

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: [Name of appellant]

Agency classification: School Support Assistant,
GS-303-6

Organization: [Appellant's organization/location]
Department of Defense Education
Activity (DoDEA)
Department of Defense Dependents
Schools (DoDDS)
Department of Defense

OPM decision: (Title at agency discretion)
GS-303-6

OPM decision number: C-0303-06-11

Robert D. Hendler
Classification and Pay Claims
Program Manager

August 17, 2005
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 address]

[Address of appellant's representative]

[Address of appellant's servicing human resources office]

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Introduction

On February 15, 2005, the San Francisco Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [name of appellant]. On March 25, 2005, we received the agency's administrative report. The appellant's position is classified as School Support Assistant, GS-303-6, but he believes it should be upgraded to the GS-7 or GS-9 grade level. The appellant works in the business office of the [appellant's organization/location], Department of Defense Education Activity (DoDEA), Department of Defense Dependents Schools-[school area], Department of Defense (DoD). We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

This decision is based on a thorough review of all information submitted by the appellant and his agency. In addition, to help decide the appeal we conducted a separate telephone interview with the appellant, and a combined telephone interview with his first- and second-level supervisors.

General issues

The appellant does not believe that his current official position description (PD) [number] is completely accurate, but the record shows that his supervisor has certified to its accuracy. The appellant is concerned that the PD has not been updated to reflect his current purchasing procedures, that it does not reflect the current nomenclature for the major purchasing office he now deals with, and that the dollar purchase limit of the school has been raised. We will address these issues under the **"Position information"** section of this decision.

A PD is the official record of the major duties and responsibilities assigned to a position by an official with the authority to assign work. A position is the duties and responsibilities that make up the work performed by the employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities currently assigned by management and performed by the employee. An OPM appeal decision classifies a real operating position, and not simply the PD. Therefore, this decision is based on the work currently assigned to and performed by the appellant.

The appellant makes various statements about the classification review process conducted by his agency, and compares his work to other higher graded positions within DoD. By law, we must classify positions solely by comparing current duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others, which may or may not be classified correctly, as a basis for deciding his appeal. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of his position. Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison. Because our decision sets aside any previous agency decision, the classification practices used by the appellant's agency in classifying his position are not germane to the classification appeal process.

The appellant's agency has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellant considers his position so similar to

others that they all warrant the same classification, he may pursue the matter by writing to his agency's human resources office. In doing so, he should specify the precise organizational location/installation, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same as his, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to him the differences between his position and the others.

Position information

The appellant performs administrative support duties relating to supplies and property, and logistical and miscellaneous support to the faculty, staff, and students at the [appellant's school]. The school operates under the auspices of the DoDEA, which is a major DoD field activity with worldwide scope. DoDEA provides education programs, from preschool through grade 12, for eligible dependents of DoD military service members and civilian employees stationed in thirteen foreign countries overseas, seven states, Guam and Puerto Rico. The overseas component of DoDEA is DoDDS.

The appellant spends up to 95 percent of his time performing a mix of clerical duties and responsibilities including purchasing supplies using the Government Purchase Card (GPC), accounting for property, maintaining the school's supplies and inventory records, receiving and distributing incoming supplies to faculty and staff, maintaining purchase and budget records, administering records for the school's safety and security program, and ensuring that mail is properly routed within the school.

Our fact-finding disclosed that some changes regarding his duties should be updated the PD of record. His purchasing duties currently involve performing specified procedures to replace and replenish various items within the previously purchased curricula. These duties entail using contracts already in place to determine stock number, price, sources of supply, and involve preparing order documentation and coordinating the shipment of material. In making purchases he now deals with the agency's headquarters DoDEA procurement office, rather than the now defunct DoDEA Educational Supplies Procurement Office. Additionally, purchases against government purchase cards were formerly known as IMPAC purchases, but are now made using the GPC program, and the school's purchasing limit has been raised. He also spends about 5 percent of his time assisting a contract maintenance employee and/or performing minor facility repair and maintenance at the school, and helping with unloading supplies and moving furniture and equipment in and around the school, as needed.

We find that the appellant's PD is sufficient for classification purposes, and incorporate it by reference into this decision. The results of our interviews and other material of record provide more information about the appellant's duties and responsibilities, and how they are performed.

Series, title, and standard determination

The appellant's agency has classified his position in the Miscellaneous Clerk and Assistant Series, GS-303, titling it School Support Assistant, and the appellant does not disagree. We concur with the agency's series determination. Like positions in the GS-303 series, the primary

purpose of the appellant's position is to perform one-grade interval work in a variety of occupations no one of which is primary and paramount. As a result, his position is not classifiable in any other more appropriate specialized occupational series. No titles are specified for positions classified in the GS-303 series. Therefore, the agency may designate an appropriate title in accordance with titling guidance specified in the *Introduction to the Position Classification Standards, Section III, H*.

