



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

Human Capital Leadership  
and Merit System  
Accountability Division

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

**Appellant:** [name]

**Agency classification:** Program Support Assistant (OA)  
GS-303-4

**Organization:** Imaging Service  
Acute Hospital/Clinical Service  
Veterans Affairs Medical Center  
Department of Veterans Affairs  
[location]

**OPM decision:** GS-303-4  
Title to be determined by agency to  
include (OA).

**OPM decision number:** C-0303-04-07

/s/ Robert D. Hendler

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Robert D. Hendler  
Classification and Pay Claims  
Program Manager  
Center for Merit System Accountability

September 25, 2006

\_\_\_\_\_  
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).

As discussed in this decision, the agency has classified the appealed position as Program Support Clerk (OA), GS-303-4, but the activity has not processed that certificate. This decision agrees with the propriety of the agency's certificate, and corrective action must be taken by the activity human resources office as required by 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 to the Atlanta Field Services Group which accepted the appeal.

**Decision sent to:**

[appellant's name and address]

Director, Human Resources  
Department of Veterans Affairs  
[name] VAMC  
[location]

Deputy Assistant Secretary for  
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## **Introduction**

The Atlanta Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [name] on June 12, 2006. As the result of an agency-level appeal decision, the appellant's position is currently classified as Program Support Assistant (Office Automation) or (OA), GS-303-4. It is assigned to the Imaging Service, Acute Hospital/Clinical Service, Department of Veterans Affairs Medical Center (VAMC), Department of Veterans Affairs (VA), located in [location]. The appellant requests that her position either be returned to the GS-5 grade level or be upgraded to GS-6 and placed in the Management and Program Assistant Series, GS-344. This appeal was accepted and decided under section 5112 of title 5, United States Code (U.S.C.)

## **Background**

The appellant's current position was originally classified as an Office Automation Clerk, GS-326-4. Her supervisor requested a review of the position from the local Human Resources Office (HRO) based on additional assigned duties and responsibilities. The local HRO changed the classification of the position to Program Support Assistant, GS-303-5, and promoted the appellant on February 3, 2006. However, due to her belief that the job was actually a GS-6, she appealed the classification to the VA headquarters Compensation and Classification Service. In a decision dated April 27, 2006, the agency determined the position to be a Program Support Clerk (OA), GS-303-4, and directed the VAMC to correct the position's classification in accordance with published OPM regulations. Therefore, we find the April 27, 2006, VA agency-level decision constitutes a certificate on the position and that the official classification of the appellant's position is Program Support Clerk (OA), GS-303-4. As a result of this decision, the appellant filed an appeal with OPM.

## **General Issues**

The appellant makes various statements about her agency's review and evaluation of her position. She feels that her involvement with the voice recognition system was not fully considered in the agency's decision. She asserts that other VAMC have incorporated the voice recognition system in higher graded positions. She believes that the agency supported its rationale using OPM classification appeal decisions for positions that are not comparable to her position. In adjudicating this appeal, our only concern is to make an independent decision on the proper classification of the appellant's position. Therefore, we have considered these statements only insofar as they are relevant to making that comparison. Because our decision sets aside all previous agency decisions, any concerns regarding the agency's classification review process are not germane to this decision.

The appellant's rationale includes comparison of her PD to higher graded positions at other VAMC. By law, we must classify positions solely by comparing her 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 appellant's position to others which may or may not be classified correctly, as a basis for deciding the 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 others that they all warrant the same classification, she may pursue the matter by writing to her agency's human resources headquarters. 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 hers, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to her the differences between her position and the others.

During our fact finding discussions, both the appellant and her supervisor identified the volume, quality, and the efficiency of the work performed by the appellant as rationale supporting a higher grade for the position. However, volume is not considered in determining the grade of a position (*The Classifier's Handbook*, chapter 5). The quality of work is not germane to the classification process since the classification analysis of a position is based on the assumption that the assigned work is properly performed (*The Classifier's Handbook*, chapter 3, Factor 5). Therefore, the efficiency and effectiveness of the appellant's work may not be considered in the classification of her position. Rather, they are properly considered as part of the performance management process.

