

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

**Appellant:** [Name of appellant]

**Agency classification:** Management Services Assistant  
GS-303-7

**Organization:** [Appellant's organization/work location]  
Bureau of Labor Statistics  
Department of Labor

**OPM decision:** GS-303-6  
(Title at agency discretion)

**OPM decision number:** C-0303-06-15

Ana A. Mazzi

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Ana A. Mazzi  
Deputy Associate Director  
Merit System Audit and Compliance

10/8/2010

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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 (Introduction)*, appendix 4, Section G (address provided in appendix 4, section H).

As indicated in this decision, our findings show the appellant's official position description does not meet the standard of adequacy described in section III.E. of the *Introduction*. Since position descriptions must meet the standard of adequacy, the agency must revise the appellant's position description to reflect our findings. The servicing human resources office must submit a compliance report containing the corrected position description within 30 days of the date of this decision to the San Francisco Oversight office.

Since this decision lowers the grade of the appealed position, it is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The applicable provisions of parts 351, 432, 536, and 752 of title 5, Code of Federal Regulations, must be followed in implementing the decision. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented. The servicing human resources office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action to the OPM office that accepted the appeal.

**Decision sent to:**

[Appellant's mailing address]

[Address of appellant's servicing human resources office]  
Department of Labor

Director, Human Resources Center  
Department of Labor  
200 Constitution Avenue, NW, Room C5526  
Washington, DC 20210

## **Introduction**

On June 25, 2009, the San Francisco Oversight and Accountability Group (now San Francisco Oversight) of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [name of appellant]. On July 16, 2009, we received the agency's complete administrative report. The appellant's position is currently classified as a Management Services Assistant, GS-303-7. However, because he performs some budget related work he believes it should be classified as Budget Analyst, GS-560-9. The appellant works in the [appellant's organization/work location] Bureau of Labor Statistics (BLS), Department of Labor (DOL). We have accepted and decided this appeal under section 5112(b) of title 5, United States Code (U.S.C.).

## **General issues**

The appellant makes various statements about the classification review process conducted by his agency, and compares his duties to higher graded positions classified as Budget Analyst, GS-560-9, at other locations in his agency. In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of his position. By law, we must make that decision solely by comparing his 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 others that may or may not be properly classified, as a basis for deciding his appeal. Because our decision sets aside any previous agency decision, the classification practices used by the appellant's agency in classifying his position are not germane to the classification appeal process.

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 his position so similar to others that they all warrant the same classification, he may pursue the matter by writing to his agency's human resources headquarters. In doing so, he 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 his, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to him the differences between his position and the others.

The appellant does not believe his current position description (PD) [number] is completely accurate, but his immediate supervisor has certified to its accuracy. 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 is the duties and responsibilities that make up the work performed by the employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities currently assigned by management and performed by the employee. An OPM appeal decision classifies a real operating position, and not simply a PD. This decision is based on the work currently assigned and performed by the appellant.

Our review disclosed the appellant's PD describes some duties which he does not perform. Specifically, he does not assist with personnel related processes including monitoring authorized positions and assisting with WebPars, which is an automated system for processing and posting personnel actions and data, e.g., SF-52. Moreover, he does not assist with regional office space planning, space projection, and staffing verification. Therefore, the appellant's PD of record does not meet the standard of adequacy addressed on pages 10-11 of the *Introduction to the Position Classification Standards*, and the agency must revise the PD to reflect our findings.

### **Position information**

The appellant's position supports the regional office Administrative Officer (AO) in performing administrative support activities for regional office programs and the Regional Commissioner. The appellant provides support for administrative processes ensuring that data is accurate and that reporting deadlines are monitored and met. He orders and tracks supplies and coordinates requests and procurement of supplies, equipment and services. He makes service calls to vendors and processes invoices to submit to the agency's Office of the Assistant Secretary for Administration and Management (OASAM) for payment. He is also responsible for preparing administrative reports, including training forms, memoranda and other correspondence as needed.

