Classification Appeal Decision Under section 5112 of title 5, United States Code		
Appellant:	[appellants et al.]	
Agency classification:	Office Automation Assistant GS-326-5	
Organization:	Medical Transcription Unit Medical Administration Services Health Administration Management [city] Health Care System Veterans Health Administration Department of Veterans Affairs [city and state]	
OPM decision:	Office Automation Assistant GS-326-5	
OPM decision number:	C-0326-05-05	

/s/ Jeffery Sumberg Jeffrey E. Sumberg Deputy Associate Director Center for Merit System Accountability

February 8, 2008

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:

Ms. [appellant] Ms. [appellant] Ms. [appellant] Medical Administration Services Health Information Management Medical Transcription Unit ([location]) [location] Department of the Veterans Affairs VA [city] Health Care System [city and state, zip code]

Ms. [chief] Chief, Human Resource Management System VA [city] Healthcare System [address] [city and state, zip code]

Mr. specialist] HR Specialist Department of Veterans Affairs [address] [city and state, zip code]

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Introduction

On December 27, 2006, the Chicago Oversight and Accountability Group (formerly the Chicago Field Services Group) of the U.S. Office of Personnel Management (OPM) accepted a group classification appeal from Mses. [appellants]. The appellants currently occupy identical additional positions, hereinafter referred to as position, classified as Office Automation Assistant, GS-326-5, in the Medical Transcription Unit of the , Medical Administration Services, Health Administration Management, [city] Health Care System (IHCS), Department of Veterans Affairs (VA), in [city and state]. The appellants believe their position should be classified as Medical Records Technician, GS-675-6. Ms. [appellant] was designated as lead appellant. On January 26, 2007, we received the initial agency administrative report (AAR), and received the last document to complete the AAR on March 30, 2007. We accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

To help decide the appeal, an OPM representative conducted a telephone audit with the lead appellant and a telephone interview with the immediate supervisor on April 3, 2007. We also contacted the second-line supervisor and made several follow up calls to the first-line supervisor to complete our fact-finding. In reaching our decision, we carefully considered the audit and interview findings and all other information of record furnished by the appellants and the agency, including the official position description (PD) which we find contains the major duties and responsibilities assigned to and performed by the appellants and we incorporate it by reference into our decision.

General issues

The appellants requested the human resources (HR) review their position; forwarding a copy of a proposed PD from the VA Health Revenue Center automated PD Library to support their request. As a result, an agency classifier reviewed their position, although he did not conduct an on-site desk audit. His evaluation was issued as an addendum to PD # ####-#] on January 9, 2007, but did not change the position's title, series, or grade. The agency classifier's statement excluded the use of the proposed PD from the PD Library submitted by the appellants because it had not been classified using OPM standards as required. When the evaluation of their PD did not result in any change, the appellants filed an appeal with OPM.

Implicit in the appellants' rationale is a concern that their position is classified inconsistently with other positions that perform similar work. By law, we must classify positions solely by comparing current duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). In adjudicating this appeal, our responsibility is to

make our own independent decision on the proper classification of their position. Since comparison to standards is the exclusive method for classifying positions, we have considered the appellants' statements only insofar as they are relevant to making that comparison; we cannot compare the appellants' position to others, which may or may not be classified correctly, as a basis for deciding this appeal. Because our decision sets aside any previous agency decision, the previous actions of the appellants' agency are not germane to the classification appeal process.

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 represents the duties and responsibilities that make up the work performed by an employee. Position classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities assigned by management and performed by the employee. An OPM appeal decision grades a real operating position, and not simply the PD. Therefore, this decision is based on the actual work assigned to and performed by the appellants.

Like OPM, the appellants' 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 appellants consider their position so similar to others that they all warrant the same classification, they may pursue the matter by writing to their agency headquarters HR office. In doing so, they 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 theirs, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to them the differences between their position and the others.

Position information

The appellants work under the direct supervision of the Chief of the Health Information Management Section (HIMS) whose position is classified as Supervisory Medical Record Administrator, GS-669-12, in the Medical Administrative Office at IHCS. The HIMS Chief manages six distinct work units designated as Coding, File Room, Records Management, Release of Information, Document Scanning, and the Transcription Unit where the appellants work. The official PD notes the unit plays a vital role in the success of good patient care services and in the revenue process by providing timely and accurate transcription of medical dictation and related general administrative support services.

