgment in choosing, interpreting, or adapting available guidelines to specific issues or subjects studied. The employee analyzes the subject and current guidelines which cover it and makes recommendations for changes.

At Level 3-4, guidelines consist of general administrative policies and management and organizational theories which require considerable adaptation or interpretation for application to issues and problems studied. Guidelines do not go into detail as to methods used to accomplish projects. At this level, administrative guidelines usually cover program goals and objectives of the employing organization, such as agency controls on size of the workforce, productivity targets, and similar objectives. Within the context of broad regulatory guidelines, the employee at this level may refine or develop specific guidelines such as implementing regulations or methods for the measurement and improvement of effectiveness and productivity in the administration of operating programs.

Guidelines used by the appellant include a wide range of Department and Bureau policies, laws, legal decisions, Federal Acquisition Regulations, County Office Personnel Operations, Personnel Administration, Payroll Administration, including State and General Accounting Office rules and regulations, various Departmental and Bureau Handbooks and Notices, all of which may or may not be applicable to the state of [name of state]. Such guides cannot be characterized as broad guides. The guides are more appropriately matched to Level 3-3 where the guidelines are available, regularly used in the work, and are in the form of policies, precedents, and regulations (e.g. the analysis and formation of budget estimates, requirements for narrative justification for budget requests), and specific substantive program goals and work processes. Similar to Level 3-3, the appellant interprets program regulations and policies developed and issued by the central policy office concerning the budget formulation and execution process, and the implementation of various administrative requirements. Although she must be familiar with a variety of guidelines, her task is limited to interpreting and applying them within the confines of the [state] State Office and its Counties. Examples provided by the appellant included recent notices she issued to the County Executive Directors informing them of a USDA developed template for an emergency evacuation plan, issuing a "Questions and Answers" fact sheet regarding travel questions as developed by a USDA notice, open season information regarding Thrift Saving Plan and Federal Employees Health Benefits, and the agency's requirements for annual ethics training. Unlike Level 3-4, the appellant's guidelines are more specific than just general administrative policies requiring considerable interpretation. The work that she performs does not require her to refine or develop more specific guidelines from general regulations.

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

#### *Factor 4, Complexity*

This factor covers nature of the assignment, difficulty in identifying what needs to be done, and difficulty and originality involved in performing the work.

At Level 4-3, the work principally involves dealing with problems and relationships of a procedural nature rather than the substance of work operations, issues, or other subjects studied. At this level, the employee analyzes the issues in the assignment, then selects and applies accepted analytical techniques such as task analysis, work simplification, work-flow charts, workload measurement, and trend analysis to the resolution of procedural problems affecting the efficiency, effectiveness, or productivity of the organization and/or workers studied.

At Level 4-4, the work involves gathering information, identifying and analyzing issues, and developing recommendations to resolve substantive problems of effectiveness and efficiency of work operations in a program or program support setting. This is in addition to analyzing and improving conditions solely of a procedural nature (rather than the substance of administrative operations), which is creditable at Level 4-3. In contrast to Level 4-3, work at this level requires application of evaluative methods and techniques to a wider range of variables. For example, assignments may involve compiling, reconciling and correlating voluminous workload data from a variety of sources with different reporting requirements and formats.

The appellant's work exceeds Level 4-3 and meets Level 4-4. Similar to Level 4-4, she gathers and analyzes a variety of administrative data to identify issues and develop recommendations to resolve substantive administrative support issues impacting on the efficiency of overall support functions. This goes beyond just dealing with procedural issues as she is concerned with assessing the effectiveness of supporting budget, staffing, procurement and contracting activities in the State and county offices, and determining how these functions affect mission accomplishment and service farm program enrollees, committee members, and county operations. For example, in gathering and analyzing budget and staffing data, through application of various quantitative analytical techniques the appellant identifies and prioritizes critical needs and makes recommendations on the most efficient use of financial and staffing resources. Because the state's programs are funded through a variety of funding arrangements, (e.g., Commodity Credit Corporation), she analyzes workload, funding, and individual program requirements across county office lines in order to advise management on the most efficient organizational structure and mix of staff specialties to best serve farmer clients.

