

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

**Appellants:** [Appellant]  
[Appellant]  
[Appellant]

**Agency classification:** Archives Technician  
GS-1421-6

**Organization:** [Branch]  
[Division]  
[Group] Repository  
Office of Trust Records  
Office of the Special Trustee  
for [Group]  
U.S. Department of Interior  
[City, State }

**OPM decision:** Archives Technician  
GS-1421-6

**OPM decision number:** C-1421-06-01

/s/ Ana A. Mazzi

---

Ana A. Mazzi  
Deputy Associate Director  
Merit System Audit and Compliance

10/27/2010

---

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:**

PERSONAL:

[Appellant's names]

[Appellant's Address]

Director of Human Resources  
U.S. Department of the Interior  
Office of the Special Trustee for [Group]  
1849 C Street, NW, Suite 5140  
Washington, DC 20240

[Name]  
Human Resources Specialist  
Office of the Special Trustee for [Group]  
4400 Masthead Street NE, Suite 185  
Albuquerque, New Mexico 87109

Director of Personnel  
U.S. Department of Interior  
Mail Stop 5230-MIB  
1849 C Street, NW.  
Washington, DC 20240

## **Introduction**

On April 27, 2010, Chicago Oversight of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [Appellant]. We received the initial agency administrative report (AAR) on May 20, 2010. On August 16, 2010, [second Appellant] and [third Appellant], who occupy identical additional positions (hereinafter referred to as position) currently classified as Archives Technician, GS-1421-6, asked to join the appeal. The appellants' position is located in the [Branch] [Division], at the [Group] Records Repository (AIRR), Office of Trust Records (OTR), with the Office of the Special Trustee (OST) for [Group], U. S. Department of the Interior (DOI), in [City, State]. The appellants believe the position should be classified as Archives Technician, GS-1421-7. We received the complete AAR on September 8, 2010. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

## **Background information**

DOI, as trustee of the [Group] Trust Fund, has the primary fiduciary responsibility to manage tribal trust funds and Individual Indian Money (IIM) accounts. OST is responsible for the financial management of the [Group] fiduciary trust, including the collection of, accounting for, and investing and disbursing of trust funds to individual and [Subgroup] beneficiaries as well as other related activities and services. A Memorandum of Understanding (MOU) exists between DOI and the National Archives and Records Administration (NARA) regarding the storage, preservation, and protection of [Group] records in AIRR located at NARA's Regional Records Services Facility in [City, State]. AIRR also houses the consolidated fiduciary trust records of Bureau of Indian Affairs (BIA) and OST as part of DOI's effort to improve Federal and [Subgroup] trust records management by providing secure access to Indian records.

In early 2009, the appellants brought an informal grievance over the issue of position description (PD) accuracy to their agency, but after further discussion with their supervisory chain they dropped the grievance when the agency agreed to conduct a desk audit which was performed by a classifier from the servicing human resources (HR) office in Albuquerque, New Mexico, on April 3, 2009. The desk audit findings left the classification unchanged, but resulted in the issuance of a new PD, certified on June 2, 2009, and a new evaluation statement, dated June 9, 2009. The appellants were not satisfied and subsequently filed a classification appeal directly with OPM.

## **General issues**

The supervisor certified the accuracy of the appellants' official PD (#####), but the appellants believe the position warrants a higher grade. The appellants disagree that the PD accurately describes the duties they perform. They believe they are performing work similar to the description of work contained in the 1421 position classification standard (PCS) at the GS-7 grade level.

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). 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 employees. 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 appellants.

The appellants say their work has an important impact on Government operations and the [Group] and their beneficiaries who are dependent on their services. They also say their position should be higher graded because of the importance of their work, particularly the accuracy and full independent completion of all document search requests. In adjudicating an appeal, however, the quality and volume of work are not germane to the classification process since the classification analysis of a position is based on the assumption that the assigned work is properly and fully performed (*Introduction to the Position Classification Standards*, Appendix 3, Factor 5). Therefore, issues raised regarding the effectiveness of the appellants' work may not be considered in the classification of their position. Rather, they are properly considered as part of the performance management process.

