

U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA Programs



Philadelphia Oversight Division
600 Arch Street, Room 3400
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Classification Appeal Decision
Under Section 5112 of Title 5, United States Code

Appellant: [appellant's name]

Agency classification: Transportation Assistant (Typing)
GS-2102-5

Organization: Quality Control Section
Transportation Division
Directorate of Logistics
[activity name] Support Facility
U.S. Department of the Army
[location]

OPM decision: Transportation Assistant (Typing)
GS-2102-5

OPM Decision Number: C-2102-05-01

Robert D. Hendler
Classification Appeals Officer

3-4-98
Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[appellant's name]
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Introduction

On October 24, 1997, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. Her position is classified currently as Transportation Assistant (Typing), GS-2102-5, job description (JD) #91197. The appellant, however, believes the classification should be Transportation Assistant (Typing), GS-2102-6. The position is in the Quality Control Section, Transportation Division, Directorate of Logistics, [activity name] Support Facility, U.S. Department of the Army, [activity location]. We have accepted and decided her appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

The appellant believes that while her JD accurately reflects the major duties of her position, Factors 1, 3, 4, 6, and 7 should each be evaluated at the next higher level. She believes they are assigned very low point values compared to those assigned to the five transportation assistants in the Personal Property Section of the Transportation Division. These five transportation assistants occupy GS-2102-6 positions, and are on different JD's than that of the appellant. She is not appealing the levels assigned to Factors 2, 5, 8, and 9. In her original appeal letter, dated August 20, 1997, she maintained that, as additional evidence of the comparability to the five transportation assistants whose positions are graded higher than hers, her position is a continuation of personal property work and is therefore directly comparable to the work they do. Moreover, the appellant maintains that, as time permits, she helps out with personal property duties.

By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). All positions subject to the Classification Law contained in title 5, U.S.C., must be classified in conformance with published position classification standards (PCS's) of OPM or, if there are no directly applicable PCS's, consistently with PCS's for related kinds of work. Since comparison to standards is the exclusive method for classifying positions, other methods or factors of evaluation, such as comparison to other positions that may or may not be classified correctly, are not authorized for use in determining the classification of a position. Therefore, we have considered the information and documents provided only insofar as they are relevant to making that comparison.

The classification appeal process is a de novo review that includes a determination as to the duties and responsibilities assigned to the appellant's position and performed by the appellant, and constitutes the proper application of PCS's to those duties and responsibilities. Our analysis of the position is based in large part on the information provided during a telephone audit with the appellant on February 18, 1998, and with her immediate supervisor, [supervisor's name], Packing Inspector Foreman, WS-7002-5, on February 12 and 23, 1998, and our independent review and analysis of the entire appeal record. Our audit with the appellant and our interviews with her supervisor confirmed that the JD of record contains the major duties and responsibilities performed by the appellant and is hereby incorporated by reference into this decision.

Regarding the appellant's statement in her original appeal letter of August 20, 1997, that "when time permits, I also help out with the personal property duties," the Introduction to the PCS's (Introduction) states that:

Some positions involve performing different kinds and levels of work which, when separately evaluated in terms of duties, responsibilities, and qualifications required, are at different grade levels. . . .

In most instances, the highest level of work assigned to and performed by the employee for the majority of time [emphasis added] is grade-determining. When the highest level of work is a smaller portion of the job, it may be grade controlling only if:

- The work is officially assigned to the position on a regular and recurring basis;
- It is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time); and
- The higher level of knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

As the appellant's occasional assistance with the work of the Personal Property Section does not meet these criteria, that work cannot be credited toward grade level determination.

Position information

The appellant counsels and assists U.S. Department of Defense (DOD) military and civilian personnel regarding claims for damaged and/or missing personal property. She advises these personnel in person or by telephone, giving detailed instructions on procedures for filing claims and the special requirements for the appropriate one of nine separate military service branch claims offices servicing her transportation office, which covers 66 counties in [four state names]. She advises personnel how to obtain necessary estimates of damage expeditiously and assists them by providing required official Government documentation, such as bills of lading, copies of inventories or warehouse receipts, notice of loss/damage and inspection forms. She counsels claimants on both carrier and Government liability regarding household goods, non-temporary storage, unaccompanied baggage, mobile home, and do-it-yourself moves. Upon request of the claimant, she reviews the claim documentation for completeness, proper supporting documents, and accuracy, prior to forwarding to the proper claims office.