Similar to Level 4-4, with the passage of the 2002 Farm Bill and/or projected changes in laws and regulations impacting on farm subsidies and other FSA programs, the appellant must determine the current and future impact on administrative support program services state-wide including budget costs, procurement, contracting and staffing needs. She works with the program staff and, at times, must gather, compile and reconcile ample amounts and, at other times, incomplete information from county offices and the National Agricultural Statistics Service to determine the nature and extent of administrative support services needed to implement a new strategic state plan for administering the new programs. Similar to Level 4-4, in order to forecast funding needs for continuing and projected support activities, she studies and cross checks extensive historical workload and cost data to ensure accurate and relevant information upon which recommendations are made. For example, she notes trends showing increasing costs in specific administrative program support costs over the years, and gathers and analyzes extensive information to determine the reasons for the increases.

The appellant's position does not meet Level 4-5 where work consists of projects and studies which require analysis of interrelated issues of effectiveness, efficiency, and productivity of



substantive mission-oriented programs. Typical assignments at Level 4-5 require developing detailed plans, goals, and objectives for the long-range implementation and administration of the program, and/or developing criteria for evaluating the effectiveness of the program. Decisions on how to proceed are complicated by conflicting program goals, and the need to deal with subjective concepts such as value judgments. Findings and conclusions of studies are highly subjective and not readily susceptible to verification through replication of study methods or reevaluation of results. Unlike Level 4-5, the appellant's assignments do not require that she develop the entire program plans and objectives, or develop the overall evaluation criteria for evaluating the effectiveness of mission oriented State programs. She is not faced with conflicting State program goals, or required to deal with highly subjective concepts in performing management analysis.

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

*Factor 5, Scope and effect*

This factor covers the relationship between the purpose, breadth, and depth of the assignment. Effect considers the effect of the work products or services both within and outside the organization.

At Level 5-3, the purpose of the work is to plan and carry out projects to improve the efficiency and productivity of organizations and employees in administrative support activities. Employees at this level identify, analyze, and make recommendations to resolve conventional problems and situations in work-flow, work distribution, staffing, performance appraisal, organizational structure, and/or administration. Employees may be assigned portions of broader studies or largely administrative organizations or participate in the evaluation of program effectiveness at the operating level. Work may also involve developing detailed procedures and guidelines to supplement established administrative regulations or program guidance. Completed reports and recommendations influence decisions by managers concerning the internal administrative operations of the organizations and activities studied.

At Level 5-4, the purpose of the work is to assess the productivity, effectiveness, and efficiency of program operations or to analyze and resolve problems in the staffing, effectiveness and efficiency of administrative support and staff activities. Work involves establishing criteria to measure and/or predict the attainment of program or organizational goals and objectives. Work at this level may also include developing related administrative regulations, such as those governing the allocation and distribution of personnel, supplies, equipment and other resources, or promulgating program guidance for application across organizational lines or in varied geographic locations. Work contributes to the improvement of productivity, effectiveness, and efficiency in program operations and/or administrative support activities at different echelons and/or geographical locations within the organization. Work affects the plans, goals, and effectiveness of missions and programs at these various echelons or locations.

The appellant's work compares to Level 5-3, but falls short of Level 5-4. Similar to Level 5-3, the purpose of the work is to ensure the efficiency and productivity of all administrative support activities in the State Office. In that regard, she is particularly concerned with budgetary,

procurement, purchasing and contracting activities through monitoring expenditures, certifying payments, disbursing funds, and contracting for supplies, services and equipment. Like Level 5-3, she analyzes and makes recommendations to resolve conventional administrative support problems and situations (e.g., determining availability of equipment, or assessing the effectiveness of certain contracted services), and supplements established administrative regulations to meet the needs of the State Office. Her recommendations influence decisions by managers on the cost-effective use of funds, achievement of financial goals, identifying the most effective procurement procedures, and the overall internal administrative support operation. Furthermore, her functions provide customers and employees the services they need in carrying out their mission to provide low interest farm loans.

