

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

Appellant: [name]

Agency classification: Administrative Resource Coordinator
GS-301-12

Organization: [name] Regional Office
U.S. Small Business Administration
[location]

OPM decision: (Title at agency discretion)
GS-301-12

OPM decision number: C-0301-12-08

Judith A. Davis for

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

January 25, 2010

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, 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).

Decision sent to:

[appellant name and address]

[name]

Supervisory, HR Specialist
U.S. Small Business Administration
Office of Human Capital Management
Personnel Services Division – [name]
[location]

Assistant Administrator for Personnel
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Introduction

The Atlanta Oversight and Accountability Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal on June 22, 2009, from [name]. Her position is currently classified as Administrative Resources Coordinator, GS-301-12, and located in the [name] Regional Office, U.S. Small Business Administration (SBA), in [location]. She requests her position be upgraded to the GS-13 level. We received the complete appeal administrative report on August 23, 2009. We accepted and decided this appeal under section 5112 (b) of title 5, United States Code (U.S.C.).

General Issues

The appellant makes various statements about her agency and its evaluation of her position. In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of her position. By law, we must make that decision solely by comparing her current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison. Because our decision sets aside all previous agency decisions, the appellant's concerns regarding her agency's classification review process is not germane to this decision.

The appellant believes she should receive back pay at the GS-13 grade level. However, the U.S. Comptroller General states that an "...employee is entitled only to the salary of the position to which he is actually appointed, regardless of the duties performed. When an employee performs the duties of a higher-grade level, no entitlement to the salary of the higher grade exists until such time as the individual is actually promoted.... Consequently, back pay is not available as a remedy for misassignments to higher level duties or improper classifications." (CG decision B-232695, December 15, 1989). The Back Pay Act (5 U.S.C. 5596(b)(3)) bars back pay for periods of misclassification.

The appellant mentions her personal qualifications, including human resources background and years of professional knowledge in the Federal service. Qualifications are considered in classifying a position to the extent they are required to perform current duties and responsibilities. Therefore, we have considered the appellant's personal qualifications only insofar as they are required to perform her current duties and responsibilities. To the extent needed for this purpose, we carefully considered them along with all other information furnished by the appellant and her agency, including her official position description (PD).

The appellant is assigned to PD number ARC12401, a standardized PD, which she agrees is generally accurate. In her appeal rationale, she proposed such modifications as changing the general reference to regional office to Region IV. A PD does not have to be a comprehensive and detailed narrative of the position's duties and responsibilities or of its work methods, processes, and tools. 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. Based on these criteria, we find the appellant's PD is adequate for

classification purposes and meets PD standard of adequacy discussed in section III.E of the *Introduction*.

A PD is the official record of the major duties and responsibilities assigned to a position or job by an official with the authority to assign work. A position represents the work which is 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 based on the actual duties and responsibilities currently assigned by management and performed by the employee. An OPM appeal decision classifies a real operating position and not simply the PD. Therefore, this decision is based on the work currently assigned to and performed by the appellant.

In reaching our decision, we have carefully reviewed all information furnished by the appellant and the agency, information obtained from on-site job audit interview with appellant on September 30, 2009 and telephone interview conducted with the acting first-level supervisor on December 8, 2009. The second-level supervisor certified the accuracy of the PD because the first level supervisory position is vacant. The acting supervisor, who serves at a different work location, declined to certify PD accuracy because he has only supervised the appellant since January 2009. We find the PD of record contains the major duties and responsibilities assigned to and performed by the appellant, and we incorporate it by reference into our decision.

Position information

The mission of SBA is to help small businesses start, grow, and succeed. SBA administers loan-guarantee programs, provides business education, works to expand contracting opportunities, assists in recovering from disasters and represents small business interests before Congress and Federal agencies. SBA administers two business assistance programs for small disadvantaged businesses (SDB). These programs are the 8(a) Business Development Program and the Small Disadvantage Business Certification Program. The 8(a) program offers a broad scope of assistance to socially and economically disadvantaged firms; SDB certification strictly pertains to benefits in Federal procurement, and 8(a) company firms automatically qualify for SDB certification.

