

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

Center for Merit System Accountability
1900 E Street, NW., Room 6484
Washington, DC 20415-6000

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

Appellant: [name]

Agency classification: Auditor
GS-511-13

Organization: Office of the Inspector General
[agency]
[city and State]

OPM decision: Auditor
GS-511-11

OPM decision number: C-0511-11-03

/s/ Kevin E. Mahoney

Kevin E. Mahoney
Deputy Associate Director
Center for Merit System Accountability

April 10, 2006

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a classification 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 the conditions and time limits specified in title 5, Code of Federal Regulations, sections 511.605, 511.613, and 511.614, as cited in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

Since this decision changes the grade of the appealed position, it is to be effective no later than the beginning of the sixth pay period after the date of the decision, as permitted by 5 CFR 511.702. The applicable provisions of parts 351, 432, 536, and 752 of title 5, Code of Federal Regulations, must be followed in implementing the decision. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented. 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:

[appellant]

[servicing human resources office]

Introduction

On December 2, 2005, the Center for Merit System Accountability (formerly the Center for Merit System Compliance) of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who is employed as an Auditor, GS-511-13, in the Office of the Inspector General (OIG) at the [agency] in [city and State]. [Appellant] requested that his position be classified at the GS-14 level. We accepted and decided this appeal under the provisions of section 5112 of title 5, United States Code.

We conducted a desk audit with the appellant on February 16, 2005, including an interview with his supervisor, [name], (Inspector General). We decided this appeal by considering the audit findings and all information of record furnished by the appellant and his agency, including his official position description [number], and other material received in the agency administrative report on January 9, 2006.

Position information

The appellant performs financial audits and reviews, including the annual audit of [agency] financial statements in accordance with the Chief Financial Officers (CFO) Act of 1990 and the Accountability of Tax Dollars Act of 2002. The purpose of this audit is to ensure that the agency's financial data conforms to accepted accounting principles and relevant laws, regulations, and financial system requirements, and that effective internal controls over financial reporting and assets are in place. The appellant also conducts performance audits and reviews to determine whether programs are achieving the desired level of results.

Series determination

The position is correctly assigned to the Auditing Series, GS-511, which covers positions that apply professional accounting and auditing knowledge to the systematic examination and appraisal of financial records and related documents and systems. Neither the appellant nor the agency disagrees.

Title determination

The authorized title for nonsupervisory positions in this series is Auditor.

Grade determination

The appellant's work related to the conduct of financial audits, i.e., work that requires professional accounting and auditing skills, was evaluated by comparison to the grade-level criteria contained in the Job Family Position Classification Standard (JFS) for Professional and Administrative Work in the Accounting and Budget Group, GS-500. This standard is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade conversion table provided in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a

position 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, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

The appellant's other work involving the conduct of program performance audits, i.e., work that does not involve review of the financial aspects of the programs and does not require the professional accounting skills that serve as the foundation of the GS-511 occupation, was evaluated by use of the Administrative Analysis Grade Evaluation Guide. This guide is designed specifically to evaluate staff analytical, planning, and evaluative work concerned with the administrative and operational aspects of agency programs, where the work requires a high degree of qualitative and/or quantitative analytical skills, the ability to research problems and issues, written and oral communications skills, and the application of mature judgment in problem solving. This guide is also written in the FES format.

Evaluation using the GS-500 JFS

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.

The knowledge required by the appellant's position matches Level 1-7. At that level, work requires comprehensive professional knowledge of accounting and auditing theories, practices, and methods and the organization's policies, practices, and functions sufficient to develop or modify methods and techniques to resolve a variety of auditing problems. The JFS provides the following examples of Level 1-7 auditor assignments:

- Reviewing an organization's appropriation accounts maintained at an installation's finance and accounting office. Accounts cover such activities as operations and maintenance; research, development, test, and evaluation; foreign military sales; and new construction. Identifying any overspending and the propriety of obligations and expenditures.
- Developing methods to isolate and identify conditions affecting mission capability, susceptibility to fraud, and the potential for increased efficiency. Assessing the potential to reduce cost in a variety of programs, projects, and functions such as information technology, financial management, acquisition, and logistics systems.

