

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

Dallas Field Services Group
Plaza of the Americas, North Tower
700 North Pearl Street, Suite 525
Dallas, TX 75201

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

Appellant: [appellant]

Agency classification: Work and Family Life Specialist
GS-101-9

Organization: Fleet and Family Support Center
Fleet and Family Support Program
Personnel Support
Navy Region [name]
Commander Navy Installations
Department of the Navy
[installation]
[city and state]

OPM decision: Training Instructor
GS-1712-9

OPM decision number: C-1712-09-04

/s/ Kevin E. Mahoney

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

December 21, 2005

Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government. The agency is responsible for reviewing its classification decisions for identical, similar or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

Since this decision changes the series and title 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. The servicing personnel office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effect date of the personnel action.

Decision sent to:

[appellant's name and address]

Total Force Manpower Office
Navy Region [name]
Department of the Navy
[address]

Director, Labor and Employee Relations Division
Office of Civilian Resources (DON OCHR)
Department of the Navy
614 Sicard Street, SE., Suite 100
Washington Navy Yard, DC 20374-5072

[name]
Department of Navy Principal Classifier
Human Resources Service Center, Northwest
3230 NW Randall Way
Silverdale, WA 98383

Director, Office of Civilian Human Resources
Department of the Navy
ATTN: Code 00
614 Sicard Street, SE., Suite 100
Washington Navy Yard, DC 20374-5072

Chief, Classification Appeals Adjudication Section
Civilian Personnel Management Service
U.S. Department of Defense
1400 Key Boulevard, Suite B-200
Arlington, VA 22209-5144

Introduction

The Dallas Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal on April 25, 2005, from [appellant] that he submitted through his agency. His position is currently classified as a Work and Family Life Specialist, GS-101-9. The appellant does not dispute the series of his position, but believes it should be titled as Work and Family Life Consultant/Educator and classified at the GS-11 grade level. The position is assigned to the Fleet and Family Support Center (Center), Fleet and Family Support Program (FFSP), Personnel Support, Navy Region [name], Commander Navy Installations, Department of the Navy, at the [installation] in [city and state]. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

Background

On February 24, 2002, the appellant was temporarily promoted from a Transition Program Manager, GS-301-9, position to that of a Social Science Program Specialist, GS-101-11. The temporary promotion was extended several times but was finally terminated on January 23, 2005, following the implementation of a most efficient organization (MEO) study and the subsequent regionalization of the FFSP. Three Center positions, including the appellant's, were classified to Work and Family Life Specialist, GS-101-9, positions and assigned to the standardized position description (PD), number [number]. All three Work and Family Life Specialists filed separate classification appeals to OPM. One was cancelled after the individual accepted a position with another agency. The other is being adjudicated separately as that position performs different Center program responsibilities.

General issues

The appellant believes his work is equivalent to duties described in various PDs classified by the Department of the Navy at the GS-11 level. In addition, he said the duties he currently performs are no different than those he was performing when temporarily promoted to the GS-11 level. Therefore, he believes his position should be classified at a higher grade. By law, we must classify positions solely by comparing their duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to other positions, which may or may not be classified correctly, or to previous duties as a basis for deciding his appeal.

Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. However, the agency has primary responsibility for ensuring its positions are classified consistently with OPM appeal decisions. If the appellant considers his position so similar to others that they all warrant the same classification, he may pursue the matter by writing to the Department of the Navy's human resources headquarters. In doing so, he should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same as the appellant's position, the agency must correct the classification of the positions to be consistent with this

appeal decision. Otherwise, the agency should explain to the appellant the differences between his position and the others.

The appellant also asked that the principle of a person's impact on the job be considered if applying the appropriate standards did not result in a higher grade for the position. He believes the position has changed based on his recognition as an expert by his peers and, in addition, by his contribution to the Center's efficiency and economy in directing two functional areas; i.e., the personal financial management and relocation services.