The appellant serves as back-up system administrator at the minor customer level for the E2 travel system, and backs-up the local timekeeper to resolve technical issues. He also performs tasks associated with new employees such as preparing BLS credential paperwork, requesting calling cards, processing reimbursement for fingerprint fees and preparing separation notices and clearances. He enters appropriate information into the Central BLS Employee Database (CBED) and uses various automation software and hardware to produce a variety of documents. He coordinates telephone services and charges with the staff of the OASAM. He participates in the annual inventory reconciliation phase by assisting the property management officer (PMO) and conducting initial physical inventory of office equipment.

The appellant is also responsible for fact-finding and compilation of various reports listing budget estimates for the coming fiscal year in areas such as supplies, equipment, tuition/training and printing. He gathers and compiles this information from the division managers and submits the regional office input for those items to BLS's Office of Field Operations (OFO), whose staff prepares the entire regional budget for the fiscal year. Throughout the fiscal year he is responsible for posting all expenditures as they occur for the regional office into the BLS Checkbook System which is incorporated into the BLS Management Information System (MIS). He receives, verifies and codes invoices, purchases minor items using a purchase card, and uses the Department's Electronic Procurement System (EPS) when appropriate. The appellant is also involved in the midyear budget reviews working with managers on any adjustment information needed by the OFO, and participates in the end of year closeout with OASAM concerning finishing, closing and finalizing purchase orders.

In reaching our classification decision, we have carefully reviewed all information provided by the appellant and his agency, including his official PD which, although not completely accurate, we have incorporated by reference into this decision. In addition, to help decide the appeal we

conducted an onsite desk audit with the appellant at the regional office, and a separate onsite interview with his supervisor.

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

The agency has classified the appellant's position in the one-grade interval Miscellaneous Clerk and Assistant Series, GS-303, but the appellant believes it should be classified in the two-grade interval Budget Analysis Series, GS-560. The GS-560 series covers positions that perform, advise on, or supervise work in any of the phases of budget administration when such work requires knowledge and skill in applying budget-related laws, regulations, policies, precedents, methods, and techniques. The GS-303 series includes positions the duties of which are to perform or supervise clerical, assistant or technician work for which no other series is appropriate. The work requires knowledge of the procedures and techniques for carrying out the work of an organization, and involves application of procedures and practices within the framework of established guidelines.

Classification guidance in the *Introduction* and *The Classifier's Handbook* describes distinctions between positions properly classified in two-grade interval administrative series and positions classified in one-grade interval support series. Administrative positions (two-grade interval) are involved in work primarily requiring a high order of analytical ability. This ability is combined with a comprehensive knowledge of (1) the functions, processes, theories, and principles of management and (2) the methods used to gather, analyze, and evaluate information. Administrative positions are involved with analyzing, evaluating, modifying, and developing the basic programs, policies, and procedures that facilitate the work of Federal agencies and programs. In contrast, support positions (one-grade interval) perform work that follows established methods, procedures, and guidelines and may require a high degree of technical skill, care, and precision. The work can be performed based on a practical knowledge of the purpose, operation, procedures, techniques, and guidelines of the specific program area or functional assignments. Support personnel typically learn to do the work on-the-job and also may attend specific training courses related to their work.

We find the appellant's position does not involve work that is administrative, two-grade interval in nature. Although he performs a variety of general administrative and budget related support functions, those duties do not require a high order of analytical ability, a comprehensive knowledge of management principles and theories, or knowledge of the methods and techniques to gather, analyze, and evaluate information. Like assistance work, the appellant's duties involve performing technical tasks to support the administration or operation of the programs of his organizational unit. It requires a working knowledge of the work processes and procedures of an administrative area and the mission and operational requirements of an organizational unit.