The 8(a) program is SBA's effort to promote equal access for socially and economically disadvantaged individuals to participate in the business sector of the nation's economy. Socially and economically disadvantaged individuals include African Americans, Hispanic Americans, Native Americans, Asian Pacific Americans, and Subcontinent Asian Americans. This program has become an essential instrument for helping socially and disadvantaged entrepreneurs gain access to the economic mainstream of American society. SBA helps thousands of aspiring entrepreneurs to gain a foothold in government contracting. There are two phases of participation, a 4-year developmental stage and a 5-year transition stage.

A requirement by program goals is for 8(a) firms to maintain a balance between their commercial and government business. There is a 100 million dollar value of sole-source contracts that an individual participant can receive while in the program, and the overall goal is to graduate firms that will go on to thrive in a competitive business environment.

Therefore, SBA district offices are statutorily required to monitor and measure the program of participants through annual reviews, business planning, and systematic evaluations. The 8(a) participant may take advantage of specialized business training, counseling, marketing assistance, and high level executive development provided by SBA.

The 7(j) Training and Development program authorizes SBA to enter into grants, cooperative agreements or contracts with public or private organizations to pay all or part of the cost of technical management assistance for individuals or businesses eligible for 8(a) contracts. Through the use of private sector providers, SBA provides a wide variety of management and technical assistance to eligible individuals to meet specific needs, including counseling and training in financing, management, accounting, bookkeeping, marketing, and business operations.

The Office of Field Operations (OFO) represents the SBA field offices at Central Office (CO). OFO provides policy guidance and oversight to regional administrators (RA) and district directors (DD) by implementing agency goals and objectives, and by solving problems in specific operational areas. OFO establishes and monitors performance goals for the districts; serves as liaison and expedites issues for the regions and districts in dealing with CO; coordinates the presentation of field views regarding CO; and organizes reviews of field offices. There are 10 regional offices (RO) and 68 district offices (DO) within SBA. Each RO maintains oversight responsibility and ensures the goals and objectives of the agency are met on a consistent basis by the DO within its boundaries. The DOs are the point of delivery for most SBA programs and services, and work with SBA resources partners, other partners and intermediaries to accomplish the SBA mission. Each DO is led by a DD (GS-15) with a subordinate staff size ranging from 10 to 22 employees.

DOs are staffed with an Administrative Officer (AO), GS-341-11, position in small districts and a Business Development Specialist (BDS), GS-1101-12, position in larger, more complex districts. This position serves as the initial point of contact on all administrative requirements of the DO. The AO advises management on planning, developing, and executing SBA programs. The AO conducts studies concerned with the efficiency and effectiveness of administrative program operations, e.g., budget, procurement, information resource management and human resources, which serve to facilitate line or program operations, and coordinates procurement, property management, space and layout, and other related services.

Unlike the AO position, the paramount duty of the BDS is to assist the DD in negotiating funding, explaining the full range of SBA products, providing information on program requirements, and referring clients to SBA divisions and partners for formal review of financial statements and business documents. This position also performs the full range of administrative tasks performed by the AOs. The BDS takes the lead in obtaining resources and services needed to manage and operate the DO, as well as advising managers on their use. AOs and BDSs work with and receive technical guidance from the appellant as necessary.

The [name] RO oversees and manages the 9 DOs. The RO is staffed with a RA (GS-15), a Regional Communications Director (GS-13), and the appellant's position. The appellant performs a mixture of administrative work such as performing administrative studies and

projects 55 percent of the time; advising and assistance to regional managers and staff regarding administrative and payroll matters 35 percent of the time; and coordinating activities for the regional office staff 10 percent of the time.

