

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



Chicago Oversight Division  
230 South Dearborn Street, DPN 30-6  
Chicago, Illinois 60604

/s/

**Classification Appeal Decision**  
**Under Section 5112 of Title 5, United States Code**

**Appellants:** [Appellants' Names]

**Agency Classification:** Processor, GS-1101-8

**Organization:** U.S. Department of Agriculture  
Rural Housing Service  
[Name] Center  
[Name] Branch  
St. Louis, Missouri

**OPM decision:** **GS-1101-8**  
(Title at agency discretion)

**OPM decision number:** C-1101-08-01

\_\_\_\_\_  
Ricardo Sims, Operations Supervisor

November 30, 2000

\_\_\_\_\_  
Date

As provided in section 511.612 of title 5, Code of Federal Regulations, 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:**

[appellants' names and address]

[name and address of appellants' servicing personnel office]

Ms. Donna Beecher, Director  
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U.S. Department of Agriculture  
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## Introduction

The appellants contest their agency's decision to classify their positions as Processor, GS-1101-8. Their position is located in the [Name] Unit, [Name] Branch, [Name] Center, Single Family Housing, Rural Housing Service, U.S. Department of Agriculture (USDA), [City, State].

They believe their position description accurately lists their major duties. They do not believe, however, that the classification is accurate. They contend that the position is in the wrong occupational series and credited inaccurately for the knowledge required, supervisory controls, scope and effect, and personal contacts and purpose of contacts.

The agency's loan servicing of Section 502 and 504 loans was nationally centralized to the [City] [Name] Center as part of a reorganization in 1997. The [Name] Center's [Name] Unit did not exist originally as part of the [Name] Center but evolved from the [Name] Section that was part of the [Name] Branch. Processors were pulled from the [Name] Section to research and resolve difficult and sensitive escalated inquiries, most of which came from the congressional work.

## Job Information

The five appellants and one additional Processor, GS-1101-8, along with their Mortgage Loan Servicing Supervisor, GS-1101-11, comprise one of the two units of the [Name] Branch. The other unit is the [Name] Unit that has about 15 Processor positions, GS-1101-6/7. The appellants research and respond to congressional and accelerated inquiries about loan origination and servicing functions on a nationwide portfolio of over 600,000 single family housing loans. In FY 2000, the GS-8 Processors together answered about 2,000 congressional inquiries and provided backup for occasional overflow from the [Name] Unit's inquiries. This backup function generated approximately 300 to 600 additional inquiries per year for the unit. The appellants spent most of their time in performing the following duties while responding to congressional inquiries.

- Reviewing and researching inquiries and accounts to make corrections to the status of accounts on the cash management systems and providing or recommending special servicing (31%). The appellants provided answers to congressional offices and kept case records corrected and updated:
  - Using the financial computer systems to input new or changed loan account information;
  - Using computerized systems to research, input, and activate loan information;
  - Scanning imaged account documents for the case file;
  - Maintaining Congressional Log and Internal Inquiry Tracking Log.
- Drafting and editing agency responses to the inquiries (34%). The appellants drafted official agency responses to congressional inquiries and edited the correspondence that involves performing the following tasks.

- Providing answers to Congressional Offices, Legislative and Public Affairs Staff, National Office, State Offices, Field Offices, Office of General Counsel, U.S. Attorney, and [Name] Center organizations on inquiries concerning servicing issues or Rural Housing Service policy as it relates to the [Name] Center. These letters often involved explaining the results of audits the processor completed, procedures followed, corrections and adjustments taken, the application of payments to the account, changes in monthly payments, and recounting the customer's case history.
  - Writing synopses of all telephone calls, responses, letters, and actions made on agency automated information and reporting systems.
  - Proofing all responses to insure proper grammar, sentence structure, style, spelling, and format and insuring that all issues have been addressed.
- Explaining agency policy and regulations (10 %).
    - The appellants used the telephone to explain agency policy and regulations to Members of Congress and their staffs, other representatives, borrowers, State Offices, Field Offices, and other [Name] Center organizations.
    - The appellants maintained working relationships with government representatives, news media, private sector lenders, and other representatives of the agriculture and business community.