The appellant is also responsible for dealing with late inbound and outbound personal property shipments. When these occur, she traces the late shipment through carriers, contractors, freight forwarders, military air and water terminals, and personal property shipping offices. She rectifies mixed or erroneous shipments and insures delivery to the correct consignee. She also locates missing property and arranges delivery to proper shippers after locating same.

A relatively infrequent but important aspect of the appellant's responsibilities is to assist claims offices and carriers in the rectifying of fraudulent claims against the United States government and carriers by U.S. Department of Defense personnel. Due to the seriousness of these accusations, this assistance must be accomplished without error and involves detailed notes of all pertinent information.

The appellant also assists the Packing Inspector Foreman in quality control monitoring of Direct Procurement Methods Contractors. She also performs a variety of administrative and clerical duties involving correspondence, messages, registers, and reports, including preparation and forwarding of Notice of Loss and Damage and Government Inspection Reports. She researches files for shipping and claims information to forward to the appropriate claims office or carrier so they can properly adjudicate the claim.

The appellant and her supervisor, the Packing Inspector Foreman, are the only employees in the Quality Control Section office operations segment. Consequently, the appellant works primarily on her own and, within the limits of her duties, performs all necessary actions with no support other than the availability of her supervisor for consultation on unique and unusual situations.

The appellant makes only occasional use of a computer to access the Transportation Operational Personal Property System to trace a shipment reported late and determine when it was shipped and the carrier's name, address, and telephone. She passes this information to the person whose property is involved and sends the requisite information to the relevant personnel. She uses this system less than 3 percent of her time. She types correspondence on a typewriter. Her communications are otherwise by telephone. Her position requires the application of competitive keyboard skills using a typewriter rather than office automation equipment.

Series, title, and guide determination

The agency determined the appellant's position is covered by the Transportation Clerk and Assistant Series, GS-2102, is titled Transportation Assistant (Typing), and is graded using the Transportation Clerk and Assistant Series, GS-2102 PCS with which the appellant has not disagreed. We concur that the GS-2102 PCS covers the preponderance of the appellant's work, specifically within the personal property functional work specialty. The appellant's typing duties are covered by the Typing and Stenography Grade Evaluation Guide.

Grade determination

The Transportation Clerk and Assistant, GS-2102 PCS is written in Factor Evaluation System (FES) format. Positions graded under the FES format are compared to nine factors. Levels are assigned for each factor and the points associated with the assigned levels are totaled and converted to a grade level by application of the Grade Conversion Table contained in the PCS. Under the FES, factor level descriptions mark the lower end; i.e., the floor, of the ranges for the indicated factor level. If a position fails in any significant aspect to meet a particular level in the standard, the next lower level and its lower point value must be assigned unless the deficiency is balanced by an equally important aspect that meets a higher level.

The appellant disagrees with the evaluation of Factor 1, Knowledge Required by the Position; Factor 3, Guidelines; Factor 4, Complexity; and Factors 6 & 7, Personal Contacts and Purpose of Contacts. She agrees with her agency's crediting of Levels 2-3, 5-2, 8-1 and 9-1. We reviewed carefully the levels assigned to the other factors by the agency and the accompanying rationale with which the appellant has not taken issue. We found these determinations to be appropriate for Factors 5, 8, and 9 and have so credited the position. Our assessment of the position requires us to address Factor 2. Accordingly, our appeal analysis focuses on the evaluation of Factor 2 and the other remaining factors.

Factor 1, Knowledge required by the position

Factor 1 measures the nature and extent of information or facts that the workers must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, theories, principles and concepts) and the nature and extent of the skills needed to apply that knowledge. To be used as a basis for selecting a level under this factor, a knowledge must be required and applied.

At Level 1-3, the work requires knowledge of a body of standardized transportation regulations, procedures, and operations related to one or more transportation support functions. This work requires knowledge of established transportation or traffic management rules to perform a full range of transportation support duties. For example, in arranging for the movement of goods or passengers, this may include rules governing the selection of carriers under established agreements (e.g., carriers identified in standing route orders, under contract, on established lists, or in fare guides) and the preparation, review, or verification of movement and billing instructions related to such moves. The range of duties may include selecting modes or carriers, consolidating shipments or coordinating connections, responding to customer inquiries, and ensuring regulatory compliance throughout the movement process, i.e., ensuring equal tonnage distribution, appropriate use of contract carriers, or proper markings or documentation.