The appellant believes his position should be classified to the GS-560 series and titled Budget Analyst. As described in the Job Family Position Classification Standard (JFS) for Professional and Administrative Work in the Accounting and Budget Group, GS-0500, positions classified in the Budget Analysis Series, GS-560, and titled Budget Analyst, involve analytical, technical, and administrative duties in one or more phases of the budgetary process, e.g., budget formulation and justification, presentation and enactment, or execution. Budget analysts are responsible for a

segment of an organization's budget programs, and/or organizational structure. Typically, budget analysts advise line managers on the requirements for the preparation, documentation, and submission of budget requests. They analyze the relative costs and benefits of alternative program plans; prepare allotments and sub-allotments of funds for distribution to program managers; check the propriety of obligations and expenditures; and provide guidance concerning legal and regulatory aspects of the acquisition and use of funds for program and administrative purposes. The appellant does not perform any of the typical functions done by budget analysts. His role is to provide technical support by gathering, processing, compiling and submitting budget information covering office supplies/equipment, training and printing for the four regional divisions to OFO for future fiscal year budgets, and posting expenditures for those items in the regional office budget throughout the current fiscal year. Unlike work in the GS-560 series he is not responsible for budget analysis and is not directly involved in the principal phases of the budgetary process as described above.

Because the appellant performs support tasks related to the region's budget, we also examined work described in the Budget Clerical and Technician Series, GS-561. That series includes positions that perform clerical and technician work in support of budget analysis and administration when such work requires primarily knowledge of the procedures which facilitate budgeting as conducted in the Federal Service. The work requires practical understanding and skill in the application of administrative rules, regulations, and procedures associated with recording, reporting, processing, and keeping track of budgetary transactions, e.g., the credit, receipt, transfer, allotment, withdrawal, obligation, or outlay of funds. Budget clerks and technicians maintain ledgers much like those used in cost accounting operations. While the appellant participates to a limited degree in the budget process by collecting and tracking information on supplies/equipment and training and printing, unlike positions in the GS-561 series he does not maintain ledgers, and does not participate in the budget formulation process by compiling, consolidating, checking and or arranging funding data in requests to cover projected annual operating expenses. Unlike budget technician positions he does not submit organizational funding requests in proper formats through agency channels for inclusion in budget requests prepared at higher echelons in the BLS.

As discussed above, the appellant's duties neither meet the intent of two-grade interval administrative work (including work typical of GS-560 positions), nor do they compare to one-grade interval budget technician work characteristic of positions classified in the GS-561 series. We find his duties match one-grade interval technical work typical of positions in the GS-303 series which is based on a practical knowledge of the purpose and functions supported, and the administrative program's operations, procedures, techniques and guidelines. Like positions in the GS-303 series the appellant performs a variety of specialized administrative support duties for which no other more appropriate occupational series has been established.

There are no titles specified for positions in the GS-303 series. Therefore, the agency may construct a title in keeping with the nature of the support work performed. In doing so, the agency should adhere to the titling guidance in section III.H.2 of the *Introduction to the Position Classification Standards*. Although the appellant uses office automation equipment, the position does not require the skill of a qualified typist. Because the standard for the GS-303 series contains no grade-level criteria, to grade the appellant's technical support work we have applied

the criteria in the Grade Level Guide for Clerical and Assistance Work (hereafter referred to as the Guide).

### **Grade determination**

The Guide provides grade-level criteria for administrative support work. Clerical work is defined in the Guide by examples of preparing, receiving, reviewing, and verifying documents; maintaining office records; and compiling information for reports. Assistance work is defined as technical work that supports the administration or operation of the program of an organizational unit, and requires a working knowledge of the work processes and procedures of an administrative field and the mission and operational requirements of the unit. The record shows the appellant primarily performs assistance work. The Guide uses two classification factors to evaluate the work of a position: (1) *Nature of Assignment* which includes knowledge required and complexity of the work, and (2) *Level of Responsibility* which includes supervisory controls, guidelines, and contacts. Our evaluation by application of the two classification factors in the Guide follows.

