

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

Appellant: [name]

Agency classification: Administrative Officer
GS-341-11

Organization: Office of Human Resources
[agency]
[city & State]

OPM decision: GS-303-6
Title to be determined by agency

OPM decision number: C-0303-06-16

J. Sumberg for Ana A. Mazzi

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

1/6/2011

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 conditions and time limits specified in the *Introduction to the Position Classification Standards (Introduction)*, appendix 4, section G (address provided in appendix 4, section H).

Since this decision lowers the grade of the appealed position, it is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The applicable provisions of parts 351, 432, 536, and 752 of title 5 CFR must be followed in implementing this decision. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented. 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 to the OPM office which accepted the appeal.

Decision sent to:

[appellant]

[servicing human resources officer]

Introduction

On June 29, 2010, the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who occupies the position of Administrative Officer, GS-341-11, in the Office of Human Resources (OHR) at the [agency] in [City & State]. She requested her position be classified as Program Analyst, GS-560-12, or Financial Analyst, GS-501-12. We accepted and decided this appeal under the provisions of section 5112 of title 5, United States Code (U.S.C.)

General issues

The appellant submitted with her appeal copies of several vacancy announcements for GS-12 and GS-13 positions at other Federal agencies which she believes are similar to her position. We may not consider these in our evaluation of her position because by law, we must classify positions solely by comparing their current 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 others which may or may not be correctly classified as a basis for deciding her appeal. We also note that duties described in a vacancy announcement are often abbreviated and not necessarily reflective of the overall scope and responsibilities of the advertised position, thus any similarities in duties may be merely superficial.

In reaching our classification decision, we have carefully reviewed all information furnished by the appellant and her agency, including her official position description (PD) #H6825. This PD, and specifically its description of the appellant's major duties and responsibilities, is basically accurate and adequate for classification purposes. The appellant takes exception to the wording in the PD under factors 5, 6, and 7. Since this wording is largely interpretive in nature, we base our decision on our own analysis of the various factor levels as they relate to the work being performed by the appellant.

Position information

The appellant provides a variety of administrative support services to the OHR. The staffing chart provided in the agency administrative report shows the OHR as an organization of 38 employees composed of four components (the Office of the Director and three teams for personnel operations; partnership, policy, and workforce performance; and training and employee development.)

The appellant assists in the budget preparation process by obtaining and consolidating projected program requests and costs from the program managers, the [agency] health unit, and the U.S. Department of Labor (i.e., for unemployment benefit and workers compensation estimates), putting the consolidated budget in the proper format for approval by the office director and forwarding to the budget office. She subsequently maintains and tracks budget expenditures for the acquisition of personal goods and services, travel, and training in the agency's Momentum financial management system, ensures sufficient availability of funds, and briefs the supervisor and other program managers on their expenditures and the status of funds quarterly or upon request. She ensures that expenditures have been properly posted and processed in the system and reconciles discrepancies as necessary. She continually reviews open training and travel

obligations and follows up with the appropriate offices within established time frames to request that remaining balances be deobligated or cancelled as necessary. She conducts the year-end close-out of prior and current year contracts, purchase orders, training and travel obligations by reviewing unliquidated obligations and contacting vendors, contractors, and staff to obtain final invoices or travel vouchers to ensure all payments have been made before close-out. She is designated as the Contracting Officers Technical Representative for the agency's Flexible Spending Account, which involves reviewing invoices to ensure they reflect the correct number of agency enrollees and generating the corresponding purchase orders. The appellant reported that these budget-related duties comprise approximately 40-45 percent of her time.

The appellant is responsible for processing all requisitions for supplies and services for the OHR (e.g., furniture, equipment, office supplies, temporary services, office movers, etc.), including reasonable accommodation requests (e.g., ergonomic furniture, readers, etc.) She makes the purchases via credit card and posts the expenditures directly into the Momentum system. For expenditures related to training and interpretation services, other staff members have credit cards and can also post charges directly to those accounts, but the appellant is responsible for monitoring account balances and reconciling posted charges against invoices as they are received. The appellant reported that these purchasing duties comprise approximately 40-45 percent of her time.

