

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

Appellant: [Appellant]

Agency classification: Administrative Assistant (OA)
GS-303-7

Organization: [Name]
[Organization/Name]
[Organization]
Veterans Affairs Medical Center
Veterans Health Administration
Department of Veterans Affairs
[Location]

OPM decision: (Title at agency discretion) (OA)
GS-303-7

OPM decision number: C-0303-07-13

Judith A. Davis for

Robert D. Hendler
Classification and Pay Claims
Program Manager
Merit System Audit and Compliance

11/15/2010

Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a classification certificate which 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 5 CFR 511.605, 511.613, and 511.614, as cited in the *Introduction to the Position Classification Standards (Introduction)*, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[Name]
[[Address]
[Location]

[Name]
Department of Veterans Affairs
Medical Center
Office of Human Resources
[Address]
[Location]

Director
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Introduction

On July 21, 2010, Philadelphia Oversight of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [Appellant]. The appellant's position is [Name], Associate Director of Finance, Veterans Affairs Medical Center (VAMC), Veterans Health Administration (VHA), Department of Veterans Affairs (VA) in [Location]. The appellant believes her position warrants classification as an Administrative Specialist, GS-301-9/11 or Administrative Officer, GS-341-11.. We received the complete agency administrative report (AAR) on August 17, 2010, and have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

To help decide this appeal, we conducted on-site interviews with the appellant and her current supervisor on September 21, 2010 and a telephone interview with her previous supervisor on September 23 2010, respectively. In reaching our classification decision, we have carefully considered all of the information obtained from the interviews, as well all information of record provided by the appellant and the agency.

Background information

In May 2009, the appellant discussed having her position description (PD) re-written with her supervisor so it accurately reflects her duties. They both agreed it was inaccurate based on an "accretion of duties." The appellant's supervisor suggested she make modifications to her existing PD and submit it to him for review. The appellant submitted a PD with a proposed classification of Administrative Specialist, GS-301-9, for review since she believes it reflects the duties she performs on a daily basis. The appellant states she followed up on the status of the PD with both her supervisor and the [Location] VAMC human resources office (HRO) but the issue of PD accuracy was not resolved. She further states in March 2010, she requested a desk audit through the [Location] VAMC HRO which was conducted on April 29, 2010. The HRO's June 16, 2010, decision changed the position's title from Program Support Assistant (OA) to Administrative Assistant (OA) and updated the PD. The appellant was dissatisfied with the results of the desk audit and filed this appeal with OPM.

General issues

The appellant takes issue with what she describes as the hostile work environment and the level of anxiety and stress she experiences at her work site. She states her agency has been constantly attempting to force her out of her position and refuses to acknowledge the level of work being performed which impacts her ability to obtain a fair and unbiased review of the classification of her position. She points to her having been eligible for higher graded positions and raises other issues such as not being paid for overtime performed and her disagreement with management's attempt to move her position from the VAMC to a [Name].

In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of her position. By law, we must make our decision solely by comparing her current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Eligibility for promotion to higher graded positions, disputes concerning overtime pay, the appellant's concerns regarding her work environment and her disagreement with her duty location are not germane to the position classification process. Because our decision sets

aside all previous agency decisions, the agency's classification review process are not germane to this decision.

The appellant does not agree PD# [Number] dated May 27, 2010 accurately describes the duties and responsibilities of her position. The appellant states the PD does not describe the level of knowledge or analytical skill required to support the administrative functions of the [Name/Organization] and remote [Name] sites, to include purchasing equipment; hiring contract employees; and serving as the sole contracting point-of-contact. The appellant also does not agree her PD fully describes the technical aspects of the duties she performs, including the skills required to resolve potential information technology (IT) problems; serving as a contracting officer's technical representative (COTR) for remote [Name] sites, and the knowledge required to configure software. She further states the factor descriptors for supervisory controls do not reflect her level of independence in terms of making decisions on a day-to-day basis and personal contacts are downplayed to show only internal to[Location] VAMC contacts. Her current and previous supervisors certified the accuracy of the PD.

A PD is the official record of the major duties and responsibilities assigned to a position or job by an official with the authority to assign work. A position is the duties and responsibilities which make up the work performed by the employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal based on the actual duties and responsibilities currently assigned by management and performed by the employee. An OPM appeal decision classifies a real operating position and not simply the PD. This decision is based on the work currently assigned to and performed by the appellant.

