

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

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

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

**Appellants:** [Names]

**Representative:** [Name]

**Agency classification:** Processor, GS-1101-4

**Organization:** U.S. Department of Agriculture  
Rural Development  
[Name] Center  
[Name] Branch  
[Name] Unit  
[City, State]

**OPM decision:** Mail Clerk, GS-305-4

**OPM decision number:** C-0305-04-01

/s/

\_\_\_\_\_  
Douglas K. Schauer  
Classification Appeals Officer

June 12, 2001

\_\_\_\_\_  
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).

This decision is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The servicing personnel office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

### **Decision sent to:**

#### **Appellants:**

[name and address of appellants' representative]

#### **Agency:**

[name and address of appellants' servicing personnel office]

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## **Introduction**

On March 8, 2001, the Chicago Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from a group employed at the U.S. Department of Agriculture, Rural Development, [Name] Center, [Name] Branch, [Name] Section, [Name] Unit. The position occupied by the eight appellants is classified as Processor, GS-1101-4, and the appellants believe their position is properly classified as Processor, GS-1101-5/6/7. We accepted and decided the appeal under section 5112 of title 5, United States Code (USC). Appellant [Name] was chosen by her co-appellants as the representative of the group. During the course of the fact-gathering, we interviewed Ms. [Name] and another appellant, Mr. [Name].

## **General Issues**

Prior to July 1998 the work of the appellants' unit and that of their sister organization in the [Name] Section, the [Name] Unit, were combined within one organizational unit. In July 1998 the functions were separated and the positions in the [Name] Unit were reclassified and upgraded to Processor, GS-1101-5. All of the employees were given the opportunity to apply for the new, higher graded positions, and those now employed as GS-5 Processors in the [Name] Unit were competitively appointed to those positions.

From information available as the result of another classification appeal from the [Name] Center, it seems that this very large organization located in [City, State], has a homogeneous organization in terms of the classification of the great majority of its technical action officer positions. The position classification specialists servicing the [Name] Center determined that the basic functions of the large [Name] Center technical staff are properly covered by the GS-1100 Business and Industry Group. Since there is no one occupation applicable to these positions, the appellants are classified to the "catch-all" occupation in this family, the General Business and Industry Series, GS-1101. This decision will determine the propriety of assigning the appellants' position to the GS-1101 even though the primary duties are classifiable to another occupational series.

## **Position Information**

The appellants' organization was previously titled "[Name] Services," and according to the mission statement, the mission of the [Name] Section is "to deliver mail to our customers accurately, timely, and efficiently, ensuring each customer has an opportunity to become a successful homeowner." A principal mission of the USDA, Rural Development is to finance decent, affordable housing for rural America. The appellants' organization within the [Name] Section is the [Name] Unit. Their primary mission is the receipt and delivery of correspondence, packages and other mail within the [Name] Center, to receive and meter or otherwise process outgoing mail from offices within the [Name] Center, and to distribute or outprocess the mail to the recipients via internal distribution, the U.S. Postal Service (USPS), Federal Express, UPS, and contractor employees. In addition, when mail is returned with addressee unknown, the appellants are charged with researching and correcting the addresses of borrowers. Each appellant is successively rotated within the unit to perform the various individual tasks for which the unit is responsible.

There are 32 internal offices to which mail items have to be distributed. Often, Rural Development's main customers throughout the United States and Puerto Rico, the borrowers, fail to designate the recipient of the correspondence on the address. In this instance the appellants are responsible for opening the mail and determining the proper recipient. This requires the appellants to possess a good working knowledge of the mission and function of each office in the [Name] Center. Also, they process in excess of 200 items of accountable mail per day. This mail requires special handling, and the unit has an accountability system which the appellants use to keep track of all items and to ensure it gets delivered in a timely manner.

The appellants process outgoing mail. This varies according to the type of mail it is and the recipient. All mail utilizing the U.S. Postal System has to be metered, charged to the appropriate office, and accounted for. To process items for Federal Express, for certified, express and pre-sorted USPS mail, for Airborne Express, and for UPS the appellants use different administrative processes and procedures. There are approximately 100 Rural Development district and field offices and 50 state offices to which mail is sent, and many hundreds of individual customers. Approximately 1000 certified letters go out per day, each of which must be metered and accounted for by office.