The concept of a person's impact on the job is addressed in the *Introduction to the Position Classification Standards* and *The Classifier's Handbook*. The policy is based on the premise that the special knowledge, skills, abilities, talents, or achievements of an individual may have an important effect of the duties, responsibilities, and expectations of the job held. This impact may be reflected in the classification when the performance of the employee makes the job materially different from what it otherwise would be, e.g., when the performance of the individual broadens the nature or scope and effect of the work being performed. Such changes may affect the difficulty of the work performed or the responsibility and authority given to the employee. Possession of higher qualifications or that the employee stands out from other individuals in comparable positions is not sufficient reason by itself to classify the position to a higher grade. In using this concept, management must recognize and endorse the duties and that the work environment allows continuing performance at a different level. The PD should be revised and must clearly state the higher level duties and responsibilities, and the classification must be based on comparison with appropriate standards. An OPM appeal decision is based on the real operating position, and our decision will address the appellant's concerns in this area.

Position information

The Center's primary goal is to provide assistance and services to enhance the stability and autonomy of active duty military personnel and their family members through comprehensive education and training, counseling assistance and information, and referral for various family assistance programs. Core programs fall under three main categories of assistance, which are career/retention, deployment/readiness, and crisis response. Those core programs include such areas as transition assistance, spousal employment assistance, personal financial management, clinical counseling, family advocacy, deployment support, relocation assistance, ombudsman support, etc. The Center's customer base fluctuates significantly but currently totals 138,712. This includes active duty military; reserve service members from Navy, Marine, Air Force, and Air National Guard; civilian employees; and retired military. The Center serves clients from the [two cities] metroplex and 25 counties in the North {state name} area. Eighty five percent of that potential customer base involves retired military.

The appellant works under the supervision of the Family Support Site Manager, who occupies a GS-101-12 position. According to the organizational chart contained in the record, the Center is staffed with two Advocacy Clinical Counselor, GS-101-11, positions; three Work and Family Life Specialists, GS-101-9; an Information Referral Assistant, GS-303-5; a half-time Office Automation Assistant, GS-326-6; and a half-time contractor position to provide new parent support services. The standardized PD established by the MEO states that the incumbent serves

as a non-clinical consultant on a wide variety of work and family life issues; establishes, implements, monitors, and coordinates work and family life services and activities to include information and referral services; and may be required to serve as non-clinical consultant and instructor in one or more of the following areas: career resource development, relocation services, personal financial management, and command representative and marketing. The PD indicates the work requires knowledge of social services delivery systems and the concepts, principles, and theories relating to one or more social or behavioral science fields to assess needs and concerns of clients and understand how social or behavioral patterns or attitudes impact and affect work and family life issues. It requires skills in conducting interviews to provide assistance and referrals, establishing and maintaining effective working relationships, and working with social service delivery systems in military and civilian communities.

The appellant is specifically responsible for developing, implementing, and administering the Center's personal financial management and relocation assistance programs in accordance with Department of Defense (DOD) instructions and local policies. DOD Instruction 1342.17 requires establishing personal financial management programs to maintain service members' personal readiness, support personal financial needs throughout an individual's military career, and promote retention in the military. In support of this effort, the appellant coordinates and provides comprehensive training, orientations, and workshops tailored to specific areas, e.g., personal and family budgeting, savings plans, and car buying strategies. The appellant also provides financial planning counseling for a variety of cases involving the needs of an individual or a family. Clients initially complete a financial planning worksheet, which allows the appellant to assess individuals in terms of their level of debt, degree of self-discipline, and desired financial goals. The appellant then inputs the information into a software program resembling mass-marketed personal finance computer programs, such as Intuit's Quicken and Microsoft Money. The software program generates a spending plan, which is a visualization of income versus expenditures. The plan, which is the basis for future counseling sessions, allows the appellant to identify problem areas by comparing what the client spends to what is earned and then recommend actions to achieve short- and long-term financial goals. The site's current funding and service level of three indicates that financial management delivery will be done in workshops and briefings only with no individual counseling provided. The recent FFSP accreditation report acknowledged that because of his understanding of the challenges and financial impact faced by mobilized reservists and their families, the appellant has continued to do some individual counseling.

