

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

Appellant: [appellant's name]

Agency classification: Editor
GS-1082-9

Organization: Major Land Resource Area
[state] State Conservationist Office
Natural Resources Conservation Service
U.S. Department of Agriculture
[city, state]

OPM decision: Editorial Assistant
GS-1087-7

OPM decision number: C-1087-07-03

Ana A. Mazzi

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Deputy Associate Director
Merit System Audit and Compliance

10/27/2010

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).

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 5 CFR parts 351, 432, 536, and 752 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 (PD) 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 Dallas Oversight.

Decision sent to:

[appellant's name and address]

[servicing HR office name and address]

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Introduction

On March 8, 2010, Dallas Oversight of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. The appellant's position is currently classified as Editor, GS-1082-9, but she believes it should be classified at either the GS-11 or GS-12 grade level. The position is located in the Major Land Resource Area (MLRA), [state] State Conservationist Office, Natural Resources Conservation Service (NRCS), U.S. Department of Agriculture, in [city, state]. We received the agency's administrative report on March 31, 2010. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

Background

The appellant's position was previously classified in the GS-1087 Editorial Assistance Series. The agency reviewed her position and reclassified it to the GS-1082 Writing and Editing Series at the GS-9 grade level. On September 21, 2003, the appellant was officially promoted to the position after competing for the reclassified position. Since 2004, the appellant repeatedly requested a review of her position through the immediate supervisor. On July 25, 2007, she officially requested a desk audit of her position through the immediate supervisor. No action was taken on this request. She requested a review of her position from the State Conservationist in September 2008. In an October 8, 2009, report, the State Office's Human Resources (HR) Officer determined her position was appropriately classified as GS-1082-9. The appellant then filed an appeal with OPM.

General issues

The appellant believes she is performing work similar to higher-graded positions assigned to other MLRA regional offices (MO). The 18 MOs, which are located in conjunction with State Offices, are responsible for soil survey mapping and assuring quality and consistency of recorded soil descriptions across broad geographic areas that have similar soils with the objective of eliminating inconsistencies with the soils mapped at State and county boundaries. The appellant submitted various documents in support of her classification appeal (e.g., a vacancy announcement for a Multimedia Publication Specialist/Editor, GS-1082, position at the GS-9 or GS-11 grade level, and PDs for GS-1082 Writer/Editor positions at another MO and graded at the GS-11 and GS-12 grade levels).

Although the PDs provided by the appellant contain duties similar to those she performs, we identified a number of major duties in the higher-graded PDs that are materially different from those described in the appellant's PD of record. For example, the GS-11 PD includes the following as major duties: assists with the development of soil survey manuscripts within MO[number]; works closely with all MO[number] staff in proposing and reviewing editorial standards, policies, and procedures; participates in the formation of overall plans and objectives and recommends methods of integrating editorial functions for soil surveys; and works with the head editor in developing procedures that improve the efficiency of editing and the editorial quality of soil descriptions. Regardless, by law, we must classify positions solely by comparing their current duties and responsibilities to OPM position classification standards (PCS) and

guidelines (5 U.S.C. 5106, 5107, and 5112). Other methods or factors of evaluation are not authorized for use in determining the classification of a position, such as comparison to positions which may or may not have been properly classified.

Like OPM, the NRCS must classify positions based on comparison to OPM's PCSs and guidelines. Under 5 CFR 511.612, agencies are required to review their own classification decisions for identical, similar, or related positions to ensure consistency with OPM certificates. Consequently, NRCS has primary responsibility for ensuring its positions are classified consistently with OPM appeal decisions. If the appellant believes her position is classified inconsistently with others, then she may pursue this matter by writing to her agency's headquarters HR office. She should specify the precise organizational location, series, title, grade, and responsibilities of the positions in question. The agency should explain to her the differences between her position and the others, or classify those positions in accordance with this appeal decision.

The appellant discusses issues (e.g., volume and high quality of work) that are not considered in determining a position's classification (*The Classifier's Handbook*, chapter 5). Other areas of the HR management system, such as performance awards, take these considerations into account.