A large portion of the appellants' work is processing mail items returned for the incorrect address or "addressee unknown." The appellants state that the most complex and difficult work they have is to research various electronic, telephonic and personal sources to determine the correct addresses for this returned mail. To determine the correct address the appellants utilize a variety of available sources. They utilize the automated FasTeller and the Credit Retrieval systems to find addresses. They contact local Post Offices and telephone companies to attempt to find the correct addresses. They task other administrative offices in Rural Development, and ask field representatives of Rural Development to physically check out properties in their effort to find the correct address. In short, the appellants are empowered to use virtually any source available.

In performing their work the appellants must each operate a Personal Computer (PC) and utilize various software systems. These include the FasTeller system which is a proprietary Rural Development system that records a large volume of information on borrowers and accounts. They also have access to a Credit Retrieval system, which contains a variety of personal information on persons throughout the U.S., to find out addresses or leads to find addresses. They utilize the ACCUTRAC system to account for metered mail and the mail budget. They utilize the internet to converse with Post Offices throughout the U.S. in their address search work.

### **Series and Title Determination**

The classifiers servicing the [Name] Unit considered classifying the processor positions to the GS-305, Mail and File Series; however, they classified the appellants' position to the GS-1101 occupational series. Their rationale was that the work of the processor positions requires subject matter knowledge of [Name] Center's loan servicing system and other technical aspects of the Rural Development service. We surmise that an additional underlying reason was to maintain

organizational homogeneity in classification and to provide qualifying experience for employees in the [Name] Unit who wish to apply for higher graded positions in the Rural Development [Name] Center.

The reasons cited above for assigning a position to one occupational series as opposed to another are justified, but only under certain circumstances. The duties must not be clearly identified with one occupational series to the exclusion of all others. When a position is clearly classifiable to one occupational series, it cannot be classified to another series to meet goals or expectations not related to proper classification. According to OPM's The Classifier's Handbook, a position should be classified to the occupation which best represents the main purpose for the existence of the position. It should be classified to the occupation that represents the paramount knowledge, or the most important type of subject matter knowledge or experience required to do the work. Positions are often classified to the occupation that best represents the reason for the existence of the organization within which the positions are found. Often, the occupation which provides the best qualified candidates to do the work is the most appropriate series.

The appellants spend a considerable amount of their time in searching for the correct addresses of borrowers, and these efforts are often intensive and time-consuming. In order to acquire the correct address, the appellants must understand and utilize a proprietary computer system, task other offices, and sometimes task Rural Development field offices near the property for the borrower's address. This work requires knowledge of the missions, functions and operations of the offices (and personnel) which make up Rural Development. However, we do not think that the reason for the establishment of the [Name] Unit or of the appellants' position was to track down and correct the addresses of borrowers.

The mission of the [Name] Unit, as stated in the mission statement, is to process mail. Regardless of the tools utilized to accomplish this goal, processing mail is the reason for the existence of the organization. Prior to the recent re-naming of the organization, it was called [Name] Services. We conclude from our position audits that the primary knowledges required of the position are those concerned with the processing of incoming and outgoing mail. The employees state that it takes at least 90 days to learn the minimum required to accurately process the mail; in fact it may take a year for a new employee to learn all that is necessary for he or she to flawlessly process the mail. From these audits we also conclude that the most desirable skill to bring to the job is knowledge of mail processing; the other knowledges can be learned within a reasonable period of time. The primary reason for the existence of the position is without doubt to accurately process mail.

The Classifier's Handbook also states that a valid consideration for classifying a position into a particular occupation is if the occupation represents the normal line of progression for the position and/or similar positions in the organization. This would seem to apply to the [Name] Center where the majority of technician positions are classified to GS-1101. However, virtually all other positions in the [Name] Center are graded higher than the appellants' position. While the knowledges specific to the mail work performed by the appellants do not necessarily qualify an incumbent for one of these positions, the knowledges gained of the [Name] Center and its missions, functions and organizations while performing the mail duties are certainly qualifying

experience as is the knowledge of the FasTeller and other systems utilized in both mail processing and functional technical work.