The appellant reported that she spends the remainder of her time on various other administrative duties. These include inputting contracts into the Momentum system and forwarding them to the procurement office for processing; conducting inventories of office equipment and preparing the annual fixed asset report; consolidating the program managers' input for the annual Federal Managers Financial Integrity Act (FMFIA) report; and coordinating the acquisition of services (such as carpet cleaning, lock changes, etc.) with appropriate personnel in the agency.

Series and title determination

The appellant's position is not correctly classified to the GS-341 Administrative Officer Series. This series includes positions in which the employee is responsible for providing or obtaining a variety of management services essential to the direction and operation of an organization. This would appear to superficially describe the work performed by the appellant. However, the paramount qualifications required by this series are extensive knowledge and understanding of management principles, practices, methods, and techniques, and skill in integrating management services with the general management of an organization. The performance of work covered by this series requires a high order of analytical ability in performing such typical duties as: helping management to identify its financial, personnel, and material needs and problems; developing budget estimates and justifications and making sure that funds are used in accordance with the operating budget; counseling management in developing and maintaining sound organization structures, improving management methods and procedures, and seeing to the effective use of staff, money, and materials; collaborating with personnel specialists in finding solutions to management problems arising out of changes in work which have an impact on jobs and employees; and advising on and negotiating contracts, agreements, and cooperative arrangements with other government agencies, universities, or private organizations.

The GS-341 series is a two-grade interval series and the above duties are typical of work otherwise performed within the parameters of the corresponding two-grade interval occupation-

specific series, such as the GS-560 Budget Analysis Series, the GS-1102 Contracting and Procurement Series, the GS-343 Management and Program Analysis Series, and the GS-201 Human Resources Series. Thus, in order for the appellant's position to be classified to the GS-341 series, she would have to be performing some combination of duties comparable to these or other two-grade interval series in the administrative occupations. Since the majority of her work consists of budget-related and procurement-related duties, the issue therefore is whether this work is two-grade or one-grade interval in nature.

Guidance on distinguishing between two-grade interval administrative series and one-grade interval support series is contained in *The Classifier's Handbook*. Generally speaking, support work usually involves proficiency in one or more functional areas or in certain limited phases of a specific program. Employees who perform support work follow established methods and procedures. Support work can be performed based on a practical knowledge of the purpose, operation, procedures, techniques, and guidelines of the specific program area or functional assignment. Administrative work, on the other hand, requires a high order of analytical ability combined with a comprehensive knowledge of the functions, processes, theories, and principles of management, the methods used to gather, analyze, and evaluate information, skill in applying problem solving techniques, and skill in communicating effectively both orally and in writing. In other words, the primary skill requirements of administrative work are not the ability to carry out established processes and procedures, but rather to analyze a given issue or case assignment to ascertain the facts and determine the actions necessary; to conduct research, identify options, and determine regulatory requirements; and to prepare written products and explain or defend findings and conclusions.

Within this context, the GS-560 Budget Analysis Series covers positions that perform or advise on work in any of the phases of budget administration (i.e., budget formulation, presentation/enactment, and execution) when that work requires knowledge of and skill in applying budget-related laws, regulations, policies, precedents, methods, and techniques. These budget phases are described as follows:

Budget formulation is the process of preparing detailed analyses and estimates of annual funding needs for one or more future budget years. This involves gathering, comparing, and correlating information about projected costs of current and future programs and activities; determining costs and benefits of different levels of program operations; putting the recommended budget for the desired level of program operations into a format consistent with existing legislative and regulatory guidance; and providing extensive written justification for proposed requests for funds to the Office of Management and Budget (OMB).

Budget presentation/enactment is the process of review, discussion, and concurrence as Congress considers requests for appropriations. This involves presenting budget requests to fund-granting and reviewing authorities, such as OMB; briefing agency officials on testimony to be given in formal Congressional budget hearings; or testifying as an expert witness on behalf of the requested budget.

Budget execution is the phase during which OMB makes funds in the approved fiscal year budget available to agencies to carry out their missions, functions, and programs on a time-phased basis through the apportionment process. This involves submitting formal written requests to Congress to obtain apportionment; controlling obligation and expenditure of funds

available through a distribution of allotments and sub-allotments distributed on a time-phased, project, or other basis; and monitoring and controlling the use of agency funds, including ensuring that obligations incurred and the resulting expenditures of funds are in accordance with existing laws and regulations.

