

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

**Appellant:** [Appellant]

**Agency classification:** Area Technician  
GS-1101-6

**Organization:** [Name/Organization]  
[Organization]  
Rural Development  
U.S. Department of Agriculture  
[Location]

**OPM decision:** (Title at agency discretion)  
GS-1101-6

**OPM decision number:** C-1101-06-05

**This decision was originally issued using C-1101-06-04 in error**

\_\_\_\_\_  
/s/

Robert D. Hendler  
Classification and Pay Claims  
Program Manager  
Merit System Audit and Compliance

5/7/10

\_\_\_\_\_  
Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a classification 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 5 CFR 511.605, 511.613, and 511.614, as cited in the *Introduction to the Position Classification Standards (Introduction)*, appendix 4, section G (address provided in appendix 4, section H).

**Decision sent to:**

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## **Introduction**

On November 4, 2009, Philadelphia Oversight, formerly the Philadelphia Oversight and Accountability Group, of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [Appellant]. The appellant's position is currently classified as Area Technician, GS-1101-6, and is located in the [Name/Organization], [Organization], Rural Development (RD), U. S. Department of Agriculture (USDA) in [Location]. The appellant believes her position warrants a higher grade level. We received the complete agency administrative report on December 1, 2009, and have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

To help decide this appeal, we conducted telephone interviews with the appellant and her supervisor on February 17, 2010, and February 18, 2010, respectively. In reaching our classification decision, we have carefully considered all of the information obtained from the interviews, as well as the written information furnished by the appellant and her agency including the position description (PD) of record.

## **Background information**

On April 6, 2009, the appellant requested a review of the classification of her position from her local human resources office (HRO). In her request, the appellant stated her PD was not accurate because she works independently and above the level required for the GS-6 position. The HRO issued its decision on October 5, 2009, which did not change the position's grade. On October 20, 2009, she filed this appeal with OPM.

## **General issues**

The appellant was assigned to PD # [number] effective October 5, 2009. Previously, the appellant was assigned to PD # [number], a standard PD, which the appellant's supervisor stated did not accurately reflect the duties of her position. The HRO's position review decision included issuing the current PD. Even though the appellant and her supervisor certified to the accuracy of this new PD, the appellant states she disagrees with the grade level specifically as it relates to the factors: knowledge required by the position, complexity of work, personal contacts, and purpose of contacts. She further states she assumed the duties of a GS-1101-7 position as a GS-1101-5 three years ago and has since learned various programs from application processing to loan closing. She was promoted to the GS-6 level in August 2007, but feels the additional responsibility that has been placed upon her justifies an upgrade to GS-7.

The appellant alludes to classification inconsistency based on the grade of her predecessor's position. The appellant states she assumed some duties of the GS-1101-7 position upon the departure of the previous incumbent. 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). Since comparison to the standards is the exclusive method for classifying positions, we cannot compare the appellant's current duties to other positions which may or may not be classified properly as a basis for deciding her appeal.

A PD is the official record of the major duties and responsibilities assigned to a position or job by an official with the authority to assign work. A position is the duties and responsibilities which make up the work performed by the employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal based on 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 the PD. This decision is based on the work currently assigned to and performed by the appellant.

### **Position information**

The [Name/Organization] Housing Programs provide access to safe, decent, and sanitary housing solutions to rural low-income [Location] residents. Through loan programs, RD supports communities by providing people with loans or grants for repairing, buying, or building homes, or providing rental assistance. RD offers two types of homeownership loans: guaranteed and direct. Under the direct loan programs, which are 502 or 504 loans, individuals or families receive a loan directly from USDA. Payments are based on income, and applicants must be unable to obtain a homeownership loan from a bank or other conventional sources. Guaranteed or Guaranteed Single Family Housing (GSFH) loans are available to qualifying applicants who would not be able to get a conventional loan without the loan guarantee. These are loans made by other lenders, such as banks or credit unions, and are guaranteed by USDA RD.

The appellant provides technical support to the Area Director (AD) and loan specialists in areas such as loan processing and servicing, outreach and public information, and administration. The appellant is involved in all aspects of processing 502 and 504 loans, primarily in the closing aspects of processing GSFH Loans. Work is typically assigned via a geographic area of responsibility. The appellant also provides information to the general public, attorneys, lending partners, realtors, and others regarding loan program eligibility requirements.

The appellant's PD states in processing 502 and 504 loans, she reviews applications for completeness and compliance with regulatory requirements and gathers supporting information necessary to determine eligibility. She sends correspondence to the applicant, employer, and others as necessary to obtain required information. She also maintains a locally developed applicant database to monitor and track all loan applications. The appellant then orders a credit report and conducts pre-qualification eligibility determinations of the loan applicants by analyzing, verifying, and entering income, credit, debt, and other financial data from the applicant into the UNIFI loan origination and underwriting system, which automatically calculates the affordability ratios and maximum loan amounts. She provides this data to a loan specialist, who reviews it and determines whether or not to proceed with processing the loan. The ultimate loan approval decision lies with her supervisor, the AD. If the loan is declined, the appellant composes appropriate correspondence to the applicant using locally developed template letters.