During the last fiscal year, congressional inquiries covered approximately 40 problem areas. The appellants spent most of their time with these types of inquiry problems: foreclosures (23%); delinquency and subsidy disputes (13%); missing/misapplied payments (13%), and moratoriums (6%). The scope of congressional inquiries covered many other aspects of mortgage loan origination and servicing such as new loan set up, escrow analysis, tax/insurance disbursements, payoff/recapture disputes, payment application, delinquent payment disputes, year-end statements, customer information changes, Internal Revenue Service (IRS) offset disputes/fees, verification of mortgages, defalcations, dispute workout agreements (DWA), moratorium disputes, document copy requests, reamortizations, credit bureau disputes, late change disputes, interest credit/deferred payment/payment assistance disputes, the Soldier/Sailor Act, etc. The appellants analyzed information from borrowers as well as in their agency records to determine the extent of existing borrower problems.

In responding to inquiries, the appellants researched transactions using the Dedicated Loan Origination and Servicing (DLOS) System that is designed to expedite loan-making, and standardize information collection and record keeping. DLOS tracks loans from application through servicing using two interconnected systems; UniFi and FASTeller. They also use the Automated Discrepancy Processing System (ADPS) for older information that predates loans that are on DLOS. UniFi is a personal computer-based application used for loan origination. FASTeller is a mainframe-based application that is used to service agency loans and monitor loan performance. FASTeller is used to record every action taken by [Name] Center regarding an individual borrower's account. The

appellants' entries on these systems impact cash management and the general ledgers for the borrowers' accounts.

## **Analysis and Findings**

### **Series and Title Determination**

The appellants believe they should be classified in the GS-301 series. They stated:

This particular series was requested for two reasons.

a.) As stated in the Personnel Department's position evaluation ours is a Hybrid position. The Congressional Processor position performs all of the functions of an Accounting Technician, GS-525, Writer and Editor, GS-1082 and the General Business Series, GS-1100.

b.) The second reason the [Name] Unit has requested the GS-301 series is due to Office of Personnel Management historical standards. Typically, positions similar to that of the Congressional Processor at the [Name] Center are classified as GS-301. Enclosed with this correspondence are copies of three vacancy announcements from other Agencies for positions that require duties that are similar to the Congressional Processor duties.

The GS-301 series includes positions the duties of which are to perform, supervise, or manage nonprofessional, two-grade interval work. Typically, two-grade interval work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives. While the appellants' work focuses on resolving many types of loan problems from borrowers across the nation, the appellants' knowledge of the policies, laws, regulations, processes, and instructions primarily concerns the technical processes and accounting for the agency's "502" and "504" single family loan programs for individual borrowers. They are not required to use analytical skills and abilities for planning, developing, evaluating, or carrying out the overall operation and delivery of these programs to the public. These functions would be identified with knowledges required for two-grade level work.

The appellants state that their work requires them to perform the functions of a Writer/Editor, GS-1082. We found that the appellants' work requires good writing skills, but not a specialized knowledge of writing. The Correspondence Clerk Series, GS-309, describes the skills in the composition of correspondence that would be most appropriate for this work. We concur that some aspects of their work reflect GS-525, Accounting Technician, work. They verify the accuracy and completeness of accounting data and make adjustments to the borrowers' accounts that we address later in the decision.

The Business and Industry Group, GS-1100, includes positions that perform work requiring knowledge of business practices and the administration of regulatory provisions and controls. The GS-1101 series includes all classes of positions the duties of which are to administer, supervise, or perform other work properly classified in this group for which no other series has been provided. Other processor positions at the [Name] Center are classified in the GS-1100 series, such as the positions in the [Name] Unit of the appellants' branch organization. The [Name] Center uses the GS-1101 as a main stream occupation for its loan servicing work. Therefore, the appellants' position should remain in the GS-1101 series, as it fits best the purpose of the work as well as the line of

progression and staffing for positions at the Center.

### **Title Determination**

There is no published standard for the GS-1101 series. According to the guidance in the *Introduction to the Position Classification Standards*, agencies may designate the official title of positions in occupational series for which OPM has not prescribed titles.

