

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

Appellant: [appellant]

Agency classification: Librarian (Medical Sciences)
GS-1410-11

Organization: Medical Library
Learning Center
VISN 15 Western Information Network
VA Medical Center
Veterans Health Administration
U.S. Department of Veterans Affairs
[city and state]

OPM decision: Librarian (Medical Sciences)
GS-1410-11

OPM decision number: C-1410-11-03

/s/ Jeff Sumberg for Robert Hendler

Robert Hendler
Classification and Pay Claims
Program Manager

May 6, 2009

Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a certificate which 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:

[appellant]
Medical Library 142D
VA Medical Center
[address]
[city, state zip code]

[Resources Officer]
Acting Human Resources Officer
Department of Veterans Affairs
VISN15 Network Business Office
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Introduction

On February 15, 2008, the Chicago Oversight and Accountability Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. The appellant occupies a position currently classified as Librarian (Medical Sciences), GS-1410-11, with the Medical Library, Learning Center, at the [location] Veterans Affairs Medical Center (VAMC), VISN 15 Western Information Network, Veterans Health Administration (VHA), U.S. Department of Veterans Affairs (VA), in [city and state]. The appellant believes her position should be classified as Librarian (Medical Services), GS-1410-12. We received the initial agency administrative report (AAR) on March 10, 2008, and complete AAR on August 4, 2008. Final comments from the appellant and a restatement of her duties and appeal rationale were received on August 18, 2008. We accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

The appellant was assigned to a position description (PD) which was initially developed and classified in November 2002, as Librarian (Medical Services), GS-1410-11, by application of the Librarian Series, GS-1410, position classification standard (PCS). In response to a request, the servicing VAMC Human Resources (HR) Office conducted a desk audit resulting in a decision issued on January 16, 2008, affirming the accuracy of the position's title, series, and grade determinations. The appellant subsequently appealed the classification of her position directly with OPM.

Both the appellant and her supervisor have certified to the accuracy of the appellant's official PD (number [XXXX]-0), but the appellant disagrees with the grade-level determination. A PD is the official record of the major duties and responsibilities assigned to a position by a responsible agency official; i.e., a person with authority to assign work to a position. A position represents the work which makes up the duties and responsibilities performed by an employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal based on the duties assigned by management and performed by the employee. We classify a real operating position, and not simply the PD. Therefore, this decision is based on the actual work assigned to and performed by the appellant.

The appellant addresses several duties which she believes have not been properly credited in determining the proper grade for her position. She states her predecessor held a similar Librarian position classified at the GS-12 level, and feels she is "worthy of a GS-12 grade, especially since the former librarian did not perform at the level of complexity that I do now." By law, we must classify positions solely by comparing current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since the comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others, which may or may not be classified correctly, as a basis for deciding the appeal.

Implicit in the appellant's rationale is a concern her position is classified inconsistently with other VA positions which perform similar work. Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. However, the agency

also has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellant considers her position so similar to others that they all warrant the same classification, she may pursue the matter by writing to her agency headquarters human resources office. In doing so, she should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same as hers, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to her the differences between her position and the others.

Position information

The appellant reports directly to the Learning Resources Officer (GS-1701-13) who assigns work in broad terms of mission requirements and program objectives. The appellant works under broad delegated authority for independently planning, scheduling, coordinating, carrying out, and monitoring the effectiveness of operations of the library. The appellant manages all aspects of library services for the Medical Library and the Learning Center. The medical library maintains a collection of monographs, journal subscriptions, bound volumes of journals and items of audiovisual software. The appellant provides health science information services for the informational, educational and when appropriate, research related needs of the staff members regarding patient diagnosis and treatment. The Learning Center supports consumer health information as well as therapeutic, educational and recreational programs for patients, families, visitors and staff.

The appellant services the medical and non-medical staff of the [location] City VA Medical Center which provides acute medical surgical, neurological, psychiatric, and rehabilitation medicine for the veterans of the [location] area. She provides information, health education and bibliographic resources to the clinical staff, medical research, medical students, residents, administrative personnel, allied health staff, Medical Center employees, patients, families and visitors. She establishes relationships with VA personnel and affiliated persons in order to coordinate the delivery of health information throughout the Medical Center. She also retrieves interlibrary loans for the doctors and staff at the VA Medical Center.