If the loan is approved, the appellant checks a Federal Emergency Management Agency website to determine if Flood Plain insurance is needed and checks with the State Historical Planning Office to determine if the property is on a historical register. She passes this information on to the loan specialist for further action. Using UNIFI, she then calculates the loan amount and

closing costs considering option/contract amounts, development costs, taxes, appraisal and escrow fees, attorney, title insurance and mortgage sketch fees, and leveraged funds. Using a locally developed spreadsheet, she also conducts security and loan limit tests to ensure adequate security and compliance with loan limits and advises the loan specialist of any issues. The loan specialist then reviews all calculations and spot checks the loan package. This package review usually occurs post closing. The appellant also re-verifies applicant information and ensures all loan approval conditions are complied with prior to closing.

Upon closing a loan, the appellant orders the title insurance binder and mortgage sketch from the closing agent and reviews each for regulatory compliance. If there are any matters requiring further action, she informs the loan specialist. The appellant then prepares the loan closing documents, inspects them for completeness, and sends them to the loan closing agent or attorney. If a complex issue arises in processing a loan, such as the property is located on an Indian Reservation, the appellant would raise the issue with a loan specialist or the AD. However, both the appellant and her supervisor stated this rarely happened as most of the loans they process are straight-forward. The loan closing documents are reviewed by the loan specialist and spot-checked by the AD.

Aside from providing technical support in loan processing, the appellant's PD also states she monitors the Centralized Servicing Center task queries and prepares discharges/releases of mortgages. She also performs administrative and miscellaneous technical work as needed and trains new employees on these duties.

The appellant and her supervisor estimate she currently spends approximately 40 percent of her time processing 502 and 504 loans and 60 percent of her time processing GSFH loans. Her GSFH work was added recently. In December 2009, she began working approximately three days per week in the guaranteed loan program due to an increase in GSFH loan applications and funds. Neither the appellant nor her supervisor could anticipate how much longer this workload will continue.

The *Introduction* states regular and recurring duties are the foundation of most positions. They may be performed in a continuous, uninterrupted manner, or they may be performed at recurring intervals. These duties should be considered in classifying the position if they extend over a long period of time (e.g., several months) and it is reasonable to assume that the duties will continue to recur. Since the appellant has already been performing GSFH duties on a regular basis for several months and is likely to continue to do so we will consider these duties in our classification determination.

### **Series and title determination**

The agency has classified the appellant's position to the General Business and Industry Series, GS-1101, and titled it Area Technician. The appellant does not disagree with the assigned GS-1101 series or the PCSs used to evaluate her position.

The GS-1101 series covers all classes of positions administering, supervising, or performing (1) any combination of work characteristic of two or more series in the GS-1100 Business and

Industry Group where no one type of work is series controlling and where the combination is not specifically included in another series, or (2) other work properly classified in this group for which no other series has been provided. GS-1101 positions may perform either one- or two-grade interval work.

To decide the proper PCS to use for determining the series, we must first determine whether the work performed by the appellant is one-grade interval administrative support or two-grade interval administrative in nature. Some tasks are common to both types of occupations, and it is not always easy to distinguish between them. Guidance on distinguishing between one-grade and two-grade interval work is available in *The Classifier's Handbook*.

Support work usually involves proficiency in one or more functional areas or in certain limited phases of a specified program. Employees performing support work follow established methods and procedures. They have specific boundaries narrowly restricting their work. They use a limited variety of techniques, standards, or regulations. Support work involves handling problems which are often recurring and have precedents, limiting the breadth and depth of knowledge required, complexity of problem solving, applicability of guidelines, and closeness of supervisory controls.

In contrast, administrative work primarily requires a high order of analytical ability 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 work also requires skill in applying problem-solving techniques and skill in communicating both orally and in writing. Administrative positions do not require specialized education, but they do involve the types of skills (i.e., analysis, research, writing, and judgment) typically gained through college-level education or through progressively responsible experience.

Typical of one-grade interval work, the appellant applies a practical knowledge of the purpose, operation, procedures, techniques, and guidelines set forth in direct and guaranteed loan processing. She provides technical support that is of a continuing, repetitive nature, and is performed on the basis of her acquiring a familiarity with loan processes after several years of experience. The work does not involve making the sort of judgmental decisions characteristic of two-grade interval positions. While the appellant exercises some judgment in reviewing applicant financial data, the record shows she normally deals with recurring types of loans. This work is analogous to support work. In addition, the appellant uses pre-determined eligibility ratios, income guidelines, policy letters, checklists, and specific guidelines, such as the Direct Single Family Housing Handbook, National Procedure Notices, [Location] Procedural Notices, and the Rural Housing Service's Dedicated Loan Origination and Servicing Manual to perform her work. Typical of support work, these guidelines are clear, well-established, and do not typically require significant interpretation or adaptation to fit work situations. The appellant's tenure in the position has resulted in her having advanced knowledge in these processes, but, unlike two-grade interval positions, her duties do not require her to analyze or use evaluative methods and techniques.

