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

Chicago Field Services Group 230 South Dearborn Street, Room 3060 Chicago, IL 60604-1687

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

**Appellant:** [appellant]

[appellant]

**Agency classification:** Human Resources Assistant

(Information Systems/OA)

GS-203-6

**Organization:** Processing and Records Section

Human Resource Management Service

VA [unit] Healthcare System Veterans Health Administration Department of Veterans Affairs

[city and state]

**OPM decision:** Human Resources Assistant

(Information Systems)

GS-203-6

**OPM decision number:** C-0203-06-02

/s/ Marta Brito Pérez

Marta Brito Pérez Associate Director

Human Capital Leadership

and Merit System Accountability

August 4, 2004

Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Since this decision changes the classification of the appealed position, it is to be effective no later than the beginning of the fourth pay period after the date of this decision (5 CFR 511.702). The servicing human resources office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

#### Decision sent to:

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#### Introduction

On December 18, 2003, the Chicago Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from Mses. [appellants']. They occupy identical additional (IA) positions (hereinafter referred to as position), currently classified as Human Resources (HR) Assistant (Information Systems/OA), GS-203-6, in the Processing and Records Section, Human Resources Management Service, Veterans Affairs (VA) Healthcare System, in [city and state]. The appellants believe their position should be reclassified as HR Assistant (Information Systems/OA), GS-203-7. [the appellant] was designated to represent the group of two appellants. We received the complete agency administrative report on March 12, 2004. We accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

To help decide the appeal, we conducted a telephone audit with the lead appellant on April 7, 2004, and a telephone interview with her first-line supervisor on April 8, 2004. In reaching our decision, we carefully considered the audit and interview findings and all information of record furnished by the appellants and the agency, including the official position description (PD) which we find contains the major duties and responsibilities assigned to and performed by the appellants and we incorporate it by reference into our decision.

#### **General issues**

In June 2003 the appellants prepared a draft PD and submitted it to their supervisor for consideration. The supervisor, in consultation with the Assistant Human Resources Officer, revised the draft PD and submitted it for classification resulting in the current PD of record ([###-#]), dated October 30, 2003, which the supervisor has certified as accurate. The appellants appealed the classification of the position to the Office of Personnel Management.

The appellants still believe their official PD is inaccurate. Specifically, they say that revisions made by the Supervisory Human Resources Assistant and the Assistant Human Resources Officer to the draft PD resulted in the inaccuracies.

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

Implicit in the appellants' rationale is a concern that their position is classified inconsistently with other positions. The appellants refer to positions in other VA offices that perform similar work, but are classified at the GS-7 grade level. By law, we must classify positions solely by comparing current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since the comparison to standards is the exclusive method for classifying positions, we cannot compare the appellants' position to others as a basis for deciding the appeal.

Like OPM, the appellants' agency must classify positions based on comparison to OPM standards and guidelines. Section 511.612 of 5 CFR requires that agencies review their own classification decisions for identical, similar, or related positions to insure consistency with OPM certificates. Thus, the agency has the primary responsibility for insuring that its positions are classified consistently with OPM appeal decisions. If the appellants consider their position so similar to warrant the same classification, they may pursue the matter by writing to their agency headquarters human resources office. In doing so, they should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to them the differences between their position and the others.

The appellants also make various other statements about their agency and its evaluation of their position. Because our decision sets aside all previous agency decisions, the appellants' concerns regarding their agency's classification review process are not germane to this decision. In adjudicating this appeal, our only concern is to make our own independent decision based on the proper classification of the position.

The appellants point out the large amount of work they perform. However, volume of work is an issue that cannot be considered in determining the grade of a position (*The Classifier's Handbook*, chapter 5).

#### **Position information**

The appellants work under the general supervision of a Supervisory Human Resources Assistant, GS-203-8. They support the human resources office by processing personnel actions utilizing the agency's proprietary and human resources information system (HRIS), the Personnel and Accounting Integrated Data (PAID) payroll administration system, and handling numerous administrative tasks related to this basic responsibility. This involves processing personnel actions for employees hired under appointment authorities from title 5 and title 38 of the United States Code (U.S.C.). The appellants are responsible for an assigned portion of the activity, processing the entire range of personnel actions, from initial appointment to resignation, retirement, or termination. There are several HR specialists assigned to the Human Resources Management Service (HRMS) who are individually responsible for the administration of a portion the organization's total HR responsibilities. While the appellants routinely identify and obtain or correct missing or erroneous data for the actions with which they work, any problems encountered in obtaining or correcting data may ultimately be referred to either their supervisor for guidance or the appropriate HR Specialist for resolution. They generally receive requests for personnel actions from an HR specialist who normally receives them directly from management.