Budget analysts who work in components where missions and programs are carried out (i.e., in program offices rather than budget offices) advise line managers on requirements for the preparation, documentation, and submission of budget requests and perform these duties: analyzing the relative costs and benefits of alternative program plans; preparing allotments and sub-allotments of funds for distribution to program managers; checking the propriety of obligations and expenditures; and providing guidance concerning the legal and regulatory aspects of the acquisition and use of funds for program and administrative purposes.

The appellant's budget-related duties do not involve the types of analytical processes described above and are not otherwise synonymous with the two-grade interval GS-560 series. In terms of budget formulation, she does not personally prepare analyses and estimates of annual funding needs, including gathering and comparing information about projected costs of current and future programs, determining costs and benefits of different levels of program operations, or preparing written justifications for proposed requests. Rather, she is provided information on program costs and requests and the associated written justifications by the program managers. She does not subject this information to any significant depth of analysis beyond requesting documentation for budget increases or new programs. In short, she collects budget estimates and justifications from others and compiles the material into a consolidated budget request. In terms of budget execution, she does not determine the distribution of allotments and sub-allotments, nor is she responsible for determining whether obligations and expenditures are in accordance with law and regulations. Rather, her work is confined to monitoring the expenditure of funds and ensuring that open obligations are closed out by requesting supporting invoices or vouchers.

This work is likewise not associated with the two-grade interval GS-501 Financial Administration and Program Series. This series covers positions that perform administrative work of a fiscal, financial management, accounting, or budgetary nature that is not classifiable to another more specific two-grade interval professional or administrative series in the GS-500 Accounting and Budget Group. The appellant's position is not classifiable to this series because her duties cannot be construed as two-grade interval administrative work within the context of the GS-500 occupational group. Her primary duties consist of keeping track of expenditures and closing out open obligations by requesting supporting invoices and vouchers. This is a procedural rather than an analytical function in that it does not involve developing cost analyses, distributing allotments on a time-phased or other basis, or authorizing expenditures and the discretionary use of funds based on interpretations of law and regulations. Rather, it involves carrying out established processes and procedures based on a practical knowledge of requirements and is characteristic of the one-grade interval work covered by the GS-561 Budget Clerical and Technician Series. This series includes positions that involve performing clerical or technician work in support of budget analysis and administration when such work requires primarily practical knowledge and skill in the application of administrative rules, regulations, and procedures associated with recording, reporting, processing, and keeping track of budgetary transactions, e.g., the credit, receipt, transfer, allotment, withdrawal, obligation, or outlay of funds. Budget clerks and technicians maintain ledgers. Some positions are concerned with salary and administrative expenses that require less sophisticated record-keeping techniques.

They participate in the budget formulation process by compiling, consolidating, checking, and arranging funding data in requests to cover annual operating expenses, and may submit organizational funding requests in proper format through channels for inclusion in the budget request prepared at higher levels in the agency. This basically describes the work performed by the appellant.

The appellant's procurement-related duties are not classifiable to the two-grade interval GS-1102 Contracting and Procurement Series. This series includes positions that manage, perform, or develop policies and procedures for professional work involving the procurement of supplies, services, construction, or research and development using formal advertising or negotiation procedures; the evaluation of contract price proposals; and the administration or termination and close out of contracts. Specifically excluded from this series are positions responsible for the purchase of products or services through the use of simplified purchase procedures, such as imprest fund accounts; informal open-market methods, such as repeat suppliers, price catalogs, and oral solicitations; orders under Blanket Purchase Agreements (charge accounts); orders under indefinite delivery contracts, e.g., Federal Supply Schedules; purchase orders, invoices, vouchers, or priced purchase orders. Simplified purchase procedures are characterized by low dollar value; use of prenegotiated pricing arrangements when negotiation of price is not required; standard products or specifications; competitive prices from available price lists or catalogs; award by purchase order or other instruments where terms and conditions are preestablished, such as basic ordering agreements; short contractual periods (usually within 30 days); large volume of actions; and adequate sources of supply, usually within the local area. The work requires knowledge of commercial supply sources and common business practices with respect to sales, prices, discounts, deliveries, stocks, and shipments, rather than knowledge of formal advertising and negotiation procedures as described in the GS-1102 series. This type of work is specifically covered by the one-grade interval GS-1105 Purchasing Series and accurately represents the nature of the appellant's procurement duties.