Typical of positions in the GS-1100 Business and Industry Group, the appellant's primary work includes advising on and administering programs that require knowledge of business practices, and the characteristics and use of property, conducting investigations and studies, collecting and disseminating information, providing advisory services, etc. The appellant uses this knowledge to provide technical support in the processing of loans, to advise loan applicants on all issues related to their application, and to review applicant financial data to determine loan eligibility. Since the appellant performs one-grade interval work, the work cannot be classified in the Loan Specialist Series, GS-1165. Therefore, we find the appellant's position is properly placed in the GS-1101 series, since it covers other work properly classified in the GS-1100 Group for which no other series is applicable. OPM has prescribed no titles for positions in the GS-1101 series. Therefore, in accordance with Section III.H.2 of the *Introduction*, selection of an appropriate title is at the agency's discretion following the titling guidance in the *Introduction*.

### **Standards and grade determination**

There are no published grading criteria for positions classified in the GS-1101 series. Therefore, as explained in the *Introduction*, an appropriate general classification guide or criteria in a PCS or PCSs for related work should be used. PCSs used for cross comparison should cover work as similar as possible to the work being performed with regard to the kind of work processes, functions, or subject matter; qualifications required to do the work; level of difficulty and responsibility; and the combination of classification factors with the greatest influence on grade level.

The appellant's servicing HRO determined the grade of the appellant's position by applying three one-grade interval PCSs: the PCS for Management and Program Clerical and Assistance Series, GS-344; the Job Family Standard (JFS) for Assistance Work in the Legal and Kindred Group, GS-900 (*specifically the Legal Instruments Examining Series, GS-963*); and the JFS for Clerical and Technical Accounting and Budget Work, GS-500 (*specifically the Accounting Technician Series, GS-525*).

We do not find use of the PCS for Management and Program Clerical and Assistance Series, GS-344, appropriate. The purpose of work in this series is to analyze, evaluate, and improve the efficiency, effectiveness, and productivity of organizations and programs and to provide managers with objectively based information for making decisions on the administration and operational aspects of agency management and program operations. The appellant coordinates and maintains loan docket, an applicant database, and financial statements for the purpose of assisting loan specialists. However, the nature of the work is not to improve the efficiency, effectiveness, or productivity of an organization, but provide technical support to loan specialists and the AD in the processing and servicing of loans.

We also do not find the use of the JFS for Assistance Work in the Legal and Kindred Group, GS-900 (*specifically the Legal Instruments Examining Series, GS-963*), appropriate. The purpose of work in this series is to provide one-grade interval administrative support in connection with the examination of legal instruments and supporting documents, other than claims, to determine whether a requested action complies with certain provisions of various laws. While the appellant applies knowledge of loan processing regulations and laws in her review and preparation of loan

documents, the JFS states this work is excluded as it typically involves determining amounts of money properly payable and validating requests for payment. This exclusion further states the JFS for Clerical and Technical Accounting and Budget Work, GS-500, is more appropriate.

We do not find the use of the JFS for Clerical and Technical Accounting and Budget Work, GS-500 covering Accounting Technician Series, GS-525 appropriate. This series covers account maintenance clerical and accounting technician support positions requiring a basic understanding of accounting systems, policies, and procedures in performing the examination, verification, and maintenance of accounts and accounting data. The appellant evaluates documents such as income statements, tax returns, budgets, etc. to determine loan eligibility. The nature of the work is not to classify accounting transactions, maintain and reconcile accounts, analyze accounting data nor examine accounts, but to provide technical support to loan specialists and the AD in the processing and servicing of loans.

To evaluate the appellant's work requiring a working knowledge of the work processes and procedures of an administrative field, e.g., loan processing, and the mission and operational requirements of her unit, we applied the grading criteria in the Grade Level Guide for Clerical and Assistance Work (*Guide*) which provides general criteria for grading clerical and assistance work. In reviewing the appellant's work evaluating documents such as income statements, tax returns, budgets, etc. to determine loan eligibility, we applied the Financial Clerical and Technician Series, GS-503 work described in the JFS for Clerical Technical Accounting and Budget Work, GS-500.

### ***Evaluation of administrative assistant duties***

The *Guide* provides general criteria to use in determining the grade level of nonsupervisory clerical and assistance work being performed in offices, shops, laboratories, hospitals, and other settings in Federal agencies. The *Guide* describes the general characteristics of each grade level from GS-1 through GS-7, and uses the two following criteria for grading purposes: *Nature of Assignment* (which includes knowledge required and complexity of the work) and *Level of Responsibility* (which includes supervisory controls, guidelines, and contacts).