### **Position information**

The appellants work under the general supervision of the Chief, Research Branch, who is responsible for the day-to-day direction of the staff performing research activities and ensures quality control measures are in place to ensure the research results reflect proper information requested by the requesters. The supervisor assigns work, monitors subordinate staff performance, provides training and technical assistance as required, and finds ways to improve production and increase quality of work produced. He assigns the special requests for unique documentation. He also oversees the automated records systems to meet quality and reporting requirements.

The main purpose of the position is to fill requests for information by providing records research and document production services. The appellants also answer telephone calls and contact requesters to clarify what they actually need to satisfy the request. They follow standard operating procedures (SOPs) requiring them to confirm requests within 24 hours of receipt, meet a five day turnaround requirement on requests, and provide updates when a search is delayed. The appellants are responsible for the day-to-day processing of research requests for copies of documents received from a variety of sources, including OST and BIA headquarters and field offices, and [Group] agencies, bureaus, and [Subgroup]s. This is a multi-step process starting with the analysis and evaluation of the assigned research requests to ensure the information furnished by the requester (the requesting office or individual) is complete (i.e., documents requested are properly identified, include correct account numbers, and have appropriate authorizing signatures, etc.). If information for a request is unclear, missing, or incomplete, the appellants must contact the requester to ask for the missing information. This may involve asking about the purpose for the request in order to understand which documents are needed. When a request for information is complete, the appellants run a query against the applicable inventory database to obtain a listing of the box(es) of documents needed and the storage location.

The appellants use this information to request the appropriate box(es) from the storage location on the NARA side of the repository, and when received, they must perform a physical search of

the boxes to find and identify the requested documents. Additional search queries may be needed if the requested information cannot be located in the box(es) requested.

Since the issuance of the new PD on June 2, 2009, OTR has installed the patent-pending Versatile SMP (vSMP) architecture, a commercial off the shelf (COTS) software system utilizing symmetric multiprocessing (SMP). The new Versatile system serves as the front-end system used to access the various databases, including search inquiries using the Box Index Search System (BISS) which contains information on all boxes of records retired at AIRR, and other databases such as the Trust Asset and Accounting Management System (TAAMS) and the Trust Funds Accounting System (TFAS). In effect, the system becomes an invisible front-end operating system which incorporates BISS and other search engines to search inventory databases created for document discovery. When the documents are found, and the requested information is complete, the appellants scan them and copy relevant data to the appropriate format as specified by the requester; usually as printed paper copies or downloaded to CDs or DVDs. The appellants then perform a final review to ensure the information is accurate and comprehensive, and the format is in compliance with OTR standards. They are responsible for resolving discrepancies and advising higher authorities of significant problems. Completed work is subject to review by the supervisor for technical accuracy. The supervisor runs a quality assurance check of each request, and the copied materials are prepared for shipping by express mail service.

Assignments may also involve specialized and detailed work; e.g., identifying and locating records to obtain requested information for authorized requesters and preparing correspondence in answer to requests which involve searching records of more than one creating office/bureau, multiple records series, or types of records.

Outside of trust work, the appellants also answer requests for information or documentation necessary for social services, education, and employment. This requires using available information to find pay or service records, transcripts and other education records, and if necessary, contacting BIA law enforcement offices for employment checks.

The appellants regularly provide guidance and give advice and instructions to lower graded technicians and student interns when technical assistance is needed. They also make suggestions and recommendations about how to improve the efficiency of the work (e.g., methods, procedures, and practices to be implemented, modified, changed, or adopted), and to improve procedures and techniques for retrieving particular types of information.

The appellants perform other duties as assigned related to carrying out branch workload such as updating the daily request tracking database, filing documents, performing building lock-up at end of business day, assisting with incoming telephone calls, receiving visitors, and maintaining security and control of records and documents.

The work regularly requires the appellants to bend and lift boxes of up to 40 pounds and occasionally move carts of boxes which can weigh up to 200 pounds.

To help decide this appeal, we conducted a telephone audit with the appellants and a telephone interview with the first- and second-level supervisors on August 16, 2010, with additional follow up calls to each to clarify appeal issues. In deciding this appeal, we carefully considered the

interviews and all other information of record furnished by the appellants and their agency, including the official PD. Based on our fact-finding, we find the appellants' PD covers the major duties and responsibilities performed by the appellants, is adequate for purposes of classification, and we incorporate it by reference into this decision.