We conclude that the Mail and File Series, GS-305 is the most appropriate occupational series for the appellants' position. It is worthwhile to quote the series definition of the GS-305 series so that the appellants fully understand our rationale for placing their position in that series. The GS-305 series "covers positions involving the ... performance of clerical work related to the processing of incoming or outgoing mail ... *and the performance of related work* [OPM emphasis added] when such duties require the application of established mail ... methods and procedures, knowledge of prescribed systems for governing the flow and control of communications, ... and knowledges of the organization and functions of the operating unit or units served." Processing the mail is the reason for the existence of the positions and the research required to find borrowers' addresses is incidental to the mail mission and operations. The proper title for positions in the GS-305 series in which mail duties are predominant is Mail Clerk.

### **Grade Determination**

The GS-305 is a Factor Evaluation System (FES) occupational standard where nine different job factors are identified as being characteristic of all positions. For each factor there are different levels which correspond to differing levels of difficulty or complexity. Each factor level has a point value assigned, and the position is compared to each factor level in the standard to determine the appropriate level. The total of points assigned for the position is compared to a grade conversion chart in the standard to arrive at the proper grade. We have compared the appellants' position to all nine factors.

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

At Level 1-2 mail positions require a basic knowledge of the functions and organizational structures of the units serviced, a basic knowledge of the subject matter content of the materials being processed, and a knowledge of mail processing and control procedures. This knowledge of the organization, subject matter content and processing procedures enables the clerk to read, sort and route materials to 50 to 100 distribution points when the functions of the units serviced are clearly separate in nature, and the subject matter of the materials processed is identifiable by subject headings, organizational or other codes, references, etc., as to functional responsibility. This level also requires knowledge of procedural instructions and/or postal regulations for the control and processing of various types of mail, or for preparation and dispatch of various kinds of outgoing materials with differing processing procedures.

Positions at Level 1-3 typically require a thorough knowledge of the functions performed within the units serviced, and a thorough knowledge of the subject matter content of the materials being processed. This level encompasses the level of knowledge required by positions whose work involves a range of mail processes that embrace practical knowledge of mail systems procedures necessary to recognize problems within the unit and recommend improved procedures and methods to increase efficiency. For most mail positions this knowledge enables clerks to analyze and route materials to 150 or more discrete organizational units which may have close or

overlapping functions when the subject matter of the materials may not be clearly identifiable and may pertain to matters of a substantive nature.

The appellants receive and route mail within the [City] [Name] Center to 32 different offices. They are frequently required to open the mail to determine the exact intended addressee by subject matter. They utilize several mail service providers, i.e., USPS, Federal Express, UPS, and Airborne Express, in processing the full range of outgoing mail, i.e., correspondence, express, overnight, certified, registered, and packages to over 150 USDA Rural Development district and field offices and state offices. The addresses for offices or persons outside of the [Name] Center are determined by the sending office, and if there is a question on the part of the mail processors, they contact the sending office. Each employee also handles on average 50 pieces of misdirected mail per day for which they must determine the reason for the return and find the correct address when returned as addressee unknown. The internal office distribution duties require in-depth knowledge of the organization serviced. This level of knowledge is most closely comparable to Level 1-2. The appellants also must possess and utilize knowledge of both internal and external procedural systems to search and locate addresses for borrowers throughout the United States. While not typical for a Mail Clerk or specifically addressed in the standard, we judge that the knowledge required to search the various sources for the correct addresses is comparable in difficulty to Level 1-3.