The appellants' duties include reviewing the personnel actions for completeness. They are responsible for obtaining missing or needed information. To do this, they use various reference materials including OPM regulations and agency-specific guidance. They use the Internet to look up information on the OPM web site, the VA's intranet to research information on the agency's HR web site, as well as paper manuals for procedural guidance particularly related to the PAID system. The appellants generally perform their duties independently, with general work objectives, priorities and deadlines established by their supervisor. Since most of the work

involves working with the PAID system, deadlines are based upon the established payroll cycle. When necessary, the appellants seek clarification or assistance from their supervisor. They also may seek assistance, usually in the form of specific information, from the appropriate HR specialist. They perform precise pay and date-related computations and calculations required for properly maintaining employee records. These include calculating and/or verifying various service computation dates and manual pay adjustments for employees on pay retention or other circumstances which the PAID system cannot handle automatically. They input and maintain proficiency codes and review annual Physician and Dentist Special Pay Agreements, obtaining signatures as required. They also enter, maintain, and terminate uniform allowances for eligible employees. When the Notification of Personnel Action, Standard Form (SF) 50, comes back from the VA automation center the appellants review the SF-50 against the Request for Personnel Action, SF-52, for accuracy and completeness, make any necessary corrections, file the action in the Official Personnel Folder (OPF), and distribute copies as appropriate.

Although the PD specifies the need for competitive keyboard skills, the record shows that these skills are not required to perform the appellants' regular and recurring work. Unlike the typing of letters and reports, entering processing system data does not require or even permit the performance of the level of keyboard skills as required for titling purposes by the Office Automation Clerical and Assistance Series, GS-326.

# Title, series, and standard determination

The agency has placed the appellants position in the Human Resources Assistance Series, GS-203, and titled it Human Resources Assistant with the parenthetical titles, Information Systems and Office Automation (abbreviated to OA), with which the appellants agree. However, because the Information Systems duties of the position include office automation systems skills, but do not require a level of proficiency for competitive keyboard skills as defined in the GS-326 PCS, the appropriate title is Human Resources Assistant (Information Systems).

#### **Grade determination**

The GS-203 PCS is written in the Factor Evaluation System (FES) format. Under the FES, positions are evaluated on the basis of their duties, responsibilities, and the qualifications required in terms of nine factors common to non-supervisory General Schedule positions. A point value is assigned to each factor based on a comparison of the position's duties with the factor-level descriptions in the standard. The factor point values mark the lower end of the ranges for the indicated factor level. For a position factor to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails in any significant aspect to meet a particular factor level description in the standard, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect which meets a higher level. The total points assigned are converted to a grade by use of the grade conversion table in the standard.

The appellants disagree with the agency's evaluation of Factors 1, 2, and 3. Based on a careful review of the record, we agree with the agency and the appellants that the position is properly evaluated at Levels 4-3, 6-2, 7-B, 8-1, and 9-1. We will focus our analysis on Factors 1, 2, 3, and 5.

## 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 1-4 the work requires a knowledge of, and skill in applying, an extensive body of HR rules, procedures, and operations sufficient to perform a wide variety of interrelated and/or non-standard HR support work; plan, coordinate, develop facts and/or resolve support problems in one or more HR specialties; use personal computers with office applications to perform operations or to prepare complex documents containing tables or graphs; and to refer to online HR websites to obtain required information accessible over the Internet.

At Level 1-5, the work requires knowledge of, and skill in applying, a comprehensive body of HR rules, procedures, and technical methods sufficient to carry out limited projects; analyze a variety of routine facts; research minor complaints or problems that are not readily understood; and summarize HR facts and issues. Examples of work at this level are to make presentations following established lesson plans for routine administrative support subjects; conduct interviews to identify and organize pertinent facts of a situation; provide advice to employees regarding minor problems of employee conduct, dissatisfaction, or poor work habits; explain to supervisors the nature of records or sequence of actions required in connection with recurring disciplinary problems, such as excessive unplanned absences; assist supervisors in writing admonishment letters; and explain options to employees when they are dissatisfied with their performance ratings.