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

The agency assigned the appellants' position to the Archives Technician Series, GS-1421. The appellants do not disagree with this determination and, based on careful analysis of the record, we agree. Archives Technicians (hereinafter referred to as technicians) perform nonprofessional and technical work in accessioning, arranging, describing, preserving, using, and disposing of archives, non-current records, and related material kept in record and manuscript depositories and providing associated reference services to agencies, organizations, and individuals.

We find the appellants' primary work consists of performing well-defined reference service and research functions in handling and processing documents. The work is confined to the immediate archives collection and does not involve the conduct of liaison or other program interrelationships with other Government or outside agencies other than follow up telephone calls to requesters to clarify their requests and submitting requests to order archived boxes from the NARA side of the repository. Their work is technical rather than administrative in nature and is consistent with the typical duties performed by technicians as described above. This work and the knowledge and skills required to perform it are directly associated with the 1421 series.

The authorized title for technician positions in the 1421 series at GS-4 and above is Archives Technician.

### **Grade determination**

The agency evaluated the appellants' position using the 1421 PCS which is written in a narrative format with grade level criteria expressed in terms of two factors, Nature of assignments and Responsibility. The agency assigned the GS-6 level to both factors, but the appellants believe both factors should be classified at the GS-7 level. Our analysis of the two factors follows:

#### *Nature of assignments*

Nature of assignments measures the area of assignment or functional area of work; the kind of work; the scope, depth, and special characteristics of the assignment; and the kinds and degree of knowledge, skills, and abilities required to do the work.

At the GS-6 level, technicians' assignments typically involve the application of subject-matter knowledge to bodies of records; and involve determinations as to which procedures, practices, and methods apply. The 1421 PCS states the criteria for the GS-6 level consist essentially of the same kind of work described at GS-5 (i.e., where technician work requires a practical or technical knowledge of archival methods, procedures, and techniques), but typically involves a more intensive and highly specialized knowledge of the subject-matter of one or more significant bodies of records. Some assignments require knowledge of the administrative history of a specific Federal organization, past and present. Also at the GS-6 level, the methods, practices, and procedures, although standardized, are not always directly applicable, but require the

technician to make adjustments and take alternative courses of action. Another difference from GS-5 is that at GS-6 the methods, practices, and procedures are applied to more complex and specialized bodies of records.

At the GS-7 level, the work requires the application of a substantial specialized body of technical and quasi-professional archival knowledge and skills to a very broad range of functions in a major subdivision of the records depository. For example, the work may involve organizing, arranging, preserving, or maintaining a major body of records, including providing the necessary reference and research services from this body. Assignments at GS-7 cover either a broad span of activities or a relatively narrow specialized and intensive activity. In either case, the work is complex and difficult and requires the application of an intensive knowledge of specific records, record systems, and record keeping programs, and the application of a thorough understanding of how the different bodies of records and the record systems involved relate to one another. Many assignments involve highly technical work, e.g., assembling, correlating, and analyzing information in connection with reference requests; screening, organizing, selecting, arranging, and rearranging of records; or collecting and correlating data and information derived from a number of sources. For example, a GS-7 archives technician may perform complex and difficult work in maintaining a major body of records, including either the preparation of cross-references, finding aids, and related instructional material, or providing adequate reference service from these records. In this case, the records represent a number of activities of a major department of the Federal Government and are arranged according to several record keeping systems.

Another example of GS-7 technician work described in the PCS requires a substantial specialized technical or quasi-professional knowledge of archival work and the application of this knowledge (1) in a very broad range of functions in major subdivision of the records depository; or (2) in a very broad range of staff support functions in a large records depository. These differ from assignments at the GS-6 level which typically involve either (1) an intensive and highly specialized knowledge of the subject matter of one or more significant bodies of records, or (2) a quasi-professional knowledge of a relatively narrow segment of archival work (e.g., preparation of finding aids) as it applies to one or more significant bodies of records. GS-7 assignments frequently reflect specific individual's competence and demonstrated ability to perform particular range of archival work as it relates to a particular major body of records.

The appellants state their work is similar to the work at the GS-7 level. They say 75 per cent of their work is as complex and difficult as described at the GS-7 level, and requires an intensive knowledge of specific records and record-keeping programs and a thorough understanding of how the different bodies of record systems involved are related to one another. They say the work is further complicated because many of the records they encounter were archived many years ago, come from different time periods and different activities, or were manually inputted and indexed before present computer systems existed resulting in incomplete and error-filled indexing documents.