### **Grade Determination**

The GS-1101 series has no grade level criteria for the evaluation of positions. We must use another series standard to determine the grade of the position. The appellants' position involves some restricted types of loan specialist work (i.e., servicing small residential loans including duties for research, analysis, and evaluation of financial ability, alternative terms, and credit risks). However, it is inappropriate to evaluate full performance level one-grade interval work by comparison with trainee and developmental criteria from a two-grade interval standard. The appellants' position description indicates that they use a broad knowledge of accounting systems to research and resolve moderately difficult and sensitive problems. The Accounting Technician Series, GS-525, describes work requiring a broad knowledge of accounting at the nonprofessional level. Positions in this series require a knowledge of existing accounting systems, standard accounting codes, classifications, and terminology; an understanding of agency accounting policies, procedures and requirements. The *Job Family Standard for Clerical and Technical Accounting and Budget Work, GS-0500C*, includes the *Accounting Technician Series, GS-0525*. Positions in this series are evaluated on a factor-by-factor basis using factor level descriptions provided in Factor Evaluation System (FES) format. Under FES, work must be fully equivalent to the factor-level described in the standard to warrant credit at that level's point value. If work is not fully equivalent to the overall intent of a particular level described in the standard, a lower level and point value must be assigned, unless the deficiency is balanced by an equally important aspect of the work that meets a higher level. Work demanding less than a substantial (at least 25 percent) amount of time is not considered in classifying a position. Similarly, acting, backup, and other temporary responsibilities that are not regular and continuing are not considered. Since the work compares favorably to technical single-grade interval work rather than two-grade interval administrative work, it is appropriate to apply the GS-0525 standard for grade determination.

### **Factor 1: Knowledge Required by the Position**

*This factor assesses the nature and extent of information or facts that employees 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 those knowledges.*

In support of their claim to higher credit, the appellants state:

The position of Congressional Processor requires a broad knowledge of all Rural Housing Service Single Family Housing functions ... Consequently, we are required to know all aspects of the Section 502 and 504 RHS loan program from origination issues to servicing. The position also requires the processors to have general accounting knowledge. We are responsible for some of the cash management functions, the reversal and re-application of payments and fees. We regularly correct the inaccurate posting and application of funds to RHS accounts.

The position description states that the position requires a complete detailed knowledge of aggregate cash flow analysis to research and determine corrective action necessary on accelerated inquiries. The appellants' supervisor said that the appellants need a good accounting foundation to know how payments affect cash management general ledgers. She said that the "aggregate cash flow analysis" is the "total picture" of how making cash corrections affects every other [Name] Center section that will handle the accounts. These corrections may be made in two separate automated systems, the Automated Discrepancy Processing System (ADPS) and FASTeller. The appellants completely review the records on each sensitive inquiry to insure that all issues are resolved and provide an accurate, comprehensive accounting to avoid any further inquiries in any area of RHS single family loans.

The appellants' knowledge requirements meet that described at Level 1-5 as requiring a broad in-depth practical knowledge of accounting or other financial management technical methods, techniques, and precedent cases, and procedures to resolve especially difficult or sensitive problems. The congressional inquiries are sensitive problems. These inquiries often encompass problems that cross over historical changes to loan programs, accounting systems, and procedures. The appellants' knowledges are similar to those described at this level as knowledge of master file systems, document processing, and the effects of transactions on existing records to modify normal automated processes in existing accounts while protecting historical data. Likewise, these modifications relate to servicing transactions and payments involving complicated adjustments. The appellants analyze, determine, and resolve loan servicing problems and respond to inquiries ranging from delinquent payments to the foreclosure of loans. They initiate and/or recommend actions to resolve and adjust borrower accounts. They initiate actions to remove accounts from foreclosure, establish loan repayment plans, suspend payments to aid borrowers in critical situations, recover funds for the agency, and correct the misapplication of payments directly reducing customer accounts.

We evaluate this factor at Level 1-5, the highest level represented in the standard, and credit 750 points.

## **Factor 2: Supervisory Controls**

*This factor covers the nature and extent of direct and indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work. Controls are exercised by the supervisor in the way assignments are made, instructions are given to the employee, priorities and deadlines are set, and objectives and boundaries are defined. Responsibility of the employee depends upon the extent to which the employee is expected to develop the sequence and timing of various aspects of the work, to modify or recommend modification of instructions, and to participate in establishing priorities and defining objectives. The degree of review of completed work depends upon the nature and extent of the review, e.g., close and detailed review of each phase of the*

*assignment, detailed review of the finished assignment, spot-check of finished work for accuracy, or review only for adherence to policy.*

In support of their claim for higher credit, the appellants state:

In all assignments, the Congressional Processor researches the assignment, resolves all conflicts that arise, determines what action, if any, is needed to correct the situation and the methodology to correct the action. In most instances, the Congressional processor corrects the situation themselves, however, in certain instances, the Congressional Processor is required to Direct Supervisors and Section Heads from various areas within [Name] Center to perform a specific task that may be beyond system limitations of the Congressional processor. While the limitations are not a question of knowledge, in most cases, the [Name] Unit provide the data and the appropriate response. It is merely a question of authority level.

