

**U.S. Office of Personnel Management
Classification Appeal Decision
Under section 5112 of title 5, United States Code**

Appellant: [appellant's name]

Agency classification: Program Support Assistant
GS-303-6

Organization: [division]
[activity]
Veterans Canteen Service
Department of Veterans Affairs
[city and state]

OPM decision: Human Resources Assistant
(Employee Benefits)
GS-203-6

OPM decision number: C-0203-06-03

//Ana A. Mazzi

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

3/26/12

Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a 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 the *Introduction to the Position Classification Standards (Introduction)*, appendix 4, Section G (address provided in appendix 4, section H).

Since this decision changes the series 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, as permitted by 5 CFR 511.702. As discussed in this decision, the appellant's position description (PD) of record must also be revised to meet the PD standard of adequacy in the *Introduction*. The servicing human resources office must submit a compliance report containing the corrected PD and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effect date of the personnel action to the Dallas Oversight.

Decision sent to:

[appellant's name and address]

[name and address of appellant's servicing personnel office]

Ms. Ann Marie Hannon
Director, Compensation and Classification Service (055)
Office of Human Resources Management
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Introduction

On May 23, 2011, the Chicago Oversight office of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. The appellant's position is currently classified as Program Support Assistant, GS-303-6, but she believes it should be classified as Human Resources Specialist, GS-201, at the 7, 9, or 11 grade level. The position is located in the [division], [activity], Veterans Canteen Service (VCS), Department of Veterans Affairs (VA), in [city and state]. We received the agency's administrative report on July 8, 2011. Due to workload considerations, the Dallas Oversight office assumed responsibility for adjudicating the appeal on November 14, 2011. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

Background

On October 15, 2010, the appellant requested a desk audit of her position through the [activity's] human resources (HR) office. When no decision was rendered, the appellant attempted to resolve her position's classification through the agency's grievance procedures on April 20, 2011. In the May 9, 2011, grievance response, the [division] Associate Director said the agency initially attempted to resolve the appellant's classification concerns by requesting a classification opinion from the Network Business Office of Veterans Integrated Service Network (VISN) [number]. The VISN's January 16, 2011, email suggested the appellant's position is appropriately classified in the GS-203 Human Resources Assistance series at the GS-6 grade level. The email further states, "If there is an organizational restriction on having HR Assistants, then Program Support Assistant, GS-303, can be used." No action was taken to reassign the appellant's position to the GS-203 series. She subsequently forwarded her appeal to OPM.

Position information

The appellant's position is responsible for performing Officer of Workers' Compensation Program (OWCP) support work for the [activity's] [division]. This entails collecting, compiling, tracking, retrieving, and reporting statistical data; establishing protocols for data input; reviewing case files for correctness and completeness; establishing and maintaining case files; and drafting routine correspondence. The appellant's work involves tracking OWCP data for the VCS's food services and retail stores located at VA medical centers (VAMC) operated by the Veterans Health Administration (VHA), as well as other VCS outlets. She also performs other OWCP support work for [activity] employees including advising employees and supervisors when an injury or illness occurs. The appellant's position is supervised by the Human Resources Specialist (Employee Development), GS-201-13.

The appellant's work involves collecting injury and compensation data from the Department of Labor's (DOL) Access Query System (AQS), the VA's Workers Compensation Management Information System (WCMIS), and other databases. She ensures the data is properly coded, notifying appropriate officials when corrections are required. In compiling data into spreadsheets, she sorts and arranges information and identifies trends such as highest cost areas, frequent types of injuries, etc. She creates various reports, using tables and charts to highlight data trends.

If an injury occurs at the [activity], the appellant creates case files to manage and track each situation. She advises employees and supervisors in completing the Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation (CA-1) and other required forms. She reviews the forms, reports, and other case file documents submitted by the [activity] and other VCS organizations for correctness and completeness, communicating when necessary by telephone, email, or mail to clarify or obtain information from agency officials, DOL, physicians' offices, or pharmacies. The appellant raises issues involving unprecedented or potentially fraudulent claims to her supervisor's attention, suggesting possible courses of action. She also drafts correspondence for the supervisor's signature.

