

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:** Program Analyst  
GS-343-9

**Organization:** [Appellant's organization/location]  
Department of Veterans Affairs

**OPM decision:** Program Analyst  
GS-343-9

**OPM decision number:** C-0343-09-05

/s/ Robert D. Hendler

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Robert D. Hendler  
Classification and Pay Claims  
Program Manager

10/31/2005

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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:**

[Name of appellant and mailing address of her representative]

[Address of appellant's servicing human resources office]  
Department of Veterans Affairs

Team Leader for Classification  
Office of Human Resources Management and Labor Relations  
Compensation and Classification Service (055), Room 240  
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Deputy Assistant Secretary  
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## **Introduction**

On June 17, 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 July 29, 2005, we received the agency's complete administrative report. The appellant's position is classified as Program Analyst, GS-343-9, but she believes it should be graded at the GS-11 level. She works in the [name of appellant's organization/location], Department of VA. We have accepted and decided this appeal under section 5112(b) 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 her agency. In addition, to help decide the appeal we conducted separate telephone interviews with the appellant, her supervisor, and the Decision Support System Site Manager.

## **General issues**

The appellant believes that her current position description (PD) [number] does not accurately and fully describe her overall responsibilities, but her supervisor has certified to its accuracy. 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. This decision is based on the work currently assigned to and performed by the appellant.

The appellant compares her position to higher graded program analyst positions in her agency that she believes are performing the same work as her position. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM 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 her appeal.

Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellant considers her position so similar to the other positions that they should warrant the same classification, she may pursue the matter by writing to her agency's human resources office. In doing so, she 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 as her position, the agency must correct the classification to be consistent with this appeal decision. Otherwise, the agency should explain to her the differences between her position and the other positions.

The appellant notes that she serves as the Decision Support System (DSS) Site Manager in his absence. However, duties performed in another employee's absence cannot be considered in determining the grade of a position (*The Classifier's Handbook*, Chapter 5).

## **Position information**

The appellant participates in administering the DSS at the [appellant's organization]. The DSS is a set of programs that uses regional and national databases to provide clinical, financial, and workload information that enables managers to monitor and improve the tracking of supplies, services, workload, patients and costs. DSS has been implemented throughout the VA healthcare systems, with the [appellant's organization] one of the last to implement it.

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

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

The agency has classified the appellant's position in the Management and Program Analysis Series, GS-343, titling it Program Analyst, and the appellant does not disagree. We concur with the agency's series and title determination.

There are no grade-level criteria provided in the GS-343 standard. Instructions in the standard state that non-supervisory positions at grade GS-9 and above are to be evaluated by reference to the Administrative Analysis Grade-Evaluation Guide (AAGEG).

## **Grade determination**

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

### *Factor 1, Knowledge required by the position*

This factor measures the kind and nature of knowledge and skills needed and how they are utilized in doing the work.

At Level 1-6, employees apply analytical and evaluative techniques to the identification, consideration, and resolution of issues or problems of a procedural or factual nature. The issues or problems deal with readily observable conditions, written guidelines covering work methods and procedures, and information of a factual nature. Included at this level is knowledge of the theory and principles of management and organization, including administrative practices and procedures common to organizations, e.g., channels of communication, delegation of authority, routing of correspondence, filing systems, and storage of files and records.

Level 1-6 is met. The appellant's position applies analytical and evaluative techniques to identify, modify, and resolve workload, item classification, and financial data issues and

problems or the lack of such information found or not found in the DSS. The DSS issues and problems relate to coding data, identifying workload, capturing workload data, training staff to input data, classifying items correctly and inputting costs appropriately, validating the data through audits, implementing updates and, in some cases, creating clinical protocols (e.g., surgery, pharmacy, laboratory) on the software, etc. For example, the appellant found that the costs for the pharmacy were excessive based on known drug use and costs. She discovered that existing system data was old and included many pages of drugs no longer used by the facility. Drug costs were incorrect, resulting in higher than normal costs for the pharmacy program. The work entailed reviewing pages of drug names, culling and deleting obsolete drugs from the list and entering correct cost data. It has taken the appellant two years to update the system with the correct information. As part of the process to validate data and correctly code data, she conducted interviews with supervisors and employees familiar with the information. However, intricate and detailed as the appellant's DSS work is in capturing various data, the record shows that the issues or problems assigned to the appellant's position are essentially factual in nature and are comparable to Level 1-6.