The appellant's duties include but are not limited to: conducting library budget analysis, monthly, quarterly and annually; initiating/negotiating contracts with journal vendors, book vendors and with Emporia State University for Library Internship training at this site; providing technical expertise in acquisition, organization, cataloging, preservation, access, dissemination of information and support with automated systems; performing all aspects of acquisition work including ordering, receiving, and claiming ensuring periodic issues of serials are received; locating seldom used or little known guides to track obscure materials or outside sources such as publishers, authors, government agencies or private organizations; developing and managing library collections; providing services to public including maintaining online catalog, circulation assistance and answering reference questions; conducting bibliographic searches of databases to locate and order books and materials from other libraries; developing detailed plans for the operation and maintenance of the regional (VISN 15 Western Information Network) Web site which includes responsibility for library Web site design and content.

The position requires the incumbent to possess a Master's Degree in Library Science (accredited by the American Library Association). The position requires knowledge of the larger library or library system's practices and procedures in functions such as circulation, organization of the material and preservation to manage a small branch under general professional supervision, and knowledge of manual and automated reference tools to provide ready reference services to scientists, medical staff, hospital employees, patients, families and visitors.

Series, title, and standard determination

The agency classified this position in the Librarian Series, GS-1410, and assigned the title, Librarian (Medical Sciences) to recognize the matter specialization of the work assigned. The appellant does not question this determination. Based on a review of the record, we concur. The PCS for the Librarian Series, GS-1410, contains the grade-level determination criteria which are applicable to all non-supervisory positions in the 1410 series at grade GS-5 and above.

Grade determination

The GS-1410 PCS uses the factor evaluation system (FES), which employs nine factors. Under the FES, each factor-level description in a standard describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor-level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level.

The agency evaluated the position at Levels 1-7, 2-5, 3-3, 4-3, 5-3, 6-2, 7-b, 8-1, and 9-1. The appellant disagrees with the agency's evaluation of Factors 1, 3, and 4. After a thorough review of the record, we agree with the agency's crediting of Factors 5, 6, 7, 8, and 9. Therefore, we will focus our analysis on Factors 1, 2, 3 and 4.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts a worker must understand in order to do acceptable work and the nature and extent of skills needed to apply that knowledge. To be used as a basis for selecting a level under this factor, the knowledge must be required and applied. The agency assigned Level 1-7. The appellant believes Level 1-8 should be credited.

At Level 1-7, work requires knowledge of a wide range of duties in one or more library functions which is required to modify standard library practices, precedents, and techniques; adapt computer systems; or make significant departures from previous approaches to similar problems or projects to solve a variety of information access, dissemination, and preservation problems. This includes knowledge required to evaluate, select, and adapt precedents to meet specialized information requirements; and apply standard practices of other disciplines as they relate to the librarian profession (e.g., physical and biological sciences, social sciences and humanities, languages, engineering, law, medicine, archival work, curatorial work, contracting, computer systems analysis). Knowledge is used to locate information, often of a specialized or technical nature, from a wide variety of published and unpublished sources and electronic data bases; to

catalog difficult material, sometimes considerable requiring knowledge of a subject-matter area (such as medicine). Reference, serials, and acquisitions librarians at this level make authoritative recommendations on collection development and source selection, instruct clientele in how best to make use of library resources, and provide training in end-user search systems.

At Level 1-8, librarians use a mastery of one or more major library functions to solve highly complex problems within the function, or problems that involve relationships within functions. They develop new approaches for other experienced librarians to use in solving a variety of problems or in expanding services. They also make significant recommendations to change, interpret, or develop important or innovative information policies, programs, approaches, or analysis methods. At this level, assignments involve evaluating and advising subordinate full-service libraries in a library system; and developing policies, programs, services and/or products for a library system or systems. Methods and techniques developed serve as models for other libraries outside of the agency or major component (such as bureau or major military command). Bibliographies, reports and other publications prepared; cataloging and classification practices developed; preservation techniques developed; and the like are cited as authoritative by other libraries. Illustrative of such work are librarians serving as experts in references and information research advising experienced librarians and serving as senior staff librarians for a library system or a central library with branches, and librarians serving as interagency or Federal experts in the development of cataloging criteria for classifying new and changing fields of knowledge, and advising and guiding other experienced librarians.