#### *Nature of assignment*

At the GS-6 level technical or assistance work requires considerable evaluative judgment within well-defined, commonly occurring aspects of an administrative program or function. The work may involve providing direct assistance to specialists or analysts by performing a segment of their work, or it may involve responsibility for a stream of products or continuing processes based on direct application of established policies, practices, and criteria. Assignments involve a relatively narrow range of case situations that occur in a broad administrative program or function. This work typically involves identifying issues, problems, or conditions and seeking alternative solutions based on evaluation of the intent of applicable rules, regulations, and procedures.

Assignments requiring evaluative judgment are narrowly focused, address a single product or action, and are relatively clear cut. The employee usually deals with problems or situations that remain stable, and resemble past problems or situations. Assignments often involve problems or situations where there is not one absolutely correct solution, only a best or most appropriate one. Work requires practical knowledge of guidelines and precedent case actions relating to a particular program area equal to that acquired through considerable work experience or specialized training. The work also requires skill to recognize the dimensions of a problem and express ideas in writing.

An illustrative work example of GS-6 level assignments in the Guide describes a position where the employee runs statistical reporting and records systems for a major division of a regional office. The employee analyzes feeder reports from various branches and prepares division wide reports. The employee reviews work measurement functions for the division to ensure that basic reporting requirements and procedures are being followed and that reports provide clear and concise information. The employee in the work example consolidates annual funding estimates from subordinate offices into a complete budget request for the division; organizes estimates by appropriation, object class, and line item following current budget instructions; and prepares

required supporting documentation for expenditures such as employee travel, training, and office supplies and equipment. Funding requirements for the division are relatively stable from year to year. Work requires an in-depth practical knowledge of statistical reporting and records systems, and the budget process. It requires skill to compile and summarize information and data, identify inaccuracies or anomalies in the information, and make written recommendations to resolve discrepancies based on interpretation of applicable regulations and procedures. The employee must extract and analyze a considerable volume of information to arrive at an end product.

At the GS-7 level, which is the highest level for this factor described in the Guide, the work consists of specialized duties with continuing responsibility for projects, questions, or problems that arise within an area of a program as defined by management. Work assignments involve a wide variety of problems or situations common to the segment of the program or function for which the employee is responsible. Each assignment typically consists of a series of related actions or decisions prior to final completion. Decisions or recommendations are based on the development and evaluation of information that comes from various sources. The work involves identifying and studying factors or conditions and determining their interrelationships as appropriate to the defined area of work. The employee must be concerned about taking or recommending actions that are consistent with the objectives and requirements of the program.

At the GS-7 level, the work requires knowledge and skill to recognize the dimensions of the problems involved, collect the necessary information, establish the facts, and take or recommend action based upon application or interpretation of established guidelines. The work also requires practical knowledge, developed through increasingly difficult, on-the-job experience dealing with the operations, regulations, principles, and peculiarities of the assigned program, function, or activity.

An illustrative work example of GS-7 level assignments in the Guide describes a position that advises the manager of a single-function field office on the practical and technical aspects of office administration, to include budgeting, purchasing, supply management, personnel administration, data processing and files management, and performs staff support work in each of these areas. The employee collects data for the office operating budget, reviews submissions of office staff assistants for proper format and compliance with agency budget requirements, and consolidates material into an annual office budget; sets up controls to monitor expenses during the year; and recommends budget adjustments including restructuring budget allocations or work plans to deal with changing situations such as varying costs for equipment parts, or services, and changes in availability of funds. The employee purchases office supplies through various methods and tracks purchase documents; completes requests for personnel actions and writes position descriptions; and distributes forms and instructions for annual performance ratings and ensures timely, proper completion. The employee conducts local recruitment and holds new employee orientation sessions, and maintains the office filing system.

In the GS-7 work example the employee maintains and transfers funds between several unrelated appropriated fund accounts and several revolving fund accounts. The work also involves initiating personnel actions as needed, and tracking virtually all financial, personnel, supply, and other administrative transactions as the documentation flows through the office. The employee



applies a broad understanding and detailed procedural knowledge of budget, purchasing, personnel, and information processing functions.