The appellant is also responsible for the relocation assistance program, which provides assistance and services necessary to support DOD personnel and their families who are undergoing a permanent change of station move. The appellant provides sponsorship training to assist in the transition of incoming military personnel and their family members. He also responds to inquiries concerning community services, as well as maintains and distributes the installation welcome packets. He compiles the packets by gathering information from the Standard Installation Topic Exchange Service, which is an agency-wide computer database on domestic and foreign DOD installations covering such topics as the local community, housing, and child care services. The appellant provides pre-departure and post-arrival assistance, which includes educating military personnel on moving costs and entitlements, housing, child care, the sponsorship program, and volunteer opportunities.

The appellant markets all of the Center's programs through flyers, bulletins, newspaper articles, and on-base promotional booths. He is responsible for establishing continuing cooperative relationships with other agencies, organizations, and institutions. The purpose of these contacts is to secure a multitude of useful benefits and services for use by Center customers. Generally, these public relations and community service contacts are restricted to those in the local area. Although spending the majority of his time on the programs for which he is specifically responsible, the appellant will support other Center functions as needed. For example, the appellant provides group briefings for the transition assistance program, which offers transition and employment information to military service members planning to separate from active duty within 180 days. The appellant will share tips on resume writing and interviewing skills, as well as direct clients to services provided by civilian and private agencies with employment opportunities.

The appellant's PD and other material of record furnish much more information about his duties and responsibilities and how they are performed. The immediate supervisor certified to the accuracy of the duties described in the PD of record; but the appellant stressed that his PD is not accurate, in part, because his agency's evaluation did not sufficiently credit his responsibilities for providing personal financial management and relocation services. However, we classify a real operating position and not simply the PD. A PD is the official record of the major duties and responsibilities assigned to a position by a responsible management official; i.e., a person with authority to assign work to a position. A position is the work made up of the duties and responsibilities performed by the employee. Classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the duties assigned by management *and* performed by the employee. We find the PD of record includes the major duties and responsibilities assigned to and performed by the appellant, and we hereby incorporate it by reference into this decision.

To help decide this appeal, we conducted telephone audits with the appellant on May 6 and 13, 2005, an on-site audit with him on June 20, 2005, and an on-site interview with the appellant's first-level supervisor on July 21, 2005. We also conducted telephone interviews with the second-level supervisor on October 18 and 20, 2005. In reaching our classification decision, we carefully considered all of the information gained from these interviews, as well as the written information furnished by the appellant and his agency, including the PD of record.

Series, title, and standard determination

The appellant's position is currently classified to the two-grade interval GS-101, Social Science Series, which covers positions the duties of which are to advise on, administer, supervise, or perform research or other *professional* and scientific work in one or any combination of the social sciences when such work is not classifiable in other series of this occupational group.

Work classified to a professional series requires education and training in the principles, concepts, and theories of the occupation. Typically, these can be gained only through completion of a specified curriculum at a college or university. This requirement, called a "positive education requirement," is common to nearly all professional occupational series. Furthermore, professional work involves creativity, analysis, evaluation and interpretation. It

involves applying basic or natural law, principles, or theory; evaluating the research of others; and assessing the need for and validity of proposed changes and improvements in procedures and methods. Professional responsibility involves the ability to reason from existing knowledge to unexplored areas; to adapt methods to circumstances that deviate from the standards; and to stay abreast of and evaluate technical subjects, analyses, and proposals in professional literature. Positions can be considered professional only if the work requires application of professional knowledge and ability. The classification series of a position is governed by the requirements of the assigned duties rather than the qualifications of its incumbent. Neither the desirability of such qualifications nor the employee's possession of them is a factor in determining the series.