The *Guide* covers the work of processing transactions and performing various office support and miscellaneous clerical and assistance duties within a framework of procedures, precedents, or instructions. The *Guide* applies a distinction between "clerical" and "assistance" work. Clerical work is defined as preparing, receiving, reviewing, and verifying documents; maintaining office records; locating and compiling data or information from files; compiling information for reports; keeping a calendar and informing others of deadlines and other important dates; and similar clerical support work within an organization. This work requires knowledge of the clerical requirements and processes involved in maintaining the functional programs of the unit. Assistance work is defined as performing technical work to support the administration or operation of the programs of an organizational unit. This work requires a working knowledge of the work processes and procedures of an administrative field and the mission and operational requirements of the unit.



Similar to assistance work, the appellant's work requires a working knowledge of the processes and procedures of an administrative field, e.g., loan processing, and the mission and operational requirements of her unit.

#### *Nature of assignment*

Assistant work at the GS-6 level typically requires considerable evaluative judgment within well-defined, commonly occurring aspects of an administrative program or function. The work 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 occurring in a broad administrative program or function. 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 which 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. It 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.

At the GS-7 level, work consists of specialized duties with continuing responsibility for projects, questions, or problems that arise within an area of a program or functional specialty 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 or functions. The work also 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 training or experience dealing with the operations, regulations, principles, and peculiarities of the assigned program, function, or activity.

Similar to the GS-6 level, the appellant's position involves responsibility for continuing processes, including performing many aspects of direct and guaranteed loan processing, based on direct application of established policies and practices. The processing of these loans is a relatively stable process in which new loan applications, and their resulting subsequent issues, typically resemble those of previously processed loans. Unlike work at the GS-7 level, the appellant is not charged with a continuing responsibility for projects, questions, or problems that arise within an area of a program or functional specialty. Instead, it is the loan specialists who are given this responsibility. While the appellant recently assumed responsibility for performing

the calculations for pre-qualification loan eligibility determination, the decision to proceed with a loan lies with the loan specialists and the AD makes the final loan approval decision. The appellant's work does not require making decisions consistent with the GS-7 level where assistants are responsible for studying and evaluating information, identifying problems, and recommending actions. In contrast, the appellant's work involves verifying loan applications for completeness, calculating affordability ratios and maximum loan amounts using UNIFI, and completing loan closing documents for loan closing agents and/or attorneys. The appellant does not evaluate applicant data or loan affordability ratios to make decisions or recommendations for loan specialists on applicants' final loan eligibility.

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 an 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 other employees in the agency, in other agencies, or management 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 programs or functions. 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.

Like the GS-6 level, the appellant works independently in carrying out many aspects of the processing of direct and guaranteed loans. She uses judgment and initiative when applying the varied local and national guidelines, policy letters, and checklists to perform her work. While the guidelines are occasionally inadequate to address certain situations that arise in the processing of some loans, they usually cover most situations. Additionally, as previously mentioned, the appellant's work is usually routine, as most loans are straight-forward. Therefore, the appellant does not encounter a wide variety of problems which require choosing alternate responses and her guidelines do not rise to the level of complexity mentioned in the GS-7 level. In addition, the AD reviews all the appellant's work prior to it leaving the office. While

the supervisor stated during his interview some of these reviews are cursory in nature, the appellant's work is still reviewed for more than just appropriateness and conformance to policy as expected at the GS-7 level. Loan specialists review the appellant's loan ratios, budget calculations, and other data prior to sending the completed loan package to the AD for final approval.

This factor is evaluated at the GS-6 level.

Both factors covered by the *Guide* are evaluated at the GS-6 level. Therefore, the appellant's administrative assistant duties are graded at the GS-6 level.

### ***Evaluation of financial technician duties***

The JFS for Clerical and Technical Accounting and Budget Work, GS-500, uses the Factor Evaluation System (FES) under which factor levels and accompanying point values are assigned for each of the nine factors, with the total then being converted to a grade level by use of the grade-conversion table provided in the PCS. Under the FES, each factor-level description in a PCS 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 unless the deficiency is balanced by an equally important aspect that meets a higher level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level.

The appellant disagrees with her agency's assignment of Levels 1-4, 4-3, 6-2, and 7-b. She agrees with her agency's assignment of Levels 2-3, 3-2, 5-2, 8-1, and 9-1. Our evaluation of the nine FES factors follows.

#### ***Factor 1, Knowledge required by the position***

This factor measures the nature and extent of information or facts that a worker must understand to do acceptable work, such as the steps, procedures, practices, rules, policies, theories, principles, and concepts; and the nature and extent of the skills needed to apply this knowledge.