As previously discussed, the appellant performs some miscellaneous repair and maintenance at the school, and helps with unloading supplies and moving furniture. While these duties are regular and recurring, they do not constitute the paramount knowledge and skills to perform the primary duties of the position. Therefore, they do not affect the pay category, title, series or grade of the position, and are considered in this decision as part of the appellant's supply support duties. The appellant's primary duties require knowledge of clerical methods and procedures, not related to trade, craft, or manual-labor work and are appropriately classified in the GS-303 series.

There are no published grade-level criteria for positions in the GS-303 series. The GS-303 standard instructs that clerical positions classified in that series be evaluated by application of the criteria in the Grade Level Guide for Clerical and Assistance Work (GLGCAW).

Grade level determination

The GLGCAW uses two classification factors to evaluate the work of a position: *Nature of assignment* which includes the knowledge required and complexity of the work, and *Level of responsibility* which includes supervisory controls, guidelines, and contacts. The GLGCAW distinguishes between clerical and assistance work and provides separate criteria for each where appropriate. However, clerical work is not described above the GS-6 grade level. The appellant's position primarily requires performance of clerical functions. Since the knowledge of clerical requirements and processes involved in maintaining the functional programs of the school's business office represents the primary purpose of the appellant's position, the use of the clerical criteria is appropriate for evaluating the duties and responsibilities of his position. Our evaluation by application of the two classification factors in the GLGCAW follows.

Nature of assignment

At the GS-6 grade level, clerical work typically entails processing a wide variety of transactions for more than one type of assigned activity or functional specialization. Assignments are subject to different sets of rules, regulations, and procedures. Such issues must be examined that a course of action has substantive impact on the outcome of the assignment. The work requires comprehensive knowledge of rules, regulations, and other guidelines relating to completing assignments in the program area assigned. This knowledge is usually attained through extensive, increasingly difficult, and practical experience and training in the subject matter field. The work also requires ability to interpret and apply regulatory and procedural requirements to process unusually difficult and complicated transactions.

At the GS-7 grade level, technical assistance work consists of specialized duties with continuing responsibility for projects, questions, or problems that arise within an area of a program or functional specialty as defined by management. Work assignments involve a wide variety of problems or situations common to the segment of the program or function for which the employee is responsible. Each assignment typically consists of a series of related actions or decisions prior to final completion. Decisions or recommendations are based on the development and evaluation of information that comes from various sources. The work involves identifying and studying factors or conditions and determining their interrelationships as appropriate to the defined area of work. The employee must be concerned about taking or recommending actions that are consistent with the objectives and requirements of the program or functions.

At the GS-7 grade level, the work requires knowledge and skill to recognize the dimensions of the problems involved, collect the necessary information, establish the facts, and take or recommend action based upon application or interpretation of established guidelines. The work also requires practical knowledge, developed through increasingly difficult, on-the-job training or experience dealing with the operations, regulations, principles, and peculiarities of the assigned program, function, or activity.

A work example in the GLGCAW at the GS-7 level describes an assistant who advises the manager of a field office on the practical and technical aspects of office administration, including budgeting, purchasing, supply management, personnel administration, data processing, and files management, and performs staff support work in each of these areas. The employee collects data for the office operating budget consolidating it into the annual budget, sets up various controls to monitor expenses during the year, and tracks virtually all financial, personnel, supply and other administrative transactions as the documentation flows through the office.

The appellant's position meets the GS-6 grade level. Like that level, his duties involve processing a wide variety of transactions for more than one type of function and activity. These include purchasing equipment and school supplies through the GPC program, maintaining records on material inventory and property accountability, and maintaining and updating financial data and budget records relating to purchase, storage and use of equipment and supplies. These duties are subject to different sets of DoD rules, regulations, and guidelines, particularly those covering budgeting for material and supplies, and the procedures for purchase of supplies and equipment using the GPC. Similar to the GS-6 grade level, these guidelines and references must be closely examined to ensure that the proper course of action or purchase method is selected and that all supporting documentation is developed.

Like the GS-6 grade level, the appellant applies a comprehensive knowledge of the procedural guidelines and regulations governing the school's purchasing and supply requisition program, which he has attained through extensive formal training and practical experience at the school. He applies knowledge of standard DoD supply and logistic support systems as outlined in the agency's regulations covering supply management and logistics support within funding limitations. His comprehensive knowledge is used, for example, to administer the GPC program, to determine if received orders and requests are appropriate and meet GPC program conditions, to make data entries into the automated systems associated with purchases, and to reconcile and

certify monthly statements and reports prepared for submission to approving officials and DoDDS [name of school area] staff. The appellant performs a myriad of other duties such as administering the records for the school's safety and security program, which requires the same level of knowledge and application of established guidelines as described at the GS-6 grade level.