The appellants spend 50 percent of their time transcribing dictation from voice recordings, other spoken material, or doctor's notes, into final typewritten copy (written format) of highly technical medical, surgical, radiological, and psychological material. They select the right system applications or formats to integrate the information into the correct database to generate regular reports, working documents, and standard forms using typical Microsoft programs such as spreadsheet, database, word processing, desktop publishing, graphics, and similar software products. They must check and verify medical terminology using available written and on-line references, contacting the specific/particular doctor to ask for clarification of either notes or dictation when needed. They must also update medical records at a doctor's request; e.g.; in cases where there is a change in diagnosis or prognosis. They upload the final

transcription of the medical record documentation into the Computerized Patient Record System (CPRS) and/or the Veterans Health Information Systems Technology Architecture (VISTA). Timeliness of transcription affects both the success of the Director's performance measures for radiology, compensation and pension exams, including the revenue/billing cycle, as well as compliance with the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) accreditation standards for risk management, patient safety, patient rights and responsibilities, and organizational ethics, and revised JCAHO standards and other directives and policies concerning inspections and surveys.

They spend about 40 percent of their time performing general administrative support duties such as managing files and records, receiving calls and responding to inquiries, and providing customers with current account information according to established policies and procedures. As necessary, they handle problems that arise when dealing with customers, resolving conflicts according to accepted practices. They regularly complete paper work as required; e.g., preparing authorization forms to transfer patients to different hospitals. In performing these duties, they must meet the needs of customers while supporting VA missions. They are expected to communicate with and treat customers (veterans and their relatives and representatives, visitors, and all VA staff) in a courteous, tactful, and respectful manner, providing information according to established VA and policies and procedures.

The remaining 10 percent of time is spent performing other miscellaneous duties, such as providing coverage for other unit duties including the control desk. They also provide the needed secretarial and transcription support for the Administrative Board of Investigations (BOI) where timeliness can be essential to the success of an investigation particularly in preserving evidence or the recall of witnesses.

In the performance of all of these duties, they have regular access to electronic files containing sensitive data which must be protected under the provisions of the Privacy Act of 1974, the Healthcare Insurance Portability and Accountability Act of 1996 (HIPPA), as well as all applicable laws, Federal regulations, and VA and VHS/RS policies. They are responsible for maintaining computer system security, including guarding the systems from unauthorized access.

Series, title, and standard determination

The agency placed the appellants' position in the Office Automation (OA) Clerical and Assistance Series, GS-326, titling it Office Automation Assistant, based on the determination their primary duties which involve office automation work, including word processing, are performed in the context of general office support. However, the appellants and their supervisor disagree. They believe their duties and responsibilities are covered by the Medical Records Technician Series, GS-675, and should be titled Medical Records Technician.

The GS-675 series includes technical support positions that perform work in connection with processing and maintaining medical records for compliance with regulatory requirements. It also covers positions that review, analyze, code, abstract, and compile or extract medical records data. The work required a practical knowledge of medical record procedures and references and the organization and consistency of medical records. Positions also require a basic knowledge of

human anatomy, physiology, and medical terminology. The record shows that while the appellants' work requires a practical knowledge of medical terminology, their work is limited to transcribing medical records for the Medical Administration Service and does not require or permit application of the broader knowledge of the complete medical record procedures and references or the organization and consistency of medical records as described in the series definition; i.e., the appellants' work does not entail processing and maintaining medical records for compliance with regulatory requirements; reviewing, analyzing, coding, abstracting, and compiling or extracting medical records data; and does not require a practical knowledge of medical records as does GS-675 work as described in the JFS. Therefore, the appellants' position is not covered by the GS-675 series.

We also considered the Medical Support Assistant Series, GS-679, which includes performing support work in connection with care and treatment given patients in wards, clinics, or other such units of a medical facility. Typical GS-679 functions include serving as receptionist, performing record keeping duties, and providing miscellaneous support to the medical staff of the unit. The work requires a practical knowledge of computerized data entry and information processing systems, the facility's organization and services, basic rules and regulations governing visitors and patient treatment, and a practical knowledge of standard procedures, medical records, and medical terminology of the unit supported. The appellants' work does not involve this type of support in connection with the care and treatment of patients as described in the JFS. Their work is performed in a medical transcription unit and involves the completeness and accuracy of the transcription of medical report information from voice lines into a personal computer. Therefore, the appellants' position is not covered by the GS-679 series.