For the past three years, the appellant has been responsible for conducting the annual audit of the agency's financial statements and preparing the CFO audit report for submission to the Office of Management and Budget (OMB). The purposes of this audit are to ensure that the agency's financial statements and financial management systems conform to generally accepted accounting principles and statutory requirements and that appropriate internal controls are in place to ensure financial integrity. This involves conducting a detailed analysis of the agency's major accounts and verifying the balances as supported by general ledger entries and source

documents (e.g., payroll system transactions, contracts, purchase orders, travel vouchers, and other records). The appellant traces transactions on a sample basis through the entire budgetary and accounting process to ensure that figures are complete, consistent, and accurate throughout by reviewing journal entries that feed into the general ledger and testing them for accurate recording through the system and then back to the actual source documents, focusing on major dollar accounts such as payroll, rent, and credit card purchases. In order to verify the adequacy of internal controls, the appellant reviews the system of authority and accountability, separation of duties to ensure that no one individual controls all aspects of a transaction, and other management aspects such as the system for approvals, authorizations, and reconciliations, and documentation and system controls such as security, back-up systems, and edit checks.

This work is consistent with Level 1-7 criteria in that it involves analyzing the agency's accounting system using conventional auditing techniques in order to verify accuracy of reporting and the maintenance of adequate internal controls. This assignment contains elements of both examples described above in their references to reviewing an organization's appropriation accounts for propriety of obligations and expenditures (comparable to conducting an account analysis to verify the accuracy of the agency's financial statements), and identifying conditions affecting susceptibility to fraud (i.e., assessing the adequacy of internal controls).

The position does not meet Level 1-8. At that level, work requires mastery of the theory, concepts, principles, and practices of accounting and financial and performance auditing to conduct difficult assignments involving interfaces and interrelationships between and among programs, systems, or policies. The standard provides the following examples of Level 1-8 auditor assignments:

- Serving as the agency technical expert in a wide variety of agency audit program management functions, including developing agency guidance in audit program areas and establishing review criteria to improve the efficiency of audit activities.
- Conducting broad audit assignments requiring integrated analysis of a number of different accounting systems, including choosing the audit areas to be covered and planning audit efforts in different locations and at different organizational levels, where the audits may target highly controversial problems, require an extended period of time to complete (e.g., more than one year), and involve shaping major programs or compliance with new legislation.

The [agency] is a small agency with about 450 employees. The appellant reported that approximately 85 percent of the agency budget is consumed by salaries and associated expenses, with the remainder devoted primarily to the purchase of computer and laboratory equipment and product samples for testing. The appellant is the sole auditor in the agency's OIG office. This work setting does not permit performance of the types of assignments expected at Level 1-8. First, given that the appellant is the agency's only auditor, there is no opportunity for him to perform audit program management functions such as developing agency guidance and review criteria for use by other auditors. Second, the relatively small size of the agency effectively precludes the conduct of the broad audit assignments described at that level, e.g., assessing different accounting systems in varying locations and at multiple organizational levels. In

contrast to the Level 1-8 examples above, the CFO audit conducted by the appellant is not designed to target controversial areas nor have any such issues been encountered given the relatively limited mission of the agency and its salary-driven budget. This is a relatively short-duration project in that the appellant reported that it commences in July of each year for completion before the mid-November due date for submission to OMB. Further, the agency uses one accounting system, a module of the Federal Financial System maintained by the Department of the Interior, rather than the multiple systems that would support Level 1-8 auditing work.

Level 1-7 is credited (1250 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, and the review of completed work.

The level of responsibility under which the appellant works is comparable to Level 2-4. At that level, the supervisor outlines overall objectives and available resources. The employee and supervisor, in consultation, develop the scope of the assignment and possible approaches. The employee is fully experienced in the field and is considered a technical authority with responsibility for planning and carrying out the work, directing other functional specialists, resolving conflicts that arise, coordinating with others as necessary, interpreting policy and regulatory requirements, developing changes to plans and methodologies, and providing recommendations for improvements. The employee keeps the supervisor informed of progress and potentially controversial matters. Completed work is reviewed for soundness of approach, effectiveness in meeting requirements, and the feasibility of recommendations.

This fully represents the type and level of supervision under which the employee works. The appellant's supervisor makes the assignments and determines their scope. The appellant, being the sole accountant in the office, operates with great technical autonomy in the conduct of the work but provides weekly status reports to the supervisor. Draft audit reports are reviewed by the supervisor for overall soundness and acceptability.