At Level 1-7, in addition to knowledge required at Level 1-6, assignments require knowledge and skill in applying analytical and evaluative methods and techniques to study the efficiency and effectiveness of program operations carried out by administrative or professional personnel or substantive administrative support functions. This level includes knowledge of pertinent laws, regulations, policies, and precedents which affect the use of program and related support resources in the area being studied. This knowledge is used to plan, schedule, and conduct studies to evaluate and recommend ways to improve the effectiveness and efficiency of work operations, program effectiveness, and/or organizational productivity. Knowledge at this level is applied in developing new or modified work methods, organizational structures, records and files, management processes, staffing patterns, procedures for administering program services, guidelines and procedures, and automating work processes for the conduct of administrative support functions or program operations. Knowledge may also be applied in analyzing and making recommendations concerning the centralization or decentralization of operations.

Level 1-7 is not met. The operational scope of the appellant's position does not require or permit the application of comparable knowledge. The appellant's assignments result in accurate and complete data that are used by higher management levels in support of decisions concerning the efficiency and effectiveness of both clinical and fiscal operations. The appellant's position is not responsible for conducting studies of various programs, analyzing the findings, and making recommendations on the efficacy of work processes, etc. In contrast to Level 1-7 work involving efficiency and effectiveness of programs, the appellant resolves issues on how best to capture data within the established parameters of the system, explaining to various program chiefs and employees the necessity for changing the structure of inputs, and describing the differences of outcome results. The record shows that the appellant's work involves studies of factual data and inputs rather than studies of program operations and recommendations for substantive changes to those operations found at Level 1-7.

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

### *Factor 2, Supervisory controls*

This factor measures how the work is assigned, the employee's responsibility for carrying out the work, and how the work is reviewed.

At Level 2-3, the supervisor assigns specific projects in terms of issues, organizations, functions, or work processes to be studied and sets deadlines for completing the work. The supervisor or higher grade analyst provides assistance on controversial issues or on the application of qualitative and quantitative analytical methods to the study of subjects for which precedent studies are not available. The employee independently plans, coordinates, and carries out the successive steps in fact-finding and analysis of issues necessary to complete each phase of assigned projects. Work problems are normally resolved without reference to the supervisor in accordance with the body of accepted policies and precedents. Work is reviewed for conformance with overall requirements as well as contribution to the objectives. Findings and recommendations developed by the employee are reviewed prior to release, publication, or discussion with management officials.

Level 2-3 is met. Although the appellant is under the general supervision of the Chief, Fiscal Service, she attends (along with the DSS Site Manager) bi-monthly national program telecons to determine which programs need to be studied, and specify projects and work processes for the local DSS program. Managers also make special requests to have their programs reviewed. The Site Manager provides assistance on controversial issues. Like Level 2-3, the appellant independently plans and carries out all phases of her assignments. She normally resolves most problems that arise during the course of her work. For example, the appellant found that incorrect data input for radiology resulted in costs being recorded at the higher rate for audiology. Radiology expenses were incorrectly charged to the laboratory, thereby driving the laboratory costs up. In another example, the appellant found that higher cost Nurse Practitioner work was entered into the system as Registered Nurse work which resulted in a shortfall in the salary charges. The appellant reports these types of discrepancies to management for decisions on any structural changes. Like Level 2-3, work is reviewed for conformance with overall program requirements.

At Level -2-4, within framework of priorities, funding and overall project objectives (e.g., cost reduction, better workload distribution), the employee and supervisor develop a mutually acceptable project plan which includes identification of the work to be done, the scope of the project, and deadlines for its completion. Within the parameters of the approved plan, the employee has responsibility for planning and organizing the study, 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, and the initial application of new methods. The employee informs the supervisor of potentially controversial findings, issues, or problems with widespread impact. Completed work is also reviewed critically outside the employee's immediate office by staff and line management officials whose programs and employees would be affected by implementation of the recommendations.

Level 2-4 is not fully met. Although the appellant independently performs her duties, her assignments are limited in scope and are not so complex that they require her to work with her supervisor to develop a plan and establish project parameters and resources needed. The appellant carries out her day-to-day work independently, developing her own schedule, setting her own priorities, coordinating with facility staff and management personnel to properly capture data, and resolving problems in order to accomplish assignments within established deadlines. Nevertheless, the record shows that the appellant is not assigned individual studies of the scope meeting Level 2-4 which require the employee to plan, organize, and conduct the phases of the study and to estimate the funds needed to conduct the study. The appellant's completed work is reviewed through the audit process where the data must meet certain standards before it becomes part of the national DSS database available to high-level decision-makers. The limited nature of the work does not require review, comparable to Level 2-4, for feasibility and compatibility with other program requirements. Likewise, the appellant's position is not responsible for studies that result in recommendations of the scope envisioned at Level 2-4.