The appellant's projects include determining space requirements; conducting work flow analyses, methods and procedures analyses, and loan program/goal analyses, workforce utilization studies, management surveys, communication analyses, and methods and procedures analyses using standard operating procedures (SOP); and performing marketing, outreach and liaison activities. She evaluates complex program issues concerning the delivery of programs, products, and services. She determines methodologies and tools for these analyses, conducts evaluations, develops recommendations, and follows through to ensure appropriate implementation. She coordinates with field managers and CO on the implementation of administrative policies, program initiatives and operational procedures. She works with the RA to coordinate efforts with the DDs to develop region-wide strategies to deliver SBA program services to community organizations in associated markets. She interacts with senior Government officials and high-level representatives of other organizations, and works with local and national community-based organizations.

The appellant coordinates with DDs in administering annual 8(a) business development program reviews, ensuring reviews are completed in a timely fashion, and reporting review status to the OFO. The appellant receives reports from each DO on a weekly basis, and when questions arise, she deals directly with the DDs to resolve issues and discrepancies. She monitors the programs and ensures statutory requirements are adhered to. The appellant monitors the completion of annual reviews based on spreadsheets submitted from CO, with input from DOs, and ensures master reports are consolidated and returned to CO. When questions arrive from CO, the appellant coordinates with DOs, troubleshoots coding and other errors, and assists with correcting reporting errors and issues and reports back to CO.

The appellant serves as central point of contact and works with the DOs, OFO, and training vendors to determine appropriate training courses best suited for the needs of firms authorized to use SBA's 7(j) Training and Development program. This program authorizes SBA to provide grants, enter into corporative agreements, or contracts with public or private organizations to pay all or part of the cost of technical management assistance for individual or businesses eligible for 8(a) contracts. The appellant coordinates with DOs to determine course availability, location, and date, and to clarify and recommend class assignments and adjustments. After coordinating course selections, she develops master spreadsheets and submits them to vendors and the field operations coordinator in CO.

The appellant advises DDs and AOs on all administrative functions, and serves as the primary point of contact with and OFO on regional administrative matters. She is the regional lead for such administrative programs as: Joint Accounting and Administrative Management System (JAAM)s - Oracle Financial and Budget; Electronic Travel System (E2 Travel); and the Electronic Performance Management System (GoalOwner). As the primary point of contact for JAAMs, the appellant advises supervisors and employees regarding the functionality of the program. She oversees and monitors budget allocations and the processing of purchases and travel expenses. She was a member of the pilot group which worked with the SBA

Denver Financial Center to develop the processes and applications for the system. She led training conference calls with AOs within the region to familiarize each with and train them on proper use of the system. The appellant helps DDs interpret the JAAMs screens to determine office expenditures, funding availability, etc. The appellant travels to DOs to provide one-on-one training for newly appointed AOs, and she also participates on and occasionally chairs monthly conference calls held with the nine regional lead JAAMs users and the Denver Financial Center staff.

As primary point of contact for the region's E2 Travel program, the appellant helps users initiate travel arrangements and process travel vouchers. Prior to the deployment of the program SBA-wide, the appellant served as a pilot user for six months. She conducted user training for AOs/BDSs through Website and telephone conferencing systems. When users have problems with the program, the appellant intervenes, troubleshoots, and resolves program issues and concerns.

The appellant serves as SuperUser for the region's GoalOwner computer system. This system establishes the performance management standards for SBA. The appellant guides and assists with system operations and trains DDs and AOs on system operations. When problems or issues arise, the appellant intervenes and resolves them. She also made recommendations adopted by Acting RA and utilized by other district offices.

Series and title determination

The agency allocated the appellant's position to the GS-301 series which covers nonprofessional, two-grade interval work for which no other series is appropriate, and constructed the title of Administrative Resource Coordinator as provided in the *Introduction to the Position Classification Standards, Section III.H.2.*. The appellant does not disagree. We find the appellant performs a mixture of analytical administrative work classifiable to the Administrative Officer Series, GS-341, and line-program support work typical of several series no one of which is primary and paramount. Therefore, we find the position is properly allocated to the GS-301 series, with titling at the agency's discretion.