The appellant also identifies employees eligible for limited duty positions, as well as those employees with injuries where returning to work is unlikely. She advises VCS supervisors in choosing from pre-established limited duty position descriptions (PD). She communicates with supervisors, employees, and DOL regarding return-to-work issues. With concurrence from the [division] Associate Director or others, the appellant ensures employees are removed from local compensation rolls to long-term injury rolls.

Other duties include assisting with data collection for VCS's Annual Employee Survey (AES). Similar to her AQS and WCMIS work, the appellant verifies accuracy of AES data, assembles and arranges data, and creates reports for each VCS unit.

The appellant disputes the accuracy of her official PD, number [number], but the supervisor certified to the accuracy of the duties described in 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. Major duties are normally those occupying a significant portion of the employee's time. They should be only those duties currently assigned, observable, identified with the position's purpose and organization, and expected to continue or recur on a regular basis over a period of time.

Our review found the appellant's PD describes major duties not currently being performed (e.g., the PD describes processing and distributing VCS's annual and hourly rate wage schedules, providing administrative support to the Equal Employment Opportunity program area, overseeing VCS's security program, and participating in the development of workers' compensation policies, procedures, and guidelines). PDs must meet the minimum standard of adequacy as described in the *Introduction*. Therefore, the appellant's PD must be revised so that there is a clear understanding of the duties and responsibilities representing the approved classification. Regardless, an OPM decision classifies a real operating position and not simply the PD. We have decided this appeal based on an assessment of the actual work assigned to and performed by the appellant.

To help decide this appeal, we conducted a telephone audit with the appellant on December 14, 2011; a telephone interview with her first-level supervisor on December 16, 2011; a telephone interview with the [division] Associate Director, her second-level supervisor, on March 16, 2012; and separate follow-up conversations with the appellant and first-level supervisor on

January 18, 2012. In deciding this appeal, we fully considered the interview findings and all information of record provided.

Series, title, and standard determination

The appellant disagrees with the agency's assignment of her position to the GS-303 Miscellaneous Clerk and Assistant Series. This series covers positions the duties of which are to perform or supervise clerical, assistant, or technician work when 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. The GS-303 series specifically excludes positions requiring knowledge of specialized processes or subject matter for which a specific series exists.

The appellant believes her work warrants classification to the GS-200 Human Resources Management Group, and specifically to the GS-201 Human Resources Management Series. We agree the appellant's work is appropriate in the GS-200 Group, which covers classes of positions the duties of which are to advise on, administer, supervise, or perform work involved in various phases of HR management. For example, the appellant's PD states:

Primary areas of responsibility will be in the Office of Workers' Compensation Program (OWCP) arena, as well as work involving the collection, compilation, tracking of statistical data, and establishment of protocol for data input, i.e., retrieving, assembling and summarizing computerized data into pre-set and ad hoc reports.

Performing this work requires knowledge of database management as well as the principles and practices of OWCP. The record shows the primary purpose and knowledge required by the position are directly connected to the OWCP work; the appellant spends the majority of her time on OWCP work; and the position's current performance appraisal standard identifies two critical elements (i.e., OWCP Administration and Customer Service), both relating to OWCP work. Determining why the position exists, where the majority of work time is spent, and how work is evaluated is clearly linked to the OWCP duties, an area of work covered by and described to different degrees by the GS-201 and GS-203 series. We also noted the appellant's first- and second-level supervisors' positions are both classified to the GS-201 series and assigned to an [division] organization staffed heavily with other GS-201 and GS-203 positions. Therefore, the GS-303 series is not appropriate.

The GS-201 series covers two-grade interval administrative positions that manage, supervise, administer, advise on, or deliver HR management products or services. In contrast, the GS-203 series covers one-grade interval administrative support positions that supervise, lead, or perform HR assistance work. We must determine whether the appellant's work is covered by an administrative or support series. Since some tasks are common to both administrative and support occupations, it is not always easy to distinguish between assistants classified in one-grade interval administrative support occupations and specialists classified in two-grade interval administrative occupations. Both the GS-201 and GS-203 standards discuss how to distinguish between specialist and assistant work. Guidance on distinguishing between administrative and support work is also contained in *The Classifier's Handbook*.

Support work usually involves proficiency in one or more functional areas or in certain limited phases of a specified program. The work usually does not require knowledge of interrelationships among functional areas or organizations. Employees performing support work follow established methods and procedures. Specifically, HR assistants have boundaries narrowly restricting their work. They use a limited variety of techniques, standards, or regulations. The problems HR assistants deal with are recurring and have precedents.