Work at Level 1-3 requires knowledge of a body of standardized regulations, requirements, procedures, and operations associated with clerical and technical duties related to the assigned accounting, budget, or financial management support function. This includes knowledge of the various steps and procedures required to perform a full range of accounting, budget, or financial management support duties related to recurring or standardized transactions (e.g., auditing cash processing documents for completeness; verifying the availability of funds by account and obligating necessary dollar amounts; and performing a variety of processes involving tax returns covering many sources of income, taxes, claims and/or deductions). Work at Level 1-3 also requires a knowledge of various accounting, budget, or other financial processing procedures to support transactions that involve the use of different forms and the application of different procedures (e.g., knowing how to process an action involving multiple documents such as processing the full range of travel related expenses when the sale of a residence as well as personal transportation and some household freight shipments are involved). Employees

performing this level of work also have knowledge of one or more automated data bases associated with a specific accounting, budget or other financial management function sufficient to input a range of standard information or adjustments, understand recurring error reports and take corrective action, and generate a variety of standard reports; and knowledge of the structure and content of accounting, budget, or other financial management related documents (e.g., invoices, reports, travel orders, payroll forms, etc.), to investigate and resolve routine or recurring discrepancies, check documents for adequacy, or perform comparable actions that are covered by established procedures; and/or knowledge of frequently used and clearly stated regulations and rules to determine if a transaction is permitted or to respond to recurring questions from agency personnel, clients, and others.

At Level 1-4, work requires in-depth or broad knowledge of a body of accounting, budget, or other financial management regulations, practices, procedures, and policies related to the specific financial management functions. This includes knowledge of a wide variety of interrelated steps, conditions, and procedures or processes required to assemble, review, and maintain complex accounting, budget, or other fiscal transactions (e.g., adjusting tax accounts or processing tax returns involving numerous supporting schedules; reconciling accounts in accounting systems involving extensive subdivision of accounts, frequent and varied adjustments to accounts, or extensive balancing and reconciling of detailed summary accounts; or resolving problems in balancing accounts, adjusting discrepancies, developing control records, verifying the accuracy of budgetary data, adjusting dollar amounts of accounts by line item and object class, and preparing reports on the status of funds). Work at this level also requires a knowledge of various accounting, budget, or other financial regulations, laws, and requirements (e.g., related fiscal regulations and applicable schedules, pay and leave rules, administrative rules associated with recording and tracking budgetary transactions, tax laws, entitlement rules, documentation requirements, schedules, deductions, etc.) to ensure compliance and recommend action. Employees performing Level 1-4 work also have knowledge of automated accounting and budget systems to reconcile errors that require an understanding of nonstandard procedures or to provide assistance in the development of automated procedures for clerical operations and/or a knowledge of extensive and diverse accounting, budget or other financial regulations, operations, and procedures governing a wide variety of types of related transactions to resolve nonstandard transactions, complaints, or discrepancies, provide advice, or perform other work that requires authoritative procedural knowledge.

Comparable to Level 1-3, the appellant's work requires knowledge of a body of standardized regulations, procedures, and operations associated with technical duties in support of direct and guaranteed loan processing. She routinely reviews loan application documents for completeness and verifies many sources of income, taxes, and/or debts. She also uses the UNIFI system and locally developed spreadsheets to input applicant data and, calculate loan amounts, closing costs considering option/contract amounts, development costs, taxes, appraisal and escrow fees, attorney, title insurance and mortgage sketch fees, leveraged funds, and loan limits. In many of these instances, the appellant is required to use multiple documents to perform these calculations. While these calculations are varied in nature and often require multiple steps, they are fairly routine, repetitive and straight-forward. Because of this, the appellant's work does not require the in-depth knowledge of accounting, budget, or other financial management regulations, practices, procedures, and policies characteristic of Level 1-4. While the appellant may have

acquired an in-depth knowledge of accounting and budget regulations during her years of experience, the nature of her work does not require it. As such the appellant's work does not require an understanding of nonstandard procedures to reconcile accounts, ensure compliance, recommend actions, nor reconcile errors. It is the type of work which handles more complex, non-routine issues which would require more in depth knowledge of non-standard accounting and budget regulations and policies.

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

*Factor 2, Supervisory controls*

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

At Level 2-2, the supervisor or other designated employee provides general standing instructions on recurring assignments by indicating what is to be done, applicable policies, procedures and methods to follow, data and information required, quality and quantity of work expected, priority of assignments, and deadlines. They provide additional, specific instructions for new, difficult, or special assignments including suggested procedures, sources of information including the location and type of written material that may be used as an aid in completing the assignment. For example, standing instructions may cover the steps involved in processing documents or transactions. This guidance may include an explanation of how to: review documents for missing or incompatible information; assemble and prepare forms, accounts, or other paperwork that make up a file; recognize and reconcile discrepancies, and prepare transaction files for closeout; and/or use automated systems to access, retrieve, and generate various transaction data and reports. The employee uses initiative to perform recurring assignments. The employee also resolves recurring clerical or technical tasks without specific instructions. The employee refers situations not covered by instructions or precedents to the supervisor for decision or help. At this level, some employees work more independently than others, receiving little day-to-day supervision. However, their work is limited or controlled by readily applicable instructions or procedures that specifically describe how the work is done and the kind of adaptations or exceptions which can be made. The supervisor or other designated employee assures finished work and methods used are technically accurate and in compliance with established instructions, methods, procedures, and deadlines. Recurring assignments are reviewed through quality control procedures and selected work products may be spot checked. New, difficult, or unusual assignments are usually checked in more detail to determine if instructions were carried out correctly.