Exclusion 3 of the GS-600 JFS specifically excludes work that involves typing or taking dictation that requires a fully qualified typist or stenographer and the performance of general office clerical work (such as answering the telephone, filing, opening and distributing mail, etc.); and suggests other series, including the Office Automation Clerical and Assistant Series, GS-326, where the primary duties involve office automation work, including word processing either solely or in combination with clerical work, when work is performed in the context of general office support. This work requires knowledge of (1) general office automation software, practices, and procedures, (2) a fully qualified typist, and (3) the ability to apply the knowledge and skills to general office support work. The appellants' position fully meets these criteria as the record indicates the primary knowledge requirements are of the capabilities, operating characteristics, and functions of the office automation software; knowledge of the capabilities and operational features of the digital dictation system; and skill and proficiency in use of VISTA/CPRS (VA's patient record system).

The position also requires the ability to accurately transcribe from the spoken word, which requires a practical knowledge of medical terminology. The Position Classification Flysheet for Office Automation (OA) Clerical and Assistance Series, GS-326, instructs that office automation work be evaluated using the Office Automation Grade Evaluation Guide (OAGEG), and other aspects of the work of positions in this series not covered by the OAGEG be evaluated by using the most appropriate position classification standard (PCS) or guide depending on the duties performed; e.g., the Grade Level Guide for Clerical and Assistance Work (the Guide) or PCSs

for specialized subject-matter work. Use of specialized terminology is addressed in both the OAGEG and the Guide. For these reasons, this position is properly assigned to the GS-326 series and, based on the following grade level determination, is titled Office Automation Assistant.

Grade level determination

The appellants' OA work is evaluated using the OAGEG. In addition, the Guide, which may be applied alone or in conjunction with other appropriate standards depending on the mix of work involved in a particular position, is used to determine the grade level of the general administrative support duties of the position.

Evaluation of OA duties:

Applying the OAGEG, the agency credited Levels 1-3, 2-2, 3-3, 4-2, 5-2, 6/7-2b, 8-1, and 9-1. Since the appellants disagree with the basis for the agency's evaluation of their position, we will assess all nine factors.

The OAGEG is written in the Factor Evaluation System (FES) format which contains nine factors to evaluate the grade level of a position. Under the FES, each factor-level description in a PCS or guide 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 covers the nature and extent of information and facts the employee must understand to do acceptable work and the nature and extent of the skills needed to apply this knowledge. To be used as a basis for selecting a level under this factor, knowledge must be required and applied.

At Level 1-3, employees are required to apply knowledge of varied and advanced functions of one software type; varied functions of more than one software type; or other equivalent knowledge of automated systems. The employee applies knowledge of software functions to produce a wide range of documents that often require complex formats, such as graphics or tables within text, to edit and reformat electronic drafts, and to update or revise existing databases or spreadsheets. Positions typically require at least one of the following bodies of knowledge and skill: the level of knowledge of software functions; knowledge of office automation systems to use several types of software for various office needs; and/or knowledge of specialized terminology to transcribe scientific or engineering reports, laboratory analyses, legal proceedings, or similar material from voice tape or handwritten drafts. Included in illustrations are knowledge of special medical, chemical, and forensic terminology and knowledge of what data are reported in certain categories to prepare material in final format, and preparation of

verbatim transcriptions from voice tapes requiring specialized knowledge of slang, foreign terms, street language, or other unusual terminology.

At Level 1-4, employees apply knowledge of the capabilities, operating characteristics, and advanced functions of a variety of types of office automation software. Knowledge is applied to select the most appropriate software type for a specific office need, to integrate different software types into a single document, to devise new methods of automated office support, to resolve problems with current automated office support methods, or to complete other nonstandard assignments using varied office automation technologies.

The appellants' work requires knowledge of office automation software comparable to Level 1-3. They use word processing software to produce a variety of documents. For example, they use database or spreadsheet software to enter, revise, sort or calculate, and retrieve data for standard reports; and use graphics software to provide graphic symbols, charts, and graphs. They transmit and receive documents and messages electronically using personal computers that are networked or linked to other computers through a local area network (LAN). They apply knowledge of the varied functions of more than one software type to produce a variety of documents and update existing databases and spreadsheets. Their office automation responsibilities include the use of word processing software (Microsoft Word) to transcribe doctors' dictation, discharge summary reports, and doctors' non-operational/operational notes; an ability to access a digital voice system to retrieve notes left by the doctor to be transcribed; and using database software (Microsoft Excel) once a month to prepare production reports for radiology, nuclear medicine, and compensation and pension examinations.