The position does not meet Level 5-4. While she is concerned with determining the effectiveness of the administrative support program, she is not involved in establishing measurement criteria to demonstrate or predict attainment of program goals or objectives, and does not develop administrative regulations or promulgate program guidance for use across organizational lines (this is done at higher levels within the Bureau).

The appellant believes that Level 5-4 is appropriate because she works with sister organizations in USDA in developing EEO and civil rights documents, public affairs documents, and outreach documents, etc. However, complexity and coordination of assignments are covered by and have been appropriately credited in our analysis of Factors 4, 6 and 7.

This factor is evaluated at Level 5-3, and 150 points are credited.

#### *Summary of FES factors under the Guide*

The following chart summarizes our assignment of factors by application of the Guide:

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-7	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and effect	5-3	150
6. & 7. Personal contacts and Purpose of contacts	6&7-3C	180
8. Physical demands	8-1	5
9. Work environment	9-1	5
	Total:	2,540

The total of 2,540 points falls in the GS-11 range (2,355-2,790) in accordance with the grade conversion table in the Guide. Therefore, her administrative analysis and related activities are graded at the GS-11 level.

***Evaluation using the JFS for Administrative Work in the Human Resources Management Group, GS-0200***

This JFS is written in the FES format and the criteria are applied as discussed previously.

*Factor 1, Knowledge required by the position*

This factor measures the nature and extent of information an employee must understand in order to do the work, and the skills needed to apply that knowledge.

At Level 1-6 the employee demonstrates knowledge and skill in applying fundamental HR management (HRM) laws, principles, practices, and standardized analytical and evaluative methods and techniques sufficient to advise on moderately complex, non-controversial, recurring issues. Management advisory services are provided on specific requests, and the specialist analyzes segments of broader HRM issues or problems.

The appellant's position meets Level 1-6. The State Office has its own full-service personnel office located in Kansas City, with delegated final authority for recruitment, selection and classification; the appellant serves as a liaison for personnel actions. However, the appellant provides full personnel services for all county positions within the [state office] and its County Offices. Policy advice is provided by the agency's Headquarters office. As the [name of state] State Office's sole personnel administrator, like Level 1-6 the appellant applies fundamental HRM methods and standard analytical techniques to moderately complex factual or procedural issues affecting County Office employees. She must be well versed in the regulations, policies, and practices relating to all of the HRM functional areas to provide a full range of effective technical services, and to advise managers on the disposition of specific actions and approaches for resolving problems.

Unlike Level 1-7, the appellant's work does not require knowledge of a wide range of HRM concepts, practices, laws, regulations, policies, and precedents sufficient to provide comprehensive management advisory and technical services on substantive organizational functions; recommend appropriate interventions to resolve complex, interrelated problems; develop new or modified work methods, approaches, or procedures for delivering effective services to clients; apply consensus building, negotiation, and conflict resolution techniques; and deliver briefings, project papers, status reports, and correspondence to managers to foster understanding and acceptance of findings and recommendations. Given the limited size of the organization serviced and the nature of the recurring human resources (HR) problems and issues dealt with, the appellant's work does not require the degree depth and breadth of knowledge and skill characteristic of Level 1-7.

This factor is evaluated at Level 1-6, and 950 points are credited.

*Factor 2, Supervisory controls*

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

At Level 2-3, the supervisor outlines or discusses possible problem areas and defines objectives, plans, priorities, and deadlines. Assignments have clear precedents requiring successive steps in planning and execution. The employee independently plans and carries out the assignments in conformance with accepted policies and practices; adheres to instructions, policies, and guidelines in exercising judgment to resolve commonly encountered work problems and deviations; and brings controversial information or findings to the supervisor's attention for direction. The supervisor provides assistance on controversial or unusual situations that do not have clear precedents; reviews completed work for conformity with policy, the effectiveness of the employee's approach to the problem, technical soundness, and adherence to deadlines; and does not usually review in detail the methods used to complete the assignment.

