

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

Appellant: [name]

Agency classification: Funeral Honors Support Specialist
GS-301-9

Organization: [division]
[directorate]
[district]
[department]
[city and State]

OPM decision: GS-301-11
(Title at agency discretion)

OPM decision number: C-0301-11-04

/s/ Kevin E. Mahoney
Kevin E. Mahoney
Associate Director

March 21, 2007
Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under the 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 grade 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 (5CFR 511.702). The servicing human resources office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

Decision sent to:

[appellant]

[servicing human resources office]

Ms. Janice W. Cooper
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[additional human resources components within department]

Introduction

On February 1, 2007, the Center for Merit System Accountability, U.S. Office of Personnel Management (OPM), accepted a position classification appeal from [appellant], who occupies the position of Funeral Honors Support Specialist, GS-301-9, in the [division], [directorate], [district], at the [installation] in [city and State]. He requested that his position be classified at the GS-11 level. We accepted and decided this appeal under the provisions of section 5112 of title 5, United States Code (U.S.C.). By law, a classification appeal decision is based on comparing the appellant's current duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112).

Position information

The appellant executes the [department's] funeral honors support program for the [region]. He verifies eligibility for military funeral honors and the level of honors to be provided. He personally arranges honor services for burials of [department] veterans at [cemetery], including coordinating with the Ceremonial Guard and [department] Band and managing logistical requirements for various participants such as escort commanders, service representatives, and Catholic priests, and conducts periodic site visits to ensure the quality of the services rendered. He initiates and monitors the selection process for officers to serve as funeral escort commanders for special military funerals at [cemetery]. The appellant prepares information packages and briefs escort commanders regarding specific details of the funeral procession and graveside procedures along with the decedent's biography. He receives and reviews the after action report from the escort commander upon completion of the funeral service for quality control purposes. For burials at other national, State, base, and private cemeteries within the region, he tasks military coordinators at the appropriate sub-areas with arranging for the provision of honor services, although he retains responsibility for the overall conduct of these services and any associated problem resolution.

The appellant maintains a database containing relevant statistics for the approximately two thousand [department] funerals performed within the region each year, prepares detailed year-end reports serving as the basis for future manpower and resource allocations, and responds to periodic requests for funeral data from higher management levels. He responds to inquiries regarding such matters as eligibility, scheduling conflicts, special requests, and any other problems associated with manpower commitments and logistical arrangements for honor funerals. He performs occasional special projects such as a recent revision of a [department] instruction to reflect changes in organizational responsibilities regarding the assignment of funeral escort commanders, and a major revision of the funeral honors procedural manual for [cemetery], which serves as a comprehensive reference source for participants in honor funerals at this facility.

The appellant is assigned certain other [department]-wide responsibilities. He prepares letters of condolence to next of kin for signature by the Secretary of the [department] for all deceased active duty service members. He also prepares official notifications to the appropriate organizations upon the death of active duty service members, e.g., to the Secretary of the [department], [other department official], Flag Matters, and other staff elements on the death and

funeral arrangements of flag officers; to the [department] Academy Alumni Association on the death of all [alumni]; and to the community point of contact for the death of an officer. He was also asked to prepare a major expansion of the [department]'s military funeral procedural manual, which will provide detailed guidelines for all [department] military funeral honors servicewide. The draft is currently being staffed within other [department] elements for input.

We conducted an on-site desk audit with the appellant and a subsequent telephone interview with his supervisor. The appeal record contains additional descriptive information which, along with the official PD, contains the major duties and responsibilities assigned to and performed by the appellant, and we incorporate it by reference into our decision.

Series and title determination

The GS-301 series includes positions that perform, supervise, or manage non-professional, two-grade interval work for which no other series is appropriate. The work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives. The administrative work of this series involves skills such as analytical, research, and writing ability, and requires the application of judgment typically demonstrated by substantial, responsible experience, or that equivalent to a college level education. The appellant's position is correctly assigned to this series.

There are no titles specified for positions in the GS-301 series. Therefore, the agency may construct a title in keeping with the nature of the work performed. In doing so, the agency should adhere to the position titling guidance contained in the *Introduction to the Position Classification Standards*. We note that the appellant's current title of Funeral Honors Support Specialist is descriptive of the work performed and meets these requirements.

Grade determination

The standard for the GS-301 series does not contain grade-level criteria. It instructs that positions in this series be evaluated using various standards for other series, depending on the position's content and work environment.