On the other hand, administrative work primarily requires a high order of analytical ability 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 work also requires skill in applying problem-solving techniques and skill in communicating both orally and in writing. HR specialists use broad HR management knowledge, concepts, and principles to perform a wide variety of work in one or more HR specialty areas.

We found the appellant's position does not require the full application of skills (i.e., analysis, research, writing, and judgment) indicative of administrative positions. Her work requires working knowledge of OWCP policies and operating procedures, competency in collecting and arranging data, and ability to create various reports and draft correspondence. As stated in the PD, a primary responsibility of the appellant's position is to perform "...work involving the collection, compilation, tracking of statistical data, and establishment of protocol for data input..." Her statistical reporting duties involve arranging data and identifying trends (e.g., increases and decreases in the injuries reported), but the record shows the input, collection, and assembly of data into a usable format is the primary function of the appellant's position and, unlike specialist work, does not involve using the reports as a tool for her to further analyze or evaluate the information for program guidance purposes.

Other duties include responding to OWCP-related inquiries (e.g., which forms to complete, how to complete forms, etc.). Each situation requires applying established and previously followed procedures and/or by referring to readily available OWCP laws, regulations, and practices; DOL guides; and agency-specific standard operating procedures (SOP). Unlike two-grade interval positions, the appellant's duties do not require applying a high level of analysis or judgment to make the information gathered fit a particular situation. Her work is conducted in an environment where many of the paths of action are predictable and information is pre-structured. In the employee benefits area, two-grade interval work extends beyond the data reporting and case advisory functions vested in the appellant's position. Rather, it includes programmatic responsibilities which are not assigned to or performed by the appellant.

Similar to support work, the appellant performs OWCP-related work including advising employees and supervisors on documentation requirements, reviewing and maintaining case files, reviewing PDs from the standpoint of matching light duty assignments to employees with limitations, and collecting and compiling injury- and compensation-related data. This and other work requires knowledge of the organization's mission, goals, and functions combined with practical knowledge of OWCP processes, procedures, and requirements. Like assistant work, the appellant's duties involve operational tasks such as identifying and obtaining missing data,

assisting employees in completing paperwork, reviewing forms for adequacy, responding to employee and supervisor inquiries, and collecting and compiling statistics. Consequently, the appellant's position is properly classified to the GS-203 series.

We applied the grading criteria in the Job Family Position Classification Standard (JFS) for Assistance Work in the Human Resources Group, GS-200, to evaluate the appellant's work. The authorized title for the appellant's position is Human Resources Assistant. Since her work primarily involves performing OWCP-related guidance, consultative, and other support tasks to agencies and employees, the appellant's position is appropriately covered by the parenthetical designator (Employee Benefits).

Grade determination

The GS-203 JFS is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are assigned for each of the nine factors. The total is converted to a grade level by use of the grade conversion table provided in the PCS. Under the FES, each factor-level description demonstrates the minimum characteristics needed to receive credit for the described level. If a position fails to meet the criteria in a factor-level description in any significant aspect, it must be credited at a lower level unless an equally important aspect that meets a higher level balances the deficiency. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level.

VISN [number] applied the grading criteria in the GS-203 JFS and suggested, as stated in the January 16 email, crediting the appellant's position at Levels 1-4, 2-2, 3-2, 4-3, 5-3, 6-2, 7-b, 8-1, and 9-1. However, no action was taken to implement the VISN's recommendations. The appellant's PD indicates the agency assigned the position to the same factor levels as the VISN with the exception of their crediting Levels 3-3, 5-2, and 7-a, even though it is unclear which position classification standard (PCS) was applied. The appellant's appeal request included an evaluation of her position based on application of an unspecified PCS, crediting her position at Levels 1-6, 2-5, 3-3, 4-4, 5-3, 6-3, 7-b, 8-1, and 9-1. Our evaluation using the appropriate PCS follows.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of information or facts the employee must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, regulations, and principles) and the nature and extent of the skills needed to apply the knowledge.