To determine whether the position requires professional knowledge, such as that of a social scientist, we examined the appellant's assignments along those dimensions where they most closely parallel those of a professional. These dimensions would typically encompass defining and analyzing problems, evaluating technical practices, establishing standards, improving work methods, and developing skills. While some of the assignments were minimally similar to those of a professional, despite the appellant's credentials, none demanded professional insight of the social sciences. The appellant initially interviews clients to identify the types of services available to meet individual needs. On the surface, this process resembles the major phases of activity that make up the action sequence in the professional social worker's casework; i.e., identifying the problem (study), deciding appropriate action (diagnosis), and providing indicated services (treatment). The foundation of the professional social scientist's work is the exploration of facts on a case to determine the nature, cause, components, and impact of the situation to better understand present and future effects on individuals. DOD has identified the potential adverse effects from life changes, such as relocation and retirement, on service members and their families. Center assistance and services are designed specifically to mitigate these effects, so significant portions of the appellant's duties are performed by following pre-established DOD methods and procedures.

While providing personal financial management counseling, the appellant may discover the client's financial problems ultimately stem from issues with a spouse or family member. If the severity of the situation so warrants, the appellant will refer the individual to one of two Advocacy Clinical Counselors assigned to the Center for diagnosis and treatment of obstacles potentially impeding the appellant's ability to provide aid. The appellant shared other examples of problems characteristic of his work. For example, he said the demand for attendance in the transition assistance training oftentimes exceeds the available space, which he resolves by adding a class to the training schedule. However, he is not required to apply creativity and the type of problem-solving techniques, including analyzing options from multiple courses of action, typical of professional work. Instead, the appellant's work is based on practical knowledge of the purpose, operation, procedures, technique, and guidelines of the assignment, usually performing limited although complete projects. We understand the FFSP, in an effort to reorganize work functions, will be asking the appellant to train additional personnel on the day-to-day management of the personal financial management program. To provide training in this manner suggests that the fundamental requirements of this function can be learned through on-the-job training. Because the appellant's work does not require professional knowledge of social or behavioral sciences, the position is excluded from the GS-101 series.

The record shows that the appellant's position is a mixed position involving a combination of one-grade interval support and two-grade interval administrative work associated with different occupational series and grades. The Center provides assistance and services through (1) comprehensive education and training, (2) counseling assistance, and (3) information and referral for various family assistance programs. The majority of duties associated with counseling assistance, as well as information and referral, are classifiable as one-grade interval support work. Support work usually involves proficiency in one or more functional areas or in certain limited phases of a specified program. Employees performing support work follow established methods and procedures, techniques, and guidelines of the specific program area or functional assignments. Support work may be learned on the job through experience or by attending specific training courses.

The appellant's one grade interval support work fits the GS-187, Social Services Series, which covers positions requiring application of special program knowledge and service skills in providing assistance to individuals and families in a social service program. Similar to the appellant's position, this work involves such functions as obtaining selected background information through interviews, establishing eligibility to make use of agency resources, and helping individuals identify needs related to services the Center can provide. The work also involves explaining and encouraging the use of agency and community resources as means of dealing with identified problems and making appropriate referrals to sources of additional help. Although these positions require a specialized knowledge of the social services program, they do not require a broad theoretical approach to social problems acquired through professional education in social work or in other recognized disciplines in the social sciences. Work properly classified to this series may be performed either (a) in conjunction with professional social work or (b) in conformity with agency procedural instructions and standards of service. Although the Work and Family Life Specialists are tasked with performing work in all core programs, the appellant is primarily responsible for ensuring the provisions for the relocation assistance and personal financial management functions are met. Comparable to social service representatives, the appellant collaborates with other agencies in a mutual goal to assist clients in receiving maximum benefits from the services he provides as well as assistance provided by other organizations. This may include establishing a network with such organizations as the U.S. Department of Labor, American Red Cross, and the Chamber of Commerce. Work covered under the GS-187 series must be evaluated by reference to the grading criteria in the published GS-187 position classification standard (PCS).