The appellant maintains her mastery of knowledge in electronic resources warrants assignment at Level 1-8. She points out that electronic resources have changed considerably since she was first appointed to her position in 2002 at which time electronic journal and book publishing was in its infancy. The appellant states that in 2002, a print subscription to a journal included free online access to the electronic version or what is now called an ejournal. Today there are very few print subscriptions which allow access to the ejournal. The majority of publishers separate the print from the electronic. Some publishers require the librarian to sign a license agreement which covers copyright restrictions and rules of access. Each site license has to be carefully read and negotiated. Prices vary according to other sets of criteria.

As discussed in the PCS, all Federal libraries are affected by automation. Librarians continually need to evaluate new technological tools, and try to anticipate the next development and its effect on information access. Changing technology in and of itself does not have an impact on the grade level of a position. The kinds of automation involved and the skills required to use them generally replace or supplement work methods and techniques previously performed through manual or machine enhanced processes. For example, the increased sophistication of search tools enables librarians and end-users to access a larger variety of information in a more timely manner than was previously possible. While automation could also increase the complexity of constructing a search, evaluating the results, and selecting the most relevant and timely information to meet user needs, the primary end-users of the library are health care professionals involved with patient diagnoses and treatment. Although the appellant indicates she had been enrolled in [state] University's Pharmacy School, and her familiarity of biological sciences and chemistry allow her to conduct better searches for the doctors, she does not independently evaluate and select the most relevant and timely information to satisfy the health care

professional's needs. It is the health care professional (the end-user) who makes the determination about the relevancy and timeliness of the information retrieved.

In addition, the appellant maintains her PD does not include the teaching or training of end-user search systems, which she performs. One of the basic tasks of Librarians, regardless of grade, is to instruct clientele on how and where to find relevant information and how to assess its quality. Although the appellant's PD does not specifically state that one of her responsibilities is to instruct end-users how to search and find relevant information, that responsibility is inherent in all librarian positions. There are no grading criteria to distinguish the varying complexities of the information being sought as they are considered as part of the customer support process.

Finally, the appellant maintains an upgrade is warranted due to keeping up with the knowledge required for her position. She asserts medical librarianship requires constant learning of not only medical information and terminology, but also keeping up with new technologies, databases, products and methodologies for best practices. The appellant points to her taking classes and attending conferences in order to stay abreast of these changes, network with other librarians and view new products. The Medical Library Association (MLA), the Special Libraries Association (SLA), and the Mid-Continent Association (MCMLA) (which is a subsidiary of MLA and includes a five state region), all host annual conferences. The appellant is a member of MLA and MCMLA. She states VA librarians also meet during the annual MLA conference. In MCMLA, she serves on the Library Advocacy Committee and the Research Committee and, as a member, she is expected to attend the conferences.

A General Schedule position is graded based on the official Federal Government duties assigned to and performed by its incumbent. Even if this position required special licensing or certification from nationally recognized organizations, this does not in itself affect the grade of the job. Similarly, membership in professional organizations does not in itself affect the grade of a position as these are not Federal functions. The GS-1410 PCS series definition states the work requires a full professional knowledge of the theories, objective, principles and techniques of librarianship. Therefore, keeping up-to-date on the technical and other occupational changes is inherent in any professional librarian position.

Like Level 1-7, the appellant is required to locate information of a specialized or technical nature requiring knowledge of a subject-matter area (i.e., medical sciences) from a wide variety of published and unpublished sources and electronic databases. Like Level 1-7, she is required to make extensive departures from standard procedures and precedents to obtain information necessary for medical staff to make diagnostic decisions to meet patient needs and to meet specialized information requirements. Unlike Level 1-8, where methods and techniques developed serve as models for other libraries outside of the agency, and bibliographies, reports and other publications prepared are cited as authoritative by other experienced librarians, the appellant's decisions and recommendations typically are limited to her own library. Her actions do not change or influence important policies or programs affecting other libraries or library systems. Her peer-to-peer advice and assistance to other operating-level VA librarians does not rise to the level of expert advice with the scope of impact envisioned at Level 1-8.