The nature of the work performed by the appellants does not meet the GS-7 level, as it does not require the substantial specialized technical knowledge of the archival methods and procedures described here as applied to performing a broad range of functions in a major subdivision of the archive, including accession, description, arrangement, preservation, and reference work. This includes inputting records into the archival database; arranging and continually maintaining the

collection in accordance with approved plans and in adherence to established records management requirements; preparing inventories, cross-references, and location registers; assessing the physical condition of materials and making basic repairs or recommending preservation or migration to another format; and responding to requests for information, access, or copies of archived materials. The appellants' position does not correspond to the GS-7 example described above as their work is limited to a single primary function, reference service and research. They do not perform the full range of functions associated with the maintenance of a major body of records consisting of a variety of materials arranged according to differing record keeping systems reflecting the content of the materials or the time periods they represent nor the comprehensive knowledge required to do so.

As at the GS-6 level, document search at AIRR requires a highly specialized knowledge of the function, organization, and records management and file processes to locate, retrieve, and release requested documents from manual and automated inventories. The appellants must have a practical knowledge of trust responsibilities and of the functions, organization, and records management and file processes of DOI/BIA in OST to search all relevant record databases. Document search requires certain analytical skills necessary to research a variety of sources, including incomplete records in electronic databases, media records in microfiche, microfilm, CDs, and many times in hard copy inventories. Sometimes the appellants need to converse with requesters to refine the type of information needed, and other times based on their familiarity with the Trust operations, the appellants may suggest other forms or documents which may assist in clarifying what information is really needed by the requesting office. The appellants use ingenuity to search for such information as payments, overpayments, verification of deposits, vouchers, probate records, royalties, and [Subgroup] allotment numbers.

At GS-6 the work typically involves a more intensive and highly specialized knowledge of the subject-matter, in this case knowledge of the [Group] trust functions and related documents. For example, the work illustration at the GS-5 level in the 1421 PCS is similar to the appellants' work where a technician who handles reference requests from case-files type records when searches must be made in numerous series of records and frequently in numerous record groups (e.g., the collecting of information relating to a soldier from the pension application files of the Veterans Administration, the compiled service records of the Adjutant General's Office, the court martial records of the Judge Advocate General, the cemeterial records of the Quartermaster General, etc.) Such work requires the exercise of considerable judgment, both in using and applying a variety of established regulations, instructions, and procedures and in adapting and modifying methods and procedures and selecting those that are most useful. However, we find the appellants' archival work exceeds the work described here at the GS-5 level for the following reasons: the requests received are frequently not specific and the technicians must contact the requesters to determine what is actually needed; the records are not always case-file types as the boxes often contain miscellaneous information and sometimes [Group] [Subgroup] valuables; and many files are not filed according to familiar filing schemes.

The appellants' work differs from the GS-5 illustration because the document searches are more complex and require the appellants to use their special knowledge of trust functions to figure out where and how to extract the requested information or documents. Typically, problems occur when an incoming request is missing vital information; e.g., as when requesters do not know the number of a form they need, or when IIM account or [Subgroup] allotment numbers are missing. Some [Subgroup] member's records are only identified by a thumb print. The appellants use



ingenuity to work around these problems by contacting the requesting office to refine the parameters of the search, so as to determine when an account was established and what type of document was issued. They may ask for maiden, married, or [Subgroup] names which might be different than that appearing in the record. They also use passports, driver's licenses, Social Security Numbers (SSNs), and census data to assist in the search. They may try to find the appropriate information by searching historic documents, such as treaties, appropriations, resolutions, and constitutions, some of which predate the twentieth century. Other requests require the appellants to find personal information such as birth certificates, an individual demographic document (IDD), or SSN. Once found, the appellants scan and save each record. They then copy records in the formats desired by the requesters, usually paper copies or encrypted CDs.