Grade and standard determination

There are no published grade-level criteria for the GS-301 series. The position is properly evaluated by application of the criteria contained in the Administrative Analysis Grade Evaluation Guide (AAGEG). The AAGEG provides grade level criteria for non-supervisory staff, administrative, analytical, planning, and evaluative work, at grade GS-9 and above. The work covered by the AAGEG is administrative in nature and does not require specialized subject matter knowledge and skills. While such work does not require specialized educational preparation, it does require a high degree of qualitative and/or quantitative analytical skills, the ability to research problems and issues, written and oral communication skills, and the application of mature judgment in problem solving. Typical positions covered by the AAGEG require knowledge of: (1) the overall mission, functions, and organization of the agency or component; (2) the principles, functions, and processes of management and the organization of work; (3) agency program operations, processes, goals, and objectives; and (4) evaluative,

planning, and analytical processes and techniques (quantitative and qualitative). Knowledge is applied in a staff advisory capacity to line management in support of planning, development, and execution of agency programs; the administrative management of agencies and their component organizations; or the performance of related functions requiring comparable knowledge and skills.

This AAGEG is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are assigned for each of 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.

Using the AAGEG, the agency credited Levels 1-7, 2-4, 3-4, 4-4, 5-4, 6-3, 7c, 8-1, and 9-1. The appellant believes her position should be evaluated at Levels 1-8 and 2-5. After careful review of the record, we concur with the crediting of the undisputed factor levels and will limit further evaluation to those factor levels in dispute.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of information an employee must understand in order to do the work, and the skills needed to apply that knowledge. The appellant believes this factor should be evaluated at Level 1-8 because it requires expert knowledge of the administrative functions she performs and SBA program goals.

At Level 1-6, employees require skill in applying analytical and evaluative techniques to the identification, consideration, and resolution of issues or problems of a procedural or factual nature. The issues or problems deal with readily observable conditions (e.g., office or shop layout, work-flow, or working conditions), written guidelines covering work methods and procedures such as performance and production standards, and information of a factual nature (e.g., number and type of units actually produced or capability of equipment). This level includes knowledge of the theory and principles of management and organization, including administrative practices and procedures common to organizations, such as those pertaining to areas of responsibility, channels of communication, delegation of authority, routing of correspondence, filing systems, and storage of files and records. Assignments typically involve using qualitative and quantitative analytical techniques such as: literature search; work measurement; task analysis and job structuring; productivity charting; determining staff to workload ratios (e.g., span of control); organization design; space planning; development and administration of questionnaires; flowcharting of work processes; graphing; and calculation of means, modes, standard deviations, or similar statistical measures. Assignments require skill in conducting interviews with supervisors and employees to obtain information about organizational missions, functions, and work procedures.

In contrast, at Level 1-7 the employee is required to apply knowledge and skill in applying analytical and evaluative methods and techniques to issues or studies concerning the efficiency and effectiveness of program operations carried out by administrative or professional personnel, or substantive administrative support functions (i.e., internal activities or functions such as supply, budget, procurement, or personnel which serve to facilitate line or program operations). This level includes knowledge of pertinent laws, regulations, policies, and precedents which affect the use of program and related support resources (people, money, or equipment) in the area studied. Projects and studies typically require knowledge of the major issues, program goals and objectives, work processes, and administrative operations of the organization.

Knowledge at Level 1-7 is used to plan, schedule, and conduct projects and studies to evaluate and recommend ways to improve the effectiveness and efficiency of work operations in a program or support setting. The assignments require knowledge and skill in adapting analytical techniques and evaluation criteria to the measurement and improvement of program effectiveness and/or organizational productivity. Knowledge is applied in developing new or modified work methods, organizational structures, records and files, management processes, staffing patterns, procedures for administering program services, guidelines and procedures, and automating work processes for the conduct of administrative support functions or program operations.