Typical of the knowledge requirements at the Level 1-3 level are knowledge of the structure and content of transportation documents (e.g., tenders, bills of lading, invoices, travel orders, or vehicle accident or usage reports) to investigate and resolve routine or recurring discrepancies, check documents for adequacy, or perform comparable actions that are covered by established procedures;

knowledge of related functional areas to investigate and resolve recurring problems, coordinate actions, or expedite receipt of needed documentation using established approaches; and knowledge of frequently used and clearly stated regulations to respond to a range of recurring questions from agency or activity personnel, customers, commercial carriers, or others.

Illustrative of personal property work at Level 1-3 is when employees monitor inbound shipments from both domestic and overseas locations. They set up or use tracking systems and initiate tracers when shipments are late. They contact carriers to get information on shipment location and intended disposition. They use established procedures to clear inbound shipments, estimate storage costs, select commercial storage warehouses from approved lists, establish and maintain records of all lots in storage, and verify the accuracy of storage charges. The information in the appellant's JD as well as the other documentation and the telephone audits all clearly indicate that the knowledge required by her position fully meets the above requirements for Level 1-3.

At Level 1-4, the work requires knowledge and application of an extensive body of transportation regulations, methods, and practices to perform a wide variety of interrelated or nonstandard transportation support assignments and resolve a wide range of problems. The work requires knowledge of transportation regulations governing entitlements and documentation requirements for domestic or foreign relocation travel to advise on travel procedures, restrictions, and allowances, and to resolve conflicts or issues related to the travel. Conflicts or issues might involve repayment or crediting of travel funds advanced; disputes between carrier and customer; or emergency situations, such as those involving extremely short lead times, problems in transit, inadequate paperwork for foreign entry, or similar situations. Also typical of Level 1-4 is knowledge of a variety of transportation functional areas and their relationship to other functions to investigate complaints or errors that require, for example, reconstructing and reconciling incomplete information, conducting extensive and exhaustive searches for required information, or performing actions of similar complexity; and knowledge of the requirements of various transportation regulations or operations to monitor and report on carrier compliance with contract terms, safety provisions, or other transportation programs. This work typically involves knowledge of report preparation and skill in analyzing factual information to document deficiencies or areas of noncompliance and make recommendations for action.

Illustrative of personal property work at Level 1-4 is when employees determine and advise on entitlements or procedures, such as the type and quantity of personal property that can be moved at Government expense; storage entitlements, movers' liabilities, and prohibited items; the various methods of movement (e.g., Government, "do-it-yourself," or commuted rate); and the paperwork necessary to document moves and substantiate claims for reimbursement of expenses or damage to goods. Some employees review reimbursement claims resulting from these moves. This involves reviewing charges for handling services, temporary storage, third party services (e.g., utility connection), county and state mileage rates, and transportation advances.

While the appellant's position on the surface entails some of the work which requires certain aspects of Level 1-4, e.g., counseling on aspects of the various methods of movement, it does not meet the full intent of the level. For example, while she assists claimants in the preparation and processing of

their claims, and frequently assists in obtaining and forwarding necessary documentation, she is not required to have the knowledge necessary to determine entitlements nor to review the claims themselves. The knowledge her position requires is limited to assisting claimants in preparing the necessary documentation for each type of claim, advising them on the procedures for filing, and assisting them in obtaining missing documentation. Nor does her position require knowledge necessary to analyze factual information and make recommendations for action, the extent intended at Level 1-4. Therefore, this factor is credited properly at Level 1-3.

Factor 2, Supervisory controls

The appellant is not contesting the evaluation of Level 2-3. She works alone, being the sole occupant of her position. The only other person in the office operation area of the Quality Control Section is her immediate supervisor, who reviews her completed work for technical soundness, appropriateness, and conformity to policy and requirements. Frequently, her work can be reviewed only after the fact in response to complaints from customers, carriers, or contractors. The methods she uses to complete her assignments usually are not reviewed in detail. The supervisor generally provides guidance only on dealing with unusually involved or one-of-a-kind situations.