The appellant likewise does not perform work that would be classifiable as that of a Program Analyst, which is covered by the GS-343 Management and Program Analysis Series. Program analyst positions serve primarily as analysts and advisors to management on the evaluation of the effectiveness of government programs. They perform such work as developing program evaluation plans, procedures, and methodology; analyzing the effectiveness of line programs in meeting goals; developing life cycle cost analyses of projects; or analyzing new or proposed legislation or regulations. The work involves analyzing and evaluating the manner in which programs or functions are carried out *by others* and recommending new procedures, policies, or other mechanisms to improve those operations. The appellant is not engaged in analyzing and evaluating work operations carried out by others but rather providing administrative support services to the organization. Therefore, her position does not involve the basic types of duties associated with program analysis work.

The appellant performs a variety of one-grade interval administrative work associated primarily with the GS-561 and GS-1105 series, neither one of which is predominant in terms of proportion of time. Although the highest grade level work performed is that related to the GS-561 series, this work does not require the same degree of knowledge and skill in the application of budget rules and regulations expected within that series. Therefore, her position is properly classified to the GS-303 Miscellaneous Clerk and Assistant Series. This series covers one-grade interval

administrative work where either the primary work of the position is not classifiable in any other series or the work involves mixtures of work in more than one occupational series.

There are no titles specified for positions in the GS-303 series. Agencies may construct titles for positions in this series following guidance provided in the *Introduction*.

Grade determination

Since the major portion of the appellant's work is most closely represented by the GS-561 and GS-1105 series, her position is properly graded by reference to the classification standards covering those series.

Evaluation Using the Job Family Standard (JFS) for Clerical and Technical Accounting and Budget Work, GS-500

The GS-500 JFS is used to evaluate work in several one-grade interval series including the GS-561 series. This standard is written in the Factor Evaluation System (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 in order to do the work, and the skills needed to apply that knowledge.

The knowledge required by the appellant's position meets Level 1-3. At this level, the work requires knowledge of a body of standardized regulations, requirements, procedures, and operations. This includes, for example, knowledge of the various steps and procedures required to perform a full range of budget support duties related to recurring or standardized transactions (e.g., verifying the availability of funds by accounts and obligating necessary dollar amounts); knowledge of one or more automated data bases sufficient to input a range of standard information or adjustments, understand recurring error reports and take corrective action, and generate a variety of standard reports; knowledge of the structure and content of budget related documents, such as invoices, reports, travel orders, payroll forms, etc., to investigate and resolve routine or recurring discrepancies, check documents for adequacy, or perform comparable actions covered by established procedures; and/or knowledge of frequently used and clearly stated regulations to determine if a transaction is permitted. An example of Level 1-3 work provided in the standard is as follows:

Employees review documents such as vouchers, purchase requests, work orders, and contract invoices to verify budgetary account codes and dollar amounts. They compare job orders, work orders, and requests for funds with account balances to assure that funds are available.

They check closed accounts for unobligated balances. They adjust account balances to reflect the effect of allotments, transfers, obligations, expenditures, and other actions which change the amount of funds available in accounts. They provide information about budget procedures and status of funds to program managers and prepare recurring reports on account balances and status of funds.

This accurately represents the work performed by the appellant. Her work requires knowledge of the various steps and procedures required to perform recurring and relatively standardized transactions, such as tracking and verifying the availability of funds and identifying and closing out unliquidated obligations by obtaining invoices or travel vouchers to ensure all payments have been made; knowledge of the Momentum system sufficient to input standard information and generate recurring reports; and knowledge of budget-related documents such as invoices and travel vouchers to compare them to stated obligations. The above Level 1-3 illustration is fully descriptive of the work performed by the appellant.