The main purpose of the appellants' position is to identify, retrieve, copy, and send relevant documentation to the requesters to meet agency trust obligations. The success of the work hinges to a large extent upon the degree to which a technician is familiar not only with the record systems, but also with the specific contents of the records. Typical of the GS-6 level, this type of document search requires a thorough and highly specialized knowledge of the functions, organizations, and records management and file processes of the BIA and OST in order to locate, retrieve, and release requested documents. The key task of the work is to identify the proper documents needed to satisfy the requesters' needs which requires an extensive knowledge of pertinent information necessary to provide requesters with the proper information. Complicating factors include the need to search a variety of manual and automated inventories to locate requested documents. This requires checking various manual systems and querying automated databases to search for needed documents, including official government forms, document types and numbers, record series, date of creation, fiduciary and beneficiary records, pay records, census data, social security information, school records, marital status, and BIA law enforcement records, among others. This also requires a special knowledge of OST operations, [Group] trust assets, and income systems. This is similar to the more intensive and highly specialized knowledge of the subject-matter of one or more significant bodies of records typically involved at the GS-6 level.

This factor is evaluated at the GS-6 level.

### *Responsibility*

Responsibility measures the way in which the work is assigned and the degree to which it is supervised; the nature of instructions, guidelines, references, etc., their applicability, and the degree to which these control the work; the extent and degree to which initiative and originality are required; and the type of responsibility exercised, what is involved, and the degree of accountability for the work.

GS-6 technicians follow established archival techniques and methods, and the use of standard tools and guidelines. They must make adjustments and adaptations of those standardized archival practices, procedures, and techniques which are not directly applicable to the situation they encounter. When performing continuing quasi-professional assignments, the GS-6 technician works under the general technical supervision of an archivist or Supervisory Archives Technician. The employee typically receives only general guidance upon assignment of work, and is expected to perform ordinary workload independently; difficult problems are referred to

the supervisor for advice or action; and completed work is subject to review for technical accuracy.

At the GS-7 level, the work is performed under the general supervision and administrative direction of an archivist. The work is reviewed for conformance to policy and regulation (in relation to the handling of unique, special, or precedent cases) rather than for technical content. The employee is responsible for the technical accuracy of his work and for the development of information where finding aids, precedent situations, or instructions are inadequate or unavailable.

The appellants state they meet the GS-7 level because all their work is done under general supervision similar to that described. Unlike GS-6 technicians who perform ordinary workload and refer difficult problems to supervisor, they say their work reflects their competence at this level as they complete their work independently, and say they spend more than 25 per cent of their time performing complex and highly analytical tasks to fulfill requests under the same type of general supervision as described by the PCS at the GS-7 level. They also disagree with their PD because they say their work is not reviewed for technical accuracy by their supervisor as stated, but only for conformance and compliance.

The GS-7 level is not met. The appellants work under general supervision of a Supervisory Records Management Specialist, GS-301-11. While they perform the technical aspects of their work independently and determine the most appropriate practices to apply to new situations, it is the supervisor who is ultimately responsible for the technical accuracy of the work, as seen in the quality assurance review he performs before any completed search can be shipped to the requesting authority. In addition, we found the appellants follow SOPs established by the Records Branch under the DOI/BIA Records Management Programs for performing their work. The SOPs explain the basic procedures and methods for document retrieval and processing, but the work requires the appellants to interpret and adapt guidelines to make them fit a particular work situation typical of the technical functions found at the GS-6 level.

The appellants also state they provide guidance and give advice to lower level technicians and student interns when they request assistance about procedures and techniques for retrieving particular types of information as described at the GS-7 level. However, the advice and guidance provided at the GS-7 level is predicated on doing so based on the application of GS-7 knowledge and skill. It is not unusual for more experienced employees to train their less-experienced co-workers. Since in this case the appellants advice and guidance involves applying the same level of knowledge and skill as that required to perform the work of the position, it does not affect the overall grade of the position.

The appellants also state they make recommendations as described at the GS-7 level to improve the efficiency of the retrieval process. However, while they may recommend procedural changes for improving the efficiency of the search process, the supervisor reviews the suggestions and implements any changes in procedures and techniques. Furthermore, this work does not occur with sufficient frequency to affect the classification of the position. In addition, the purpose of their work contacts involves resolving specialized problems related to trust documents as expected at the GS-6 level.

This factor is evaluated at GS-6.

*Summary*

Since both factors have been credited at the GS-6 level, the position is properly evaluated at the GS-6 level.

**Decision**

The position is classified properly as Archives Technician, GS-1421-6.