The level of judgment applied by the appellant is somewhat more limited than typical of Level 2-3 due to the more restricted range of her assignments as discussed previously in this decision. We find, however, that the position minimally meets the intent of Level 2-3 based on the appellant's independent resolution of the full range of problem situations without intervention by her supervisor. Therefore, this factor is credited properly at Level 2-3.

Factor 3, Guidelines

This factor covers the nature of guidelines and the judgment needed to apply them. Guides used include, for example: established procedures and policies, traditional practices, and reference material such as manuals and handbooks. Guidelines should not be confused with knowledge described under Factor 1, Knowledge Required by the Position. Guidelines either provide reference data or impose certain constraints on the use of knowledge.

At Level 3-2, numerous procedures for doing the work have been established, and many specific guidelines are used. Guidelines include volumes of transportation regulations, manuals, guides, directories, tenders, or operating procedures. For example, guides may cover the kinds of paperwork required, special instructions or markings to use, kinds of carrier equipment available, clearance requirements, conditions for authorizing various entitlements, or carrier selection criteria.

Because of the number and similarity of guidelines or the diverse circumstances of individual actions, employees must use judgment to identify and select the appropriate reference and procedure for each phase of the process, question, or condition that develops. For example, employees determine which passenger or personal property entitlement allowances apply under varying circumstances. In most cases, employees must be familiar with the general content of numerous guides since it is not practical

to be researching guides continually to locate a specific reference. There may be omissions in guidelines that require employees to use some judgment and initiative to handle aspects of the work not covered completely (e.g., when deciding whether to delay shipments for consolidation purposes, devising clerical instructions to cover procedural gaps, or selecting a better route than the one requested by the customer). Employees refer situations requiring significant judgment or interpretation to the supervisor or others for guidance or resolution.

In contrast, at Level 3-3 guidelines are similar to those described in Level 3-2, but are not applicable completely to many aspects of the work because of the problem solving or complicated nature of the assignments. For example, there may be no directly related precedent cases or reference sources to use in deciding if justifications for a higher than normal level of service are valid. At Level 3-3, employees use judgment to interpret guidelines, adapt procedures, decide approaches, and resolve specific problems. This includes, for example, evaluating customer justifications for premium service or reconciling incomplete and conflicting information when precedents or guidelines are not available or are not related directly.

The appellant's position fully meets the Level 3-2 requirements. Due to changes in guidelines from time to time, she must adjust to changing conditions or interpretations. She refers situations which require significant deviations from guidelines to her supervisor. The adjustment to different or changing guidelines is a Level 3-2 situation. In contrast, at Level 3-3, the existing guidelines are not applicable to many aspects of the work and there may be no directly related precedents. While the appellant may occasionally encounter such situations which require interpretation, such situations are rare and not so dissimilar from some preceding cases that the extent of interpretation and absence of precedent meets the level envisioned at Level 3-3. Therefore, this factor is credited properly at Level 3-2.

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 4-2, the work involves performing related processing and procedural tasks in support of transportation related functions. For example, processing a transportation action may involve sorting incoming forms or requests, reviewing documents for gaps in information, assembling the appropriate document control forms, entering data into automated or manual files, verifying calculations, and distributing documents to the appropriate personnel. Employees make decisions, such as how to sort incoming documents, locate and assemble information, and correct errors. They do this by reviewing similar cases or standard operating procedures and selecting from among clearly recognizable alternatives. Employees take action using established instructions, practices, or precedents for format, content, and processing of transportation documents and requests. Actions taken are similar and well-established, although the specific pattern of actions taken may differ somewhat; i.e., the

order and kinds of personnel contacted, the reference sources checked, and the entries or corrections made may differ depending on the given situation and the information available.

In contrast, Level 4-3 work involves performing one or more transportation support functions that require the use of different and unrelated procedures and methods. The use of different procedures may result, for example, because assignments received are relatively broad and varied (e.g., involve a full range of shipping or traveler situations) or transactions are interrelated with other systems and often require extensive coordination with various, different personnel. Employees make recommendations or take actions (e.g., select the optimal means of transportation, determine entitlements, or verify compliance) based on a case-by-case review of pertinent transportation regulations and documents. For example, employees may make the final review of orders, vouchers, and receipts that involve a variety of differing traveler situations by checking authorizations, entitlements, allowances, and figures; counsel applicants changing duty stations regarding their entitlements to personal and dependent travel, the optimal combination of shipping and storage services, allowances for "do-it-yourself" moves, and different ways to avoid excess cost or misuse of Government funds when this involves diverse situations and the need to tailor advice to fit varying individual concerns; or review reimbursement claims, such as those submitted for "do-it-yourself" moves of personal property, when this involves reviewing the specific details of each move to determine Government vs. traveler costs.