At Level 1-4, work requires knowledge of and skill in applying an extensive body of HR rules, procedures, and operations to perform a variety of interrelated and/or nonstandard HR support work. HR assistants at this level plan, coordinate, develop facts, and/or resolve support problems. They use personal computers with office applications to perform operations or to prepare complex documents containing tables or graphs. Assistants at Level 1-4 also use online HR resources to obtain information accessible over the Internet, as needed.

At Level 1-5, which is the highest level identified in the JFS, work requires knowledge of, and skill in applying, a comprehensive body of HR rules, procedures, and technical methods sufficient to carry out limited projects; analyze a variety of routine facts; research minor complaints or problems that are not readily understood; and summarize HR facts and issues.

The appellant's position meets Level 1-4. Her work is comparable to an illustration in the JFS of an HR assistant at Level 1-4 applying knowledge of an extensive body of HR rules to obtain relevant facts about the problem, evaluate the adequacy of the facts in light of established precedents, and explain options available to the employee based upon analysis of individual circumstances. The appellant's position is responsible for providing OWCP-related support directly to the approximately [number] employees located at the VCS [activity]. VCS is by law an independent unit within VA. However, VHA Handbook 1008.01 requires VAMCs to integrate the canteen program by providing OWCP and other HR program support to the canteen employees operating within the facility. The appellant shares OWCP support responsibility for the 3,500 field employees assigned to over 150 nationwide locations with the workers' compensation staff at the VAMCs. While the VAMC staff provides the direct, day-to-day support to canteen employees if an injury or illness occurs at the facility, the appellant's data reporting and oversight work entails monitoring open claims; reviewing submitted medical reports; preparing OWCP documents and correspondence; and recommending light duty assignments. She also maintains the Continuation of Pay (COP) report to provide management with current information on the number of days [activity] employees received COP due to work-related injuries or other covered medical problems; and prioritizing claims for management based on projected agency costs.

Similar to Level 1-4, the appellant's work requires applying extensive knowledge of OWCP policies and procedures to obtain, evaluate, and explain relevant facts. She also identifies anomalies with individual claims and, when necessary, gathers and presents information to the supervisor when recommending the removal of fraudulent claims from workers' compensation rolls. Comparable to the Level 1-4 description of work involving the planning, coordinating, and developing of facts, the appellant identifies increases in the medical costs of long-term claimants and, based on past precedents, makes recommendations to determine if claims are fraudulent (e.g., using a private investigator to conduct surveillance). She also conducts Internet research on Google, Facebook, and other media to determine if long-term claimants are engaging in dancing, bowling, or other vigorous and suspicious activities which are inconsistent with the reported injury or illness. Also similar to Level 1-4, the appellant uses a variety of computer applications to collect, sort, and report data in tables, graphs, and other formats to identify and highlight trends and areas of concern.

The appellant's position does not meet Level 1-5. The JFS includes an illustration at Level 1-5 of an HR assistant applying knowledge of, and skill in applying, a comprehensive body of HR rules, procedures, and technical methods concerning employee benefits sufficient to provide advice and assistance to employees regarding employee benefit problems and issues; and research, identify, and explain complicated and in-depth employee benefit-related issues such as health benefits conversion and complicated annuity calculations and information. In contrast, the appellant's position does not require a comprehensive knowledge of OWCP rules and procedures. Her work entails using standard spreadsheet software and tools for the purpose of

grouping, sorting, and reporting, rather than analyzing, data. Other work includes advising employees and supervisors in filling out appropriate forms, identifying missing information, drafting correspondence, and identifying potential light duty assignments. This work requires applying DOL, VA, and VHA guidelines in addition to past precedents and SOPs. The appellant's decision-making involves prioritizing cases for management's attention by considering the claimant's length of time on OWCP rolls and dollar amount compensated; identifying fraudulent activity by reviewing required documentation and conducting online research; identifying missing information by reviewing case files; and reporting and highlighting workers' compensation trends by pinpointing increases and decreases in the number of reported injuries by units and other activities. These and other decisions typical of the appellant's work requires consideration of clearer cut, more readily identifiable factors and steps than those complicated and in-depth issues described at Level 1-5.

Level 1-4 is credited for 550 points.

Factor 2, Supervisory Controls

The supervisor covers the nature and extent of direct and indirect controls exercised by the supervisor, the employee's responsibility, and the degree to which work is reviewed by the supervisor.