At Level 2-3, the standard states that the supervisor assigns work with standing instructions on objectives, priorities, and deadlines and provides guidance for unusually involved situations. At Level 2-3, the supervisor or designated employee evaluates completed work for overall technical soundness and conformance to agency policies, legal, or system requirements. The appellants independently develop information and process the most difficult actions and handle problems in accordance with instructions, policies, previous training, and accepted practices. Their standing assignments to resolve inquiries and their review meet Level 2-3. For example, our interviews with the appellant(s) and their supervisor support that they research the assignment, resolve all conflicts, and determine actions to correct the situation and the methodology to make the correction. Their work is spot checked for technical soundness and reviewed in terms of the accomplishment of established objectives.

We evaluate this factor at Level 2-3, the highest level represented in the standard, and credit 275 points.

### **Factor 3: Guidelines**

*This factor covers the nature of guidelines and the judgment needed to apply them.*

The appellants were in agreement with the points that the agency assessed for this factor. The standard describes Level 3-3 as having established procedures and guidelines but because of the complicating nature of the assignments, they lack the specificity, frequently change, or are not completely applicable to the work requirements, circumstances, or problems. The appellants use guidelines that are subject to program changes. These guidelines include legislation, federal and state laws, regulations, and handbooks to carry out various services related to the loan origination and servicing systems. As at Level 3-3, the appellants use judgment to interpret guidelines, adapt procedures, decide approaches, and resolve specific problems such as in the example of gathering and organizing information for inquiries or resolving problems referred by others. They often rely on experienced judgment to fill in gaps, identify sources of information, and make working assumptions about what transpired.

We evaluate this factor at Level 3-3, the highest level represented in the standard, and credit 275 points.



## **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.*

The appellants are in agreement with the agency's point determination for complexity. At Level 4-4, the standard distinguishes complexity 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. The appellants' problem solving includes a wide variety of problems concerning mortgage loan origination and servicing. Resolution of these problems requires the appellants to independently identify issues and determine what action is necessary. They begin with information provided by the borrowers' representatives and the borrowers' own information. The appellants must sort through complicated factual information and often develop cases from unreliable or conflicting information. Historical information is often incomplete or complicated by years of changing regulations or procedures. Borrowers' mortgages frequently are complicated by a prior accounting system conversion. The appellants must identify problems and develop approaches to resolve all issues they uncover as well as those referred. Resolutions to problems require a thorough understanding of the loan programs in order to make recommendations and explain options available to borrowers.

We evaluate this factor at Level 4-4, the highest level represented in the standard, and credit 225 points.

## **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. Only the effect of properly performed work is considered.*

The appellants contend their work affects the lives of their borrowers:

The [Name] Unit's resolution of an inquiry may result in a borrower's account being put into or brought out of foreclosure, the cancellation of a particular debt or the establishment of a moratorium of payment on their account.

The service the [Name] Unit provides involves analyzing and correcting a variety of non-conventional problems, conditions and circumstances for Section 502 and 504 loans. In many cases, the results of our research and investigations are now being used as justification to grant exceptions to the Code of Federal Regulations. The results of this may also be used to permanently amend the 3550 Code of Federal Regulations. ... The potential changes to the Code of Federal Regulations could affect both our internal and external customers. Subsequently, the impact of our investigation not only has an immediate impact on our customer but may also be the catalyst for procedural changes internally in every department in the [Name] Center.

The appellants claim higher credit for this factor than the agency has credited. The appellants point out that it is their responsibility to present the agency's interest and justify agency actions to Members of Congress.

The appellants' work is similar to the example provided at Level 5-2. In this example, correcting data in automated records enables others to base their decisions on accurate information. The work also affects the accuracy of further processes performed by related personnel in various organizations.

It also affects the reliability of the organization's services provided to users and customers. At Level 5-3, the standard states that the purpose of the work is to apply conventional practices to treat a variety of problems in accounting, budget, or financial management transactions. The standard states that issues might result, for example, from insufficient information about the transaction, a need for more efficient processing procedures or request to expedite urgently needed cases. The appellants' work will, on occasion, provide them an opportunity to recommend or implement improvement to their record keeping, procedures, or servicing of borrowers. However, the focus of the appellants' work is not to insure the integrity of the overall operating program or servicing as would be expected at Level 5-3. This responsibility lies with the unit's supervisor and higher management.

We did find that the appellants initiate recommendations for exceptions to regulations in extraordinary circumstances. While the numbers of exceptions made to regulations (about 35 for the unit since 1997) are important, they are an infrequent part of their overall inquiry work. Some cases involve extreme political interest such as medical hardship or terminal illness coupled with foreclosure. The authority to make the exceptions, however, is with the [Name] Center Administrator. As at Level 5-2 the appellants' work affects the accuracy of the borrower's loan and adjustments as required to ensure delivery of servicing for successful home ownership.