The position does not meet Level 2-5. At that level, the supervisor provides administrative and policy direction in terms of broadly defined missions or functions of the organization. The employee is responsible for a significant program or function. The employee defines objectives, interprets policy promulgated by authority senior to the immediate supervisor, and determines their effect on program needs. The employee independently plans, designs, and carries out the work to be done and is a technical authority. The supervisor's review of the work covers such matters as fulfillment of program objectives and the effect of advice, influence, or decisions on the overall program. The supervisor usually evaluates the employee's recommendations for new systems, methods, projects, or program emphasis in light of availability of funds, personnel, equipment capabilities, priorities, and available resources. The supervisor rarely makes significant changes to the employee's work.

Factor 2 is designed to measure not only the degree of independence with which the employee operates but also the extent of responsibility inherent in the assignment. The level of

responsibility exercised is directly related to the nature of the work being performed. Within this context, implicit at Level 2-5 is a significant degree of program management authority, i.e., the employee is responsible not only for individual performance of certain assigned tasks but also for the overall conduct of a broader program or function. This program or function must be of sufficient size and scope to permit the implementation of “new systems or projects” requiring consideration of funding and staffing needs. In contrast, the appellant is responsible only for carrying out defined audit assignments determined by his supervisor. Regardless of how independently he works in completing these assignments, they do not individually constitute programs nor does the appellant function as a program manager with responsibility for policy definition, development of program objectives and priorities, and the attendant funding, personnel, and equipment needs.

Level 2-4 is credited (450 points).

Factor 3, Guidelines

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

The guidelines used by the appellant match Level 3-4. At that level, guidelines and policies are scarce and general in nature, and are stated in terms of goals to be accomplished rather than the approach to be taken. These include such guidelines as OMB circulars and directives, Department of the Treasury regulations, Comptroller General decisions, and broad agency program goals and policy statements. The employee must develop specific objectives and devise new methods and techniques for identifying trends and patterns, acquiring information and analyzing data, or developing solutions and presenting findings.

There are no specific guidelines covering the conduct of CFO audits. These audits must be performed in accordance with Government accounting standards and must include tests of internal controls and compliance with applicable laws and regulations. The procedures and methodologies by which to accomplish this are developed by the appellant.

The position does not meet Level 3-5. At that level, guidelines consist of broad policy statements, basic legislation, laws, and agency goals. Often the guidelines originate with more than one Federal department or agency. They may require extensive interpretation to effect agency-specific policy statements, regulations, and instructions, such as financial management policy for use throughout a department or throughout the government, or guidelines on auditing contracts or regulated industries that apply governmentwide. Often the employee has peer recognition as a technical authority in the field with responsibility for developing policy, standards, and guidelines for use by other accountants or auditors within agencies or within functional areas that cross agency lines.

This level involves analyzing and interpreting broad policy statements and legislation for the purpose of developing agency-specific or governmentwide implementing guidance for use by other accountants or auditors, i.e., it requires developing guidelines for use by others. This is not applicable to the appellant’s situation given the limited scope of his audit program.

Level 3-4 is credited (450 points).

Factor 4, Complexity

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

The complexity of the appellant's work is comparable to Level 4-4. At that level, work consists of varied duties that require applying many different and unrelated processes and methods to a broad range of activities or to activities that entail substantial depth of analysis. The employee must originate new techniques, establish criteria, and develop new information to plan, coordinate, and conduct audits and develop reports on work processes and accounting systems. The employee must resolve problems that require considerable innovation and originality, such as deciding which aspects of program operations to evaluate and the approaches to use in collecting and structuring data; determining the nature and extent of problem areas; developing recommendations from among a variety of solutions; and presenting critical findings to management.

This basically characterizes the level of complexity inherent in the appellant's work. Conduct of the CFO audit entails substantial depth of analysis as it involves detailed account analysis of the agency's financial statements. The work involves the full range of audit activities expected at this level, from defining target areas, devising approaches, and identifying problems, to developing recommendations.