The appellant's position does not meet the GS-7 grade level. Unlike that level, his clerical work is limited to the processing of a variety of transactions, rather than recurring responsibility for entire projects within the program or functional specialty. While he has to determine the best course of action for particular transactions, he is not faced with a wide variety of extensive problems or situations typical of the GS-7 grade level. Although he has to follow certain procedural steps to make purchases using the GPC, unlike the GS-7 grade level, in order to do so he does not have to make decisions or recommendations based on the development and evaluation of information from various sources. Purchases and requisitions of supplies and equipment are clearly covered by the GPC program, so there is no need to study various factors or conditions to determine the interrelationships to other aspects and purchasing methods of the supply function. The transactional nature of the appellant's assignments does not require the degree of knowledge and skill necessary to collect and analyze information, and make recommendations characteristic of the GS-7 grade level. In contrast to the GS-7 grade level work example noted above, the appellant's assignments do not entail the scope and complexity of project, problem resolution, or similar programmatic duties covering multiple administrative programs.

Level of responsibility

At the GS-6 grade level for clerical work, the supervisor reviews completed work for conformance with policy and requirements. The clerical employee is recognized as an authority on processing transactions or completing assignments within a complicated framework of established procedures and guidelines, often when there are no clear precedents. This recognition typically extends beyond the immediate office or work unit to the overall organization or, in some cases, outside the organization. The employee is regarded as an expert source of information on regulatory requirements for the various transactions, and is frequently called upon to provide accurate information rapidly on short notice.

At the GS-6 grade level, guidelines for the work are numerous and varied, making it difficult for the employee to choose the most appropriate instruction and decide how the various transactions are to be completed. Guidelines often do not apply directly, requiring the employee to make adaptations to cover new and unusual work situations. This may involve deviating from established procedures to process transactions which cannot be completed through regular channels or involve actions where guidelines are conflicting or unusable. Contacts at the GS-6 grade level are with employees in the agency, in other agencies, or with management or users or providers of agency services. The employee provides information, explains the application of regulations, or resolves problems relating to the assignment.

At the GS-7 grade level, the supervisor makes assignments in terms of objectives, priorities, and deadlines. The employee independently completes assignments in accordance with accepted

practices, resolving most conflicts that arise. Completed work is evaluated for appropriateness and conformance to policy. Guidelines for the work are more complex than at the next lower grade because the employee encounters a wider variety of problems and situations which require choosing alternative responses. Guides, such as regulations, policy statements, and precedent cases, tend to be general and descriptive of intent, but do not specifically cover all aspects of the assignments. Guidelines apply less to specific actions and more to the operational characteristics and procedural requirements of the program or function. Employees must use significant judgment and interpretation to apply the guides to specific cases and adapt or improvise procedures to accommodate unusual or one-of-a-kind situations. The contacts and purpose of contacts are usually the same as at the next lower level. However, to a greater degree, the employee serves as a central point of contact to provide authoritative explanations of requirements, regulations, and procedures, and to resolve operational problems or disagreements affecting assigned areas.

The appellant's level of responsibility meets the GS-6 grade level. Like that level, he is recognized as an authority at the school on processing purchasing transactions, and maintaining property accountability records and related financial data. Similar to the GS-6 grade level, he independently performs his assignments within a framework of complicated DoD regulations, procedures and guidelines, which sometimes lack clear precedents. Like the GS-6 grade level, he is frequently called upon to furnish information on processes, procedures and preparation of documents by staff outside his immediate office including staff and faculty of the entire school because he is regarded as an expert in the GPC program. As at the GS-6 grade level, his work is reviewed for conformance with policy and requirements, e.g., priorities and deadlines. If he encounters unusually difficult situations, technical guidance is available from Area and District DoDDS [name of school area] staff.

Like the GS-6 grade level, the DoD guidelines used are numerous and varied which makes it more difficult to choose the correct one to apply to a particular transaction. The appellant uses judgment to select and interpret the proper guide for the task at hand, and sometimes adapts or deviates from instructions that do not directly apply to cover a new or unusual situation. Like the GS-6 level, his work contacts are with school staff and DoDDS [name of school area] personnel at higher levels to obtain, coordinate, or exchange information, and provide guidance and explain the application of particular transactions and regulations.

The appellant's position does not fully meet the GS-7 grade level. Although assignments are made with limited guidance from the supervisor and the appellant independently carries out the work, when substantial conflicts arise or unusual or controversial situations occur, he seeks guidance from higher level staff members either at the school or at higher level organizations outside the facility. Unlike the GS-7 grade level his completed work is evaluated to ensure that requirements have been met, rather than simply conformance only to policy. Although the appellant utilizes numerous and varied guidelines which sometimes do not completely apply to a particular assignment, they are not as complex as at the GS-7 grade level where they tend to be general and descriptive of intent and apply less to specific assignments, focusing more on the operational characteristics of the work functions. In contrast to the GS-7 grade level, while he may have to deviate from established procedures, the appellate is not routinely faced with improvising procedures and processes to resolve or accommodate unusual situations. The

appellant's contacts are similar to the GS-7 grade level, but focused on transactions and not for the purpose or to the degree in resolving operational problems envisioned at that level.

Summary

By application of the grading criteria in the GLGCAW we find that the nature of the appellant's assignments and his level of responsibility meet the GS-6 grade level. Therefore, his position is graded at that level.

Decision

The proper series and grade of the appellant's position is GS-303-6. Selection of an appropriate title is at the agency's discretion.