A PD must contain descriptive information about the major duties and responsibilities assigned to the position which, when supplemented by other information about the organization's structure, mission, and procedures, can be classified by one's knowledge of the occupational field involved and the application of pertinent position classification standards (PCSs), principles, and practices. It is not meant to be a task list of every function performed. After careful review, we find the appellant's PD meets the standards of PD accuracy for classification purposes as discussed in section III.E of the *Introduction* and we incorporate it by reference into our decision. We also find the appellant's proposed Administrative Specialist, GS-301-9 PD overstates the difficulty and complexity of the work performed as discussed in this decision.

By law, we must classify positions solely by comparing their current duties and responsibilities to OPM PCS and guidelines (5 U.S.C. 5106, 5107, and 5112). The appellant alluded to the amount of work she performs by providing administrative support to remote [Name] sites as well as ordering their office supplies. However, volume of work cannot be considered in determining the grade of a position (*The Classifier's Handbook, Chapter 5*). She also alludes to classification inconsistency based on the grades of other positions. The appellant states since she provides administrative assistance and orders office supplies for remote [Name] sites, her classification should be the same as other positions performing these duties. Since comparison to the standards is the exclusive method for classifying positions, we cannot compare the appellant's current duties to other positions which may or may not be classified properly as a basis for deciding her appeal.

Position information

The [Location] VAMC is a 145 bed, general medical and surgical facility that provides a full-range of primary care services as well as a 135 bed nursing home. The VAMC offers comprehensive surgical, medical and psychiatric care to include special emphasis programs, alcohol and drug dependence treatment, and rehabilitative care. The VAMC supports [Name] clinics which are geographically separate from the [Location] VAMC. The services offered are based on the type of clinic and the population served. However, primary care and mental health services must be provided at a minimum. These services include initial assessment; health promotion screening and counseling; disease prevention; pharmacotherapy management; psychotherapy/psychosocial counseling for mental disorders; and screening and prevention for mental disorders and diagnostic evaluation for mental illness and substance abuse.

The appellant reports directly to the [Location] Director and supports the [Name] Director, [Name] Nurse Managers, Administrative Officer and staff by providing general administrative and clerical operations in the outlying remote clinic sites.

The appellant manages the day-to-day activities within the [Name/Organization] and serves as the initial contact person, answers telephones, receives, reviews and distributes incoming correspondence, publications, regulations and directives. She decides those items that require review and/or action by the [Name] Director and determines those that affect support staff and insures they are informed and receive a copy.

The appellant composes and/or types various kinds of correspondence to include memorandums, routine and non-routine correspondence, reports, policies, etc. She searches for, assembles and summarizes pertinent information from files or directives.

The appellant keeps [Name] staff informed of any changes that occur in program, service line or medical center commitments, policies, directives, etc. that affect the administrative and/or clinical operations. She schedules appointments, coordinates meetings and/or schedules conference rooms for the [Name] Director or support staff.

The appellant serves as the Automated Data Packages Application Coordinator (ADPAC) for all staff in the [Name/Organization] and remote [Name] sites. She acts as a liaison to ensure accuracy and implementation of applicable automation data processing (ADP)/Information Technology (IT) guidelines are followed and assists in resolving most conflicts as they arise.

The appellant serves as the Government purchase card-holder/authorized buyer for the [Name/Organization] and remote [Name] sites. She determines whether obligations, expenditures and requests for supplies and equipment are within approved funding limitations for each control point along with ensuring correct procurement methods are used.

In performing the preceding duties, the appellant uses a high level of technical knowledge of administrative processes and techniques and is viewed as an expert in administrative support functions of the [Name/organization] and remote [Name] sites.

Series, title and standard determination

The appellant's agency has classified her position in the Miscellaneous Clerk and Assistant Series, GS-303, but the appellant believes it should be assigned to the Miscellaneous Administration and Program Series, GS-301 or the Administrative Officer Series, GS-[Number]. The GS-301 series includes positions that perform, supervise, or manage non-professional, two-grade interval work for which no other series is appropriate. The work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives. The administrative work of this series involves skills such as analytical, research and writing ability, and requires the application of judgment typically demonstrated by substantial, responsible experience, or that equivalent to a college level education.