The position does not meet Level 4-5. At that level, work consists of varied duties that require resolving particularly difficult and complex problems in highly responsible circumstances and involve problem definition, intensive planning, coordination of many activities, and comprehensive analysis of a great variety of functions and operations. An example provided in the JFS of Level 4-5 work involves conducting audits of agency financial management programs, operations, and activities, where the work involves developing individual audit programs and plans covering such matters as functional responsibilities, specific project assignments, audit objectives and requirements, references, formats for data display and reports, and special instructions for contingencies. The work is complicated by the sensitivity of the issues, the range of audit targets, the judgment needed to define audit boundaries, and the lack of information on potential findings and their impact on audit schedules and resource allocations.

Although the appellant carries out functional responsibilities similar to those described at this level, the organizational setting in which he operates cannot support an equivalent level of complexity. The appellant carries out discrete audit projects that are by nature of limited scope and complexity given the size of the organization. Therefore, the planning and coordination required is considerably less than expected at this level, since the work does not entail developing plans, instructions, and project assignments for other auditors involved in the studies. Although the appellant's supervisor allows him considerable technical latitude, the appellant is not responsible for defining audit targets and boundaries or developing the overall audit program.

Level 4-4 is credited (225 points).

Factor 5, Scope and effect

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

The scope and effect of the appellant's work match Level 5-4. At that level, work involves establishing criteria and other means to assess a variety of unusual problems and conditions involving a wide range of agency activities. This may include developing audit approaches to evaluate a variety of programs and accounting systems, where the approaches vary widely because of the variability of programs and systems, and preparing audit reports to identify deficiencies or problems and recommend corrective actions.

The appellant, through his auditing of the agency's financial statements for production of the annual CFO report, evaluates the agency's entire financial activities to ensure conformance to generally accepted accounting principles and effective internal controls. This is consistent with Level 4-4 above, where the employee prepares audit reports covering a wide range of agency activities.

The position does not meet Level 5-5. At that level, work involves isolating and defining unknown conditions, resolving critical problems, and developing new theories. An example of Level 5-5 auditing work provided in the JFS involves studying and integrating the findings of a number of audit efforts to define audit targets or develop audit criteria or new approaches for use by other auditors; providing expert advice to other auditors on interpreting and applying regulations to controversial problems; and preparing audit plans or guidelines for the comprehensive examination of entire functional areas. At this level, the employee makes recommendations or influences decisions on programs of such scope as the development, acquisition, and deployment of major strategic weapons systems, the administrative delivery of a national social insurance program, or the administration of a major national grant-in-aid program.

This level applies to auditing work performed within the context of a large agency or program such that the scope of the work is not limited to the conduct of individual, self-contained assignments (as at Level 5-4), but rather relates to or influences the work of other auditors either involved in broad studies or at subordinate organizational levels. At this level, the work involves auditing complex, large-scale programs. In the appellant's case, he is the sole auditor for a small agency with no subordinate organizational levels. This work situation does not permit the performance of such work as developing audit plans for use by other auditors or providing interpretive guidance for the conduct of auditing activities, nor does it allow for the degree of programmatic scope expected at this level. Further, the outcome of the appellant's audits is to verify reporting accuracy rather than to influence financial decisions on large-scale programs.

Level 5-4 is credited (225 points).

Factor 6, Personal contacts

and

Factor 7, Purpose of contacts

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

Persons contacted

The appellant's personal contacts match Level 3, where contacts are with employees throughout the employing agency and with representatives of other agencies, such as OMB.

Correspondingly, in the course of conducting audits, the appellant has contacts with managers and employees throughout [agency]. He also has occasional contact with staff at other agencies, such as OMB and GAO.

Level 4 is not met, where there is recurring face-to-face telephone or email contact with high-ranking officials at national or international levels in highly unstructured settings, such as Congressional appropriations committee members, Presidential advisors, cabinet level appointees of major departments, or nationally recognized representatives of the news media on financial matters of national significance.

The appellant has no contacts of this nature. His position neither requires nor would he be authorized to conduct direct personal contact with Congressional appropriation committees, Presidential advisors, or other individuals of equivalent stature. Further, any occasional contacts that the appellant may have with the news media are routine and do not involve highly significant agency financial matters, which would be handled by higher level management and public affairs staff.

Purpose of contacts

The purpose of the appellant's contacts is consistent with Level B, where contacts are to plan, coordinate, and advise on work efforts and to obtain data. At this level, though differences of opinion may exist, the persons contacted are usually working toward a common goal and are generally cooperative.