At Level 2-4, the supervisor outlines overall objectives and available resources and discusses with the employee the timeframes, scope, and possible approaches for the work. The employee is responsible for determining the approach to be taken; interpreting regulations; applying new methods to complex or controversial problems; resolving most of the conflicts that arise; and keeping the supervisor informed of progress and potential controversies. The supervisor reviews completed work for soundness of overall approach, effectiveness in producing expected results, feasibility of recommendations, and adherence to requirements.

The appellant's position exceeds Level 2-3. As at Level 2-4, she works largely independently under general supervision of the supervisor who establishes the goals, objectives, and resources of the program, and reviews and approves reports and correspondence. The appellant plans and carries out her work independently, including directly furnishing management advisory services. Typical of Level 2-4, she resolves most of the conflicts that arise; the supervisor relies on the appellant's judgment in making final decisions on individual cases, and she has full signatory authority to effect personnel actions, with supervisory review limited to broad performance considerations. However, the limited nature of the program does not regularly require her to apply new methods to complex or controversial problems or involve the resource planning required to deal with such issues found at Level 2-4.

Because Level 2-4 is not fully met, this factor is evaluated at Level 2-3 and 275 points are credited.

### *Factor 3, Guidelines*

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

At Level 3-3, the employee uses a wide variety of reference materials and manuals; however, they are not always directly applicable to the issues or problems. Precedents are available outlining the preferred approach to more general problems. The employee interprets and adapts available guidelines to specific issues and problems.

At Level 3-4 the employee uses guidelines that are very general regarding agency policy statements and objectives. Guidelines specific to assignments are often scarce, inapplicable, or have gaps and require considerable interpretation or adaptation. The employee uses judgment, initiative, and resourcefulness in deviating from established methods to treat specific issues or

problems, research trends and patterns, develop new methods and criteria, and/or propose new policies and practices.

The appellant's guidelines compare to Level 3-3. Like that level she uses a variety of bureau, agency, and OPM reference materials that are not completely applicable to problems encountered. Precedents are available, but she uses judgment in selecting and researching appropriate guidelines, and adapts them to specific HR problems and issues, e.g., coordinating changes in local wages and preparing special reports related to pay. The guidelines used do not meet Level 3-4. The appellant uses references that are not scarce, or have large gaps in specificity requiring considerable interpretation or adaptation. She does not modify, adapt, or refine them to the extent described at Level 3-4.

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

#### *Factor 4, Complexity*

This factor covers the nature, number, variety, and intricacy of the tasks or processes 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 4-3, the work consists of applying established analytical techniques to problems and issues more of a technical rather than an advisory nature, and issues and problems of the same type. The employee determines the most effective technical approaches to the problem requiring the application of established analytical techniques and methods and standard regulations and procedures; verifies and assesses relevant facts from several sources, examines documentation, ensures compliance with applicable regulations and procedures, analyzes and reconciles discrepancies or inconsistencies, and researches precedent studies; and/or resolves a moderate range of problems or situations requiring the use of established analytical techniques to isolate and evaluate appropriate precedents, to examine and analyze documentation, to reconcile discrepancies or inconsistencies, and to develop supportable conclusions based on standardized research.

The complexity of the appellant's work is comparable to Level 4-3. She applies established HR techniques to issues of a technical nature, rather than extensive advisory services, to recruitment, staffing, and classification actions and problems. She applies generally standardized HR regulations, procedures and analytical techniques to a moderate range of personnel management issues at the installation.