The primary purpose of their work closely matches several illustrations of work described in the OAGEG at Level 1-3. Included in these illustrations are knowledge of special medical, chemical, and forensic terminology and knowledge of what data are reported in certain categories to prepare material in final format, and preparation of verbatim transcriptions from voice tapes requiring specialized knowledge of slang, foreign terms, street language, or other unusual terminology. They also use the VISTA system which allows them to access patient records electronically to ensure transcriptions are properly reported and uploaded before final review by the doctor. They use electronic mail (Microsoft Outlook) to send and receive messages and to transmit data; and search the Internet (Internet Explorer) to identify graphics to import into Word documents, to look up medical terminology, or research medication and dosage requirements needed to complete patient records.

The position does not meet Level 1-4. The appellants' work does not require them to select the software type for a specific office need, integrate different software types into a single document, devise new methods of automated office support, or complete other nonstandard assignments. They do not need or have the need to know the capabilities, operating characteristics, and advanced functions of the different software types to resolve problems with current automated office support methods; or to develop methods for automating administrative reports as intended at Level 1-4. Instead, like at Level 1-3, their work requires knowledge of existing software to transcribe medical information, prepare them for upload into the VISTA system, and prepare periodic reports. Therefore, Level 1-3 must be assigned.

This factor is evaluated at Level 1-3, and 350 points are assigned.

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.

Supervisory control over work takes many different forms and requires careful evaluation. Routine or standardized work may appear to be performed with a high level of independence when, in fact, it is the work itself that is closely defined and prescribed. When this is the case, the employee does not have an opportunity to perform under less than general supervision. The guide does not attempt to describe all possible work situations, and any work which is the logical equivalent of that described in the total criteria for a particular grade level should be credited at that level.

At Level 2-2, the supervisor provides general instructions for standard, pre-established, or continuing tasks; e.g., priorities, deadlines, or quantity. More specific instructions are provided when they are assigned work that is unusual or more difficult. The employee works independently in carrying out continuing assignments in accordance with instructions and seeks further guidance when new or unusual assignments require deviation from established procedures or special instructions. Completed work is usually checked for compliance with procedures, technical accuracy, and appearance. Unusual work may be checked for adherence to special instructions provided.

At Level 2-3, the highest level described in the OAGEG, assignments are given with information on general administrative changes, deadlines, and priorities. The supervisor defines overall objectives for the position. The employee works independently to plan and carry out steps for completing assignments in accordance with established office instructions and practices for office automation. When current practices in an assignment cause problems, the incumbent uses initiative to resolve them, coordinating with other employees affected. Completed work is evaluated for technical soundness, usefulness, and conformance with office operating requirements and needs. The methods used to produce work normally are not reviewed.

Level 2-3 is not met. The supervisor provides general instructions for standard, pre-established, or continuing tasks; e.g., priorities, deadlines, or quantity. While the appellants work independently to plan and carry out steps for completing assignments in accordance with established office instructions and practices for office automation, they may not use their own initiative to resolve them or coordinate efforts with other employees involved in or affected by the nonstandard procedures when current practices or deviations in an assignment cause problems, and therefore, the appellants do not have an opportunity to perform under less than general supervision. Since completed work is usually checked for compliance with procedures, technical accuracy, and appearance it does not meet the characteristics described at Level 2-3. Therefore, this factor must be assigned to Level 2-2.

This factor is evaluated at Level 2-2, and 125 points are credited.

Factor 3, Guidelines

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

At Level 3-2, guidelines include both detailed step-by-step instructions for specific office automation tasks and more general procedural guidelines in the form of manufacturer's manuals and tutorials for users, agency correspondence procedures, style manuals, sample work products, etc. Employees must select and apply detailed instructions for each office automation task or function, when available. For tasks not covered by specific guidelines, they must search more general guidelines to determine the specific steps to apply. Judgment is required because of the number and similarity of guidelines or the availability of alternative procedures for accomplishing a function such as choosing which editing procedure to use, depending on the nature and extent of the changes required. Situations in which existing guidelines cannot be applied are referred to the supervisor or to an automation specialist.

