

U.S. Office of Personnel Management  
Division for Human Capital Leadership & Merit System Accountability  
Classification Appeals Program

Chicago Field Services Group  
230 S. Dearborn Street, DPN-30-6  
Chicago, IL 60604-1687

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

**Appellant:** [appellant]

**Agency classification:** Patient Services Assistant (OA)  
GS-303-5

**Organization:** Primary Care Unit  
[location]  
Department of Veterans Affairs  
[city and state]

**OPM decision:** GS-303-5  
(Title at agency discretion)

**OPM decision number:** C-0303-05-20

/s/ Kevin E. Mahoney

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Kevin E. Mahoney  
Deputy Associate Director  
Center for Merit System Accountability

March 10, 2006

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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).

Since this decision changes the classification of the appealed position, it is to be effective no later than the beginning of the fourth pay period after the date of this decision (5 CFR 511.702). The servicing human resources 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:**

[appellant]  
[address]  
[city and state]

[personnel officer]  
HR Supervisor  
[location]  
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## Introduction

On March 18, 2005, the Chicago Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant] who currently occupies the position classified as Patient Services Assistant (OA), GS-303-5, in the Primary Care Unit, [location], Department of Veterans Affairs (VA), in [city and state]. The appellant believes that her position should be classified as Patient Services Assistant (OA), GS-303-6. We received the complete agency administrative report on May 2, 2005. We accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

To help decide the appeal, we conducted a telephone audit with the appellant and a telephone interview with her immediate supervisor on February 17, 2006. In reaching our decision, we carefully considered the audit and interview findings and all other information of record furnished by the appellant and the agency.

## General issues

The appellant is assigned to PD number [XXXXX]-A, which was developed as the result of a desk audit in response to a request for a position review by the appellant's supervisor on March 31, 2003. Her immediate supervisor at that time certified to the new PD's accuracy, but the appellant states that it is still not accurate because her number of duties and volume of work have increased considerably since she took over the duties of the position, including occasionally backing up functions in other departments and a large increase in the number of customers. The appellant also disagrees with the grade assigned. We accepted her classification appeal based on evidence that she had made a reasonable attempt to obtain an accurate PD, and we will decide the appeal on the basis of actual duties assigned by management and performed by the employee (5 CFR 511.607(a)(1)).

A PD is the official record of the major duties and responsibilities assigned to a position by an official with the authority to assign work. A position is the work made up of the duties and responsibilities performed by an employee. Position classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities assigned by management and performed by the employee. An OPM appeal decision grades a real operating position and not simply the PD. Therefore, this decision is based on the actual work assigned to and performed by the appellant.

According to the appellant, she spends 50 percent of her time conducting means tests, 20 percent providing clerical and administrative support, and 15 percent each for leading training and backing up other departments. However, her supervisor stated she spends 80 percent of her time on the means testing issues, with training only occurring twice a year, and rarely having to back up the other units, this having occurred only once during the last six months. Based on a careful review of the record, we find the appellant spends 80 percent of her time on the means testing work. Therefore, we have determined the PD contains sufficient information on her duties and responsibilities to be adequate for classification purposes (*Introduction to the Position Classification Standards*, Section III. E.).

Implicit in the appellant's rationale is a concern that her position is classified inconsistently with other positions since she refers to positions in other VA offices that perform similar work, but are classified at a higher grade level. By law, we must classify positions solely by comparing current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since the comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others, which may or may not be classified correctly, as a basis for deciding the appeal.

Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. Section 511.612 of title 5, Code of Federal Regulations (CFR), requires that agencies review their own classification decisions for identical, similar, or related positions to insure consistency with OPM certificates. Thus, the agency has the primary responsibility for insuring that its positions are classified consistently with OPM appeal decisions. If the appellant considers her position so similar as to warrant the same classification, she may pursue the matter by writing to her agency headquarters HR office. In doing so, she should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same, the agency must correct its classification to be consistent with this appeal decision. Otherwise, the agency should explain the differences between her position and the others.

The appellant makes various other statements about her agency and its evaluation of her position. Because our decision sets aside all previous agency decisions, the appellant's concerns regarding her agency's classification review process are not germane to this decision. In adjudicating this appeal, our only concern is to make our own independent decision based on the proper classification of the position.

The appellant highlights the increase in the volume of work for which she is responsible. She also mentions innovations she has introduced to increase program effectiveness, such as creating a new coding system to remind veterans to provide required information and for her suggestion to the enrollment department to provide letters to new enrollees explaining the enrollment process. She also raises other issues concerning salary comparability, efficiency of performance, her length of service, and the duties she performs in the absence of another employee. However, these issues are listed as factors which cannot be considered in determining the grade of a position (*The Classifier's Handbook*, Chapter 5). Other human resources management programs deal with these issues, such as the performance and incentive awards programs, the suggestion program, and various pay setting processes, such as periodic step increases.