The appellant is assigned to PD number 09312A. Both the appellant and her supervisor certified the accuracy of the PD. In reaching our classification decision, we have carefully reviewed all information furnished by the appellant and the agency, including the information obtained from telephone interviews and site visits with the appellant and her supervisor, and all other information of record.

### **Position information**

The Salem VAMC serves as a tertiary referral center and is classified as a Clinical Level 1 facility servicing veteran patients in [location of service]. The appellant is a member of the clerical staff in the Imaging Service. The Imaging Service consists of a General Diagnostic Section, Special Procedures Section (Ultrasound/CT Scans), Nuclear Medicine Section, Magnetic Resonance Imaging (MRI) Section, and Clerical Section. Her primary duties are to gather and analyze information concerning the coding of documents within the medical record to insure complete and accurate information for the recovery of monies for reimbursement by the care provider. The appellant provides assistance by maintaining the dictation system, working administratively with the outside transcription service, physicians, and staff on reports, etc., and by providing information on errors and deficiencies of electronic patient records. The appellant conducts basic orientation for all incoming Radiologists and Cardiologists regarding the dictation system and the voice recognition system. She will inform the staff of completion time standards, VA formats and forms, and Imaging policies and procedures. The appellant is the backup time keeper for the office.

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

The appellant disagrees with the agency's assignment of her position to the Miscellaneous Clerk and Assistant Series, GS-303. This series includes positions the duties of which are to perform or supervise clerical, assistant, or technician work for which no other series is appropriate. The work requires knowledge of the procedures and techniques involved in carrying out the work of

an organization and involves the application of procedures and practices within the framework of established guidelines.

The appellant feels that her position should be classified in the Management and Program Clerical and Assistance Series, GS-344. The GS-344 series includes positions involved in supervising or performing clerical and technical work in support of management analysis and program analysis, the purposes of which are to evaluate and improve the efficiency, effectiveness, and productivity of organizations and programs. Management clerks and assistants apply clerical and technical procedures, methods, and techniques to support program analysis functions and processes. Program analysis involves planning, analyzing, and evaluating the effectiveness of line or operating programs. This includes developing agency program objectives, identifying required resources, measuring program progress and quality of service, and devising actions to resolve problems in meeting goals and objectives. The appellant's duties involve reviewing Imaging Service medical records to insure that proper patient information has been collected and recorded properly in the Patient Care Encounter (PCE) options of the VISTA computer system. She also conducts orientations for Radiologists and Cardiologists regarding the Talk Technology System. This work is not in support of management analysis and program analysis but rather helps ensure the accuracy and completeness of the Salem VAMC patient medical records.

We considered the Medical Records Technician Series, GS-675. The GS-675 series includes technical support work in connection with processing and maintaining medical records for compliance with regulatory requirements in support of medical records programs. It also covers positions that review, analyze, code, abstract, and compile, or extract medical records data. The work requires a practical knowledge of medical records procedures and references, and the organization and consistency of medical records. It also requires a basic knowledge of human anatomy, physiology, and medical records terminology. While the appellant's work requires knowledge of medical records completion and coding requirements, her work is limited to Imaging Service medical records and does not require or permit application of the broader knowledge of the procedures and references or the organization and consistency of medical records found in GS-675 work. Therefore, the appellant's position is not covered by the GS-675 series.

We also considered the Medical Support Assistant Series, GS-679, which includes one-grade interval administrative support positions that supervise, lead, or perform support work in connection with the care and treatment given to patients in wards, clinics, or other such units of a medical facility. The work includes functions such as serving as a receptionist, performing record keeping duties, and providing miscellaneous support to the medical staff of the unit. This series includes work that requires a practical knowledge of computerized data entry and information processing systems, the medical facility's organization and services, basic rules and regulations governing visitors and patient treatment, and a practical knowledge of the standard procedures, medical records, and medical terminology of the unit supported. Unlike GS-679 functions, the appellant's work does not involve support in connection with the care and treatment of patients. but primarily involves the completeness and accuracy of the coding of documents within the medical records. While the appellant performs some duties similar to GS-679 work, i.e., substitutes for the receptionist registering and scheduling patients as needed, these are not her primary duties.