The appellant said she, unlike MO counterparts occupying positions graded at GS-9 and below, possesses a college degree. Qualifications considered in classifying positions are those required to perform current duties and responsibilities. Therefore, we could not consider the appellant's personal qualifications, except insofar as they are required to perform her current duties and responsibilities.

The appellant also makes various statements about past duties and responsibilities (e.g., re-editing work products for other MOs). However, 5 U.S.C. 5112 indicates that we can consider only current duties and responsibilities in classifying positions. In addition, the appellant said she continues performing particular duties despite the immediate supervisor's instructions. In her April 9, 2010, letter to OPM, the appellant stated "...[supervisor's name] states he instructed me not to edit Taxonomic Unit Descriptions (TUDs) and Official Series Descriptions. In fact, I still find errors in the TUDs when I edit soil survey manuscripts, and I still correct those errors." The right to assign work is a management right (5 U.S.C. 7106) and is not reviewable under the position classification appeals process.

Position information

The appellant's position is assigned to MO-[number], the [region] MLRA management office. MO-[number] is responsible for regional coordination, quality assurance, technical guidance and support, and technology transfer for State and soil survey offices assigned to parts of [state, state, state, state, and state]. The State Soil Scientist (GS-470-14) directly supervises the MO-[number] five staff positions including, in addition to the appellant, three soil scientists (GS-470-12) and a cartographic technician (GS-1371-7).

The appellant spends approximately 50 to 75 percent of her time editing and preparing soil survey manuscripts for hardcopy, Web, or compact disk (CD) publication. Soil surveys are

products of the National Soil Survey Center (NSSC), a joint effort of the NRCS and other Federal agencies, State agencies, and local participants. Survey manuscripts originate from the Soil Survey Office responsible for conducting surveys; are normally 1,000 to 3,000 pages long; and are comprised of narrative descriptions of the soil and geographic area, in addition to other features such as maps, graphs, and tables.

To ensure agency reporting standards are met, the appellant's tasks include, but are not limited to, the following: correcting grammar, punctuation, capitalization, and sentence structure; choosing one of several photographs or graphics submitted to compliment a section; organizing, condensing, and formatting text and graphics; converting graphics to fit the digital format; ensuring narrative components are consistent with other data and pictorial features; preparing manuscripts for distribution; and requesting additional information from the author, if needed. Soil scientists assemble and verify the data quality of soil tables generated from the National Soil Information Service database. The appellant identifies and flags obvious errors with the table data for a technical expert's later review, consideration, and correction. She creates map legends and formats map keys, headings, and labels.

The appellant spends the remainder of her time performing similar work on written products drafted by other State Office programs. This work may involve making significant revisions regarding the grammar, flow, and order, while maintaining the integrity of the content and the author's writing style.

The appellant's immediate supervisor certified to the accuracy of the appellant's PD, number [number]. The appellant expressed concerns with the PD's accuracy. She submitted a PD she originally drafted for consideration during her agency's October 2009 position review. A PD is an official record of the major duties and responsibilities assigned to a position by an official with the authority to assign work. A PD does not have to be a comprehensive and detailed narrative of the position's duties and responsibilities or of its work methods, processes, and tools. Major duties are normally those occupying a significant portion of the employee's time. They should be only those duties currently assigned, observable, identified with the position's purpose and organization, and expected to continue or recur on a regular basis over a period of time. Based on these criteria, we find the appellant's PD is adequate for classification purposes and meets the PD standard of adequacy discussed in section III.E of the *Introduction*.

To help decide this appeal, we conducted telephone audits with the appellant on April 12 and 23, 2010. We also conducted telephone interviews with the immediate supervisor on April 19, 2010, the Assistant State Soil Scientist on April 16, 2010, the NSSC's head editor on April 16, 2010, and a MO-[number] soil scientist (otherwise titled Soil Data Quality Specialist (SDQS)) on May 5, 2010. In deciding this appeal, we carefully considered the interviews and all other information of record furnished by the appellant and her agency, including the official PD.