At Level 2-2, HR assistants use initiative and work independently within the framework established by the supervisor in carrying out recurring assignments, such as obtaining, inserting, and correcting missing and incorrect data in an automated HR system. They follow limited procedures or are controlled by readily applicable instructions that specifically describe how the work is to be done and the kind of adaptations or expectations that can be made. They refer to a supervisor or designated employee for assistance or decision. The supervisor reviews work to verify accuracy and conformance to procedures and any special instructions. Recurring assignments are reviewed through quality control procedures. Work may be spot checked for accuracy. The supervisor closely reviews new or difficult assignments such as pay changes or situations that have potential adverse impact.

At Level 2-3, which is the highest level identified in the JFS, HR assistants plan the work, carry out successive steps of assignments, resolve problems, and make adjustments using established practices and procedures. In addition, they recommend alternative actions to the supervisor; handle problems and/or deviations that arise in accordance with instructions, policies and guidelines; and refer new or controversial issues to the supervisor for direction. The supervisor reviews works products for technical soundness, appropriateness, and conformity to policies and requirements.

The appellant's position meets Level 2-2. The nature of her work, combined with the appellant's experience and technical knowledge of the OWCP operations and functions, allows her to work independently with little or no day-to-day supervision from her supervisor. She refers to established guidelines to provide direction in completing assignments, but the supervisor is available for advice and guidance on unprecedented problems and situations, and reviews

completed work for technical soundness and accuracy, appropriateness, and conformity to policies and requirements.

The appellant follows established procedures or controlling instructions, requiring she follow rather than interpret procedures as expected at Level 2-3. Her completed work is typically of a recurring nature and does not require resolving case problems associated with or comparable to the job product types identified at Level 2-3, e.g., job vacancy announcements, ranking factors identified for rating schedules, position descriptions, job evaluation statements, recommendations for disciplinary action, and draft policy statements. The appellant said she works independently in planning, designing, and carrying out work; however, we found how and when her work is executed and/or prioritized is dependent on established guidelines and past precedent, rather than on the appellant's decision-making. Her work requires making recommendations of limited duty assignments for injured employees, but approval by DOL and concurrence by the canteen employee's supervisor are required prior to the job offer. The appellant also prepares a variety of OWCP-related reports on a quarterly and annual basis using AWS, WCMIS, and other available data sources; advises employees and supervisors on workers' compensations matters; and reviews and manages case files. This and other work are structured and routine with standard procedures dictating what actions are to be taken in specific cases depending on the injury, treatment type, compensation sought, and other readily apparent factors. For example, when reporting an injury, the appellant chooses the appropriate form to be used, ensures the form is completed correctly, and takes actions appropriately and timely. While working independently to accomplish these tasks, unlike Level 2-3, her finished work is spot checked and evaluated for accuracy and compliance by her supervisor, discussing non-routine issues (e.g., when drafting correspondence not covered by established templates, recommending limited duty assignments, etc.) with the supervisor and proposing courses of action based on past precedent.

Level 2-2 is credited for 125 points.

Factor 3, Guidelines

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

At Level 3-3, which is the highest level identified in the JFS, HR assistants use guidelines that have gaps in specificity and are not applicable to all work situations. The employee selects the most appropriate guideline and decides how to complete the various transactions. Assistants use judgment to devise more efficient methods for procedural processing, gather and organize information for inquiries, or resolve problems referred by others. In some situations, guidelines do not apply directly to assignments and require the employee to make adaptations to cover new and unusual work situations.

The appellant's position meets but does not exceed Level 3-3. Her OWCP work requires applying guidelines including the Federal Employees' Compensation Act; United States Code; Code of Federal Regulations; and DOL-, VA-, and VHA-issued policies, procedures, and handbooks. The appellant may also seek guidance by contacting DOL officials. Similar to Level 3-3, she responds to inquiries by researching and choosing the laws, regulations, and

guidelines applicable to the situation. While overall guidelines are extensive, they have gaps in specificity and are not completely applicable to all work requirements as described at Level 3-3. For example, she updates, monitors, and maintains the VCS database for tracking OWCP claims and other HR-related actions for agency employees, which requires identifying and recommending ways of eliminating, combining, simplifying, and improving database procedures and processes. This work is consistent with the Level 3-3 description of using judgment to devise more efficient methods of procedural processing and/or gathering and organizing information. Her work advising VCS personnel on trends and patterns, causes of recurring injuries, ergonomic requirements, and recommendations regarding cases of suspected fraud or ineligibility for processing also requires selecting appropriate guidelines and determining the appropriate course of action as expected at Level 3-3.