The agency evaluated the appellant's position by applying the grade level criteria in the Primary Standard for the Factor Evaluation System (FES), a job grading system based on the evaluation of nine position factors. The Primary Standard serves as the framework for the FES and for classification standards written in FES format by establishing the basic criteria for the various levels of the nine factors. Its purpose is to serve as the basis for other occupation-specific standards and as a basic tool for maintaining alignment across occupations. However, the Introduction to the Classification Standards specifically instructs that the Primary Standard *may not be used alone to classify a position*. It may be used for supplemental guidance in classifying a position or in evaluating an individual factor, *but only in conjunction with other FES standards*.

We evaluated the appellant's position by applying the position classification standard for the Traffic Management Series, GS-2130. This series includes positions that involve performing

technical and analytical work concerned with planning, development, and execution of traffic policies and programs designed to obtain the most efficient freight, personal property, or passenger transportation at the most economical cost commensurate with the services needed, safety and security requirements, and mission and program requirements. Thus, this occupation includes elements generally similar to the appellant's work in the sense that it involves arranging and scheduling the particular services rendered in conformance with a set of established requirements.

The GS-2130 standard is written in the FES format, under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade conversion table provided in the standard. The factor point values mark the lower end of the ranges for the indicated factor-levels. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor level description. If the position fails in any significant aspect to meet a particular factor level description, the point value for the next lower factor-level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information an employee must understand to do the work, and the skills needed to apply that knowledge.

At Level 1-6, the employee applies a practical knowledge of the established regulations and requirements of the functional program to analyze and resolve problems of a procedural or factual nature, e.g., evaluating day-to-day operations to ensure efficient and economical use of carrier services; resolving problems associated with the movement of passengers and their household goods; developing transportation plans for individual items with unique requirements; or analyzing transit time data to determine carrier effectiveness and develop a real transit time base for use in planning shipments. This level of knowledge is typically associated with positions at the first full performance level, i.e., the non-trainee level.

At Level 1-7, the employee applies indepth knowledge of a specialized function to develop, integrate, and coordinate transportation plans and programs, and thorough knowledge of agency policies and procedures to develop or interpret transportation policies, procedures, and guidelines. One of the illustrations provided in the standard of Level 1-7 assignments is as follows:

Exercises regional responsibility for the movement of a wide variety of passengers. This requires specialized knowledge of the different travel entitlements, policies, and procedures pertaining to the individual moves.

Certain aspects of the appellant's position are consistent with Level 1-6, specifically those aspects that relate to the day-to-day scheduling and coordination of funeral honors at [cemetery], i.e., monitoring schedules to ensure that all participating elements are accounted for; resolving problems that arise during the proceedings; handling special requests; and ensuring that the scheduled time frames are sufficient for the planned service.

However, that level does not capture the overall breadth of his assignment. The appellant is responsible for the conduct of the funeral honors function throughout the [department's] [region], encompassing military funerals conducted at all national, State, base, or private cemeteries in the [city] metropolitan area. In addition to the scheduling and coordination work that he personally performs for services at [cemetery], he tasks military coordinators at several sub-areas in the region with funerals occurring within their respective jurisdictions. However, any problems or complaints that arise during or after these services are directed to him for resolution. He is responsible for updating and revising procedural manuals used by funeral participants, responding to requests for information from higher organizational levels, maintaining overall data on the number of funerals conducted region-wide and the level of services provided, and conducting periodic site visits to ensure the proper conduct of military honors. Thus, the appellant exercises a degree of regional responsibility both in terms of the delegation of assignments and the development of written guidelines comparable to that addressed at Level 1-7. Corresponding to the Level 1-7 illustration cited above, the work requires specialized knowledge of eligibility requirements for military honors and the level of those honors to be provided to decedents and their spouses or dependents based on rank, and the various procedures that must be carried out for standard and full honor funerals, e.g., military escorts, casket bearers, firing parties, music accompaniment, ceremonial guards, and chaplain services. This is considered to be fully equivalent to the overall intent of Level 1-7, which envisions program coordination or development work that extends beyond the routine operational assignments described at Level 1-6.

Level 1-7 is credited (1250 points).

Factor 2, Supervisory controls

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

At Level 2-3, the supervisor assigns specific projects in terms of issues or problems to be studied and sets priorities and deadlines for completing the work. For continuing assignments, the supervisor indicates the overall results expected. The employee plans, coordinates, and carries out the successive steps and resolves work problems without reference to the supervisor in accordance with policies and guides. Completed work is reviewed for conformance with overall requirements and adherence to policy guidelines. Techniques used are not normally subject to detailed review.

At Level 2-4, the supervisor establishes the overall objectives and the level of resources available for the work. Together, the employee and supervisor develop applicable deadlines, projects, and work to be accomplished. The employee is responsible for planning and carrying out the work, resolving conflicts, integrating and coordinating the work with other functions and programs as necessary, and interpreting policy and regulations in terms of established objectives. Completed work is reviewed from an overall standpoint for feasibility, compatibility with other projects, or effectiveness in meeting requirements.