In this factor, the appellants asked for consideration of telephone contacts with Members of Congress that we will evaluate in our discussion of Factors 6 & 7, Personal Contacts and Purpose of Contacts. Likewise, we previously credited their written responses to inquiries under the complexity of problems and the knowledges used to resolve them.

We evaluate Scope and Effect at Level 5-2 and credit 75 points for this factor.

### **Factor 6: Personal Contacts and Factor 7: Purpose of Contacts**

*The standard treats Factors 6 and 7 together. Contacts credited under Factor 6 must be the same contacts considered under Factor 7. Factor 6 (Levels 1 to 3) includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. Levels of 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 (e.g., the degree to which the employee and those contacted recognize their relative roles and authorities). Factor 7 (Levels a to c) addresses the purpose of personal contacts, which may range from factual exchange of information to situations involving significant or controversial issues and differing viewpoints or objectives.*

The appellants believe their position should be credited at a higher level than the 110 combined points.

#### **Personal Contacts**

The appellants state:

The majority of our personal contacts are with Members of Congress and their staffs, various members of State and Federal Governments, Attorneys, Certified Public Accountants, Real Estate Professionals, various USDA Officials from the National, State and Field Offices as well as our borrowers.

Level 2 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 payment or those who are attempting to expedite transactions. The standard illustrates that the primary difference between Level 2 and 3 lies in contact with representatives of borrowers such as congressional staff members making inquiries on behalf of constituents. As at Level 3, the appellants' contacts are often with congressional staff as well as with attorneys, media, and other representatives. These contacts are often not recurring and may be of a sensitive or political nature. The appellants must determine the nature and extent of the communications involved and the extent of information to discuss.

We evaluate Personal Contacts at Level 3.

### **Purpose of Contacts**

The appellants state:

The purpose of our contacts with these individuals is to resolve borrower and Congressional Offices concerns with the Section 502 and 504 Loan Programs. We regularly discern and advise them of the status of their inquiries and the specific course of action that is being taken to resolve their concerns. Once we have reviewed their inquiry and evaluated the borrowers' circumstances, our focus is to complete the corrective action, achieve a common understanding of the situation and at times advise the Congressional Offices of various alternatives to resolve the Member of Congress' concerns.

At Level b the purpose of the contacts is to plan and coordinate actions to correct or prevent errors, delays, or other complications. This may involve obtaining a borrower'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. The appellants' work meets this level. The appellants must be skillful in gaining information from individuals who frequently are inclined to portray their circumstances in a fashion favorable to their needs. Some borrowers are skeptical about disclosing information that will lessen their chances of a favorable resolution or servicing option and may be deficient in providing information for risk determinations. The borrowers are sometimes fearful of foreclosure and in very serious financial circumstances. Others are confused or unable to understand the complexity of their payment problems. At Level c, the purpose of contacts is to persuade individuals to provide information, take corrective action, or accept findings to gain compliance with established laws and regulations. The appellants' purpose of contacts, however, is to obtain and provide information and expert technical advice, gain insight into potential problem areas and solutions, neutralize agitated customers, and assist in representing the agency in dealing with problems and solutions related to escalated issues. While individuals are sometimes agitated or uncooperative, the purpose of the work does not meet Level c that requires the routine use of persuasion.

We evaluate these combined factors at Level 3-b and credit 110 points.

### **Factor 8: Physical Demands**

*This factor covers the requirements and physical demands placed upon the employee by the work assignment. This includes physical characteristics and abilities and physical exertion involved in the work.*

As at Level 8-1, the appellants' work may require some physical effort, such as standing, walking, bending, or sitting. There are no special physical demands.

We evaluate this factor at Level 8-1 and credit 5 points.

### **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.*

As at Level 9-1, the appellants' work is performed in an office setting involving everyday risks or discomforts. Normal safety precautions are required.

We evaluate this factor at Level 9-1 and credit 5 points.

### FACTOR LEVEL POINT SUMMARY

Factor	Level	Points
1	1-5	750
2	2-3	275
3	3-3	275
4	4-4	225
5	5-2	75
6 & 7	3-b	110
8	8-1	5
9	9-1	5
	Total:	1720

The table above summarizes our evaluation of the appellants' work. As shown on page 33 of the standard, a total of 1720 points falls within the GS-8 grade range (1605-1850) on the Grade Conversion Table.

### Decision

The position is properly classified as GS-1101-8 with the title at the discretion of the agency.