Level 3-3 is credited for 275 points.

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

At Level 4-3, which is the highest level identified in the JFS, the work consists of different and unrelated steps in accomplishing HR assignments and processes. HR assistants at this level consider factual data, identify the scope and nature of the problems or issues, and determine the appropriate action from many alternatives. Assistants identify and analyze HR issues and/or problems to determine their interrelationships and to determine the appropriate methods and techniques needed to resolve them.

The appellant's position meets but does not exceed Level 4-3. As at this level, her OWCP work involves advising employees, supervisors, and physicians with completing paperwork to ensure it is complete, adequate, and accurate; providing information on program requirements and processing procedures; and generating reports by exporting data to spreadsheets and manipulating data into presentations highlighting trends and areas of concern. The appellant's case management work involves reviewing forms for missing information, corresponding with various offices to obtain clarifying or additional information, identifying anomalies, and presenting her supervisor with recommendations if fraudulent activity is suspected. She also reviews updated medical documentation and long-term claims to identify potential reemployment opportunities. Similar to the Level 4-3 description of work determining interrelationships and the appropriate steps to resolve HR issues and problems, the appellant accomplishes this work by reviewing light duty assignment PDs; deciding if duties are consistent with employee capabilities; and coordinating with OWCP officials, field HR offices, payroll, physicians, canteen supervisors, and others when returning claimants to work. Her work (e.g., identifying potentially fraudulent claims, tracking VCS's workers' compensation trends, and recommending viable reemployment opportunities) is consistent with Level 4-3, which describes considering factual data and the scope and nature of the issue in order to decide the proper course of action from many alternatives.

Level 4-3 is credited for 150 points.

Factor 5, Scope and Effect

This factor covers the relationship between the nature of the work; i.e., the purpose, breadth, and depth of the assignments, and the effect of work products or services both within and outside the organization.

At Level 5-2, the work involves technical services and practices such as screening job applicants on minimum qualifications for initial entry onto a competitor inventory; or verifying job content in establishing identical additional jobs. Work also involves applying specific rules or procedures to complete actions in the HR organization. Work affects the accuracy and reliability of further efforts to perform HR functions within the organization.

At Level 5-3, which is the highest level identified in the JFS, the work involves treating a variety of routine problems, questions, or situations using established procedures, such as explaining benefits options available to employees based upon analysis of individual cases. The work has a direct effect on the quality and adequacy of employee records, program operations, and services provided through the HR office. Work also affects the social and economic well being of persons serviced through the HR office.

The appellant's position surpasses Level 5-2 in that her work requires more than applying specific rules and procedures to complete limited technical services equal, e.g., to screening job applicants for minimum qualifications. Instead, as at Level 5-3, her work involves applying rules or procedures to resolve a variety of conventional issues and problems encountered in providing OWCP-related support. The PCS provides an illustration of Level 5-3, which includes work explaining benefit options available to employees based upon analysis of individual cases and processing claims that require identifying and substantiating relevant information. Work at this level affects the quality and adequacy of services the employee benefits program provides. This illustration is a match for the appellant's position.

The appellant provides OWCP support to employees and supervisors located at the [activity] and canteens dispersed nationwide. She resolves OWCP issues and problems in accordance with established criteria, guidelines, and past practices. Her work entails reviewing case documents to ensure information is correct and complete; advising employees and supervisors when an injury or illness occurs; coordinating OWCP efforts among DOL, VHA, and VCS staff; communicating with agency staff to ensure comprehensive case management services are provided to injured employees on a continuing basis; identifying employees able to return in a limited duty capacity; making recommendations to offer employment for limited duty positions; identifying, researching, and compiling information regarding potentially fraudulent claims; and reporting on trends and other areas of concern. Comparable to Level 5-3, the results of this and other work affects the quality and adequacy of OWCP case records, program operations, and services provided. The appellant's work covers the full spectrum of OWCP tasks, from the beginning (e.g., when advising employees and supervisors if an injury occurs) to the end (e.g., when identifying light duty assignments for employees on long-term OWCP rolls). Also at Level 5-3, her work expedites the return of injured or ill employees to duty, reduces the agency's workers'

compensation expenditures, and facilitates the timely payment of OWCP claims. The appellant's position meets but does not exceed Level 5-3.