The appellant's work consists of continuing assignments within a defined functional area, and both Levels 2-3 and 2-4 address work of this nature performed with limited supervisory oversight. However, although assignments at Level 2-3 require resolving work problems without reference to the supervisor, assignments at Level 2-4 are more complex and consequently require the exercise of greater and more independent responsibility in resolving conflicts, coordinating with others, and interpreting policy and regulations. The appellant's work is more consonant with Level 2-4 in that it requires a significant amount of independent planning and coordination with parties outside the organization, including detecting and resolving potential scheduling conflicts on his own initiative and providing direct regulatory guidance to others as requested. His work is reviewed only from an overall standpoint for his effectiveness in executing the function efficiently and appropriately.

Level 2-5 is not met. At that level, the supervisor provides administrative direction only, with the employee delegated complete responsibility for independently planning, designing, and directing programs or projects. The appellant does not have the management responsibility implicit at this level.

Level 2-4 is credited (450 points).

Factor 3, Guidelines

This factor covers the nature of the guidelines for the work and the judgment needed to apply them.

The appellant's position meets Level 3-3. At that level, guidelines regularly used include command, bureau, or equivalent level instructions that implement agency policy and locally developed standard operating instructions. Material referenced in the guidelines is not always directly applicable to specific assignments, but precedent cases are generally available. The employee uses judgment in selecting precedents and in interpreting or adapting available guidelines to issues arising in the work.

In the appellant's case, the guidelines covering the work are very detailed and specific as to who is eligible for military honors and how those honors are to be conducted, although there are occasional special requests where the appellant must tailor the honors provided to fit the circumstances, e.g., an escort may be provided for an enlisted person but within the context of standard rather than full honors.

Level 3-4 is not met. At that level, guidelines used include agency policy statements and program directives, Government regulations, and general administrative instructions. Guidelines provide a general outline of the program goals and objectives, but do not detail the methods used to complete work assignments. Work at this level may also include responsibility for developing guidelines for use by specialists at the same or lower levels in the organization.

The guidelines used by the appellant provide a much greater degree of specificity than described at this level. In addition, although the appellant has revised regulations and procedural manuals associated with the funeral honors function, this work has consisted of updating existing

materials to reflect changes in practice or organizational responsibilities determined at higher management levels. In other words, these materials have not included any original or independently-developed procedures or other guidance beyond the requirements established at higher levels. The protocol for the conduct of funeral honors is defined and controlled by other organizations within [department] and is not subject to local modification.

Level 3-3 is credited (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, assignments involve performance of varied duties requiring the use of different and unrelated processes, methods, practices, or criteria. The work involves consideration of such factors as the type of service requested, cost, program needs, lead time required, and applicable regulations and guidelines. Assignments at this level primarily consist of such work as determining the most efficient and economical transportation services for the movement of cargo for an installation.

The appellant's responsibility for scheduling and coordinating funeral honors fully meets this level in that it involves different processes and criteria depending on the type of funeral services requested, the level of funeral honors for which the service member is eligible, and the lead time required for the specific honors being provided. However, this level does not adequately cover the full scope of his other associated responsibilities.

At Level 4-4, assignments consist of a variety of duties and projects involving many different and unrelated functions, processes, and methods that apply to established areas of planning, operations, or management. The work requires making many decisions regarding, for example, making authoritative interpretations of established guidelines. Assignments may include providing staff policy guidance and consultation to installations for a specific program area, or planning and directing the traffic management program for a major field installation or regional area including responsibility for advising program officials on all aspects of transportation operations and requirements and developing operational plans and procedures for the economical and efficient movement of freight, passengers, and personal property.

This level more fully represents the appellant's overall duties and responsibilities. Whereas Level 4-3 is limited to the performance of operating-level work, Level 4-4 introduces the additional element of staff-type program planning, coordination, or management. Beyond the appellant's responsibility for the basic operational activity of scheduling and coordinating funeral honors, he serves in effect as the region's technical administrator for this overall function. He receives all requests for funeral honors within the assigned geographic area, verifies basic eligibility for military honors and the level of those honors, and assigns the services to coordinators in the geographic sub-areas. If a sub-area is unable to provide the requisite personnel for a given service, the appellant acquires representatives from another

[department] unit. He conducts one or two site visits every month and completes a critique sheet of the honors conducted by the assigned military personnel. He fields all problems and complaints associated with the provision (or non-provision) of funeral honors, drafts letters of apology to the family, and arranges for remedial actions, for example, a subsequent memorial service with honors. He is the authoritative source of regulatory guidance within the region as to eligibility for military honors and the exact manner in which those honors are to be carried out. He prepares updates and revisions of funeral honor manuals with detailed instructions on how these honors are to be executed. He provides [department]-wide coordination for the preparation of condolence letters and the death notification process. These responsibilities extend beyond the operational assignments described at Level 4-3 and align the position with Level 4-4.