We believe that the work of the position fully meets the intent of Level 1-3. While positions performing routine mail functions and credited at Level 1-3 are those normally found at a large agency headquarters level with many, i.e., over 150, discrete organizational levels, the appellants work requires much more intensive knowledge of the USPS operations and procedures than is typical. Their researching the addresses of misdirected mail requires a substantial practical knowledge of mail systems procedures, as described at Level 1-3. The reason this knowledge is required is not as described, that is, “to recognize problems within the unit and recommend improved procedures and methods to increase efficiency,” but to ensure that critical and time sensitive mail is delivered to clients whose addresses have somehow been incorrectly recorded in USDA, Rural Development’s records and files. Also, most mail clerks credited at Level 1-3 may have to utilize this level of knowledge to route mail to 150 or more discrete organizational units which may have close or overlapping functions and when the subject matter of the material may not be clearly identifiable and may pertain to matters of a substantive nature. The appellants have 32 internal customers for which determining the correct addressee can be this difficult. They also have about 150 Rural Development and state offices to which they send mail, albeit they do not have to determine the correct address if it is incorrectly labeled. In addition, they have thousands of pieces of other mail that go out each day. And each appellant is expected to find the correct address for 50 misdirected letters per day. This is comparable in difficulty to having 50 new addressees daily for which the appellants have to analyze and route the material correctly, and it fully meets the intent of Level 1-3. Level 1-3 equates to 350 points.

### *Factor 2, Supervisory Controls*

Mail Clerks at Level 2-2 receive instructions from the supervisor on non-recurring assignments and changes in procedures. Most assignments are performed independently according to established procedures and previous experience. The supervisor is consulted when problems

arise for which there are no precedents. The work is reviewed for accuracy by spot-checking or selective sampling, and may be reviewed occasionally for compliance with regulations.

At Level 2-3 Mail Clerks receive general guidance from a supervisor who may be concerned with other functions in addition to mail services. They independently plan and adjust mail functions to meet the requirements of serviced units, which are concerned with new, emerging, or innovative programs subject to relatively constant change. The employee must therefore independently recognize the need for and take action to adjust or change mail-processing procedures. The supervisor is normally consulted only when problems arise for which no guidance or precedents exist. And the work is reviewed in terms of the results achieved and the effect on resources and other administrative matters.

The appellants meet some characteristics of Level 2-3, but do not fully meet the intent of that level. Similar to Level 2-3 they normally consult with their supervisor or work leader when problems arise for which no guidance or precedents exist. Also similar to this level, their work is reviewed in terms of results achieved and the effect on other administrative matters. However, the other aspects of this factor do not meet Level 2-3. For example, the appellants have both a work leader and a supervisor assigned to their work unit. They are not responsible for independently planning and adjusting mail functions and the work of the organizations they service is not concerned with new, emerging or innovative programs subject to relatively constant change. The appellants do not independently recognize the need for and take action to adjust or change mail-processing procedures. Level 2-2 equates to 125 points.

### *Factor 3, Guidelines*

At Level 3-2 guidelines include numerous standing oral instructions and written procedural guides which are applicable to different work situations. Employees must use judgment and initiative in selecting and applying the proper guide.

Level 3-3 guidelines consist of oral and written guides which may not be applicable (and in some cases) may not cover an extensive range of varying operating situations. Significant judgment is required both to determine which of the guides to apply to specific problems, and to adapt or improvise procedures to accommodate precedent-setting or unique situations. Written guides typically include various mail management handbooks and manuals which are used in setting up initial mail services to serve new organizational requirements or to extensively modify existing services because of major deficiencies or system changes.

The appellants utilize a variety of written guidance to include USPS manuals and regulations, a Federal Express software system, UPS instructions, and internal operational instructions. They also use instructions for operating several administrative PC software programs such as the FasTeller system. They also receive oral guidance from the work leader or supervisor, particularly when working on an unprecedented situation or problem. This is a match to Level 3-2. The position does not meet Level 3-3 because they have guidelines available from the USPS and the various companies they utilize. They also have the system operating instructions, and when these fail to provide the guidance needed, they have a work leader and supervisor available to provide the necessary guidance. Level 3-2 equates to 125 points.



#### *Factor 4, Complexity*

Positions at Level 4-2 perform several related duties involving consideration of choices of appropriate procedures or actions to be taken in a variety of work situations. There is generally variety in the materials processed and in the activity required. This work also requires a number of steps or processes involving several different types of mail and recognizing which procedure is appropriate for each type (e.g., registered, insured, certified, etc.); distinguishing among a large number of distribution points when the functions of some serviced units overlap; or represent similar work.