Level 5-3 is credited for 150 points.

Factors 6 and 7, Personal Contacts and Purpose of Contacts

Personal contacts include face-to-face and telephone contacts with persons not in the supervisory chain. Levels described under this factor are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place. These factors are interdependent. The same contacts selected for crediting Factor 6 must be used to evaluate Factor 7. The appropriate level for personal contacts and the corresponding level for purpose of contacts are determined by applying the point assignment chart for factors 6 and 7.

Personal Contacts

At Level 1, the HR assistant has personal contacts with other employees in the immediate office or related units. Typically, they have limited contact with the general public.

At Level 2, which is the highest level identified in the JFS, the HR assistant has contact with employees and managers in the agency, both inside and outside the immediate office or related units, as well as applicants, retirees, and/or the general public, in moderately structured settings. Contact with employees and managers may be from various levels within the agency, such as headquarters, regions, districts, field offices, or other operating offices at the same location.

In addition to contacts typical at Level 1 with peers and coworkers, the appellant's contacts include all levels of employees and supervisors, the general public, DOL OWCP officials, physician offices, and VAMC staff. These contacts, which are comparable to Level 2, constitute a regular and recurring part of her job. The appellant also has occasional contact with attorneys or investigators with the Office of Inspector General. As these are rare, the contacts cannot be considered as controlling the evaluation of this factor. To be credited, the level of contacts must contribute to the successful performance of the work, have a demonstrable impact on the difficulty and responsibility of the position, require direct contact, and are a regular and recurring requirement. As a result, the appellant's personal contacts meet but do not exceed Level 2.

Purpose of Contacts

At Level a, the purpose of contacts is to acquire, clarify, or exchange facts or information needed to complete assignments.

At Level b, which is the highest level identified in the JFS, the purpose of contacts is to plan, coordinate or advise on work efforts, or to resolve issues or operating problems by influencing or persuading people who are working toward mutual goals and have basically cooperative attitudes.

The official PD shows the agency evaluated the purpose of the appellant's personal contacts at Level a. The PD states, "The purpose of the contacts is to clarify issues and resolve problems and concerns, and/or provide information. Incumbent may encounter resistance due to organization conflict, competing objectives, resource problems, uncooperative claimants, and physicians, etc." As confirmed by the PD and our interviews, the purpose of the appellant's contacts ranges from exchanging factual information to resolving issues by persuading people typically working towards the same goals. This is comparable to Level b. For example, the appellant advises employees, supervisors, and others when resolving issues with arranging light duty assignments for employees, attempting to expedite OWCP claims processing, and obtaining missing documentation. Contacts occasionally require tact and skill in explaining delicate, complicated, or confusing workers' compensation matters. This exceeds Level a where the reason for the contacts tends to be for informational purposes only. Therefore, the purpose of the appellant's contacts meets but does not exceed Level b.

Level 2b is credited for 75 points.

Factor 8, Physical Demands

This factor covers the requirements and physical demands placed on the employee by the work assignments.

As at Level 8-1, which is the only level identified in the JFS, the appellant's work is primarily sedentary and does not involve any special physical efforts. Some work may require periods of standing or carrying light items. Level 8-1 is credited for 5 points.

Factor 9, Work Environment

This factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required.

As at Level 9-1, which is the only level identified in the JFS, the appellant's work environment consists of an area that is adequately lighted, heated, and ventilated. Her work involves everyday risks or discomforts requiring normal safety precautions. The appellant's work environment meets but does not exceed Level 9-1. Level 9-1 is credited for 5 points.

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge Required by the Position	1-4	550
2. Supervisory Controls	2-2	125
3. Guidelines	3-3	275
4. Complexity	4-3	150
5. Scope and Effect	5-3	150
6. & 7. Personal Contacts and Purpose of Contacts	2-b	75
8. Physical Demands	8-1	5
9. Work Environment	9-1	<u>5</u>
<i>Total</i>		1,335

A total of 1,335 points falls within the GS-6 range (1,105 to 1,350) on the grade conversion table in the JFS.

Decision

The position is properly classified as Human Resources Assistant (Employee Benefits), GS-203-6.