At Level 3-3, which is the highest level identified for this factor in the OAGEG, general procedural guidelines, as described at Level 3-2, are available, but the guides normally include user's manuals and tutorials for several software packages of different types. Much of the work requires adaptation of available guides, such as user's manuals, to meet requirements for new tasks or to solve processing problems either encountered in the employee's own work or referred by others. Judgment is required to search manuals for methods that can be applied and to adapt those methods to specific requirements. Employees also exercise initiative and judgment in deviating from existing instructions or practices to resolve operating problems or to develop more efficient processing procedures. Frequently the methods developed become guidelines for other employees in the unit. Problems that cannot be resolved by adapting existing guidelines are referred to automation specialists.

The appellants' work exceeds that described at Level 3-2. The OAGEG notes that very specific and extensive guidelines for products may raise rather than lower the difficulty and responsibility of a position. When such guidelines are extensive and frequent reference to them would substantially reduce productivity, they increase the requirements for knowledge and judgment, for example, when the work of a position requires rigid adherence to dozens of complex formats. When strict format requirements are maintained over a wide range of documents, it is no longer practical for the worker to refer continually to the guidelines. This may increase the requirement for knowledge and the ability to select the right approach. That is the case here.

The appellants' position meets Level 3-3 because comparable to the situation described in the fourth illustration at this level, the appellants must select the most appropriate software for automating office work based on the nature of the work and the characteristics of available software types for their own work. Also, guidelines regarding medical transcription styles, forms, and practices are in accordance with the <u>American Association for Medical Transcription</u> (AAMT) Book of Style for Medical Transcription. Additional guidelines are furnished by Joint Commission on Accreditation of Healthcare Organizations (JCAHO) manuals and VA regulations for medical record documentation standards, procedure manuals, and oral and written guidelines. The appellants must use judgment in interpreting and applying appropriate guides. Internet resources are also used for research and verification of new and unusual terminology and pharmacological information. Therefore, Level 3-3 is assigned.

This factor is evaluated at Level 3-3 and credited with 275 points.

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of tasks, steps, 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 4-2, the documents, formats, and specific processing functions involved require a varying number and sequence of steps and use of different functions from one assignment to another. Some assignments involve using one type of software to create or edit a variety of standard documents requiring differing procedures and functions. Other assignments involve using two or more types of software to process different types of documents, paragraphs, tables, reports, etc., that can be combined in a number of ways and that require extensive entry of data from drafts. In deciding how to proceed, the employee must recognize differences in existing procedures and applications and make choices from among established alternatives. Processing steps and procedures required to complete assignments are varied and numerous. They differ in terms of the type of software used, the type of document or report produced, formatting requirements, and the existence of pre-recorded formats.

At Level 4-2, the employee is expected to recognize discrepancies and correct questions in such instances as improper formatting. An employee at this level maintains administrative records for the unit using an existing database. Information is selected from a variety of sources and the data entered into established electronic records. The employee determines whether the entry reflects additional data or whether it requires adjusting or deleting existing data.

At Level 4-3 the work involves using several types of software packages for different office needs. Assignments typically include a broad range of office automation duties such as using word processing and graphics software to prepare reports and briefing documents; using spreadsheet software to maintain production reports; or performing complex office automation duties requiring different approaches and methods from one assignment to another. This may involve using different word processing packages to edit lengthy and complicated technical reports and resolving incompatibility problems in transferring text from one software package to another when menu options or specific software instructions are not available.

At Level 4-3 the employee considers many factors that are varied and that are not always clearly established. These include, for example, the nature and capability of different software types or software packages of the same type; the similarities, differences, and integration compatibilities among software types and software packages; the general operations of the unit such as the source and timing of data for reports; and the current and long-term use of the subject document or report and how its use may change. In performing the work, the employee applies judgment in considering and selecting from among many different software types in light of the range and custom of the unit's information processing capabilities and requirements. The employee regularly develops methods and procedures for office automation tasks, and identifies and solves problems in existing methods or procedures.

The appellants' position meets Level 4-2. Like that level, they use several types of software for a variety of specific processing functions and steps to create different documents. For example, they use a type of software with different steps and functions that require them to apply judgment in considering and selecting which processing package to use for the unit's information capabilities and requirements. In preparing and editing medical transcriptions, they must be able to recognize discrepancies and make corrections as appropriate including contacting the appropriate care provider, if necessary. Like Level 4-2, they also use two or more types of software to process different types of documents that can be combined in a number of ways. Similarly, the appellants combine data from the Internet, tables, charts, text, and Word and Microsoft Excel to create reports and combine information into one document. The appellants' work is similar to the third illustrative example for Level 4-2 in the OAGEG describing employees who maintain administrative records for a unit using an existing database, entering data into established electronic records, and assembling information for reports.