The appellant's position meets the GS-6 level. Like this level, his work includes directly providing assistance to staff of the region's four program areas on matters relating to purchase of office supplies/equipment, training and printing. Throughout the fiscal year he performs the continuing processes of tracking expenditures for those items on spreadsheets, regularly posting purchase costs to the BLS Checkbook System by program area, reconciling purchase documents, and keeping program managers apprised on the status of their budgets for individual purchases. Like the GS-6 level, these assignments are performed based on direct application of agency established policies and practices, and are limited to a narrow range of case situations involving the purchase of the above items. His work includes identifying issues and problems, and seeking solutions, based on review of applicable rules and regulations. For example, he may recommend to the OFO that funds be re-allocated from different program purchase accounts to cover unanticipated increases in costs (e.g., energy or supplies) which could cause a budget shortfall. He has also reviewed Federal acquisition regulations to determine the types of vendors for purchase of particular items, and whether individual organization memberships can be paid by BLS.

Comparable to the GS-6 level, the appellant's assignments are focused on a narrow range of administrative support activities primarily covering the purchase of supplies and services. In carrying out those duties he verifies purchase vendors and prices, assigns accounting codes, ensures goods are received and makes final calculations, and records purchases in the appropriate tracking documents. His tasks and actions are straight forward and stable (resembling past issues), but sometimes involve research to determine the best solution.

The appellant's purchasing and budget work, which takes up the majority of his time, is similar to the illustrative work example described at the GS-6 level in the Guide. Like the example, he consolidates funding estimates for the coming fiscal year, and prepares required supporting documentation for purchases of office equipment/supplies, and training and printing. He applies a thorough practical knowledge of the region's activities, operating programs, and established guidelines concerning statistical reporting and records systems and the agency's budget process. Further, like the work described in the illustration he exercises skill in compiling and summarizing budget information, identifying budget inaccuracies regarding purchases, and making recommendations to program managers and OFO staff to resolve discrepancies based on interpretation of applicable regulations, procedures, and past precedents. Like the example, he extracts and analyzes a considerable volume of information from various automated systems (e.g., Management Information and Checkbook Systems) to reconcile purchase and budget information.

The appellant's position does not meet the GS-7 level. Unlike this level, his assignments do not require the broader program aspects and increasingly difficult transactions described at the higher level. His work is limited to obtaining data and information for recurring reports, reconciling purchases with budget and payment records, and tracking program budget expenditures for supplies/equipment, and training and printing. These tasks are more repetitive in terms of problems to be handled and regulations and procedures to be applied than those

described at the GS-7 level. Although the appellant determines approach and makes decisions on how to accomplish his work, his assignments are significantly more limited than those described in the work illustration at the GS-7 level. For example, although he advises managers on purchasing office supplies, he does not advise them on the technical aspects of a variety of other administrative activities including supply management, personnel administration, data processing, and files management. His work is primarily concerned with purchasing and related budget tracking. Although he collects data by program for the supplies, printing and training budgets, unlike the work example he does not collect data for the entire office budget, review data for proper budget format and compliance with BLS budget requirements, or consolidate material for an annual office budget. In carrying out his limited budget support duties, unlike the GS-7 work example he is not required to maintain and transfer funds between several unrelated appropriated and revolving fund accounts that are subject to different regulations and procedures. While he processes and tracks purchase documents, he is not involved in any matters concerning personnel administration, e.g., writing position descriptions, tracking performance ratings, participating in recruitment activities. Such tasks are performed by staff of the regional human resources division. In addition, his duties do not include responsibility for tracking virtually all financial, personnel, supply, and other administrative transactions for the regional office. Unlike the GS-7 level, the appellant does not perform the range and scope of technical work requiring a comprehensive knowledge of special and complex subjects as required at the GS-7 level.

This factor is evaluated at the GS-6 level.