Level 4-3 complexity applies to positions which perform a number of duties involving the full range of mail procedures in a work situation where there is typically a great variety in the materials received, and great complexity of subject matter materials and processing actions. Work at this level involves recognizing the need for (and taking action to obtain) improvements in mail processing procedures, or work of similar difficulty.

The appellants' position fully meets Level 4-2 for this factor, but does not meet the criteria for Level 4-3. Compared to that described at Level 4-3, there is no evidence to show that the appellants' work situation involves a great variety of materials received or that there is great complexity of subject matter materials and processing actions. Although the appellants' work involves locating the correct addresses for customers whose correspondence has been misdirected, this does not meet the complexity level described at Level 4-3. The Rural Development [Name] Center is a homogeneous organization functionally, and all of the organization's functions are related to a degree. Both appellants audited indicated that it takes about 90 days for a new employee to be minimally qualified to perform the work of a mail processor. This does not demonstrate that the organization has a great complexity of subject matter materials and processing actions. In addition, the employees are not responsible for recognizing the need for improvements in mail processing procedures, or work of similar difficulty. Level 4-2 equates to 75 points.

#### *Factor 5, Scope and Effect*

At Level 5-1 positions are concerned with well-established mail functions. Performance of these functions on a timely basis facilitates the work performed in the serviced units.

At Level 5-2 positions are concerned with work involving the improvement of methods or procedures affecting the overall efficiency of the mail unit, or work which involves determining and selecting appropriate materials to be made available to serviced units for their use. Performance affects the ability of personnel in the serviced units to perform their duties in an accurate manner, or provide service to others.

The Scope and Effect Factor is a two-part factor, and both parts must be met for a position to be credited at a factor level. The purpose of the appellants' work is not to improve methods or procedures affecting the overall efficiency of the mail unit, such as described at Level 5-2. It somewhat exceeds the intent of Level 5-1, but clearly does not meet the intent of the higher

level. The results of the work affect the ability of other personnel in the serviced units to accurately perform their work, which is described at Level 5-2. However, one element at Level 5-1 and one at 5-2 means the position as a whole must be credited at Level 5-1. This level is credited with 25 points.

#### *Factor 6, Personal Contacts*

The appellants contact numerous personnel throughout the U.S. in researching the addresses for misdirected mail. This matches Level 6-2 which is appropriate for personal contacts that are typically with personnel in serviced units and also includes personnel outside of the immediate organization. Level 6-2 equates to 25 points.

#### *Factor 7, Purpose of Contacts*

At Level 7-1 contacts are for the purpose of obtaining or exchanging information regarding performance of functions in the immediate work unit and to provide information to personnel in serviced units regarding mail operations.

Level 7-2 contacts are for the purpose of working with personnel in serviced units in resolving operating problems such as delays in receipt of materials, and problems of similar difficulty.

The overwhelming majority of the appellants' contacts are for the purpose of ascertaining factual information. They may discuss mail procedures with personnel in serviced units, but they are not responsible for correcting the mail problems of serviced activities. Level 7-1 equates to 20 points.

#### *Factor 8, Physical Demands*

The work requires long periods of standing and walking and requires lifting and carrying moderately heavy (under 50 pounds) packages and trays of mail, and pushing mail carts and trucks. This is a match to Level 8-2 and is credited with 20 points.

#### *Factor 9, Work Environment*

The appellants must load mail trucks from loading docks exposed to the weather. Also, they must walk to the Post Office in inclement weather. They work around machines (sealing machine and banding machine) which make excessive noise, and are dangerous if not handled correctly. This is a match to Level 9-2 and equates to 20 points.

## Factor Level Point Summary

Factor	Level	Points
1	1-3	350
2	2-2	125
3	3-2	125
4	4-2	75
5	5-1	25
6	6-2	25
7	7-1	20
8	8-2	20
9	9-2	20
	Total	785

The appellants' position is credited with 785 points, which falls within the range for GS-4 (655-850).

**Decision**

The appellants' position is properly classified as Mail Clerk, GS-305-4.