

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

Appellant: [name]

Agency classification: Program Analyst
GS-343-12

Organization: Office of Human Resources
Administration and Resource
Management
[agency]
[city and State]

OPM decision: Program Analyst
GS-343-12

OPM decision number: C-0343-12-07

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

November 30, 2007

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 the conditions and time limits specified in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[appellant]

[servicing human resources director]

Introduction

On March 22, 2007, the Center for Merit System Accountability, U.S. Office of Personnel Management (OPM), accepted a position classification appeal from [appellant], who occupies the position of Program Analyst, GS-343-12, in the Office of Human Resources, Administration and Program Management, at the [agency] in [city and State]. She requested that her position be classified at the GS-13 level. We accepted and decided this appeal under the provisions of section 5112 of title 5, United States Code (U.S.C.)

General issues

The appellant indicated that she is performing the same duties as the two other project officers in the office, one of whom is a GS-13 and the other a GS-14. By law, we must decide the appeal solely by comparing the appellant's 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 other positions 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. Under the authority of section 511.612 of title 5, Code of Federal Regulations, OPM may require a consistency report when, in the adjudication of an appeal, it finds reason to believe identical, similar, or related positions may be classified inconsistently with the appealed position. This action is not required in this appeal. Each of the three project officers is assigned oversight for two grantee organizations and is responsible for processing and administering the associated block of grants. However, each project officer is also assigned other disparate responsibilities. The GS-14 project officer is responsible for negotiating interagency agreements with other Federal and State agencies. The GS-13 project officer is responsible for developing policy guidelines and operational procedures for the program. The appellant is responsible for serving as liaison on human resources issues pertaining to any of the program's enrollees. Since the two other project officer positions are not essentially identical to the appellant's position, our tasking of a consistency review is neither necessary nor appropriate.

Position information

The appellant serves as project officer for approximately 30-40 active and proposed grants in the Senior Environmental Employment (SEE) Program. Under this program, [agency] provides grants to certain nonprofit organizations to place individuals age 55 and over in assignments that support pollution prevention, abatement, and control. [Agency] also accepts funding through interagency agreements to provide SEE enrollees to other Federal and State agencies to assist with their environmental activities. The enrollees are actually employed by the grantee organizations and the grants provide for payment of their salaries, benefits, and other administrative expenses.

In this capacity, the appellant serves in effect as liaison between the funding organizations (i.e., the offices in which the enrollees are employed), the grantee organizations, and the [agency] grants office which actually awards the grants and controls the release of funds. The appellant's

role is to monitor the grants and ensure that they are operating properly. Her major ongoing responsibilities include reviewing grant proposals to ensure funding is sufficient and expenses are appropriate, analyzing quarterly financial status reports to ensure accuracy and resolving discrepancies, monitoring expenditures against the incremental budget and tracking the availability of funds through the duration of the grant, and ensuring the funds from ending agreements have been spent prior to implementing new agreements. She performs occasional special projects, but these projects are non-recurring and typically constitute a relatively minor portion of her time and thus do not influence the grade of the position.

We conducted an on-site desk audit with the appellant on August 14, 2007, and subsequent telephone interviews with her team leader and supervisor of record. We decided this appeal by considering the audit findings and all other information of record furnished by the appellant and her agency, including her official position description and other material received in the agency administrative report on May 1, 2007. The appeal record contains additional descriptive information which, along with the official PD, contains the major duties and responsibilities assigned to and performed by the appellant, and we incorporate it by reference into our decision.

Series and title determination

The appellant's position is correctly assigned to the GS-343 Management and Program Analysis Series. This series covers staff administrative analytical and evaluative work related to the effectiveness and efficiency with which agencies carry out their assigned programs and functions. Insofar as the appellant's work focuses on whether her assigned grants are being implemented in a timely and cost-effective manner, her position is properly titled as Program Analyst, which applies to positions involved in analyzing and evaluating the effectiveness of line or operating programs.

Grade determination

Positions in the GS-343 series are evaluated by reference to the Administrative Analysis Grade Evaluation Guide. This guide 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.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information an employee must understand in order to do the work, and the skills needed to apply that knowledge.

At Level 1-7, work requires knowledge and skill in analyzing and evaluating the efficiency and effectiveness of program operations carried out by administrative or professional personnel, or substantive administrative support functions such as supply, budget, procurement, or human resources which facilitate line or program operations. This level includes knowledge of pertinent laws, regulations, policies, and precedents which affect the use of program and related support resources (people, money, and equipment).

Level 1-8 is the level of the expert analyst who has mastered the application of a wide range of qualitative and quantitative methods for the assessment and improvement of program effectiveness or the improvement of complex management processes and systems. This knowledge is applied in carrying out such assignments as designing and conducting comprehensive management studies where the boundaries are extremely broad and difficult to determine in advance; preparing recommendations for legislation to change the way programs are carried out; or evaluating new legislation for potential program impact and to translate it into program actions and services. The proposals made involve substantial agency resources or require extensive changes in established procedures.

The distinction between Levels 1-7 and 1-8 is that Level 1-7 describes operational-type assignments where the employee analyzes and evaluates existing program activities from the standpoint of resource usage, whereas Level 1-8 describes much broader staff responsibilities involved with defining and implementing major changes in program activities or services. In other words, Level 1-7 relates more to case-based assignments directly associated with the operating work of the organization while Level 1-8 is concerned with issues related to how the program itself functions, such as developing legislative proposals or program directives. Within this context, the appellant's work is analogous to Level 1-7 in that she analyzes and evaluates individual grant proposals and reporting documents and serves as liaison on individual personnel issues affecting enrollees. She does not have any broader responsibilities that directly affect the overall scope, design, or requirements of the program. Her work is confined to ensuring established administrative requirements are met rather than developing and defining major changes in program activities or services.