Level C is not met, where contacts are to influence or interrogate persons or groups when there is wide disagreement on the merits of a proposed action, or when the persons contacted are fearful or uncooperative. For example, this may involve persuading representatives of an audited organization to accept critical or controversial observations, findings, and recommendations when the representatives are reluctant to agree that costly errors were made, that corrective action is required, or that suggestions for change will improve operations.

There is no indication that the appellant's financial audits involve these elements of controversy or contentiousness. They have not included critical or controversial observations engendering wide disagreement within the agency. They have generally certified the soundness of the agency's financial statements and have met with management concurrence. In fact, management

(as represented by the head of the agency's financial division) provided no comments in response to the three annual CFO audit reports that the appellant has prepared. This is not indicative of the contested findings and recommendations that serve as catalyst for the types of interpersonal contacts described under Level C.

Level 3B is credited (110 points).

Factor 8, Physical demands

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

The position matches Level 8-1, where work is primarily sedentary.

Level 8-1 is credited (5 points).

Factor 9, Work environment

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

The position matches Level 9-1, which describes a typical office environment.

Level 9-1 is credited (5 points).

Summary

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-7	1250
Supervisory Controls	2-4	450
Guidelines	3-4	450
Complexity	4-4	225
Scope and Effect	5-4	225
Personal Contacts		
Purpose of Contacts	3B	110
Physical Demands	8-1	5
Work Environment	9-1	<u>5</u>
Total		2720

The total of 2720 points falls within the GS-11 range (2355-2750) on the grade conversion table provided in the standard.

Evaluation using the Administrative Analysis Grade Evaluation Guide

Factor 1, Knowledge required by the position

At Level 1-7, assignments require knowledge and skill in applying analytical and evaluative methods and techniques to issues or studies concerning the efficiency and effectiveness of program operations carried out by administrative or professional personnel, or substantive administrative support functions (i.e., internal activities or functions such as supply, budget, procurement, or personnel). This knowledge is used to evaluate and recommend ways to improve the effectiveness and efficiency of work operations through new or modified work methods, organizational structures, management processes, staffing patterns, guidelines and procedures, or automating work processes.

The appellant has conducted the following program audits over the course of the past three years:

- An audit of the agency's occupant emergency program for compliance with applicable laws and General Services Administration (GSA) regulations, which mandate that procedures be in place for employee evacuation of the building during an emergency.
- An audit of field operations to assess the effectiveness of the flexiplace program and ensure that internal controls are in place to prevent fraud, waste, abuse, or mismanagement of agency resources. (The agency's field structure is comprised of three regions with a total of about 125 geographically dispersed employees, the majority of whom are administratively assigned to a Regional Center Office but actually work from their homes.)
- An audit of the agency's purchase card program to determine whether adequate controls are in place to ensure that purchase cards are used only for authorized purposes and that payments are made to the purchase card contractor in accordance with the Prompt Payment Act. This audit is currently ongoing.

These audits are consistent with Level 1-7 criteria in that they involve studying the effectiveness of substantive administrative support functions (e.g., the purchase card program) and internal activities (the flexiplace and occupant emergency programs), and recommending ways in which they could be improved through the implementation of new management processes (such as monthly monitoring of travel card purchases and regular inventories of accountable property) and the development of more detailed guidelines and procedures.

In contrast, Level 1-8 is the level of the expert analyst who has mastered the application of a wide range of qualitative and/or quantitative methods for the assessment and improvement of program effectiveness or the improvement of complex management processes and systems. This level requires comprehensive knowledge of the range of administrative laws, policies, regulations, and precedents applicable to the administration of one or more important public programs, the sequence and timing of key program events and milestones, and methods of evaluating the worth of program accomplishments. This knowledge is used to design and conduct comprehensive management studies where the boundaries are extremely broad and difficult to determine in advance, or to prepare recommendations for legislation to change the way programs are carried out. The guide provides the following example of Level 1-8 work:

- Expert knowledge of analytical and evaluative methods plus a thorough understanding of how regulatory or enforcement programs are administered to select and apply appropriate program evaluation and measurement techniques in determining the extent of compliance with rules and regulations issued by the agency, or in measuring and evaluating program accomplishments. This may include evaluating the content of new or modified legislation for projected impact upon the agency's programs or resources.