The appellant said he spends approximately 45 percent of his time preparing for and providing comprehensive education and training. That work is two-grade interval administrative work properly assigned to the GS-1712, Training Instruction Series. Similar to the appellant's position, the GS-1712 series includes positions concerned with the administration, supervision, training program development, evaluation, or instruction in a program of training when the paramount requirement of the work is a combination of practical knowledge of the methods and techniques of instruction *and* practical knowledge of the subject matter being taught. The appellant's work requires application of methods and principles of the adult learning model to fit the learning needs of groups diverse in not only age, gender, race, and ethnicity, but also self-concept, life experiences, readiness to learn, orientation to learning, and motivation. Work

covered under the GS-1712 series is properly evaluated using the Grade Level Guide for Instructional Work.

Based on the grade-level analysis which follows, the appellant's GS-1712 covered duties are grade-controlling and predominant in terms of the basic purpose of the position and sources of recruitment. Therefore, the appellant's position is properly classified to the GS-1712, Training Instruction Series, and is titled Training Instructor.

Grade determination

Evaluation using the Grade Level Guide for Instructional Work

This Guide contains information to use when determining the grade level for instructor work in Part I and for instructional specialist work in Part II. Since the primary duties of the appellant's position involve instructional work, Part I of the standard was used to evaluate his position. The Guide considers two classification factors to evaluate the difficulty, responsibility, and qualification requirements of the work. The factors are (1) *Nature of Assignments* and (2) *Level of Responsibility*. The following is our evaluation of this position in terms of these factors.

Nature of Assignments

This factor encompasses such aspects as the knowledge, skill, and ability required in performing the work, and the complexity and difficulty of the duties and responsibilities assigned.

At the GS-9 level, the courses cover a wide variety of topics in well-established areas of a subject-matter field. They include courses taught by a technical service school in the fundamentals and skills of a technical occupation; courses taught at the secondary level through basic undergraduate levels; or all subjects taught at an elementary school level. Instructors require thorough familiarity with the assigned subject-matter areas and use a wide range of teaching methods or tools depending on the students' learning requirements. They are usually well-structured and have ample training materials. The courses generally involve instructional problems that require organization, illustration, and interpretation of course material in order to reach and motivate students who may pose typical problems of communication and motivation due to, e.g., diverse ages, backgrounds, and levels of interest in the course. The GS-9 instructors need to give concrete expression to the abstract principles and concepts taught at this level. They make recommendations for changes involving substantive rather than procedural matters. Obtaining and adapting current instructional material is typical of this level.

At the GS-11 level, the courses cover advanced technical systems of subject-matter areas comparable to the upper-division undergraduate level. These courses are not in standardized or pre-structured format, and they typically have source material problems. For example, source materials may be excessively numerous, may be difficult to locate, or may be difficult to adapt. Instructors at the GS-11 level are responsible for overall maintenance of their assigned courses and determine the need for and initiate changes or updates in course content. The instructors participate substantially in course development or modification. Instructors at this level frequently demonstrate techniques to trainee instructors and evaluate the performance of lower

level instructors. Some courses taught at this level are similar to those taught at the GS-9 level, but GS-11 instructors are required to adapt or revise their courses because of subject-matter or student problems. Subject-matter problems result from technological changes or new developments in the field and require frequent updating of knowledge and course content by instructors. Student problems relate to students with complicated, specialized, or persistent learning difficulties requiring instructors to modify courses to meet the needs of the students.

The appellant's position meets the GS-9 level, in that he provides classes on a wide variety of topics in well-established subject-matter areas. The course materials are standard packages developed by the Department of the Navy for use by the Centers with similar responsibilities. The packages normally include ample learning modules and training materials. Similar to the GS-9 level, the appellant adapts current instructional material to more appropriately fit the local community. The depth and breadth of the classes vary considerably as the appellant provides courses ranging from broad, introductory lessons to more expansive, detailed instructions. For instance, the appellant instructs classes on car buying strategies, which provide comprehensive information on what individuals need to know before purchasing a car, determining what they can afford, planning for various car expenditures and learning how to get the best deal. As at the GS-9 level, the appellant provides tangible information to abstract concepts. It is common knowledge that saving money is a good practice, but the appellant provides concrete information on how to save and/or invest. The challenge for the appellant is in teaching and motivating individuals with pre-established financial attitudes ranging from those of an inveterate spendthrift to a savvy investor. Comparable to the GS-9 level, the appellant considers which teaching approach is the best way of communicating information to the audience. In some situations, the appellant may find it beneficial to lecture to students aided with media including handouts and PowerPoint presentations. In other situations, the appellant may employ cooperative group learning by encouraging students to share real-life situations and hosting a question-and-answer session.