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.

At Level 2-4, within a framework of priorities, funding, and overall objectives, the employee and supervisor develop overall work plans covering requirements, scope, and deadlines. Within these overall parameters, the employee is responsible for planning and organizing the work, estimating costs, coordinating with staff and management, and conducting all phases of the work. The employee keeps the supervisor informed of potential controversies or problems with widespread impact. Completed work is reviewed for compatibility with organizational goals and effectiveness in achieving objectives.

At Level 2-5, the employee is a recognized authority in the analysis and evaluation of programs and issues, subject only to administrative and policy direction concerning overall priorities and objectives. The employee is typically delegated complete responsibility and authority to plan, schedule, and carry out major projects, and exercises discretion in determining whether to broaden or narrow studies. The employee's analyses and recommendations are normally reviewed only for potential influence on broad agency policy objectives and program goals.

Level 2-4 describes work carried out with a high degree of independence and recognized expertise and as such fully represents the manner in which the appellant operates. Level 2-5 recognizes not only independence of action, but also the degree of responsibility and authority inherent in the work as the context for the independence exercised. Level 2-5 is predicated on responsibility for independently planning and carrying out major program activities or projects, with only broad administrative and policy direction. Because the parameters of the work are not clearly defined, the employee has the authority to determine the most productive areas of endeavor. In contrast, the appellant carries out ongoing operational activities, the content and boundaries of which are well-established. The nature of her work is not such that it would permit the exercise of this level of responsibility and authority, which is properly credited to the head of a program or function.

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.

At Level 3-4, guidelines consist of general administrative policies, the program goals and objectives of the organization, and various administrative controls or targets relating to resource usage. At this level, policies and precedents provide a basic outline of the results desired, but do not go into detail as to the methods that should be used.

At Level 3-5, guidelines consist of basic administrative policy statements or initiatives, laws, or court decisions. The employee interprets and revises existing policy and regulatory guidance for use by others within or outside the employing organization. Some employees review proposed legislation or regulations which would significantly change the agency's programs. Other employees develop study formats for use by others on a project team or at subordinate levels.

The distinction between these two levels is that at Level 3-4, the employee *uses* the general guidelines to which the particular program is subject whereas at Level 3-5, the employee *develops* these guidelines. Corresponding to Level 3-4, the appellant applies the various rules and regulations governing grant activities to individual cases, but she does not perform the staff-level policy and regulatory development functions addressed at Level 3-5.

Level 3-4 is credited (450 points).

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of 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.

At Level 4-4, work involves gathering information, identifying and analyzing issues, and developing recommendations to improve the effectiveness and efficiency of work operations in a program or program support setting.

At Level 4-5, work consists of projects and studies requiring analysis of interrelated issues of effectiveness, efficiency, and productivity of mission-oriented programs. Typical assignments require developing detailed plans, goals, and objectives for the long-range implementation and administration of the program. The work deals less with concrete administrative processes than with subjective issues, such as the relative advantages and disadvantages of centralizing or decentralizing work operations in organizations with several echelons of geographically separated components.

The appellant's analytical work is confined to improving the effectiveness and efficiency of individual grants, consistent with Level 4-4 relating to "work operations in a program or program support setting." She does not perform any work analogous to the broad program-oriented activities described at Level 4-5; i.e., work that relates to the operation of the overall program rather than to discrete grants.

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 work products or services both within and outside the organization.

At Level 5-4, the purpose of the work is to assess the efficiency and productivity of program operations or to analyze and resolve problems in the staffing, effectiveness, and efficiency of administrative support and staff activities. At this level, work contributes to improvement of program operations and/or administrative support activities at different echelons and/or geographic locations in the organization, or may affect the nature of administrative work done in components of other agencies.

At Level 5-5, the purpose of the work is to analyze and evaluate major administrative aspects of substantive, mission-oriented programs, such as evaluating the effectiveness 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 study reports prepared contain findings and recommendations of major significance to top management of the agency and often serve as the basis for new administrative systems, legislation, regulations, or programs.

Level 5-4 relates to determining the efficiency of program or administrative activities at multiple echelons or geographic locations within an agency (i.e., discrete operating segments of the program), whereas Level 5-5 relates to the basic design, structure, or regulatory framework of the overall program. Consistent with Level 5-4, the scope of the appellant's work is limited to analyzing the content and execution of individual grants rather than the design and conduct of the overall grant program.

Level 5-4 is credited (225 points).

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

Under *Personal contacts*, the appellant's contacts match Level 3, where contacts include persons outside the agency in a moderately unstructured setting. Level 4 is not met, where contacts are with high-ranking officials, such as the heads of other agencies, top Congressional staff, mayors of large cities, or executives of comparable private sector organizations. The appellant has no contacts of this nature.

Under *Purpose of contacts*, Level c is met, where contacts are to influence managers to accept recommendations and where resistance may be encountered due to such issues as organizational conflict or resource problems. Level d is not met, as it involves settling significant or controversial matters, such as recommendations affecting major programs or substantial expenditures, which are well beyond the scope of the appellant's position.

Level 3c is credited (180 points).

Factor 8, Physical demands

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

The position matches Level 8-1, which covers sedentary work.

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 by the position	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	3c	180
Physical demands	8-1	5
Work environment	9-1	<u>5</u>
Total		2790

The total of 2790 points falls within the GS-12 range (2755-3150) on the grade conversion table provided in the standard.

Decision

The appealed position is properly classified as Program Analyst, GS-343-12.