Series, title, and standard determination

The appellant's position is currently classified to the GS-1082 Writing and Editing Series which covers two-grade interval positions involved in writing and editing materials such as reports, regulations, articles, newsletters, magazines, news releases, training materials, brochures,

interpretive handbooks, pamphlets, guidebooks, scholarly works, reference works, speeches, or scripts. This work requires acquiring information on a variety of subjects in the course of completing assignments. GS-1082 work also requires developing, analyzing, and selecting appropriate information and presenting information in a form and at a level suitable for the intended audience.

It is not always easy to distinguish between GS-1082 editors classified in two-grade interval administrative occupations and GS-1087 editorial assistants classified in one-grade interval support occupations. Some tasks are common to both types of occupations. Especially at the GS-5 and GS-7 grade levels, editors often perform work similar to editorial assistants. The GS-1082 and GS-1087 PCSs explain the distinctions between editors and editorial assistants.

Editors properly classified to the GS-1082 series research, analyze, distill, and present information either in a variety of fields or, with a broad and non-specialized approach, in a single field. The materials presented ordinarily report and explain factual information, and often interpret it in such a way as to make it clear without sacrificing completeness and accuracy. Editors gather information for assignments typically by studying the related literature and by interviewing experts. Editors analyze the subject and the audience, and then present the material interestingly, clearly, accurately, thoroughly, and convincingly. They adapt the style and format of the material to the medium or publication where it will appear.

In contrast, editorial assistants classified to the GS-1087 series prepare manuscripts for publication and verify factual information in them. Such support work includes editing manuscripts for basic grammar and clarity of expression as well as marking copy for format. These positions require skill in using reference works to verify information and knowledge of grammar, punctuation, spelling, and good English usage.

Editorial assistants edit manuscripts for basic grammar, punctuation, syllabification, spelling, capitalization, accepted English usage, and grammatical structure. They correct such errors as subject-verb agreement, use of adverbs and adjectives, and agreement of pronouns. They also suggest changes in structure. Editorial assistants need substantive knowledge of English grammar. Their rewriting or restructuring of sentences, paragraphs, or papers is based on grammatical considerations, not the substantive subject matters. In addition, they observe internal factual inconsistencies in the material such as spelling of proper names, references, and citations. They verify the accuracy of statements, figures, illustrations, and subject matter terms by referring to standard reference works, to other published material, and to the author. They compare illustrations, photographs, tables, and charts with the text to assure they are pertinent and consistent.

The GS-1087 PCS further describes distinctions between both types of occupations. It states that editors prepare manuscripts by reviewing and revising the style and manner of presentation. An editor's concerns are: Will the document suit the intended media and audience? Does it present the substance of the subject matter clearly and cogently? Will the publication accomplish its information objective? Our evaluation of the appellant's position as it relates to these editorial concerns is as follows.

- *Will the document suit the intended media and audience?*

The appellant's position requires considering a document's suitability for the intended audience. Soil surveys provide soil and related information to individuals making land-use and management decisions. Surveys are distributed nationwide to libraries, NRCS field offices, other Federal agencies, and members of Congress. They are also made available to interested individuals such as farmers, ranchers, planners, community officials, builders, and homebuyers. The appellant's role is to review the lengthy survey manuscripts prepared and written by soil scientists from MO-[number] area of responsibility. This may involve correcting grammar and punctuation, reorganizing sentences and paragraphs to improve flow of information, resolving factual inconsistencies with the material, correcting errors related to word usage, fixing errors in citations, and identifying confusing parts of the manuscript. Her work ensures manuscripts are polished and camera ready; are consistent with agency reporting standards; and are acceptable and suitable for use by interested parties with varying degrees of technical soils knowledge.