Level 1-7 is minimally met. While regional in scope, the appellant's administrative programs are constrained by the limited size of the regional staff; i.e., less than 200 people. The individual internal administrative program studies conducted by the appellant deal with organizational issues which, like Level 1-6, are primarily factual in nature. For example, DO space or work utilization studies for staffs of 10 to 22 people, by their very nature, do not require or permit the application of the more complex quantitative and qualitative methods and techniques or development of the scale and complexity of plans found at Level 1-7. However, as the primary point of contact and lead for the Region on all SBA administrative matters, the appellant uses a thorough knowledge of SBA administrative laws, policies, regulations, and precedents applicable to a wide range of Federal administrative programs: budget management, procurement, human resources administration, property management directives, space management, travel and records management. This requires her to apply knowledge of SBA's SOPs; Federal acquisition regulations, 5 CFR, 13 CFR, and 41 CFR, Comptroller General decisions, union contracts, JAAM/Oracle payroll system; E2 Travel program; and GoalOwner performance management program required to support regional operations. Thus, the appellant's multi-program responsibilities exceed the scope of work and require application of a higher level of knowledge and skill than found at Level 1-6. Comparable to Level 1-7, the appellant serves as a member of a special project team for the 5-year strategic plan for the region. The appellant uses her knowledge of SBA programs, strategic goals, and budget authorizations, then reviews and analyzes district plans to assist in developing regional plans. Typical of work at this level, she helped develop the regional office Continuity of Operations/Business Resumption Plan for emergency management. Like work at Level 1-7, the appellant conducts studies, analyzes findings, and makes recommendations on the full range of administrative and substantive operating programs. For example, the appellant exercised her knowledge of pertinent laws, regulations, policies and procedures to assist the RO and resolved a space management crisis within a building location by recommending the best way to proceed in order to achieve a more

positive outcome and maximize SBA facility, security, and client services requirement, which is reflective of Level 1-7 assignments.

At Level 1-8, the employee exercises knowledge at the expert analyst level and has mastered the application of a wide range of quantitative and/or qualitative methods for the assessment and improvement of program effectiveness or the improvement of complex management processes and systems. In addition to knowledge of the next lower level, this level requires comprehensive knowledge of the range of administrative laws, policies, regulations, and precedents applicable to the administration of one or more important public programs. Typically, this includes knowledge of agency program goals and objectives, the sequence of timing of key program events and milestones, and methods of evaluating the worth of program accomplishments. Work requires knowledge of relationships with other programs and key administrative support functions within the employing agency or in other agencies.

Knowledge characteristic of Level 1-8 is applied in a variety of ways. For example, knowledge may be applied in preparing recommendations for legislation to change the way programs are carried out; in evaluating the content of new or modified legislation for projected impact upon agency programs and resources; and/or in translating basic legislation into program goals, actions, and services. Comprehensive management studies conducted at Level 1-8 are extremely broad and so difficult to determine in advance that the actual limits of the project are developed as the study proceeds. Study objectives deal with management problems characterized by their breadth, importance and severity for which previous studies and established management techniques are frequently inadequate. Illustrative of such work is applying expert knowledge of analytical and evaluative methods plus a thorough understanding of how regulatory or enforcement programs are administered to select and apply appropriate program evaluation and measurement techniques in determining the extent of compliance with rules and regulations issued by the agency, or in measuring and evaluating program accomplishments. This may include evaluating the content of new or modified legislation for projected impact upon the agency's programs or resources.

Level 1-8 is not met. Level 1-8 is creditable to positions with much broader program responsibilities than those assigned to and performed by the appellant. In contrast to conducting studies geared to significantly change, interpret, and develop important public policies or programs, the appellant works at the agency program-delivery level carrying out programs formulated and controlled by OFO and SBA CO. It is these agency components which translate basic legislation into program goals, actions and services found at Level 1-8. Level 1-8 is applicable to positions which develop new programs or perform equivalent functions, not those which participate in pilots and help implement those new programs as the appellant states. Unlike Level 1-8, the appellant's studies are defined by established program requirements, e.g., monitoring DO progress in meeting defined program goals. Special studies tasked by CO are formulated by CO staff and not the appellant who functions under CO control and direction. Given the limited size of the regional staff and organizational structure, and the direction and control of substantive agency programs from CO, the appellant's work situation neither provides the opportunity for nor permits her to develop, implement, and control the broad, undefined studies conducted at Level 1-8. The appellant's regular and recurring duties do not require nor