#### *Level of responsibility*

At the GS-6 level, the supervisor assists with precedent assignments by providing interpretation of policy or the concepts and theories of the occupation. Completed work is evaluated for appropriateness and effectiveness in meeting goals. Guidelines such as regulations, instructions, evaluation criteria, and prior case or action files are available, but they are often not completely applicable to the assignment or have gaps in specificity. The employee uses judgment in interpreting and adapting guidelines for application to specific cases or problems. The employee bases decisions and recommendations on facts and conventional interpretations of guidelines rather than on theory or opinion. The employee contacts others to provide, receive, or develop information in order to identify problems, needs or issues, and/or to coordinate work efforts or resolve problems.

At the GS-7 level, the supervisor makes assignments in terms of objectives, priorities, and deadlines. The employee independently completes assignments in accordance with accepted practices, resolving most conflicts that arise. Completed work is evaluated for appropriateness and conformance to policy. Guidelines for the work are more complex than at the next lower grade because the employee encounters a wider variety of problems and situations which require choosing alternative responses. Guides such as regulations, policy statements, and precedent cases, tend to be general and descriptive of intent, but do not specifically cover all aspects of the assignments. Guidelines apply less to specific actions and more to the operational characteristics and procedural requirements of the program or function. Employees must use significant judgment and interpretation to apply the guides to specific cases and adapt or improvise procedures to accommodate unusual or one-of-a-kind situations. Although personal contacts for

GS-7 employees are often the same as those for GS-6 employees, GS-7 employees serve as a central point of contact to provide authoritative explanations of requirements, regulations, and procedures, and to resolve operational problems or disagreements affecting assigned areas.

The appellant's position meets the GS-6 level. Like this level, he works under the general supervision of the AO who assists with precedent assignments when BLS procurement policies require interpretation. Similar to the GS-6 work example in the Guide, in making assignments the supervisor defines objectives, priorities, and deadlines. The appellant independently gathers, posts, and verifies procurement and budget information, and carries out his duties based on experience and normal work practices. Completed work is evaluated for adequacy and appropriateness in meeting regional procurement and related administrative goals. Comparable to the GS-6 level, the appellant's guidelines include BLS and DOL procurement and budget regulations, instructions, and precedents which are often not completely applicable to the assignment. He uses judgment in interpreting and adapting these guidelines for application to specific procurement and budget cases, and to resolve operational problems. His decisions are based on the facts of a given situation, and on straight forward interpretation of guidelines rather than on theory or opinion. Like the GS-6 level, the appellant's contacts are with BLS employees and outside vendors to provide, receive, or develop specific information on procurement, budget, and administrative issues, and to coordinate work efforts and resolve immediate problems.

The appellant's position does not meet the GS-7 level. Although he works under general supervision and independently performs his daily work assignments, any technical work conflicts are resolved with guidance from the supervisor or BLS headquarters budget, financial, or procurement staff. Unlike the GS-7 level, he does not encounter a wide variety of problems and situations requiring he choose between alternative responses from various guidelines and references. The guides, regulations, and instructions utilized specifically cover most aspects of his actions and assignments. Given the specific nature of his work tasks, he is not required to use significant judgment and interpretation to apply guidelines, and is not faced with adapting or improvising procedures to deal with unusual situations. When such situations occur, he consults with his supervisor or headquarters staff. Unlike the GS-7 level, in making work contacts the appellant does not serve as the primary contact to furnish authoritative explanations and interpretations on BLS procurement and budget requirements and regulations. Any significant operational problems or disagreements on such matters are referred to and resolved by higher level agency staff.

This factor is evaluated at the GS-6 level.

### *Summary*

By application of the grading criteria in the Guide, we find the nature of the appellant's assignments and his level of responsibility meets the GS-6 level. Therefore, the position is graded at that level.

**Decision**

The proper series and grade of the appellant's position is GS-303-6. Selection of an appropriate title is at the discretion of the agency.