The appellants' position does not meet Level 4-3, where they would be involved in dealing with the capability and compatibility of different software types. In contrast, their work does not regularly require the appellants to develop methods and procedures for office automation tasks, or to identify and solve problems in existing methods or procedures. Although they use different types of software in proceeding with their assignments, the appellants are not required to apply judgment to the degree where they must consider and select from among many different software types in light of the range and peculiarities of the unit's information processing capabilities and requirements as intended at Level 4-3. Therefore, Level 4-2 must be assigned.

This factor is evaluated at Level 4-2, and 75 points are credited.

Factor 5, Scope and effect

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

At Level 5-1, the purpose of the work is to perform specific, recurring tasks required to maintain electronic records such as calendars, directories, spreadsheets, and databases, and/or to produce various items such as correspondence, memos, publications, manuscripts, reports, or forms, in draft or final form according to most recent data. Production usually includes steps such as: selecting and adhering to the proper format; determining the spacing and arrangement of material; making entries to and retrieving data from electronic records; and checking references, distribution requirements, grammar, punctuation, and spelling. The services performed facilitate the work of the originators of the documents or the users of the data maintained.

At Level 5-2, the highest level identified, the purpose of the work is to collect, select, organize, and provide information in oral or written form. This may involve telephone conversations, electronic mail, reports, on-line databases, etc. The work is performed in accordance with established rules, regulations, procedures, and office automation practices. The work affects the

way in which other employees document, store, receive, or transmit information, and increases the availability and usefulness of the information involved.

The appellants' position meets Level 5-1. They transcribe medical documents and other administrative documents in final form in accordance with established rules and regulations of the medical transcription unit. The transcribed medical documents must be completed accurately and on-time in compliance with JCAHO standards. Like Level 5-1, they use the Internet and other sources to ensure the documents they produce are accurate. As at Level 5-1, the quality of the medical record facilitates the work of the originators or users of their documents.

The position meets Level 5-2 to the extent their work requires collecting, selecting, organizing, or providing information in oral or written form as described at that level. The appellants use electronic mail and an on-line database to maintain databases that are critical to doctors, administrative staff, and the multi-disciplinary treatment team in carrying out their responsibilities. However, their work does not affect the *way* other employees store, receive, and transmit information. Those are functions vested in higher level positions in the activity.

Since Level 5-2 is not fully met, Level 5-1 is assigned, and 25 points are credited.

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

Factor 6 and Factor 7 are evaluated relative to each other. The nature of the contacts, credited under Factor 6, and the purpose of those contacts, credited under Factor 7, must be based on the same contact. Credit for Factor 6 and Factor 7 is determined by reference to the chart contained in the Guide.

Personal contacts

At Level 1, personal contacts include employees within the immediate work unit or related support units such as points-of-contact and document originators. In contrast, Level 2 personal contacts include employees at various levels throughout the agency who are involved in or affected by integrating or changing automated office procedures.

The appellants' personal contacts meet Level 1 in that their regular and recurring contacts are throughout IHCS involving staff, patients, and private sector contractors (vendors). Unlike Level 2, those contacts are not within the setting characterized by integrating or changing automated office procedures throughout the agency. Instead, those affected are within IHCS and are related to the performance of specific OA assignments. Therefore, since Level 2 is not fully met, this Factor is evaluated at Level 1.

Purpose of contacts

At Level A, the purpose of contacts is to exchange information about the assignment or methods to be used to complete the assignment. For example, to clarify terminology, determine priorities or projects, discuss additions or revisions, or discuss equipment capabilities. In contrast, the

purpose of Level B contacts is to plan, coordinate, and integrate work processes or work methods for office automation between and among related work units.

Like Level A, the purpose of the appellants' contacts is to exchange information and to plan and coordinate work processes with the health care providers on specific products. As discussed previously in this decision, the appellant's are not engaged in OA work process and method changes; e.g., the selection of new office automation packages to be used within a facility. Therefore, this factor is evaluated at Level A.

Using the chart in the OAGEG, contacts at Level 1 for the purpose typical of Level A are credited with a total of 30 points.