At Level 2-3, the supervisor or other designated employee assigns work with standing instructions on objectives, priorities, and deadlines and provides guidance for unusually involved situations. The supervisor may assign work according to a standardized control system such as batched work, caseload level, or other defined structure and provide standard general instructions about timeliness, objectives and relative priorities for doing the work. The employee independently processes the most difficult procedural and technical tasks or actions and handles problems and deviations in accordance with instructions, policies, previous training, or accepted practices. For example: the employee independently determines the types and sources of

information needed to complete the transaction; the nature and extent of deviations from established requirements; and whether standard techniques, methods or procedures are appropriate for assignments. The supervisor or designated employee evaluates completed work for overall technical soundness and conformance to agency policies, legal, or system requirements. Completed work is reviewed by sampling in a quality review system and/or spot checked by the supervisor or a senior worker for results and conformity to established requirements and deadlines. The methods used to complete the assignment are seldom reviewed in detail.

The appellant's position is comparable to Level 2-2. Work assignments are provided by the supervisor using general standing instructions and the appellant uses initiative in performing day-to-day work. Since most loans are straight-forward, it is rare for her to receive difficult or special assignments. However, she occasionally encounters situations not covered by her instructions or guidelines. In those instances, the appellant and her supervisor stated she refers to her supervisor for help. This does not meet the requirements of Level 2-3, which state the employee independently handles the most difficult tasks. Similar to Level 2-2, the appellant's supervisor reviews her completed work through spot checks for compliance with established instructions. While the supervisor stated some of these reviews are cursory in nature, the appellant's work is still reviewed for more than just conformance to policy as expected at Level 2-3. In addition to the review the AD conducts of all documentation before it leaves the office, the loan specialists also review the appellant's work at various steps throughout the loan processing process. For example, they review loan ratios, budget calculations, and other data for technical accuracy prior to sending the completed loan package to the AD for final approval.

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

### *Factor 3, Guidelines*

This factor covers the nature of guidelines and the judgment employees need to apply them. Guides used in General Schedule occupations include, for example, desk manuals, established procedures and policies, traditional practices, and reference materials, such as dictionaries, style manuals, engineering handbooks, and the pharmacopoeia.

At Level 3-2, procedures for doing the work have been established, and a number of specific guidelines are available. The number and similarity of guidelines and work situations require the employee to use judgment in locating and selecting the most appropriate guidelines, references, and procedures for application. Minor deviations may be needed to adapt the guidelines to specific cases. The employee may also determine which of several established alternatives to use. Situations in which the existing guidelines cannot be applied or significant deviations must be made are referred to the supervisor.

At Level 3-3, guidelines are available but due to the complicating nature of the assignments, are not completely applicable to the work or have gaps in specificity. The employee uses judgment in interpreting and adapting guidelines, such as agency policies, regulations, precedents, and work directions for application to specific cases or problems. The employee analyzes results and recommends changes.

Similar to Level 3-2, the appellant uses judgment to identify and select the most appropriate guidelines to use in performing her work. Guidelines are varied and include: income guidelines, credit report scores, the Direct Single Family Housing Handbook, national and state procedure notices, locally developed checklists, policy letters, and the Rural Housing Service DLOS Manual and require choosing appropriate procedures from several established alternatives. Unlike Level 3-3, the appellant does not adapt procedures to fill in gaps in guidelines to resolve complex or non-standard situations, such as when property is located on an Indian Reservation or when a loan's affordability ratios are outside the predetermined acceptable limits. In these cases, the appellant would refer the situation to her supervisor for resolution.

This factor is evaluated at Level 3-2 and 125 points are assigned.

#### *Factor 4, Complexity*

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

At Level 4-3, work involves performing various accounting, budget, or financial management support related duties or assignments that use different and unrelated processes, procedures, or methods. The use of different procedures may result because transactions are not completely standardized; deadlines are continually changing; functions assigned are relatively broad and varied; or transactions are interrelated with other systems and require extensive coordination with other personnel. The employee decides what needs to be done by identifying the nature of the problem, question, or issue, and determining the need for and obtaining additional information through oral or written contacts or by reviewing regulations and manuals. The employee may have to consider previous actions and understand how these actions differ from or are similar to the issue at hand before deciding on an approach. The employee makes recommendations or takes actions (e.g., determine eligibility for deductions, entitlements, or claims, verify factual data, or make other financial determinations) based on a case-by-case review of the pertinent regulations, documents, or issues involved in each assignment or situation. For example, employees use different established procedures to review and reconcile various financial documents and records; resolve a variety of problems through coordination with vendors, employees, taxpayers; and review and reconcile various types of transactions involving multiple funds or a number of different control accounts, or numerous modifications to contracts.