### **Position information**

The appellant's position is the administrative coordinator of the Means Test Program at the [location}. Veterans must provide the VA with health insurance and family income information, which is the means test for identifying veterans potentially subject to co-payments. This involves running a report of all individuals that have appointments each day and passing the reports out to the appropriate Primary Care teams for review. The appellant inputs this information into the database and documents that she has received each means test separately, checks to see if the information is complete and correct, performs the means test, answers any

questions the patient may have, and then enters the final means information into the system. If the means test was mailed and the information is incorrect, then she must call the patient. If the patient is not available, she places it in a suspense file until she can make contact. After two calls during the day, she leaves a message to have the patients contact her. If she gets no response, she sends the form back to the patient with a letter explaining the problem. If the 10-10 EZ form is accurate, she enters the information into the system filling in any spaces with zeroes or N/A that are supposed to be filled in for the patient and places it in a drawer for scanning. If all the means tests are done, she checks the system for prohibits, which are messages about deceased patients. She writes down each deceased patient's name, social security number, and date of death and uses the automated computer system to prevent the system from printing letters to them. She also runs a report that checks if a patient has a new VA mailing address. At around 12:00 noon each day she starts hand-folding the means test letter and 10-10 EZ forms, inserts them into return envelopes, and affixes postage. The appellant inputs means tests into the computer, updates patient means test information, and extracts a list each morning of those who need a "required means test" at their next appointment.

The appellant also interviews veterans to obtain the eligibility information and accurate financial information for means testing purposes. She provides information to numerous veterans in person and by telephone who have questions or require assistance on means testing. She provides new and refresher means test training as needed to screening and community-based outpatient clinics (CBOC) staff, as well as CBOC clerks, program assistants, and travel clerks. The appellant provides means test information and feedback to the Health Eligibility Center (HEC) in [city] and other VA facilities as needed or requested. She also regularly communicates with veterans' groups, the VA Financial Services and veterans' individual representatives, including social workers, family, and the courts.

The appellant is responsible for the day-to-day administrative work performed in direct support of the Primary Care Teams, CBOCs, ADPAC/PBS, the Medical Care Cost Recovery Section, and Eligibility. She also performs clerical and assistant work, such as covering reception duties, in support of the Clinic's financial management unit when they are short-staffed.

### **Series, standard, and title determination**

The agency classified the appellant's position in the Miscellaneous Clerk and Assistant Series, GS-303, and titled it Patient Services Assistant (Office Automation). The appellant does not disagree with the series determination. The GS-303 series includes positions the duties of which are to perform or supervise clerical, assistant, or technician work for which no other series is appropriate. The work requires knowledge of the procedures and a technique involved in carrying out the work of an organization and involves application of procedures and practices within the framework of established guidelines. The appellant performs a number of support functions requiring knowledge of information management and clerical and administrative procedures, instructions, regulations, and directives as they relate to her employing organization. The GS-303 series best represents the position's primary purpose. OPM has not prescribed titles for positions in the GS-303 series. Therefore, according to section III.H.2 of the *Introduction to the Position Classification Standards*, the appellant's agency may choose the official title for the position.

The appellant says she spends a substantial amount of her time “training” other employees how to apply the Means Test to veterans’ applications. However, we find that the appellant spends considerably less than 25 percent of her time training others. In addition, the training she provides is typical of instances of a senior employee training less experienced co-workers. As such, it requires application of the same knowledge, skills, and abilities to perform the work itself and is properly considered in the evaluation of the Means Test work performed by the appellant.

The agency also added the parenthetical title, *Office Automation* or *OA*, to the basic title. This parenthetical designation is appropriate when positions require (1) knowledge of general office automation software, practices, and procedures; (2) competitive level proficiency in typing; and (3) ability to apply the knowledge and skills in the performance of general office support work. However, the appellant’s position does not require competitive level proficiency in typing; i.e., ability to type 40 words per minute. The appellant’s work primarily requires knowledge of the means test database, sufficient typing skills to prepare e-mail messages and enter data, and the ability to apply these skills in the performance of office support work. Conversations with the appellant and the HR Supervisor confirm this level of usage. Therefore, the addition of an *OA* parenthetical title to the basic title determined by the agency is not warranted.

### **Grade determination**

The GS-303 series does not include evaluation criteria. The agency evaluated the appellant’s position by applying the OA Grade Evaluation Guide (OAGEG). With the issuance of the new PD, the agency changed Factor 1 from Level 1-4 to Level 1-3, and Factor 2 from Level 2-2 to Level 2-3. The appellant disagrees with the crediting of these factor levels. However, the primary and paramount work performed by the appellant does not entail functions covered or properly evaluated for grade-level purposes by application of the OAGEG. The OAGEG is appropriately used to evaluate the appellant’s e-mail and other automated system input and extraction duties that are incidental to her substantive clerical work. This substantive work is properly evaluated using the Grade Level Guide for Clerical and Assistance Work (the Guide).

### ***Evaluation using the Guide***

The Guide provides general criteria for use in determining the grade level of nonsupervisory clerical and assistance work. Administrative support work of the kind described in the guide is performed in offices, hospitals, and numerous other settings in all Federal agencies. The Guide describes the general characteristics of each grade level from GS-1 through GS-7 and uses two criteria for grading purposes: *Nature of assignment* (which includes knowledge required and complexity of the work) and *Level of responsibility* (which includes supervisory controls, guidelines, and contacts).