Level 1-7 is credited (1250 points).

Factor 2, Supervisory Controls

This factor covers the nature and extent of direct and indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work. The agency assigned Level 2-5, and the appellant concurs.

At Level 2-5, the librarian works under broad delegated authority for independently planning, scheduling, coordinating, carrying out, and monitoring the effectiveness of operations of a library or library system. The librarian exercises considerable discretion and judgment concerning the interpretation and implementation of existing policy and in making analytical and technical decisions that lead to, or form the basis for, major library policy and operational decisions by top management. In performing the work, the librarian makes extensive unreviewed technical judgments in the specialization, functional area, or in program management.

The agency credited Level 2-5 based on the appellant's broad delegation of authority to independently plan, schedule, coordinate, carry out, and monitor the effectiveness of operations of a library. In addition the appellant reports to a Learning Resources Officer, GS-1701-13, who is not a professional librarian by training.

Lacking a supervisor trained in her professional discipline, the appellant exercises greater independence than usual for experienced Librarians. Level 2-5, however, requires significantly greater independence and responsibility than the appellant is actually delegated. The policy and technical issues she deals with are not of the complexity and scope found at Level 2-5. For example, the PCS indicates at this level Librarians exercise considerable discretion and judgment concerning the interpretation and implementation of policy, making technical decisions which form the basis for major library policy and operational decisions, and they make extensive unreviewed technical judgments. However, it is the responsibility of the appellant's supervisor, Learning Resources Officer, who participates in establishing policies and priorities for the library, makes authoritative recommendations, and monitors staff performance and program effectiveness.

Like Level 2-4, the appellant's supervisor defines continuing areas of responsibility, sets general objectives, and reviews work for effectiveness in meeting objectives or achieving expected results. While the appellant has significant technical responsibility, her program responsibilities are limited to the operation of the library; and her supervisor has final authority over program decisions, especially if they affect the mission or functions of the library. The example of policy changes cited by the appellant, such as purchasing and placing books and other educational resources in the departments rather than just the library and upgrading technology in the library are program actions which fall fully within those found at Level 2-4 where librarians determine the approach to be taken and methods to be used in meeting program goals and objectives. Neither the absence of immediate supervision in day-to-day operations, nor the fact that technical recommendations are normally accepted, serves to support a level above 2-4.

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 agency credits this factor with Level 3-3. The appellant believes Level 3-5 is warranted. She cites her (1) purchasing and placing books and educational resources in different medical center departments, (2) improving the interlibrary loan process by upgrading library technology or software, (3) eliminating the need for patrons to fill out forms for article requests, and (4) selecting a new online catalog after extended research on what was available and most cost effective for the library's needs.

At Level 3-3, guidelines include library and agency information policies, regulations, and operating procedures; cataloging rules and formats; authorities lists; subject heading lists; and professional and technical literature; and in some cases, Federal contracting regulations. The librarian uses judgment in interpreting and adapting the guidelines for application to specific cases, problems, or situations; in applying standard library practices to new situations; and in relating work situations to precedent ones. In addition, the librarian analyzes the results of adaptations and recommends changes or improvements to the guidelines.

At Level 3-4, guidelines are essentially the same as in Level 3-3; however, they are often inadequate in dealing with the more complex or unusual problems. The librarian at this level exercises considerable personal judgment and discretion with broad latitude for interpreting and applying guidelines. At Level 3-4, the nature of the requests for information is such that standard library tools cannot cover new or highly specialized fields of knowledge. The employee exercises considerable personal judgment and discretion with broad latitude for interpreting and applying guidelines. This may involve deviating from or extending traditional methods, techniques and practices (e.g., devising a special subset of a classification system to identify a unique category of information); resolving important issues where guidelines are scarce or have limited applicability to specific projects (e.g., planning for significant enhancements to automated systems), or identifying areas for improvement in established methods of reference searching, collection development, or cataloging.