Her work in reviewing products (e.g., correspondences, employee directories, grant proposals, articles, newsletters, news releases, posters, and educational materials) from other State Office programs includes correcting errors in grammar, punctuation, spelling, capitalization, etc., while keeping in mind the document's intended audience. For example, she reviewed the [title], an activity book intended for distribution to [state] schools. The appellant's work involves determining if the document is appropriate for the audience (in this instance, if the activity book is lighthearted and at a reading level suitable to a younger audience) and ensuring that any edits or changes are consistent with the intended audience. However, unlike GS-1082 editors, the appellant's work does not extend to analyzing the subject and the audience and presenting the material interestingly, clearly, accurately, thoroughly, and convincingly. This function is vested in the originating program offices.

- *Does it present the substance of the subject matter clearly and cogently?*

The appellant's work does not involve determining if the substance of the document's subject matter is presented in a clear and convincing manner. Interviews with the appellant's supervisor, Assistant State Soil Scientist, SDQS, and NSSC's head editor confirmed the appellant's manuscript edits are reviewed by the author or another technical expert to guarantee the changes do not impact the integrity of the material. The appellant also makes similar statements. In her April 9, 2010, letter to OPM, she describes her editing process as follows, "... (a) correcting spelling, punctuation, and grammar; (b) modifying sentence and paragraph structure; and (c) choosing appropriate word usage while (d) working with authors to maintain the integrity of their writing styles, the content and formats of their documents, and NRCS standards." In reviewing written products for the MO-[number] and various State Office programs, the appellant's chief goal is to improve the clarity of the documents without changing the author's intended meaning. Her work does not require determining if the substance (i.e., the technical part) is clear and convincing as this responsibility lies with the author, SDQS, or other technical experts.

- *Will the publication accomplish its information objective?*

The appellant occasionally recommends significant revisions to survey manuscripts, but responsibility for ensuring information objectives are met begins and ends with the author or another technical expert, not the appellant. Her work requires applying extensive knowledge of the English language and using a wide variety of references including NRCS policies and procedures, Government Printing Office Style Manual, Soil Survey Manual, National Soil Survey Handbook, etc. Matters of format, tone, style, and standard language are addressed in agency policies, guidelines, and standard operating procedures. The appellant's work requires a basic understanding of soil survey terminology to identify and resolve obvious errors with the interpretative tables and parts of the narrative sections, but she consults with technical experts to make sure the changes have no impact on the substance of the subject matter. The SDQS or another soils expert reviews the technical portions of the survey documents to ensure the data is accurate and meets soil survey objectives.

Typical of GS-1087 work, the appellant's concerns are largely process-related and include: Is the grammar appropriate? Is this word correct or is there another to better describe the meaning? Is this sentence clear? Her primary responsibility is to provide editorial support work to the MO-[number] and various State Office programs. She corrects spelling, grammar, matters of style, etc., but not the more substantive issues such as accuracy, fairness, and completeness. The appellant's work does not require conducting substantial research and rewriting for the purpose of organizing, balancing, and completing deficient manuscripts to meet publication objectives as expected of GS-1082 editors. Therefore, the appellant's work is properly classified to the GS-1087.

We have used the directly applicable grading criteria in the GS-1087 PCS to evaluate the appellant's work. The authorized title for nonsupervisory positions GS-5 and above is Editorial Assistant.

The appellant's position requires knowledge of office automation (OA) systems (e.g., desktop publishing to present information in various formats such as charts, tables, and spreadsheets). We evaluated the appellant's OA duties against the criteria in the Office Automation Grade Evaluation Guide and found those duties are not grade controlling. Since those duties do not affect the position's grade, we will not discuss them further.

Grade determination

The GS-1087 PCS uses two criteria to determine grade levels: *Nature of assignment* (which includes knowledge required and complexity of the work) and *Level of responsibility* (which includes supervisory controls, guidelines, and contacts).

Nature of assignment

At the GS-7 level, the highest level described in the PCS, editorial assistants edit manuscripts by reorganizing them entirely or reorganizing sections of long manuscripts. They reorder paragraphs and suggest changes in the organization of sections in addition to restructuring

sentences and paragraphs. At this level, typical assignments include editing style of writing to conform to an agency's specified preferences. Assistants do not rewrite the manuscript to appeal to the potential audience, but they inform the originating writer or office of established stylistic requirements. Assistants edit manuscripts to assure clarity of expression through grammatical construction.