#### ***Nature of Assignment***

As at the GS-5 grade level, the appellant performs a full range of standard and nonstandard clerical assignments and resolves a variety of recurring problems in the Means Test Program. She must identify and understand the issues involved in each assignment and determine what

steps and procedures are necessary and the order of their performance. She receives a variety of assignments that involve different and unrelated steps, processes, or methods, e.g., conducting Means Testing, determining if information the VA has is accurate, gathering information from a multitude of sources, and assisting other clerks as needed. Typical of the GS-5 grade level, she is responsible for disseminating reports, mail, and faxes. She examines documents for completeness and corrects any discrepancies. The appellant has frequent contact directly with the veterans and their dependents. As a result she has developed a broad working knowledge of the specific subject matter of Means Testing, the necessary regulations, medical administrative issues, and the related office procedures to deal with the full range of standard and nonstandard assignments described at the GS-5 grade level. Indicative of nonstandard work at that level, the appellant introduced a new coding system to increase the efficiency and effectiveness of data collection from eligible veterans.

The appellant's work does not meet the GS-6 grade level. She does not process the wide variety of transactions for more than one type of assigned activity or functional specialization as depicted in the Guide. Whether it is performing strictly clerical tasks, such as mail sorting, faxing and printing set report queries, or entering information into a database, gathering the information from veterans, or correcting misinformation, the appellant's program work has a single primary functional specialization. The work is covered by a basic set of rules, regulations, and procedures related to Means Testing procedures. The processes are not unusually difficult and the transactions are not complicated within the meaning of the Guide. Unlike the GS-6 grade level where deciding on a course of action has a substantive impact on the outcome of the work, her assignments affect procedural issues, e.g., assuring proper addresses and other required information for veterans. While the appellant's work requires a comprehensive knowledge of rules, regulations, and other guidelines relating to completing assignments in the assigned program, her duties do not involve the increasingly difficult complicated transactions intended to credit the higher grade level. The appellant's case actions are repetitive in terms of regulations and procedures to be applied and problems to be handled. Her decisions are based on information readily available, such as, instructions, records, and forms. Her program duties, e.g., running edit reports, are for the purpose of assuring that ACP meets established program requirements. Her budget support work is similarly transactional in nature in that she is not responsible for creating or managing a budget, but only tracks costs that are part of the budget.

Therefore, we have assigned the GS-5 grade level for this factor.

#### *Level of Responsibility*

The appellant is responsible for the day-to-day administrative management that directly supports the other Clinic operations. As at the GS-5 level, the incumbent performs a wide variety of daily tasks independently. Her supervisor instructs her on new procedures and policies, as well as directives on how to do her job. The appellant has mastered the knowledge required to perform her daily tasks. She is able to work in accordance with accepted practices and resolve procedural problems within guidelines. She uses her judgment in deciding specific courses of action to accomplish the daily tasks and fulfill the Clinic's mission.

The appellant's work does not meet the GS-6 level. While she is considered the local subject matter expert on Means Testing, unlike the GS-6 level, her assignments do not routinely require dealing with the complicated transactions that are often without precedent as discussed previously. While she communicates with outside groups and other parts of the VA, it is to exchange information as opposed to providing advice on regulatory requirements as discussed at the GS-6 grade level. Congressional inquiries are first routed through her supervisor while other questions are filtered through other staff before the appellant is asked to provide information on a specific aspect. Unlike the GS-6 level, her work is repetitive and can be resolved by locating and applying the most appropriate guideline to the circumstances of the specific case. Her work does not routinely require or permit her to deviate from established procedures or deal with actions where guidelines are conflicting or unusable. Problems of this nature must be referred to her supervisor for resolution. Her contacts for co-worker training are, as at the GS-5 level, informational in nature and do not influence or control the crediting of this factor.

The appellant stresses her independence from supervision. Although she functions independently, the appellant's work does not permit her to apply independent judgment regarding a complex subject matter because the criteria and procedures for completing the Means Testing process are well defined. In the section, Using This Guide, the Guide states "Routine or standardized work may appear to be performed with a high level of independence when, in fact, it is the work itself that is closely defined and prescribed." That is the case here. In addition, her supervisor retains the authority to make any procedural changes.

Therefore, we have assigned the GS-5 grade level for this factor.

### *Summary*

Because both factors meet the GS-5 grade level, we find the work covered by the Guide to be properly classified at the GS-5 grade level.

### ***Evaluation using the OAGEG***

The appellant's OA duties cannot be graded higher than her clerical and assistance duties since they do not go beyond what is required for the limited range of functions typical of Level 1-2, e.g., transmitting, receiving, and acknowledging e-mail and messages. The appellant uses a limited range of standard software functions, resulting in evaluation of her OA work at a lower grade than the clerical and administrative work. Therefore, her OA work does not have an impact on the final grade level worth of the position.

### **Decision**

The appellant's position is properly classified as GS-303-5, with title at the discretion of the agency.