In its references to "agency program goals and objectives," "key program milestones," and "important public programs," Level 1-8 relates to the analysis of an agency's mission-oriented or line program accomplishments rather than its administrative support functions or other peripheral activities. The appellant, in contrast, does not analyze and evaluate the agency's line program work (i.e., the work directly associated with the regulatory functions that form the basis of the agency's mission). Rather, his program audits have related to the types of administrative and associated activities that are specifically referenced under Level 1-7.

Level 1-7 is credited (1250 points).

Factor 2, Supervisory controls

At Level 2-4, within a framework of priorities, funding, and overall project objectives, the employee and supervisor develop a mutually acceptable project plan identifying the work to be done, the scope of the project, and deadlines for completion. The employee is responsible for planning and organizing the study, coordinating with staff and line management, and conducting all phases of the study, keeping the supervisor informed of potential controversies or problems with widespread impact. Completed reports or recommendations are reviewed by the supervisor for compatibility with organizational goals and effectiveness in achieving intended objectives. Completed work is also reviewed critically outside the employee's office by staff and line management officials whose programs and employees would be affected by the recommendations.

This describes the manner in which the appellant operates. The appellant's supervisor decides what audit projects will be undertaken each year and their objectives, with the appellant's input. The appellant carries out the work independently but provides weekly status reports to the supervisor. The supervisor reviews draft audit reports for policy considerations related to any recommendations made by the appellant.

At Level 2-5, as a recognized authority in the analysis and evaluation of programs, the employee is subject only to administrative and policy direction concerning overall project priorities and objectives. The employee is delegated complete responsibility and authority to plan, schedule, and carry out major projects concerned with the evaluation of programs or organizational effectiveness. Recommendations are normally reviewed by management officials only for potential influence on broad agency policy objectives and program goals. Findings and recommendations are normally accepted without significant change.

As in the corresponding level in the GS-500 JFS, the degree of responsibility and authority described at this level are associated with program management rather than the staff work performed by the appellant.

Level 2-4 is credited (450 points).

Factor 3, Guidelines

At Level 3-3, guidelines consist of standard reference material, instructions, and manuals covering the subjects involved (e.g., organizations, equipment, procedures, policies, and regulations). At this level, the subject studied is covered by a wide variety of administrative regulations and procedural guidelines. The employee researches the regulations and determines program effectiveness.

This basically describes the guidelines governing the activities audited by the appellant. These programs are well-covered by administrative regulations and procedural guidelines. The appellant reviews these guidelines to determine the degree to which program operations conform to their requirements and intent.

At Level 3-4, guidelines consist of administrative policies and management and organizational theories which require considerable adaptation and interpretation. 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.

The programs audited by the appellant represent established administrative activities covered by clear regulatory guidelines with minimal room for interpretation. Further, the appellant's position involves measuring the extent of compliance with established guidelines rather than developing implementing regulations for program administration.

Level 3-3 is credited (275 points).

Factor 4, Complexity

At Level 4-4, the work involves gathering information, identifying and analyzing issues, and developing recommendations to resolve problems of effectiveness and efficiency of work operations in a program or program support setting. The guide provides the following example of Level 4-4 work:

- Serves as a management advisor in the bureau headquarters of an agency (or equivalent organization) with responsibility for performing a range of analytical studies and projects related to field program operations in the areas of management and productivity improvement (including effectiveness of work methods, manpower utilization, and distribution of functions); management controls; and work planning. The work requires detailed planning to conduct information gathering; interpretation of administrative

records and reports; correlation of information to corroborate facts; and coordination with management representatives.

This matches the level of complexity inherent in the appellant's projects. He analyzes and evaluates relatively confined activities of a program support nature to determine their degree of operational effectiveness and regulatory compliance. These projects are consistent with the Level 4-4 example above in that he serves as an advisor in the agency headquarters office and conducts a range of studies related to such considerations as the effectiveness of work methods, manpower utilization, and management controls.