As at Level 1-4, the appellants perform a variety of HR support duties requiring interrelated processes. This includes processing the full variety of personnel actions, screening documents, verifying factual data relating to records, and ensuring that the documents are in conformity with existing regulations and established procedures. They plan, coordinate, and resolve routine problems in their day-to-day assignments. They are knowledgeable of and apply an extensive body of HR rules, regulations, and procedures related to processing actions for employees appointed under both title 5 and title 38 of the U.S. Code of Federal Regulations. They are skilled in the use of the computer, including the Internet, to access, input, and retrieve information, particularly in the use of the agency's PAID system. The appellants' daily work with the PAID system compares closely to the illustration of Information Systems work at Level 1-4 in the JFS.

The appellants' work does not require the application of research, judgment, and analytical skills described at Level 1-5. The appellants make decisions based on a defined set of guidelines, and the conditions, procedures, requirements and other criteria for each program are well established. They screen HR actions and associated information to ensure that all necessary documentation is provided which will support the agency's HR management responsibilities. The preponderance of the incumbent's time is focused on performing the various tasks associated with processing personnel actions. Unlike Level 1-5, their work does not involve application of a comprehensive body of HR rules, procedures, and technical methods sufficient to handle substantive HR problems and issues. For example, The appellants are not required to explain complicated and in-depth employee benefit-related issues such as health benefits conversion and complicated

annuity calculations and information, or conduct recruitment and examining activities for common lower graded positions, including making qualification determinations. After those functions are performed by others on the HR staff, the appellants process the actions implementing those decisions. Therefore, this factor must be credited at Level 1-4 (550 points).

# Factor 2, Supervisory controls

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility for carrying out assignments, and how completed work is reviewed.

At Level 2-2, the supervisor provides continuing assignments indicating generally: what is to be done; data and required information; limitations; deadlines; quantities; and priorities. The supervisor provides advice or additional specific instructions for difficult, new, or special assignments including work methods. The employee uses initiative and works independently within the framework established by the supervisor in carrying out recurring assignments such as obtaining, inserting, and correcting missing and incorrect data in an automated HR system; follows limited procedures or is controlled by readily applicable instructions that specifically describe how the work is to be done and the kind of adaptations or exceptions that can be made; and refers specific problems not covered by the supervisor's instructions or standard operating procedures to a supervisor or designated employee for assistance and/or a decision. The supervisor or a designated employee reviews work to verify accuracy and conformance to procedures and any special instructions. Recurring assignments are reviewed through quality control procedures. Work products may be spot checked for accuracy. The supervisor closely reviews new or difficult assignments such as pay changes or situations that have potential adverse impact.

At Level 2-3, the highest level described in the standard, the supervisor makes assignments by outlining or discussing issues, and defining objectives, priorities, and deadlines. The supervisor provides assistance in unusual assignments that do not have clear precedents. The employee independently plans the work, resolves problems, carries out successive steps of assignments, makes adjustments using established practices and procedures, recommends alternative actions to the supervisor, handles problems and/or deviations that arise in accordance with instructions, policies, and guidelines; and refers new or controversial issues to the supervisor for direction. The supervisor reviews work products such as, job vacancy announcements, ranking factors identified for rating schedules, position descriptions, job evaluation statements, recommendations for disciplinary action, and draft policy statements for technical soundness, appropriateness, and conformity to policies and requirements.

As described at Level 2-2, the appellants carry out recurring assignments such as obtaining, inserting, and correcting missing and incorrect data in an automated HRIS. They work independently, but within the framework established by their supervisor and the cyclical nature associated with the pay period structure by which personnel actions must be processed. Typical of Level 2-2, most of the work is spot checked for accuracy.

Level 2-3 is not met. Unlike that level, the appellants do not perform assignments entailing the issues, objectives, or priorities described at Level 2-3 in the JFS, e.g., job vacancy

announcements, job evaluation statements, or ranking factors for rating schedules. While the appellants perform their work with considerable independence, their work does not require them to exercise the extent of judgment or initiative involved in handling the more demanding issues in assignments found at Level 2-3. As at Level 2-2, their difficult assignments, such as, special pay computations for physicians and dentists and annual pay adjustments for employees on pay retention, retirement, and OWCP, are reviewed by their supervisor, an HR specialist, or the Assistant HR Officer. Therefore, Level 2-2 is credited for this factor(125 points).

#### Factor 3, Guidelines

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

At Level 3-2, the employee uses a number of established, procedural guidelines, such as work samples; references; and operating procedures and manuals. The employee uses judgment in locating and selecting appropriate guidelines, manuals, references, and procedures for application to specific cases. When existing guidelines cannot be applied, the employees refers significant proposed deviations or situations to their supervisor or a higher-grade co-worker.