Factor 8, Physical demands

The factor covers the requirements and physical demands placed on the employee by the work assignment, including the physical characteristics and abilities required.

Like Level 8-1 of the Guide, the appellants' work is basically sedentary and requires no special physical demands.

This factor is evaluated at Level 8-1 and credited with 5 points.

Factor 9, Work environment

This factor covers 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 of the Guide, the appellants' work involves minimal risks and observance of safety precautions typical of office settings.

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

Evaluation Summary of OAGEG FES factors

	Factor	Level	Points
1.	Knowledge required by the position	1-3	350
2.	Supervisory controls	2-2	125
3.	Guidelines	3-3	275
4.	Complexity	4-2	75
5.	Scope and effect	5-1	25
6.	Personal contacts/ 7 Purpose of contacts	1-A	30
8.	Physical demands	8-1	5
9.	Work environment	9-1	5
	Total		890

A total of 890 points falls within the GS-5 range (855-1100) on the grade-conversion chart in the OAGEG. Therefore, the appellants' office automation duties are graded at the GS-5 level.

Evaluation of general administrative support duties

The Guide provides general criteria for use in determining the grade level of non-supervisory clerical and assistance work from GS-1 through GS-7. Administrative support work of the kind described in the Guide is performed in offices, shops, laboratories, hospitals, and numerous other settings in all Federal agencies. Positions which involve the performance of technical or specialized work may also include general administrative or support duties which can be evaluated by the criteria in this guide.

The Guide covers the work of processing transactions and performing various office support and miscellaneous clerical and assistance duties within a framework of procedures, precedents, or instructions. For the purpose of applying this Guide, the terms "clerical" and "assistance" are defined as follows: Clerical: Performing work such as preparing, receiving, reviewing, and verifying documents; maintaining office records; locating and compiling data or information from files; compiling information for reports; keeping a calendar and informing others of deadlines and other important dates; and similar clerical support work within an organization. This work requires knowledge of the clerical requirements and processes involved in maintaining the functional programs of the unit. Assistance: Performing technical work to support the administration or operation of the programs of an organizational unit. This work requires a working knowledge of the work processes and procedures of an administrative field (e.g., office administration, communications, and security) and the mission and operational requirements of the unit.

The Guide describes the general characteristics of each grade level from GS-1 through GS-7 in a three-part format: (1) the definition of the grade level as spelled out in the law (5 U.S.C. 5104); (2) a description of the grade-level concept pertaining to clerical and assistance work written in narrative format in terms of two evaluation factors: Nature of Assignment (which includes the elements, knowledge required and complexity of the work), and Level of Responsibility (which includes the elements of supervisory controls, guidelines, and contacts); and (3) general work examples to illustrate each grade level. To determine the appropriate grade, all criteria must be applied (i.e., the law, the evaluation factors, and the work examples) and assigned the highest level the work being evaluated most closely matches. Weaknesses as well as strengths are considered in matching work to the grade level criteria. We also must consider, for example, under what kind of supervisory controls the work is completed, as described at each grade level, or assign a lower level if work is performed at closer than normal supervision. Routine or standardized work may appear to be performed with a high level of independence when, in fact, it is the work itself that is closely defined and prescribed. When this is the case, the employee does not have an opportunity to perform under less than general supervision.

The Guide uses two classification factors to evaluate the work of a position: (1) *Nature of assignment* which includes the knowledge required and complexity of the work, and (2) *Level of responsibility* which includes supervisory controls, guidelines, and contacts.

Nature of assignment

At the GS-4 grade level, work consists of performing a full range of standard clerical assignments and resolving recurring problems. Work consists of related steps, processes, or methods which require the employee to identify and recognize differences among a variety of recurring situations. The work requires some subject-matter knowledge of an organization's programs and operations; or a type of business practice; or a body of standardized rules, processes or operations to determine what is being done, why the action is being taken, and how it must be accomplished. Illustrative of work at the GS-4 grade is performing a variety of recordkeeping, reporting, and informational duties in support of an organization's security program. The employee compiles, maintains, and updates data, lists and reports, applying knowledge of the organization's rules and procedures.