The GS-[Number] series includes positions that are responsible for providing or obtaining a variety of management services essential to the direction and operation of an organization. The paramount qualifications required are extensive knowledge and understanding of management principles, practices, methods and techniques, and skill in integrating management services with the general management of an organization.

The Miscellaneous Clerk and Assistant Series, GS-303, includes positions that perform or supervise clerical, assistant or technician, one-grade interval work for which no other series is appropriate. The work requires knowledge of the procedures and techniques involved in carrying out the work of an organization, and involves application of procedures and practices within the framework of established guidelines.

Classification guidance in the *Introduction* and *The Classifier's Handbook* describe distinctions between positions properly classified in two-grade interval administrative series and those classified in one-grade interval support series. Administrative positions (two-grade interval) are involved in work primarily requiring a high order of analytical ability. This ability is combined with a comprehensive knowledge of (1) the functions, processes, theories, and principles of management and (2) the methods used to gather, analyze, and evaluate information. Administrative positions are involved with analyzing, evaluating, modifying, and developing basic programs, policies, and procedures that facilitate the work of Federal agencies and programs.

In contrast, support positions (one-grade interval) perform work that follows established methods, procedures, and guidelines, and may require a high degree of technical skill, care, and precision. The work can be performed based on a practical knowledge of the purpose, operation, procedures, techniques, and guidelines of the specific program area or functional assignment. Support personnel typically learn to do the work on the job and also may attend specific training courses related to their work.

We find that the appellant's position does not meet the GS-301 or GS-[Number] series definitions as the duties do not require a high order of analytical ability or a comprehensive knowledge of management principles and theories or analytical methods and techniques. Her work does not require knowledge of a substantial body of administrative or program principles, concepts and policies, nor does it involve skills in research methods and writing ability. Instead, the appellant's work requires a working knowledge of the work processes and techniques, and

mission and operational procedures of the [Name/Organization] and remote [Name] sites. She serves as the initial contact person within the [Name/Organization]; keeps [Name] staff informed of any changes which occur in the program, service line or medical center policies and directives; and determines whether obligations, expenditures and requests for supplies and equipment are within approved funding limitations. Typical of support positions, the appellant performs a variety of technician duties requiring knowledge and application of [Name] procedural guidelines; knowledge and ability to interpret and apply VA policy and procedures concerning VA Information System Technology Architecture (VISTA); knowledge of VA policy and procedures on purchasing supplies; and ability to communicate orally and in writing, to explain to installation officials and external parties (e.g., vendors) the procedural and technical administrative aspects governing the operations of the [Name/Organization] and remote [Name] sites. She uses judgment in choosing, interpreting, or adapting available rules, regulations, standards, and guidelines to specific situations and in identifying and applying regulations.

Typical of single-grade interval support work, she provides guidance to [Name] Nurse Managers when they need to fill a vacant position, the focus is on ensuring the Standard Form 52 (SF-52), Request for Personnel Action is completed properly and any supporting documentation is provided. Her work does not extend to conducting position management studies of the position and other similar types of positions (such as clerical, technician, and administrative support positions) within the individual remote [Name] as would be typical of two-grade interval analytical work properly evaluated by application of the Administrative Analysis Grade Evaluation Guide. Her duties match one-grade interval technical work typical of the GS-303 series which is based on a practical knowledge of the purpose of the function supported and the program's operations, procedures, techniques and guidelines. Like the GS-303 series, her work involves a mix of specialized duties for which there is no more appropriate occupational series established.

There are no titles specified for positions in the GS-303 series. Therefore, the agency may construct a title in keeping with the nature of the support work performed. In doing so the agency should adhere to the position titling guidance contained in the *Introduction*. We note the appellant's work requires knowledge of office automation systems and a qualified typist to perform word processing duties. Consequently, the agency should add the parenthetical title "Office Automation" abbreviated as (OA) to the official title selected. Because the appellant's office automation duties represent lower-level work, and are neither series nor grade controlling, we have not evaluated their grade level in this decision. Because the standard for the GS-303 series contains no grade-level criteria, to grade the appellant's technical support work, we have applied the criteria in the *Grade Level Guide for Clerical and Assistance Work (hereafter referred to as the Guide)*.