Therefore, we agree with the agency classified determination that the appellant's position in the Miscellaneous Clerk and Assistant Series, GS-303. The appellant performs a number of support functions requiring knowledge of all Imaging medical record completion requirements to properly advise physicians for appropriate and complete documentation. The GS-303 series best represents the position's primary purposes.

The agency has titled the appellant's position as Program Support Assistant (OA). Program Support Assistants perform technical work to support the administration or operations of an organizational unit. Program Support Clerks perform work such as preparing, receiving, reviewing, and verifying documents. OPM has prescribed no titles for positions in the GS-303 series. Therefore, according to section III.H.2 of the *Introduction to the Position Classification Standards*, the appellant's agency may choose the official title for the position. The parenthetical title OA must be added to identify the requirements for knowledge of office automation systems and typing.

There are no published grade level criteria in the GS-303 series standard. The standard instructs that positions classified to this series be evaluated by the Grade Level Guide for Clerical and Assistance Work (Guide), which is used as a source of grade level guidance for work that is not covered by more specific grade level criteria in other guides or standards. The office automation work is evaluated against the Office Automation Grade Evaluation Guide (OAGEG).

## **Grade determination**

### ***Evaluation using the Guide***

The Guide provides general criteria to use in determining the grade level of nonsupervisory clerical and assistance work being performed in offices, shops, laboratories, hospitals, and other settings in Federal agencies. The Guide describes the general characteristics of each grade level from GS-1 through GS-7, and uses the two following criteria for grading purposes: *Nature of Assignment* (which includes knowledge required and complexity of the work) and *Level of Responsibility* (which includes supervisory controls, guidelines, and contacts).

#### *Nature of Assignment*

The appellant's work assignments most closely match the GS-4 level. Comparable to this level, the appellant performs a full range of standard clerical assignments, e.g., data entry and transcription, provides information on errors and discrepancies, prepares reports, handles correspondence and telephone inquiries, and resolves recurring problems in the imaging services area. Her work consists of related steps, processes or methods, which requires the appellant to identify and recognize differences among a variety of recurring situations. Like the GS-4 level, the appellant's duties require subject-matter knowledge of an organization's program and operations, e.g., imaging medical record completion requirements. This knowledge is needed to determine what is being done, why the action is being taken and how it must be accomplished. The appellant reviews medical records, identifies coding errors or missing documentation and takes corrective action to enable records to be entered into the VISTA computer system. As at the GS-4 level, problems encountered are recurring and actions taken differ based on the nature of the corrective action required. The appellant is responsible for conducting orientation for incoming Radiologists and Cardiologists regarding the dictation and voice recognition system.

Typical of this level, the training consists of repetitive, related steps with system manuals and guides available to assist in resolving problems or questions. The training is limited to the appellant explaining to others how to use the same systems the appellant uses to perform her day-to-day work.

The appellant's work assignments do not meet the GS-5 level at which work consists of performing a full range of standard and nonstandard clerical assignments. The appellant's duties are limited to the imaging services and standard clerical duties. She is not involved in resolving a variety of non-recurring problems typical at the GS-5 grade level. Instead, she is responsible for running standard reports and correcting errors causing records to appear as delinquent or incomplete. The corrective action taken is recurring and in accordance with established guidelines. The appellant's work is performed in accordance with standard procedures, office policies, and organizational and agency instructions which are readily available and cover most situations. As a result, the work does not afford her the latitude to decide which steps, processes, or course of actions should be taken since these are basically prescribed. Unlike the GS-5 level, she does not deal with a variety of assignments each of which involves different and unrelated steps, processes, or methods. Instead, she deals with related duties, making more limited judgments such as identifying discrepancies in imaging coding based on established procedures, or as in her work with the voice recognition system, identifying occurrences when the computer does not recognize the user's words.