At Level 3-3, the guidelines often lack specificity or are not completely applicable to the work requirements or circumstances. The employee selects the most appropriate guideline and decides how to complete the various transactions. In some situations, guidelines do not apply directly to assignments and require the employee to make adaptations to cover new and unusual work situations.

The appellants' work meets Level 3-2. The appellants refer to numerous guidelines when performing her work. These guidelines include government-wide publications such as the Guide to Processing Personnel Actions, as well as VA Manuals. Other examples of reference materials used include various circulars, interim issuances and periodic conference calls in which relevant topics are discussed. These guidelines and instructions clearly indicate the procedures to be followed for various types of assignments. They exercise judgment in selecting the appropriate guidelines necessary for each transaction. Situations not governed by regulations or procedures are referred to the supervisor or a higher level employee. Comparable to guidelines described at Level 3-2, those used by the appellants normally apply directly to transactions inputted into the PAID system. According to the supervisor, instructions are clearly defined and self-explanatory. If situations come up that are not governed by written instructions, the appellants are required to seek guidance through the chain of command.

Level 3-3 is not met. The type of work they perform is performed at numerous VA sites, and new and/or problematic processing issues are handled above the activity level. Fixes to these problems are communicated, orally and via formal and informal written methods, to field site personnel performing the work. The appellants do gather information and organize it within the context of handling inquiries from employees and supervisors, but their work does not routinely require or permit them to devise more efficient methods for procedural processing or to resolve difficult problems referred by others. These program responsibilities are managed at a higher echelon. Therefore, Level 3-2 is credited for this factor (125 points).

### Factor 5, Scope and Effect

This factor covers the relationship between the nature of work, i.e., the purpose, breadth and depth of the assignment, and the effect of the work products or services both within and outside the organization. The concept of scope alone does not provide sufficient information to properly understand and evaluate the impact of the position. The effect of the work completes the picture allowing consistent evaluations.

At Level 5-2, work involves technical services and practices, such as screening job applicants on minimum qualifications for initial entry onto a competitive inventory, or verifying job content in establishing identical additional jobs. The work also involves applying specific rules or procedures to complete actions in the HR organization. The work affects the accuracy and reliability of further efforts to perform HR functions within the organization. The work also affects the accuracy of employee records, pay, benefits, and other personnel data maintained by the HR office.

At Level 5-3, work involves treating a variety of routine problems, questions, or situations using established procedures such as explaining benefits options available to employees based upon analysis of individual cases; rating employees, in specific lower graded jobs, for promotion on the basis of their relative abilities; and counseling employees on a variety of minor disciplinary actions. The work has a direct effect on the quality and adequacy of employee records, program operations, and services provided through the HR office. Work also affects the social and economic well being of persons serviced through the HR office.

Similar to that described at Level 5-2, the purpose of the appellants' work is to code and process the complete range of personnel actions for the activity. The work directly affects employees and the adequacy of specialized personnel actions. The work is essential to the timely and proper compensation of Medical Center employees, and the maintenance and availability of personnel files and records. The appellants perform work involving a variety of matters which undoubtedly have direct affect on the quality and adequacy of employee records, program operations, and services provided through the HR office.

Level 5-3 is not met. Even considering the wide range of personnel actions required to be entered into the PAID system, the complexity of the types of problems, questions, or situations in which the appellants are involved is limited by the established uniform practices and procedures required by the HR information system. In resolving employee problems, appellants work does not require or permit them to perform the type of analysis intended at this level. In addition, the expectation for others to handle significant and complex inquiries and tasks also restricts the scope and effect of the work. Therefore, Level 5-2 is credited (75 points).

# Summary

In summary, we have credited the position as follows:

Factors		Level	Points
1.	Knowledge required by the position	1-4	550
2.	Supervisory controls	2-2	125
3.	Guidelines	3-2	125
4.	Complexity	4-3	150
5.	Scope and effect	5-2	75
6.	Personal contacts and 7. Purpose of contacts	2-B	75
8.	Physical demands	8-1	5
9.	Work environment	9-1	5
Total points:		1110	

A total of 1110 points falls within the GS-6 grade level point range (1105-1350) according to the grade conversion table in the GS-203 PCS.

# **Decision**

The position is properly classified as Human Resources Assistant (Information Systems), GS-203-6.