Grade determination

The Guide provides grade-level criteria for administrative support work. Clerical work is defined in the Guide by examples of preparing, receiving, reviewing, and verifying documents; maintaining office records; and compiling information for reports. Assistance work is defined as technical work that supports the administration or operation of the program of an organizational unit, and requires a working knowledge of the work processes and procedures of an administrative field and the mission and operational requirements of the unit. The record shows the appellant primarily performs assistance work. The Guide uses two classification factors to

evaluate the work of a position: (1) *Nature of Assignment* which includes knowledge required and complexity of the work, and (2) *Level of Responsibility* which includes supervisory controls, guidelines, and contacts. Our evaluation by application of the two classification factors in the Guide follows.

Nature of assignment

At the GS-7 level, the highest level for this factor described in the Guide, work consists of specialized duties with continuing responsibility for projects, questions, or problems that arise within an area of a program or functional specialty as defined by management. Work assignments involve a wide variety of problems or situations common to the segment of the program or function for which the employee is responsible. Each assignment typically consists of a series of related actions or decisions prior to final completion. Decisions or recommendations are based on the development and evaluation of information that comes from various sources. The work involves identifying and studying factors or conditions and determining their interrelationships as appropriate to the defined area of work. The employee must be concerned about taking or recommending actions that are consistent with the objectives and requirements of the program or functions. At this level, the work requires knowledge and skill to recognize the dimensions of the problems involved, collect the necessary information, establish the facts, and take or recommend action based upon application or interpretation of established guidelines. The work also requires practical knowledge, developed through increasingly difficult, on-the-job training or experience dealing with the operations, regulations, principles, and peculiarities of the assigned program, function, or activity.

The appellant's position meets, but does not exceed, the GS-7 level. Like the GS-7 level, the appellant serves as the [Name] "expert" on all administrative matters. She performs specialized work on a continuing basis involving a variety of projects and support activities within the [Name] and remote [Name] sites. Her duties encompass a wide variety of problems and situations including determining which correspondence, publications, regulations and directives, etc., affect [Name] support staff and insures the appropriate staff is informed and receives a copy. If a staff member response is required, the appellant issues a suspense date and follows up, as needed. If the appellant can provide the information requested she does so independently. She composes and/or types various kinds of correspondence to include analyzing the request and determines the response by researching, assembling and summarizing pertinent information from files and directives used to formulate her response. The appellant receives many requests from [Name] staff members for information on such things as how to submit a Telephone Service Request and Device Move Request and provides sample forms on initiating National On-Line Information Sharing (NOIS) requests to follow. Typical of the GS-7 level, assignments consist of a series of related actions or decisions leading to its completion. The appellant is the only administrative support employee in the [Name] supporting the business office and four currently open remote site clinics. She works closely with clinic Nurse Managers as well as the contract employment agency (MAXIM) to ensure clinical and administrative contract staff starts work when needed. The appellant keeps track of and works with all contract employees to ensure she enrolls them in all required training courses and they have completed and present all required paper work on their first day of work. The appellant also keeps track of and works with selected [Location] VAMC employees to ensure they complete all required paper work, bring required documents their first day of work and ensure they are registered for any required training. The appellant serves as the purchase cardholder for all office supplies needed in the

[Name/Organization] and remote [Name] sites. When the appellant receives requests for assistance from staff members who are unsure of how to submit a purchase request, the appellant forwards a sample to be followed. She works with them to ensure the paper work is completed properly to include obtaining all required signatures. The appellant submits all purchase requests through General Services Administration (GSA) approved vendors. The purchase orders are then input electronically through an established account with the vendor as well as through VISTA. On occasion the appellant assists one of the remote clinics with purchasing a piece of equipment such as an examination table or a shredder. She works with [Name] staff to ensure they know how to submit the correct paper work and that it is completed properly to include obtaining all required signatures. The appellant will contact a GSA approved vendor to obtain a price quote and equipment specifications. She will then put all this information together and submit it to the [Location] VAMC committee established to approve/deny equipment requests. The appellant tracks all purchases until they arrive at their destination. She manages a SharePoint web site which provides access for [Name] staff members to documents such as the [Name] Supply Request Form 2010, VA Learning Management System (LMS) User Quick Reference Guide, VA National Rules of Behavior, etc. She also provides step-by-step instructions for scheduling a VA Nationwide Teleconferencing System (VANTS) call, ordering supplies through VISTA, Instructions for Voicemail Messaging, initiating Device Move Requests, etc as requested by [Name] staff.