This factor is evaluated at the GS-4 level.

#### *Level of Responsibility*

Typical of the GS-4 grade level, the appellant performs her day-to-day work with little or no daily review by the supervisor. Her supervisor provides assistance where new or unusual situations are encountered or trends occur that need to be brought to the attention of higher authority. Procedures for correcting imaging reports are established and a number of specific guidelines are available. The appellant uses judgment in locating and selecting the most appropriate guidelines, references, and procedures. There are a number of specific agency guides and reference manuals, e.g., voice recognition system user manual, for the appellant's work. Illustrative of the GS-4 grade level, the appellant has contact with co-workers and those outside the organization to exchange information, and in some cases to resolve problems in connection with the immediate assignment. For example, the appellant will contact the outside transcription agency to obtain dictated reports missing from the VISTA system.

The appellant's work does not meet the GS-5 level. At this grade, the supervisor assigns work by defining objectives, priorities, and deadlines and provides guidance on assignments which do not have clear precedents. The employee works in accordance with accepted practices and completed work is evaluated for technical soundness, appropriateness, and effectiveness in meeting goals. In contrast, the appellant's work is performed in accordance with standard procedures, office policies, and organizational and agency instructions which are readily available and cover most situations. The appellant's completed work is spot checked for accuracy and adherence to established guidelines. Unlike the GS-5 grade level, the appellant's position does not require extensive use of judgment on a regular or recurring basis in interpreting or adapting available or established guidance and procedures to resolve problems that may be encountered. Guides are generally applicable and do not require interpretation or adaptation to

the work as would be characteristic of GS-5 grade level. Instead, the appellant refers these types of problems to her supervisor. Additionally, the appellant is not required to select from numerous or similar guidelines to complete her assignments and her contacts with others are primarily to resolve specific problems, e.g., with coding or billing problems

This factor is evaluated at the GS-4 level. With both factors evaluated at the GS-4 level, we find the appellant's position properly classified at the GS-4 level by application of the Guide.

### *Evaluation using the OAGEG*

The OAGEG is written in the Factor Evaluation System Format, under which factor levels and accompanying point values are assigned for each of the nine factors. The total is converted to a grade level by use of the grade conversion table provided in the JFS. Under this system, each factor-level description demonstrates 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.

The position falls short of Level 1-4, the highest level described in the OAGEG, in that the work does not, on a regular and continuing basis within the meaning of the position classification system, require integrating the use of different software types, e.g., retrieving data, converting it to graphic form, and incorporating it into the text of reports; using desk-top publishing software to prepare varied news releases, brochures, and reports; or developing spreadsheets and databases of similar complexity. Because the appellant also does not determine what functions should be automated and how that should be done, or make equivalent automation decisions on a regular and continuing basis, we are precluded from crediting higher levels for any of the remaining factors. These duties do not impact the grade of the position, therefore, only a summary evaluation follows:

#### *Summary*

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge Required by the Position	1-3	350
2. Supervisory Controls	2-2	125
3. Guidelines	3-2	125
4. Complexity	4-2	75
5. Scope and Effect	5-2	75
6. & 7. Personal Contacts and Purpose of Contacts	2a	45
8. Physical Demands	8-1	5
9. Work Environment	9-1	<u>5</u>
<i>Total points</i>		805

In accordance with the grade conversion table in the guide, a total of 805 points falls within the range of GS-4, 655 to 850 points.



**Decision**

By comparison with both the Guide and the OAGEG, the position is graded at the GS-4 level. The position is properly classified to the GS-303 series, at the GS-4 grade level. The title is to be constructed by the agency. The parenthetical title OA must be added to identify the requirements for knowledge of office automation systems and typing.