Work at Level 4-4 is distinguished from the previous level by (1) the variety and complexity of examinations, transactions, or systems involved; (2) the nature and variety of problems encountered and resolved; and (3) the nature of independent decisions made by the employee. Typically at this level the work may require analysis, development or testing of a variety of established techniques and methods to evaluate alternatives and arrive at decisions, conclusions, or recommendations. For example, the employee interprets and tests user-defined specifications to modify an automated accounting system requiring broad knowledge of technical functions, program objectives, and impact of system changes on other functions, processes and

requirements or the employee resolves complicated tax examinations involving substantial corrective actions or complicated adjustments. Work at Level 4-4 involves application of many different and unrelated processes and methods relating to examination or analysis of complex and unusual transactions requiring substantial research and thorough understanding of a wide variety of transactions and accounts. Decisions regarding what needs to be done include assessing unusual circumstances or conditions, developing variations in approach to fit specific problems or dealing with incomplete, unreliable, or conflicting data. The work requires originality to determine, develop, or otherwise make correct and accurate interpretations regardless of the technical difficulties encountered. At this level, employees must sort complicated factual information and apply a variety of methods to resolve issues. The work requires making decisions, devising solutions, and taking actions based on program knowledge. This involves interpreting considerable data to identify problems, determining what is the nature of the problem or issue, what approaches to use to resolve the issues, what to recommend given the variety of options, planning and implementing solutions, and refining or designing new methods or techniques.

Typical of Level 4-3, the appellant's work involves performing a variety of financial document review duties in support of direct and guaranteed loans. While the loans themselves are fairly routine, the appellant is responsible for processing a variety of them with broad functions, such as reviewing applications for compliance with regulatory requirements, gathering and verifying income, tax, and debt information to determine eligibility, ordering credit reports, and conducting analysis of income, credit, debt, and other financial data to calculate affordability ratios and maximum loan amounts. Additionally, the appellant is responsible for using a significant level of program knowledge to assess the nature of the task and determine the correct guideline or regulation to follow. However, she is not required to use analytical skills to develop or test a variety of established techniques or evaluate alternatives. Unlike Level 4-4, the appellant's work rarely, if ever rises to this level of complexity since the loans she processes are straight-forward. When faced with a complex issue not covered by guidelines, the appellant refers the issue to her supervisor for resolution.

This factor is evaluated at Level 4-3 and 150 points are assigned.

#### *Factor 5, Scope and effect*

This factor covers the relationship between the nature of the work; i.e., the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization. Effect measures whether the work output facilitates the work of others, provides timely services of a personal nature, or impacts the adequacy of research conclusions. The concept of effect alone does not provide sufficient information to properly understand and evaluate the impact of the position. The scope of the work completes the picture allowing consistent evaluations, and only the effect of properly performed work is considered.

At Level 5-2, the purpose of the work is to apply specific rules, regulations, or procedures to perform a full range of related accounting, budget, or financial management clerical or technical tasks, duties, and assignments that are covered by well-defined and precise program procedures and regulations. The employee completes standard clerical transactions in the functional area by



reviewing documents for missing information, searching records and files; verifying and maintaining records of transactions; and answering routine procedural questions. The work affects the adequacy and efficiency of the accounting and budget or financial management function and can affect the reliability of the work of analysts and specialists in related functions. For example, correcting data in automated records enables others to base decisions on accurate information. The work may also affect the accuracy of further processes performed by related personnel in various organizations. It also affects the reliability of the organization's financial support services provided to users, customers, etc.

At Level 5-3, the purpose of the work is to apply conventional practices to treat a variety of problems in accounting, budget or financial management transactions. Issues might result, for example, from insufficient information about the transaction, a need for more efficient processing procedures or requests to expedite urgently needed cases. The employee treats these or similar problems in conformance with established procedures. The work affects the quality, quantity, and accuracy of the organizations records, program operations, and service to clients. For example, the effect of the work ensures the integrity of the overall general ledger, its basic design and the adequacy of the overall operation of the accounting system and various operating programs; the amount and timely availability of money to pay for services; the economic well-being of employees being serviced; or compliance with legal and regulatory requirements.

Similar to Level 5-2, the purpose of the appellant's work is to apply guidelines and procedures to perform a full range of accounting and budgeting tasks in support of direct and guaranteed loan processing. The appellant routinely reviews loan applications for missing information, verifies and reviews financial data, and answers routine procedural questions for applicants, attorneys, banks, and other employees. The appellant's work affects the reliability of the loan specialists' work, as she is responsible for entering, verifying, and correcting, as necessary, data in the UNIFI underwriting system. While the appellant does support the integrity of the loan process, the timely payment of loans, and the compliance of loan processing with legal and regulatory requirements, they are higher-level functions and ultimately are the responsibility of the loan specialists and the AD. As such, the appellant's work does not affect the overall quality, quantity, or accuracy of the [Name/Organization] operations as is characteristic of Level 5-3. Therefore, Level 5-3 cannot be assigned.