Some GS-7 editorial assistants prepare specifications and procedures for preparing manuscripts. These specifications are in the form of guides, reference sources, manuals, desk references, and other similar materials dealing with the agency's publications. These reference materials give information on agency policies, practices, and requirements for publication styles and methods of presentation. GS-7 assistants advise users of these procedures and give them information on how to interpret the references. Some GS-7 assistants also advise manuscript producing offices on format and stylistic requirements of other publications, such as journals or magazines. Typically, GS-7 assistants provide such technical assistance on a number of publications which differ in manner and style of presentation. They advise manuscript producers before and during the writing process on possible format and styles of presentation.

The appellant's work meets but does not exceed the GS-7 level. As at this level, she edits lengthy soil survey manuscripts for the MO-[number] to ensure the document's narrative, data, and pictorial components are presented in the correct format and in a manner consistent with the agency's established guidelines. She also reviews written products drafted by other State Office programs for similar purposes. Her work requires correcting grammar mistakes, misspellings, and incorrect punctuations; identifying inconsistencies; modifying words; and rearranging sentences and paragraphs. The appellant's work does not require a full understanding of the subject matter, but she is familiar with the technical terminology and jargon. She accesses databases to verify spellings of scientific names and to properly format specific types of data. The appellant also edits locator maps, soil legends, and other legends for survey manuscripts. She makes corrections to maps involving erroneous names, symbols, and titles. Similar to the GS-7 level, the appellant uses technical information received from various sources and converts it into a narrative format. For example, she edits the climate report she requests and receives from the NRCS's National Water and Climate Center. The appellant also provides advisory-type work similar to that described at the GS-7 level. For example, she (1) developed checklists for staff to use when reviewing survey manuscripts, addressing the adjectives to use for a particular soil, how to hyphenate scientific names based on NRCS guidelines, etc.; (2) prepared a survey manuscript template on CD for use by other MOs; and (3) advised others on using desktop publishing applications.

This factor is evaluated at the GS-7 level.

Level of responsibility

At the GS-7 level, the highest level described in the PCS, editorial assistants use a number of general style manuals and other similar references to prepare an agency's interpretations and requirements. During planning sessions on new publications, assistants advise authors, editors, or other publications personnel about requirements of current publications and problems in their use. They also recommend changes in current specifications and suggest presentations methods

for new publications. Assistants base these suggestions on extensive knowledge of current publication styles and experience in the use of publication procedures. GS-7 editorial assistants advise others on manuscript preparation. Such work receives little supervision. Assistants submit edited manuscripts to originating offices for concurrence of authors, editors, or others. This staff reviews to assure that the assistants have not altered the meaning of the manuscript. After assistants prepare specifications for new publications, the planning staff typically reviews them to assure that the specifications conform to the original intent.

The appellant's work meets but does not exceed the GS-7 level. The immediate supervisor assigns and prioritizes the work, but the appellant receives little supervision and performs day-to-day work independently. She uses initiative and judgment in completing assignments by following accepted agency policies and practices. Similar to the GS-7 level, the appellant uses a variety of applicable guidelines covering style, format of presentation, and standard language established by the organization. The head editor for the NSSC is available to provide advice if the guidelines are incomplete or unclear. Consistent with the GS-7 level, the appellant recommends changes in current specifications; e.g., she suggested a new way of arranging completed survey manuscripts where all maps are contained at the end of the document and so are easier to locate. Also at the GS-7 level, the appellant coordinates with the author, SDQS, and other technical experts to ensure the edits and changes do not alter the original meaning.

This factor is evaluated at the GS-7 level.

Summary

By comparison with the GS-1087 PCS, both factors are credited at the GS-7 levels.

Decision

The appellant's position is properly classified as Editorial Assistant, GS-1087-7.