permit her to develop new program policy, comprehensive guidelines, or major new systems characteristic of Level 1-8. Therefore, we credit this factor at Level 1-7 (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 2-4, within a framework of priorities, funding and overall project objectives (e.g., cost reduction, improved effectiveness and efficiency, better workload distribution, or implementation of new work methods), the employee and supervisor develop a mutually acceptable project plan which typically includes identification of the work to be done, the scope of the project, and deadlines for its completion. Within the parameters of the approved project plan, the employee is responsible for planning and organizing the study, estimating costs, coordinating with staff and line management personnel, and conducting all phases of the project. This frequently involves the definitive interpretation of regulations and study procedures, and the initial application of new methods. The employee informs the supervisor of potentially controversial findings, issues, or problems with widespread impact. Completed projects, evaluations, reports, or recommendations are reviewed by the supervisor for compatibility with organizational goals, guidelines, and effectiveness in achieving intended objectives.

Level 2-4 is met. The appellant works independently in planning and carrying out work assignments, providing advice to regional staff, supervisors and employees on such matters as training, career development, preparing performance elements and standards, and other human resources and administrative functions. She deals directly with CO, OFO staff, and other program offices with respect to receiving and performing projects. Though the appellant independently performs her assignments and coordinates directly with CO, the RA oversees all special studies and projects and monitors work for accomplishment of objectives, for overall effectiveness of work products, compatibility with regional goals and guidelines, and effectiveness in achieving intended objectives.

At Level 2-5, as a recognized authority in the analysis and evaluation of programs and issues, the employee is subject only to administrative and policy direction concerning overall project priorities and objectives. At this level, the employee is typically delegated complete responsibility and authority to plan, schedule, and carry out major projects concerned with the analysis and evaluation of programs or organizational effectiveness. The employee typically exercises discretion and judgment in determining whether to broaden or narrow the scope of projects or studies. Analyses, evaluations, and recommendations developed by the employee are normally reviewed by management officials only for potential influence on broad agency policy objectives and program goals. Findings and recommendations are normally accepted without significant change.

Factor 2 is designed to measure not only the degree of independence with which the employee operates, but also the *extent of the responsibility* inherent in the assignment. Within this context, implicit at Level 2-5 is a significant degree of *program management* responsibility, i.e., authority over the use of funds and personnel. The employee is responsible not only for individual

performance of certain assigned tasks, but also for the overall conduct of a broader program or function. This program or function must be of sufficient size and scope to permit the implementation of new systems or projects requiring consideration of funding and staffing needs.

Unlike Level 2-5, the appellant's administrative and other program functions are controlled by OFO and other CO staff. It is these offices which control the implementation of new systems or projects and who directly affect the broad SBA programs as contemplated at Level 2-5. As discussed previously, the limited size and scope of the regional staff, including limited DOs, limits the scope and complexity of the appellant's program functions. This, in turn, precludes the appellant from routinely having to control the scope of funding and staff envisioned at Level 2-5. Although the appellant works independently, she has not been delegated the full scope of both technical and program authority required to credit Level 2-5. Therefore, Level 2-4 (450) points is assigned.

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-7	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-4	450
4. Complexity	4-4	225
5. Scope and effect	5-4	225
6. Personal contacts and		
7. Purpose of contacts	3-c	180
8. Physical demands	8-1	5
9. Work environment	9-1	<u>5</u>
Total		2790

The total of 2790 points falls within the GS-12 range (2755-3150 points) on the grade conversion table for the standard.

Decision

The appealed position is properly classified as (Title at agency discretion), GS-0301-12.