The appellant's position does not meet the GS-11 level where courses cover advanced technical systems or subject-matter areas comparable to the upper-division undergraduate level. The course materials used are standardized, as at the GS-9 level, and do not require any type of recurring modification due to technological changes or new developments resulting from subject-matter problems as typical at the GS-11 level. Participants receive instruction using a variety of pre-structured courses on various family assistance programs. Although the appellant uses various teaching strategies to assist students, the basic level of the courses and materials used, as well as the lack of course development and extensive modification, precludes assignment at the GS-11 level.

This factor is evaluated at the GS-9 level.

Level of Responsibility

This factor includes such things as independence; the extent to which guidelines for the work are available or must be developed; and the kinds of contacts required to perform the work.

At the GS-9 level, instructors independently plan and carry out their training sessions within the prescribed course framework. They resolve normal classroom problems, make outside contacts for supplemental information and materials, and obtain guidance before taking action on unusual matters or questions of program objectives and policy. Recommendations for course modification receive review for consistency with overall course material, for technical accuracy, and for educational adequacy. Courses of instructors at this level are audited and evaluated periodically by higher level instructors. The GS-9 instructors may participate in task analyses for determining training requirements or in special staff studies of training and testing materials, for which they receive specific guidance on coverage, methodology, approaches, and sources to use.

At the GS-11 level, the instructors may receive course assignments with the course objectives, topics to be covered and general content in a prescribed form; but they also typically participate in original course content development and in its subsequent modification. Within the framework of approved course objectives and topics to be covered, GS-11 instructors use such methods as they believe will be most effective. They determine the need for additional subject-matter information and may meet with representatives of outside organizations in order to obtain it. They develop or adapt new or revised training or testing materials for formal course use. These materials may be reviewed by the instructor's supervisor for technical accuracy, consistency with course objectives, educational effectiveness, and program policy.

The appellant's position meets the GS-9 level in that he works independently in providing classroom instruction to students in assigned subjects. Routine classroom problems are solved by the appellant and the supervisor is kept informed of difficult or controversial problems. The appellant performs his duties without detailed or specific guidance from the supervisor, and his work is examined for effectiveness as part of the overall program. The appellant is expected to perform all duties and responsibilities relating to the educational services in accordance with DOD instructions and local policies. Personal contacts are generally with employees within the Center, educational organizations, and the Department of Labor for the purpose of addressing training issues and concerns.

The appellant's position does not meet the GS-11 level. While the appellant performs daily work with relative independence, he is delivering prescribed course materials for students on a short-term basis. He is not involved in the development of original course content as typical at the GS-11 level. Instead, as at the GS-9 level, any recommendations the appellant may propose for modification of the course content are reviewed for consistency and for technical and educational adequacy by the immediate supervisor. While individual student learning or behavioral problems may occur, the basic nature of the course material taught and the short-term assignment of the student precludes crediting at the GS-11 level.

This factor is evaluated at the GS-9 level.

Summary

By comparison with Part I of the Grade Level Guide for Instructional Work, both factors are credited at the GS-9 levels.

Evaluation using the GS-187 Social Services Series PCS

The GS-187 PCS uses two classification factors to evaluate the difficulty, responsibility and qualification requirements of the work. The factors are (1) *Nature and range of assigned cases* and (2) *Level of responsibility*. These factors are consolidated in the grade-level portion of the standard because within each grade, supervision must be related to the difficulty of service required in different types of cases and services provided. The following is our evaluation of this position in terms of these factors.