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

### *Factor 3, Guidelines*

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

At Level 3-3, the guidelines consist of standard reference material, texts, and manuals covering the application of analytical methods and instructions and manuals covering the subjects involved. Analytical methods in the guidelines are not always directly applicable to work assignments. However, precedents are available for reference. The employee analyzes the subject and the current guidelines and makes recommendations for change. Included at this level are work assignments where the subject is covered by a wide variety of administrative regulations and procedural guidelines. The employee uses judgment in researching regulations and determining relationships between guidelines and the subject studied.

Level 3-3 is met. The appellant uses a number of standard guidelines covering the various DSS subsystems and menus including an audit guidebook, processing guide, conversion guide and technical conversion issue documents, executive summaries for audits, manuals of standardizations, and stop code guides. The guides are continually changing to match changes in the system and the appellant and the Site Manager must keep abreast of any national changes. Like Level 3-3, the guidelines are not always applicable to the work, but precedents are available for reference. Interpretation, adaptation, and judgment are needed to apply the various guidelines.

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. The administrative policies and precedent studies provide a basic outline of the results desired, but do not go into detail as to the methods used to accomplish the project. The administrative guidelines usually cover program goals and objectives of the employing organization. Within the context of broad regulatory guidelines the employee may refine or develop more specific guidelines such as implementing regulations or methods for the

measurement and improvement of effectiveness and productivity in the administration of operating programs.

Level 3-4 is not met. The appellant's work involves systems for which procedures and guidelines are highly developed and controlled nationally. The appellant's actual assignments are not of the scope typical of Level 3-4, and the guidelines she uses include standard reference materials and operating manuals typical of Level 3-3. The position's guidelines, discussed above, require the use of judgment, but are not as broad as the general administrative policies and management theories typical of Level 3-4.

The factor is evaluated at Level 3-3 and 275 points are assigned.

#### *Factor 4, Complexity*

This factor covers the nature, number, variety, and intricacy of the tasks, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

At Level 4-3, 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, workload measurement, and trend analysis to resolve procedural problems affecting the efficiency, effectiveness, or productivity of the organization and/or workers studied. Projects usually take place within organizations with related functions and objectives, although organization and work procedures differ from one assignment to the next. Organizational efficiency assignments typically involve observing work in progress to identify and resolve problems in work-flow, work methods, and procedures, task distribution, overall workload, forms and recordkeeping, span of control, and organizational structure. When performed, evaluative studies involve measurement of current work output, group productivity and accomplishments, or identification of current resource needs, e.g., staff, supplies, equipment, and space. Findings and recommendations are based upon analysis of work observations, review of production records or similar documentation, research of precedent studies, and application of standard administrative guidelines.

Level 4-3 is met. Comparable to that level, the appellant's work involves procedural issues and analyzing factual DSS workload information, costs, items, inputs, etc., for a variety of departments using accepted analytical techniques to ensure that they are accurate. For example, the appellant found that the Mental Health and Social Work department was inputting all patient appointments as 15 minute appointments and not recording costs for those patients who were actually being seen for 60 and 90 minute appointments. As previously discussed, drugs were input at higher costs different from the nationwide standardized table and charges were incorrectly input in other departments resulting in either deflated costs or inflated costs depending on the department charged. As these discrepancies and errors occur, the appellant works with the Site Manager, with approval of the Fiscal Officer, in either restructuring organizational inputs into the system or correcting errors so that they will meet nationwide system standards. The appellant produces standard quarterly reports, special reports requested

by management, and assists the Site Manager in the annual close out reports at the end of the fiscal year.

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 setting. Subjects and projects assigned at this level usually consist of issues, problems, or concepts that are not always susceptible to direct observation and analysis. Difficulty is encountered in measuring effectiveness and productivity due to variations in the nature of administrative processes studied and information that is conflicting or incomplete or cannot readily be obtained by direct means. At this level, assignments may involve compiling, reconciling, and correlating voluminous workload data from a variety of sources with different reporting requirements and formats, or the data must be carefully cross-checked, analyzed, and interpreted to obtain accurate and relevant information. Characteristic of work at this level is originality in refining existing work methods and techniques for application to the analysis of specific issues or resolution of problems. For example, the employee may revise methods for collecting data on workload, adopt new measures of productivity, or develop new approaches to relate productivity measurements to a performance appraisal system. Illustrative of work at Level 4-4 is an employee who studies, analyzes, and develops methods to improve the accuracy, adequacy, and timeliness of information and systems for disseminating information about the agency's programs and work force to managers at many organizational echelons and/or geographic locations.

Level 4-4 is not met. The appellant's assignments do not routinely involve issues or problems that are difficult to identify through direct observation and analysis, or situations where information is conflicting, incomplete, or difficult to obtain. As at Level 4-3, discrepancies in data are readily observable. In contrast to Level 4-4 analysis and development of work improvement methods, the appellant works within the existing DSS where she is responsible for factual workload and resource data concerned with the [appellant's organization].