At Level 4-5, the work consists of projects and studies which require analysis of interrelated issues of effectiveness, efficiency, and productivity of substantive mission-oriented programs. Typical assignments require developing detailed plans, goals, and objectives for the long-range implementation and administration of the program, and/or developing criteria for evaluating the effectiveness of the program. The guide provides the following example of Level 4-5 work:

- Assignments require analysis of interrelated issues of effectiveness, efficiency, and productivity affecting major administrative programs of an agency. Studies are often complicated by the need to consider and evaluate the impact of changes in legislative and regulatory requirements; long-range program goals and objectives; political, economic, and social consequences of changes in the type or amount of services provided; or the changing nature of the program's clients and beneficiaries. Difficulty characteristic of this level is encountered in planning and establishing the long-range (more than 5 year) program goals, objectives, and measurement criteria.

The appellant's audit projects do not approach this level of complexity. He does not evaluate the effectiveness and productivity of the agency's line programs but rather of limited support functions. He does not develop long-range plans for program administration. His work focuses on compliance with administrative regulations rather than the broader and more intangible considerations of program goals and overall effectiveness and productivity.

Level 4-4 is credited (225 points).

Factor 5, Scope and effect

At Level 5-4, the purpose of the work is to assess the productivity, effectiveness, and efficiency of program operations or administrative support activities at different echelons and/or geographic locations within the organization. The guide provides the following example of Level 5-4 work:

- Conducts interviews with employees who carry out administrative programs and performs non-financial audits of program and administrative records to determine compliance with agency program and administrative policies and regulations, to assess staff utilization, and to evaluate effectiveness of program administration. Prepares formal reports of violations detected involving possible fraud, waste, or abuse.

This essentially matches the role the appellant played in, for example, reviewing the administration of the agency's flexiplace program to determine effective staff utilization and the maintenance of controls to prevent abuse, and the occupant emergency program to determine compliance with GSA regulations.

At Level 5-5, the purpose of the work is to analyze and evaluate major administrative aspects of substantive, mission-oriented programs. This may involve, for example, the development of long-range program plans, objectives, and milestones, or the evaluation of programs conducted throughout a bureau or service of an independent agency, a regional structure of equivalent scope, or a large complex multi-mission field activity. The work involves identifying ways to resolve problems which directly affect the accomplishment of principle program goals and objectives (e.g., the delivery of program benefits or services). The guide provides the following example of Level 5-5 work:

- Conducts region-wide studies and evaluations of social programs administered by different organizations within the agency. The work involves isolating, identifying, and recommending solutions to critical problems affecting the administration of important national social programs and the attainment of agency program goals and objectives. Program evaluations often serve as the basis for substantive changes in the organization and administration of programs affecting substantial numbers of people.

The appellant has not conducted any projects that would have an equivalent degree of direct impact on the accomplishment of the agency's line program goals through, for example, the development of program plans and milestones.

Level 5-4 is credited (225 points).

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

Persons contacted

The appellant's personal contacts match Level 3, where contacts may include the head of the agency or program officials several managerial levels removed from the employee. In conducting program audits, the appellant has contacts with top management of the agency.

Level 4 is not met, where contacts are with other agency heads or top congressional staff. The appellant has no contacts of this nature.

Purpose of contacts

The purpose of the appellant's contacts is consistent with Level c, where contacts are to influence managers and other officials to accept and implement findings and recommendations on organizational improvement or program effectiveness. This is inherent in the types of program performance audits conducted by the appellant.

Level d is not met, where contacts involve justifying or settling matters involving significant or controversial issues, e.g., recommendations affecting major programs, dealing with substantial expenditures, or significantly changing the nature and scope of organizations. Because the appellant's projects do not relate directly to the substantive work of the agency, they do not address elements that would involve these types of considerations.

Level 3c is credited (180 points).

Factors 8 and 9 are the same as in the GS-500 JFS above.

Summary

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-7	1250
Supervisory Controls	2-4	450
Guidelines	3-3	275
Complexity	4-4	225
Scope and Effect	5-4	225
Personal Contacts		
Purpose of Contacts	3c	180
Physical Demands	8-1	5
Work Environment	9-1	<u>5</u>
Total		2615

The total of 2615 points falls within the GS-11 range (2355-2750) on the grade conversion table provided in the standard.

Decision

The appellant's financial and program audits are both evaluated at the GS-11 level. Therefore, the appealed position is properly classified as Auditor, GS-511-11.