At the GS-8 level, social service representatives work with considerable independence in providing assistance and services in a wide range of cases. Assignments may include serious and complicated problems, but the majority of assignments are characterized by continuing responsibility for service decisions affecting a wide range of cases rather than unusually complex cases. GS-8 social service representatives are given additional responsibilities for identifying needs and providing individualized assistance and service appropriate to a variety of specific problems and a wide range of cases without prior approval of the supervisor, and for developing recommendations for planned use of agency resources and auxiliary services. In working with a wide range of cases involving a variety of individualized problems of a less serious nature, the employee takes initiative in developing and implementing plans while keeping the supervisor informed of any unusual problems. Supervision received on standard cases is usually limited. Supervisory advice is available for complex problems or serious needs. When working with complex and serious need cases, the employee develops plans and discusses them with the supervisor. After the plans are approved, the employee independently carries out the services.

At the GS-9 level, assignments are based on recognition of demonstrated superior skill and proven sound judgment in working with serious and complicated assistance problems that do not require professional casework. Social service representatives at this grade are assigned a preponderance of cases that are of a serious nature requiring unusual service skills and judgment and are given authority in these very difficult cases to make appropriate decisions without prior approval of the supervisor. In addition, GS-9 employees take initiative in providing assistance and services and keep supervisors informed of their progress. Employees are relied upon to plan programs of assistance and service, make continuing appraisals of progress of plans, and provide help and encouragement to the assistance recipients. The GS-9 employee consults with the supervisor on unusual questions or when precedents for proposed actions have not been established. Supervision is mainly through review of reports and periodic discussions.

The nature and range of the appellant's cases and level of responsibility fully meet, but do not exceed, the GS-8 level. Similar to the GS-8 level, the appellant works with considerable independence in providing a wide range of personal financial management, relocation and transition assistance program services to a diverse group of individuals. Working within the scope of DOD instructions and local policies, he has authority to initiate, develop and carry out assigned work. His advice and findings are accepted as conclusive and completed work is reviewed in terms of results achieved. As at the GS-8 level, the majority of the appellant's assignments are conventional, which are characterized by common problems that have well established patterns of assistance. The appellant provides individualized and specific services to clients where problems of a less serious nature exist. Cases involving complex problems of

serious need or controversial issues are discussed with the supervisor in order to identify possible solutions and develop a recommended plan of action.

The nature and range of the appellant's cases and level of responsibilities do not meet the GS-9 level. In the standard, the level of responsibility for GS-8 and GS-9 employees is very similar in that both grade levels work with considerable independence, take initiative to develop and implement plans, are given authority to make decisions, and their completed work is primarily reviewed through records and reports. While the appellant's level of responsibility is similar to the GS-9 level, his assignments do not meet the nature and range of services required at the higher grade level. At the GS-9 level, the preponderance of services is provided to individuals with serious and complicated problems. In contrast, the majority of the appellant's assignments are not serious and complicated in nature. The appellant refers customers with more serious or complicated financial management issues to Consumer Credit Counseling Services if long-term debt management counseling is needed; Legal Services if a bankruptcy is imminent; Navy-Marine Corps Relief Society if emergency financial assistance is needed; or on-site clinical counselors if there are underlying issues aggravating pecuniary difficulties. In addition, clients interested in investment options tailored specifically to their individual circumstances are referred to professional financial advisers.

The standard's description on handling serious problems is characterized as working with an individual who is a disabled family breadwinner demoralized by long-term disability and risks incapacitation by not pursuing required therapy. The appellant occasionally works with military members required by their supervisors to attend personal financial management counseling. These individuals may be reluctant to accept assistance from the appellant, which requires him to exercise more tact, diplomacy, and restraint in getting clients to disclose information, accept responsibility for their actions, and modify patterns of harmful fiscal behavior. We understand only one out of five individual financial management counseling sessions are with involuntary clients. Furthermore, not all involuntary clients pose serious resistance to counseling. Since these situations do not represent a substantial portion of the appellant's cases, nor do they illustrate the same depth as that of the standard's description in terms of severity, the factors may not be credited at the GS-9 level.

Summary

By comparison with the GS-187 PCS, both factors are credited at the GS-8 level.

Decision

The position is properly classified as Training Instructor, GS-1712-9.