The appellant's position fully meets Level 4-2. It does not, however, fully meet the requirements for Level 4-3 in that the assignments are relatively narrow, being limited to claims for damage, delay, loss, and inconvenience. The transactions, while to some degree interrelated with other systems, seldom require extensive coordination with various, different personnel. Moreover, the reviewing and counseling functions performed by the appellant are not of the degree of finality or complexity envisioned at Level 4-3. Therefore, this factor is credited properly at Level 4-2.

Factor 6, Personal Contacts

This factor includes face-to-face contacts and telephone and electronic dialogue with persons not in the supervisory chain. The levels for this factor are based on what is required to make the initial contact, the difficulty in communicating with those contacted, and the setting in which the contacts take place, e.g., the degree to which the employee and those contacted recognize their relative roles and authorities.

The appellant's position is currently evaluated at Level 2. At Level 2 contacts are with employees in the same agency but outside the immediate organization. For example, contacts may be with personnel who are shipping or transporting items, or travelers who are seeking advice or information. Contacts also may include transportation personnel at other installations, supply personnel onsite, or employees in other agencies who are providing, requesting, or coordinating actions and information.

The appellant's position clearly meets, but does not exceed Level 2, the highest level described in the PCS.

Factor 7, Purpose of Contacts

At Level a, the purpose of the contacts is to obtain, clarify, or provide information related to transportation support assignments. For example, contacts may be to obtain missing information, advise on the status of actions, or verify transportation needs. Contacts may involve answering a simple question, such as whether a particular vehicle is available, a specific shipment has arrived, or a Government plane has left. Contacts also may involve explaining more technically oriented subject matter, such as restrictions on use of modes, contract carriers, or vehicles.

At Level b, the purpose of the contacts is to plan and coordinate actions to prevent or correct errors, delays, or other complications from occurring. Examples include briefing various personnel on their transportation entitlements; tracing missing freight or personal property through various channels; advising on or discussing shipment requirements; ensuring the timely and accurate receipt of travel documentation; or performing similar actions.

The appellant believes the current evaluation of her position at Level 2a should be increased to Level 2b because she contacts various members of the U.S. military services and Coast Guard, as well as civilian DOD personnel, via telephone, in order to secure information. She also contacts members of the general public, carriers, military installations, and nine different claims offices in order to process reports, locate shipments, and do a variety involved in processing claims and obtaining quality control information on dependability, honesty, integrity, etc. of carriers. Occasionally, carriers and their employees and business associates may be evasive or untruthful in their responses to the appellant and she must conduct ginvestigations, via telephone and checking documents, to ascertain the facts of the case. She also routinely briefs personnel on their entitlements in regard to damaged, lost, delayed, or otherwise mishandled shipments of personal goods and traces missing or delayed personal property through various channels. These functions reflect fully the purpose of contacts contemplated at Level b. Our fact finding revealed these contacts are regular and recurring, are integral to the grade controlling work performed by the appellant, and therefore, we find the position evaluated properly at Level 2b.

Summary

In summary, we have evaluated the appellant's position as follows:

Factor	Level	Points
1. Knowledge required by the position	1-3	350
2. Supervisory controls	2-3	275
3. Guidelines	3-2	125
4. Complexity	4-2	75
5. Scope and effect	5-2	75
6. Personal contacts and	2	
7. Purpose of contacts	b	75
8. Physical demands	8-1	5
9. Work environment	9-1	5
Total points		985

A total of 985 points falls within the GS-5 grade level point range of 855-1100 points on the Grade Conversion Table in the GS-2102 PCS.

The appellant's typing duties are evaluated properly at a lower level than her transportation assistant duties. They occupy a distinct minority of the time and, therefore, have no impact on the final grade level of the position.

Decision

The appellant's position is classified properly as Transportation Assistant (Typing), GS-2102-5.