As at the GS-7 level, her decisions and recommendations, especially regarding bringing on-board contract clinical and administrative personnel, require her to develop and evaluate interrelated information from various sources including [Name] Nurse Managers, contract employment agency personnel and VA and VAMC guidelines to ensure all contractors meet all necessary requirements (to include current and valid certifications) and ensure all required training is accomplished within prescribed timeframes, and updated as required. In doing so, she must ensure her actions are consistent with the requirements established by the VAMC and meet the needs of the individual [Name] site. Like the GS-7 level, her work requires the skill and practical knowledge to recognize the breadth of problems and the ability to collect needed factual information and coordinate actions with all concerned parties to resolve issues impeding progress. Such actions are based upon her extensive experience, and application/interpretation of relevant agency guidelines, program objectives and operating procedures.

Level of Responsibility

At the GS-7 level, which is the highest level for this factor described in the Guide, the supervisor makes assignments in terms of objectives, priorities, and deadlines. The employee independently completes assignments in accordance with accepted practices, resolving most conflicts which arise. Completed work is evaluated for appropriateness and conformance to policy. The guidelines for the work are more complex than at the next lower grade level because the employee encounters a wider variety of problems and situations which require choosing alternative responses. The guides, such as regulations, policy statements, and precedent cases, tend to be general and descriptive of intent, but do not specifically cover all aspects of the assignments. At this level, the guidelines apply less to specific actions and more to the operational characteristics and procedural requirements of the program or function. Employees must use significant judgment and interpretation to apply the guides to specific cases and adapt or improvise procedures to accommodate unusual or one-of-a-kind situations. At the GS-7 level, contacts and purpose of contacts are to serve as a central point-of-contact to provide authoritative

explanations of requirements, regulations, and procedures, and to resolve operational problems or disagreements affecting assigned areas.

The appellant's position meets, but does not exceed the GS-7 level. Her priorities and deadlines are uncontrollable and normally driven by the order and priority of requests. The appellant serves as the only administrative support employee in the [Name/Organization] supporting the business office and four currently open remote site clinics. Like this level, she independently coordinates her work with other services which review equipment acquisition requests, and provide assistance resolving computer software/ hardware issues; vendors who fill office supply orders and the employment agency which provides clinical and administrative contractor personnel. As the central point-of-contact, she provides authoritative explanations on requirements, regulations, and procedures for making office supply purchases, providing step-by-step instructions to [Name] staff on remotely accessing their work files through the Virtual Private Network (VPN), making telephone service requests or device move requests, etc. Similar to the GS-7 level, the appellant's supervisor expects her to resolve problems within her program area with little or no assistance. However, she keeps her supervisor apprised of any controversial issues or situations. Like this level, the appellant's supervisor evaluates completed work for appropriateness of conclusions or recommendations, ability to meet program objectives and compliance with policies and directives.

Like the GS-7 level, guidelines used by the appellant include VA regulations, standard operating procedures (SOPs), GSA guidelines, and [Name] policies and procedures, which tend to be general in nature not specifically covering all aspects of her assignments. Due to the wide variety of administrative issues encountered (such as making purchases, on-boarding contract employees, ensuring training requirements are completed timely), the appellant must choose between various guidelines to resolve problems at hand. Similar to the GS-7 level, her guidelines focus on the operational characteristics and procedural requirements of the administrative components covering the [Name], rather than specifying particular actions to follow. Therefore, the appellant must use judgment in selecting and interpreting the correct portion of the most appropriate guideline to apply to each of a large variety of actions, and when providing guidance to installation staff through written or verbal instructions/information, or coordinating various processes for office supply purchases, ensuring hardware/software issues are resolved and keeping track of training requirements for [Name] staff. Like the GS-7 level, the appellant is the central point-of-contact for furnishing authoritative guidance, and resolving disagreements on the administrative requirements and operating procedures for the [Name/Organization and remote [Name] sites.

Summary

By application of the grading criteria in the Guide, we find the nature of the appellant's assignments and her level of responsibility are properly evaluated at the GS-7 level. Therefore, the position is graded at that level.

Decision

The proper series and grade of the appellant's position is GS-303-7. Selection of an appropriate title is at the discretion of the agency but (OA) must be included in the title.