Level 4-4 is credited (225 points).

Factor 5, Scope and effect

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

At Level 5-3, the purpose of the work is to resolve a variety of conventional problems, questions, or situations. For example, the employee may plan, monitor, and coordinate use of the organization's established transportation systems or modes or develop detailed guidelines to supplement established procedures. The results of the work primarily affect the organization's ability to meet local transportation requirements, although some priority transportation requirements may affect operations at other locations.

Similarly, the purpose of the appellant's work is to schedule, coordinate, and monitor the provision of funeral honors for [department] funerals at national, State, base, or private cemeteries throughout the [city] metropolitan region; to resolve associated problems such as scheduling conflicts or errors; and to update manuals and other guidelines to conform to [department] regulations and current practices. The work directly affects [department]'s ability to fulfill its obligations in regard to the provision of funeral honors to eligible veterans within the assigned area.

At Level 5-4, the purpose of the work is to plan, develop, and implement traffic management projects or programs of considerable breadth and complexity. For example, the employee may plan and manage an installation's program for transporting a wide range of commodities to destinations within the country or for overseas shipment; evaluate assigned functions and operations in a range of subordinate activities and installations; or develop general policy and guidelines for an assigned area.

The appellant's work is more limited geographically than described at this level in that he coordinates activities throughout the [city] area only. Also, he does not plan and develop *programs* in the sense intended at this level but rather executes well-established *processes*.

Level 5-3 is credited (150 points).

Factor 6, Personal contacts
and
Factor 7, Purpose of contacts

Persons contacted

This factor includes face-to-face contacts and telephone dialogue with persons not in the supervisory chain.

The appellant's position meets Level 2. At that level, contacts are with employees and supervisors of the same agency, but outside the immediate office, and with persons outside the agency in a moderately structured setting, such as exchanges of information by phone.

The appellant has a wide range of contacts throughout various [department] components and with private cemetery officials and family members of deceased [department] personnel, as is typical of Level 2.

Level 3 is not met, where contacts are with employees and representatives of other Federal agencies and/or private industry where the individuals contacted vary according to the situation involved, and contacts with high ranking program officials of the same agency several managerial levels removed from the employee when such contacts occur on an ad-hoc basis.

The appellant has regular contacts with staff at [cemetery], which is under Department of the Army jurisdiction, but these contacts are repetitive and do not vary in terms of either the persons or the situations involved. Similarly, the appellant has direct contact with high-ranking military officers tasked as escort commanders, but these contacts are for highly structured purposes, i.e., explaining the protocol to be followed in participating in the provision of funeral honors.

Purpose of contacts

The personal contacts that serve as the basis for the level selected for this factor must be the same as the contacts that are the basis for the level selected for Factor 6.

The appellant's position meets Level b, where contacts are to provide advice to managers and program officials on noncontroversial issues and problems and include identifying alternatives and recommendations for resolving problems.

The appellant's contacts are primarily to provide coordination of services, to advise others on regulatory requirements, and to resolve problems that arise during the conduct of funerals.

Level c is not met, where contacts are to influence and motivate managers to accept recommendations and require skill and judgment in overcoming resistance due to such issues as organizational conflict, competing resources, or resource problems.

The appellant's work involves the execution of clear-cut procedures where the actions to be taken are clearly established by policy and regulation. The nature of the work does not involve making subjective types of recommendations to management nor does it require overcoming organizational resistance or resolving resource problems.

Level 2b is credited (75 points).

Factor 8, Physical demands

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

The appellant's position matches Level 8-1 (the only level described for this factor), where the work is sedentary, requiring no special physical effort.

Level 8-1 is credited (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.

The appellant's position matches Level 9-1 (the only level described for this factor), which describes a typical office environment with adequate light, heat, and ventilation.

Level 9-1 is credited (5 points).

Summary

Factors	Level	Points
Knowledge required by the position	1-7	1250
Supervisory controls	2-4	450
Guidelines	3-3	275
Complexity	4-4	225
Scope and effect	5-3	150
Personal contacts/Purpose of contacts	2b	75
Physical demands	8-1	5
Work environment	9-1	<u>5</u>
Total		2435

The total of 2435 points falls within the GS-11 point range (2355-2750 points) on the grade conversion table provided in the standard.

Decision

The appellant's position is properly classified as GS-301-11 with the title at agency discretion.