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

#### *Factor 5, Scope and effect*

This factor covers the relationship between the nature of the work; i.e., the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization.

At Level 5-3, the employees identify, analyze, and make recommendations to resolve conventional problems and situations in workflow, work distribution, staffing, performance appraisal, organizational structure, and/or administration. Employees may be assigned portions of broader studies of largely administrative organizations or participate in the evaluation of program effectiveness at the operating level. Completed reports and recommendations influence decisions by managers concerning the internal administrative operations of the organizations and activities studied.

Level 5-3 is met. The appellant's work involves identifying, gathering, processing and reviewing both clinical and financial data, resolving related conventional problems, and producing quarterly, special and annual reports as needed and required. The data is used by managers to assist them in making decisions on their operations.

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 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 the missions and programs at these various echelons or locations.

Level 5-4 is not met. The appellant's DSS work is primarily limited to the [appellant's organization]. The DSS database is used by managers and higher level decision makers at the installation to base their decisions concerning healthcare operations specific to their programs and overall to the organization as a whole. While her work data is fed into the DSS database which is an agency wide system, other employees at higher echelons are responsible for dealing with those system-wide issues. This appellant's work does not entail assessing the efficiency of the agency's program operations, and the appellant is not directly responsible for studying operations at many different echelons and/or geographical locations throughout the agency as envisioned at Level 5-4.

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

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

*Personal contacts*

This factor assesses the level of face-to-face contacts and telephone dialogue with persons not in the supervisor chain. The evaluation criteria are described in four paragraphs labeled 1 through 4.

Level 2 contacts include employees, supervisors, and managers of the same agency, but outside of the immediate office. Level 2 is met. The appellant's personal contacts are with employees, supervisors, and managers within the agency, but outside the appellant's immediate office.

Level 3 contacts include persons outside the agency, which may include business executives, consultants, or contractors and/or the head of the employing agency or program officials several managerial levels removed from the employee. Level 3 is not met. The appellant does not routinely have work contacts with persons outside the agency, or with the head of her agency or with program officials several managerial levels removed from her position.

### *Purpose of contacts*

This factor evaluates the purpose of contacts, which can range from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives. The evaluation criteria are described in four paragraphs labeled a through d.

At Level b, the purpose of the contacts is to provide advice to managers on non-controversial organization or program related issues and concerns. Contacts typically involve such matters as identification of decision-making alternatives; appraisals of success in meeting goals; or recommendations for resolving administrative problems.

Level b is met. The appellant advises managers on non-controversial program issues and concerns, e.g., explaining DSS setup, processes, and procedures and providing them alternatives on how the workload data, costs, and items may be captured or reported. For example, the appellant advised a manager by explaining how DSS worked and the processes involved in capturing data for mental health and social work patients.

At Level c, the purpose of the contacts is to influence managers or other officials to accept and implement findings and recommendations on organizational improvement or program effectiveness. Employees may encounter resistance due to such issues as organizational conflict, competing objectives, or resources problems.

Level c is not met. The record shows that the appellant is not involved in contacts involving influencing others or where management resistance is present, or in making recommendations on organizational improvement or program effectiveness. Any contacts equivalent to Level c are made by the Site Manager.

These factors are credited at Level 2-b for a total of 75 points.

### *Factor 8, Physical demands*

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

The appellant's work is primarily sedentary which meets Level 8-1. The work does not meet Level 8-2 where the work requires some physical exertion such as long periods of standing, bending, and stooping.

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.

Like Level 9-1, the appellant works in an adequately lighted and climate controlled office. The work environment does not meet Level 9-2 where the assignment requires visits to manufacturing, storage, or other industrial areas, involving moderate risks or discomforts. Unlike Level 9-2, the appellant is not required to use protective clothing and gear and observe safety precautions.

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

### *Summary*

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. <i>Knowledge required by the position</i>	1-6	950
2. <i>Supervisory controls</i>	2-3	275
3. <i>Guidelines</i>	3-3	275
4. <i>Complexity</i>	4-3	150
5. <i>Scope and effect</i>	5-3	150
6&7. <i>Personal contacts &amp; Purpose of contacts</i>	2-b	75
8. <i>Physical demands</i>	8-1	5
9. <i>Work environment</i>	9-1	<u>5</u>
Total points:		1885

A total of 1885 points falls within the GS-9 range (1855-2100) on the grade conversion table in the AAGEG. Therefore, the position is graded at the GS-9 level.

### **Decision**

The appellant's position is properly classified as Program Analyst, GS-343-9.