At the GS-5 grade level, work consists of performing a full range of standard and nonstandard clerical assignments and resolving a variety of non-recurring problems. Work includes a variety of assignments involving different and unrelated steps, processes, or methods. The employee must identify and understand the issues involved in each assignment and determine what steps and procedures are necessary and the order of their performance. Completion of each transaction typically involves selecting a course of action from a number of possibilities. The work requires extensive knowledge of an organization's rules, procedures, operations, or business practices to perform the more complex, interrelated, or one-of-a-kind clerical processing procedures. Illustrative of GS-5 grade-level work is providing specialized clerical assistance to customs inspectors by examining documents for completeness, discrepancies, and other special requirements, and applying knowledge of pertinent guides as well as substantial knowledge of the functions of other divisions and branches.

The appellants' position meets the GS-4 grade level. Like that level, they perform a full range of standard clerical assignments, resolving recurring problems, and recognizing differences among a variety of recurring situations in order to take the most appropriate action. These include managing files and records, receiving calls and responding to inquiries, and providing customers with current account information according to established policies and procedures. As necessary, they handle problems that arise when dealing with customers, resolving conflicts according to accepted practices. They regularly complete paper work as required; e.g., preparing authorization forms to transfer patients to different hospitals resolving problems within established procedures.

The position does not meet the GS-5 grade level. The appellants' work assignments are limited to standardized clerical tasks covering a range of recurring problems. At the GS-5 grade level, their general clerical support duties involve related steps and procedures and involve selecting the best course of action from a number of possibilities. While they must have knowledge of the medical transcription units operating rules, the record shows that they are not tasked on a regular and recurring basis for 25 percent or more of their total work time to perform the complex, interrelated, or one-of-a-kind clerical processing procedures as described at the GS-5 level. Therefore, the GS-4 grade level must be assigned.

This factor is credited at the GS-4 grade level. Factor-levels are progressive in nature. Since this factor does not meet the GS-5 grade level, we are precluded from either considering or crediting the position at the GS-6 grade level as requested by the appellants.

Level of responsibility

At the GS-4 grade level, the supervisor provides little assistance with recurring assignments. The employee uses initiative to complete work in accordance with accepted practices. Unusual situations may require the assistance of the supervisor or a higher level employee, and the completed work may be reviewed more closely. Procedures for doing the work have been established and a number of specific guidelines are available. Due to the number and similarity of guidelines and work situations, the employee uses judgment in locating and selecting the most appropriate guidelines, references, and procedures. The employee 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.

At the GS-5 grade level, 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. Extensive guides in the form of instructions, manuals, regulations, and precedents apply to the work. The number and similarity of guidelines and work situations require the employee to use judgment in locating and selecting the most appropriate guidelines for application and adapting them according to circumstances of the specific case or transaction. A number of technical problems may arise which also require interpretation and adaptation of established guides. Contacts are with a variety of persons within and outside the agency for the purpose of receiving or providing information relating to the work or for the purpose of resolving operating problems in connection with recurring responsibilities.

The position meets the GS-4 grade level. Like the GS-4 grade level, the supervisor provides little or no assistance with recurring assignments, and the appellants exercise initiative to complete work by following accepted practices. For unusual situations they seek guidance from the supervisor or a higher level administrative employee. The appellants use a number of specific guidelines; e.g., office procedural guides and desk notes, to perform the work. However, due to their number and similarity, judgment is used in locating and applying them. Similar to the GS-4 level, the appellants have contact with co-workers in the medical transcription unit and sometimes outside the office to exchange information and resolve problems relating to the immediate assignment.

The appellants' position does not meet the GS-5 grade level. The Guide notes that supervisory control over work takes many different forms and requires careful evaluation. Routine or standardized work may appear to be performed with a high level of independence when, in fact, it is the work itself that is closely defined and prescribed. When this is the case as it is here, the employee does not have an opportunity to perform under less than general supervision. Therefore, because this factor does not fully meet the GS-5 grade level, we must evaluate this factor at the GS-4 grade level.

This factor is credited at the GS-4 grade level. Since this factor does not meet the GS-5 grade level, we are precluded from either considering or crediting the position at the GS-6 grade level as requested by the appellants.

As both factors have been evaluated at the GS-4 grade level, the general clerical support duties are credited at GS-4.

Summary

By application of the grading criteria in the OAGEG, the appellants' OA duties equate to the GS-5 grade level. By application of the criteria in the Guide, the appellants' general clerical support duties meet the GS-4 grade level. Therefore, based on application of the mixed grade position criteria as stated in Chapter 5 of *The Classifier's Handbook*, the final grade of the appellants' position is GS-5.

Decision

The appellants' position is properly classified as Office Automation Assistant, GS-326-5.