The PD language tracks Level 3-4, stating the appellant must identify, locate, and access specialized medical materials which are often difficult to obtain and she must rely upon her own knowledge of medical information sources and exercise considerable judgment in evaluating credibility in reference and research work and in recommending materials for acquisition. It states the appellant's position requires her to adapt from established guidelines in providing library services and she makes the definitive determinations and resolutions indicative of Level 3-4. The appellant's work examples in improving library technology reflect evaluating and selecting the most appropriate developed, commercially available systems typical of Level 3-3. Similarly, her searches for medical information for medical center staff entail applying standard library practices, e.g., off-the-shelf databases, to new situations and in relating work situations to precedent ones typical of Level 3-3. As at Level 3-3, evaluating materials for acquisition require awareness of evolving subject matter areas and new sources of materials for reference researches as they become available.

Because the appellant's position fails to fully meet Level 3-4, this factor must be credited at Level 3-3. Since the position fails to meet Level 3-4, the crediting of Level 3-5 is precluded. However, we will address the appellant's rationale to clarify the intent and meaning of Level 3-5. At Level 3-5, the work situation provides the opportunity to be recognized as an authority in one or more major library functions or program management, and as such, is instrumental in developing and interpreting guidelines for widespread use, e.g., developing *national* guidelines. Although the appellant attends national library conferences and serves as an officer of a national library organization, such membership has no impact on the grade determination and is not representative of her regular and recurring official duties as discussed previously. In addition, the appellant's position functions at the activity level of the agency and, therefore, is not responsible for revising existing policy or program guidance for use by others based on Federal regulations and legislation.

Level 3-3 (275 points) is credited.

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. The agency credited this factor with Level 4-4. The appellant believes a higher level should be credited because the publishing world is in constant flux and information she accesses is constantly updated and new databases emerge that she must teach others to use.

At Level 4-5, assignments consist of a broad range of library activities or require substantial depth of analysis, and typically require solving problems in information access and dissemination in particularly difficult and responsible circumstances. Decisions regarding what needs to be done are complicated by the novel or obscure nature of the problems (e.g., finding information required by scientists to solve problems with an astronomical research satellite) and/or special requirements for organization and coordination (e.g., developing and maintaining network services for an agency or major component library system). Decisions also must be made in an environment of continual change, where information and information sources are rapidly expanding, much of the subject matter is in flux, and the technology for gaining access to this information is undergoing major change. These changes affect the decisions to be made on how public and technical services are performed and delivered, and how the library or library system as a whole is managed.

At Level 4-4, assignments typically consist of a substantial number and variety of duties within a specialization requiring a variety of techniques and methods to determine the best approach. Decisions regarding what needs to be done include assessment of new or unusual circumstances, variations in approach, and/or incomplete or conflicting information. Planning, coordination, and problem resolutions are affected by the need to keep abreast of the specialized information needs of users; the increasing quantity of information available; missing, vague or conflicting bibliographic information; changes in the subject specialty; and changes in the means of accessing and disseminating information. Assignments involve determining the nature and

extent of information needs or problem areas, developing approaches best suited to answer those needs, and assigning priorities to the work.

Comparable to Level 4-4, the appellant searches for medical information using a variety of methods to locate the appropriate printed source or finding the correct databases to search on an ever-changing Internet. Decisions regarding what needs to be done consist of choosing the appropriate database to search and selecting the pertinent information from the literature based on specific medical information and parameters provided by the requestor. Level 4-5 is not met. The appellant does not propose criteria for regional or component-wide activities. Although she services the medical and support staff at a major teaching hospital, the information she helps to retrieve is not complicated by the novel or obscure nature of the problems. Unlike Level 4-5, commercially available databases provide sufficient access to information needed by the serviced population.

Therefore, this factor is evaluated at Level 4-4 (225 points).

Summary

Factor	Level	Points
1. Knowledge Required by the Position	1-7	1250
2. Supervisory Controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and Effect	5-3	150
6. & 7. Personal Contacts and Purpose of Contacts	2b	75
8. Physical Demands	8-1	5
9. Work Environment	9-1	5
Total		2435

A total of 2435 points falls within the GS-11 range (2355 to 2750) on the grade conversion table provided in the PCS.

Decision

The position is properly classified as Librarian (Medical Sciences), GS-1410-11.