The position does not meet Level 4-4. At that level the work consists of resolving problems that often involve conflicting or incomplete information; applying analytical techniques that frequently require modification; and/or addressing substantive and often controversial or sensitive technical issues. The employee performs such work as determining the most effective and efficient approach to meet customer requirements; identifying ways to improve or enhance HRM services; assessing situations complicated by disputed or conflicting data; analyzing the effects of changes in law and regulations; proposing recommendations to problems; defining problems in terms of the applicable laws, policies, or regulations; and formulating a legal and/or factually supportable position. The difficulty involved in this situation is indicated by the

employee making a wide variety of decisions based on independent analysis and refinement or modification of existing work methods and guidelines. While the appellant is concerned about identifying the most effective approach to meet County and State Office employee HRM needs, she is not faced with many of the complicating work aspects typical of Level 4-4 noted above. She is not tasked with interpreting changes in laws or regulations, and defining their effects on the HRM program, or independently analyzing and refining work methods.

This factor is evaluated at Level 4-3, and 150 points are credited.

*Factor 5, Scope and effect*

This factor measures the relationship between the nature of the work, and the effect of the work products or services both within and outside the organization.

The appellant's position meets Level 5-3 but falls short of Level 5-4. Like Level 5-3 she applies accepted criteria and standard methods to resolve a variety of conventional HRM issues covering recruitment and retention, disciplinary actions, employee relations, etc. Her recommendations influence decisions made by managers and the State Executive Director, and affect customer perceptions on the quality of local HRM services provided. Unlike Level 5-4, her work does not involve resolving or advising on complex problems and issues that typically require analyzing a wide range of unusual conditions. Her duties, recommendations and decisions affect only the local HR activities, rather than the objectives and effectiveness of the agency's (USDA) HR activities, missions and programs.

This factor is evaluated at Level 5-3, and 150 points are credited.

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

These factors include the type and purpose of face-to-face and remote dialogue with persons not in the supervisory chain. The relationship between Factors 6 and 7 presumes that the same contacts will be evaluated under both factors.

The appellant's personal contacts match Level 2. Similar to that level her contacts are with bureau employees both inside and outside the immediate office, USDA employees, representatives of Federal, State, and non-federal agencies, applicants, and/or the general public. The position does not meet Level 3, where HR contacts are with persons outside the agency, including consultants, contractors, or business executives, or with agency officials several managerial levels removed from the employee when such contacts occur on an ad hoc basis. The appellant does not regularly and routinely have contacts of that nature.

The purpose of the appellant's contacts matches Level B, where contacts involve planning, coordinating, or advising on work efforts, or resolving issues or operating problems by influencing or persuading people who are working toward mutual goals and have basically cooperative attitudes. These represent the typical purposes of the appellant's contacts. The position does not meet Level C, where contacts are to influence and persuade employees and managers to accept and implement findings and recommendations where resistance is encountered due to organizational conflict, competing objectives, or resource problems.

Although the appellant may use persuasion in recommending particular courses of action, these relate to individual case problems rather than the broader types of issues that would be complicated by organizational conflict or resource problems.

Factors 6 and 7 are evaluated at level 2B, and a total of 75 points are credited.

*Factor 8, Physical demands*

This factor covers the requirements and physical demands placed on the employee by the work situation.

The position matches Level 8-1, where the work is sedentary, requiring no special physical effort. This is the only level described for this factor in the standard.

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

*Factor 9, Work environment*

This factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required.

The position matches Level 9-1, which describes a typical office environment with adequate light, heat and ventilation. This is the only level described for this factor in the standard.

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

*Summary of FES factors under the JFS*

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-6	950
2. Supervisory controls	2-3	275
3. Guidelines	3-3	275
4. Complexity	4-3	150
5. Scope and effect	5-3	150
6. & 7. Personal contacts and Purpose of contacts	6&7-2B	75
8. Physical demands	8-1	5
9. Work environment	9-1	5
	Total:	1,885

The total of 1,885 points falls within the GS-9 range (1,855-2,100) on the grade conversion table provided in the standard. Therefore, her HRM duties are graded at that level.

***Summary***

The appellant's administrative analysis duties are graded at the GS-11 level and her HRM duties at the GS-9 level. Based on application of mixed-grade principles, the final grade of the appellant's position is GS-11.

**Decision**

The appellant's position is properly classified as Administrative Officer, GS-341-11.