This factor is evaluated at Level 5-2 and 75 points are assigned.

#### *Factors 6 and 7, Personal contacts and Purpose of contacts*

Personal contacts include face-to-face and telephone contacts with persons not in the supervisory chain. Levels described under this factor are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place. These factors are interdependent. The same contacts selected for crediting Factor 6 must be used to evaluate Factor 7. The appropriate level for personal contacts and the corresponding level for purpose of contacts are determined by applying the point assignment chart for Factors 6 and 7.

#### *Personal contacts*

At Level 2, contacts are with employees in the same agency, but outside the immediate organization. For example, contacts may be with personnel in other functional areas. Contacts also may be with employees in other agencies who are providing requested information and/or contacts are with members of the general public in a moderately structured setting. For example, contacts may be with individuals who are explaining reasons for delays in making tax payment or those who are attempting to expedite transactions.

At Level 3, contacts are with members of the general public. For example, contacts are with persons in their capacities as representatives of others such as attorneys and accountants, contractors, public action groups, or congressional staff members making inquiries on behalf of constituents. The contacts are not recurring or routine and the purpose, role and authority of each party must be established each time in order for the employee to determine the nature and extent of information that can be discussed or released.

The appellant's position is comparable to Level 2. The record shows she has contact with Federal, state, and local agencies, banks, contractors, attorneys, and loan applicants. In a moderately structured setting, she answers questions from these contacts about the loan process and provides information on specific loans. Her work does not reflect the characteristics of Level 3 since the role of each contact is fairly routine and does not need to be established each time.

#### *Purpose of contacts*

At Level B, the purpose of the contacts is to plan and coordinate actions to correct or prevent errors, delays, or other complications occurring during the transaction cycle. This may involve obtaining a customer's cooperation in submitting paperwork or other information, requesting other personnel to correct errors in documentation or data entry, or assisting others in locating information.

At Level C, the purpose of the contacts is to persuade individuals who are fearful, skeptical, uncooperative or threatening to provide information, take corrective action, and accept findings in order to gain compliance with established laws and regulations.

The appellant's position is comparable to Level B. The record shows she works with loan applicants, attorneys, various government and private sector agencies, and other RD employees to coordinate actions to correct errors and/or obtain missing information for loan applications and prevent delays in the processing of loans. The appellant is not involved in persuading individuals who are fearful, skeptical, or threatening to provide information or take corrective action, as required at Level C. Her contacts are usually actively seeking loans and are quite cooperative in the process. Therefore, Level C cannot be assigned.

These factors are evaluated at Level 2B and 75 points are assigned.

#### *Factor 8, Physical demands*

This factor covers the requirements and physical demands placed on the employee by the work assignment. This includes physical characteristics and abilities, e.g., specific agility and dexterity requirements, and the physical exertion involved in the work, e.g., climbing, lifting, pushing, balancing, stooping, kneeling, crouching, crawling, or reaching. To some extent the frequency or intensity of physical exertion must also be considered, e.g., a job requiring prolonged standing involves more physical exertion than a job requiring intermittent standing.

At Level 8-1, the work may require some physical effort, such as standing, walking, bending or sitting. There are no special physical demands. The appellants' position meets Level 8-1 as work is primarily performed while sitting, although there is some walking and standing required when performing normal office work.

This factor is evaluated at Level 8-1 and 5 points are assigned.

*Factor 9, Work environment*

This factor considers the risks and discomforts in the employee's physical surroundings, or the nature of the work assigned and the safety regulations required.

At Level 9-1, work is usually performed in an office setting involving everyday risks or discomforts. Normal safety precautions are adequate. The appellant's position meets Level 9-1 as their work is primarily performed in an office setting.

This factor is evaluated at Level 9-1 and 5 points are assigned.

*Summary*

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge Required by the Position	1-3	350
2. Supervisory Controls	2-2	125
3. Guidelines	3-2	125
4. Complexity	4-3	150
5. Scope and Effect	5-2	75
6. & 7. Personal Contacts and Purpose of Contacts	2-b	75
8. Physical Demands	8-1	5
9. Work Environment	9-1	<u>5</u>
<i>Total Points</i>		910

A total of 910 points falls within the GS-5 range (855 to 1,100) on the grade conversion table in the JFS for Clerical and Technical Accounting and Budget Work, GS-500. Therefore, the appellant's financial technician duties are graded at the GS-5 level.

**Decision**

The appellant's financial technician duties are properly graded at the GS-5 level, and her loan processing assistant duties are graded at the GS-6 level. The record indicates the latter work is officially assigned, regularly and continuously occupies at least 25 percent of the appellant's time, and requires knowledge and skills that would be needed in recruiting for her position, if it became vacant. Therefore, based on application of mixed-grade principles, the final grade of the appellant's position is GS-6. The title is at the agency's discretion.