



United States
Office of Personnel Management

Office of Merit Systems Oversight and Effectiveness
Digest of Significant Classification Decisions and Opinions
September 1984
No. 05-06

Standard: [Support Services Administration, GS-0342](#) (November 1978, May 1979)
Factor: Level of responsibility
Issue: Proper credit for operating-level organization

Identification of the Classification Issue

This issue was addressed in a reconsideration of an Office of Personnel Management appeal decision. The position was a Support Services Supervisor, GS-0342-11, in the regional office of a Federal department. The department requested that the position be upgraded to GS-12.

The classification standard for the GS-0342 series uses three classification factors: (1) Nature of Services, (2) Organizational Environment, and (3) Level of Responsibility. The appeal decision credited a total of 78 points, which is borderline between GS-11 and GS-12; and resolved the borderline situation downward to GS-11. The department agreed with the factor levels and point ratings assigned, but believed the borderline situation should be resolved upward to GS-12, because of significant strengths not credited in Factor 3.

The appeal decision had credited Factor 3 (Level of Responsibility) at Level C. The department concurred with that assessment, but noted that the position met several characteristics of Level D, even though it failed to meet the higher level in other respects. Because of these strengthening characteristics, the department believed the borderline situation should be resolved to the higher grade.

Resolution

Factor 3 consists of five fairly discrete, but interrelated, criteria: (1) Responsibility for program planning, organization and direction, (2) Guidelines, (3) Authority for instituting changes in policy, (4) Personal contacts, and (5) Personnel management responsibility. Analysis of each of these criteria was as follows:

(1) Responsibility for Program Planning, Organization and Director

Level C entails substantial responsibility for planning, organizing and directing a support services program. An employee at this level receives guidance consisting of overall objectives to be met in supporting the work of the organization. The employee keeps his or her immediate supervisor informed of progress by means of informal briefings, periodic progress reviews, or program reviews. Programs at this level are reviewed in terms of overall adequacy of support to the organization and through budget reviews, program management reviews and audits, rather than by review of specific support service programs.

Level D involves responsibility for planning, establishing and coordinating support service programs within the broad administrative framework of an agency. The methodology employed and technical determinations made are typically accepted as authoritative. Review of the work is generally in terms of how well the support services program is integrated with the total administrative program of the agency.

The subject position was found substantially to match Level C. The position was located at a relatively small regional office; the incumbent was subject to policy statements, constraints and controls established by the department. By contrast, Level D includes *program* responsibilities in the initiation and/or administration of support services programs for an entire agency or a major segment of an agency. The fact that an employee developed "policy" for the region did not warrant crediting Degree D.

(2) Guidelines

At Level C, guidelines generally consist of basic agency policy guidelines and operating instructions for the support services function. The employee is responsible for making major adaptations or recommending new policies where agency guides are lacking or completely inappropriate.

At Level D, guidelines include the basic administrative management policies of the agency, as well as the basic orders and regulations of service agencies such as the Government Printing Office and the General Services Administration.

These two levels differ materially in the amount of originality and resourcefulness required to interpret available guidelines. Essentially, the presence or absence of operating instructions is key

to these differences. To reiterate, Level C guidelines consist of basic agency policy guidelines and operating instructions *for the support service function*, whereas at Level D they include the *basic administrative management policies* of the agency and the regulations of the various service agencies. Thus, positions at Level D have staff responsibilities for developing and maintaining operating instructions consistent with basic administrative policies of the agency and functional guidelines from applicable service agencies, such as the General Services Administration.

The department noted that the appellant developed regional policy issuances relating to printing control, motor vehicle usage, annual leave while in travel status, airline travel reservations, personal property management, mail management, and telecommunications. However, the development of *regional* operations policy cannot be equated with the development of *agency* policy as discussed at Level D. The department had issued a variety of regulations and guidelines covering policies and procedures in specific support service functions. Further, Level C explicitly includes responsibilities for "making major adaptations or recommending new policies where agency guides are lacking or completely inappropriate."

The department further stated that the appellant's overall management responsibility for a comprehensive approach to operating a support services program falls outside the purview of any one technical area of the program. All support services supervisors have such a comprehensive approach to their programs; otherwise they would not be classified to the GS-0342 series. Such an approach does not alone enhance the credit allowable under this criterion.

(3) Authority for Instituting Changes in Policy

Level C describes an operating program in which employees have full responsibility for planning methods of approach and technical details associated with program assignments. Issues involving basic organizational policy or overall organizational goals are generally cleared with their supervisors.

Level D describes a staff type responsibility in which employees make recommendations regarding, or participate in the development of, general administrative policy and support service program policy. Their programs extend throughout an agency or a major segment of an agency. They make recommendations regarding overall budget and manpower resources utilization. They are responsible for program development and execution, and for planning and carrying out these programs.

As an operating-level supervisor, this position did not exceed Level C. The appellant was responsible for monitoring and evaluating the effectiveness and efficiency of administrative operations of the region's field elements. The region employed some 1000-1200 persons in a five-state area. However, this does not compare with the broader responsibility, typical of Level D, in making recommendations for general administrative policy and support service program policy *throughout an agency* or *major* sub-ordinate organization. While such functions are not specifically addressed at Level C under the "authority" criterion, careful reading of Factor 3 as a

whole reveals they are entirely consistent with the overall intent of that level. For example, Level C entails substantial freedom in planning, organizing and directing the assigned program, and making major adaptations or recommending new policies where agency guides are lacking or completely inappropriate.

Perhaps more importantly, we noted the position was credited with program coordinating responsibility of subordinate organizations under element 3 of Factor 2. That element directly measures the impact of the incumbent's oversight responsibility. There is no basis for again crediting the same responsibility under Factor 3.

(4) Personal Contacts

At Level C, contacts are for such purposes as negotiating major changes in the manner in which the assigned program supports the work of the organization, and securing management cooperation in effecting these changes. Employees at this level frequently make binding commitments for their programs.

At Level D, contacts are generally with top managers of other major programs or functions within the agency, in service organizations, or in private organizations. Typically, they are for the purpose of negotiating the resolution of major problems, such as impasses among subordinate supervisors or problems with top managers in other agencies concerning common support services. Contacts may also involve the negotiation of changes in the procedures and regulations of other agencies, when they have a serious impact on the assigned program.

The appellant met on a regular basis with the Regional Administrator and Deputy Regional Administrator. These contacts were for a variety of purposes, including policy guidance and interpretation, negotiation of problem areas, and information. The incumbent occasionally contacted high level officials of other agencies, vendors, building owners and property management firms, and was a member of various interagency committees and working groups.

There is no question that the above-described contacts are responsible and important. Nonetheless, they are not equivalent to Level D. Contacts with the Regional Administrator and Deputy Regional Administrator are a normal part of supervisory controls, and are properly assessed under that criterion, rather than personal contacts. Contacts with top managers of regional offices of other agencies were relatively infrequent; the great majority of contacts were with the staff, rather than top management, of these organizations.

(5) Personnel Management

The previous decision found this criterion to match Level C. The Department did not disagree with that finding. Analysis showed that personnel management responsibility did not exceed Level C.

Findings and Conclusion

Reconsideration revealed no evidence that the subject position exceeded Level C under Factor 3 of the GS-0342 standard. Accordingly, there were no strengthening aspects that would warrant resolving the grade upward to the GS-12 level.