The position does not meet Level 1-4. At this level, the work requires in-depth or broad knowledge of a body of budget regulations, practices, procedures, and policies. This includes, for example, knowledge of a wide variety of interrelated steps, conditions, and processes required to assemble, review, and maintain *complex* budget transactions (such as resolving problems in balancing accounts, adjusting discrepancies, developing control records, verifying the accuracy of budgetary data, adjusting dollar amounts of accounts by line item and object class, and preparing reports on status of funds); knowledge of various budget regulations, laws, and requirements; knowledge of a variety of accounting and budget functional areas and their relationships to other functions to research or investigate problems or errors that require reconciling and reconstructing incomplete information, conducting extensive and exhaustive searches for required information, or performing actions of similar complexity; and/or knowledge of extensive and diverse budget regulations, operations, and procedures governing a wide variety of types of related transactions to resolve nonstandard transactions, complaints, or discrepancies, provide advice, or perform other work that requires authoritative procedural knowledge. An example of Level 1-4 work provided in the standard is as follows:

Employees review and verify the validity of requisitions for supplies, services, printing, and equipment. They review and approve travel and training orders and requests for personnel actions. They record overtime usage. They calculate funds for current and cumulative manpower by using staffing reports and overtime reports. They perform a variety of special assignments involving the collection, analysis, and reporting of data for budget preparation.

The appellant does not prepare or maintain complex budget transactions. She tracks expenditures associated with training, travel, and small purchases, such as supplies and services. These are not accounts with extensive subdivisions and the work does not require knowledge of extensive or diverse budget regulations governing a wide variety of transaction types. Although the above illustration describes the same general framework of duties performed by the appellant, it describes a more varied and in-depth assignment than hers. She is not responsible for reviewing the validity of requisitions, and she does not approve travel, training, or requests for personnel action, as travel and training obligations are entered into the Momentum system directly by the staff. She does not calculate manpower or overtime costs and she provided no examples of any special assignments wherein she personally collected, analyzed, and reported budgetary data (as opposed to consolidating data provided by others.) The relatively small size

of the organization she supports combined with the routine administrative nature of its expenditures limits the complexity and diversity of the budgetary transactions generated, which consequently do not require the breadth or depth of budgetary knowledge expected at Level 1-4.

Level 1-3 is credited (350 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.

The level of responsibility under which the appellant works is comparable to Level 2-3 (the highest level described under this factor). At this level, the supervisor assigns work with standing instructions on objectives, priorities, and deadlines and provides guidance for unusually involved situations. The employee independently processes the most difficult procedural and technical tasks or actions and handles problems and deviations in accordance with instructions, policies, previous training, or accepted practices. The supervisor evaluates completed work for overall technical soundness and conformance to agency policies, legal, or system requirements. Completed work is spot checked for results and conformity to established requirements and deadlines. The methods used to complete the assignment are seldom reviewed in detail.

This accurately expresses the manner in which the appellant is expected to operate. She works independently within established parameters and is responsible for the technical accuracy of her work products. Work is reviewed for overall technical soundness and adherence to established time frames.

Level 2-3 is credited (275 points).

Factor 3, Guidelines

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

The guidelines used by the appellant match Level 3-3 (the highest level described under this factor.) At this level, guidelines may include agency policies and procedures, Federal regulations, precedent actions, and processing manuals. However, because of the complicating nature of the assignments, they lack specificity, frequently change, or are not completely applicable to the work. The employee uses judgment to interpret guides, adapt procedures, decide approaches, and resolve specific problems. This includes, for example, using judgment to reconstruct incomplete files, devise more efficient methods for procedural processing, gather and organize information for inquiries, or resolve problems referred by others (e.g., those that could not be resolved at lower levels).

The appellant must use comparable judgment in such situations as determining whether additional documentation is required when preparing budget submissions or in order to initiate procurement actions; in reconciling discrepancies between charges recorded in the Momentum system against invoices received; and in monitoring account balances and contacting program managers if large balances appear to be unobligated.

Level 3-3 is credited (275 points).

Factor 4, Complexity

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

The complexity of the appellant's work is comparable to Level 4-3. At this level, the work involves performing various budget support related duties or assignments that use different and unrelated processes, procedures, or methods. The use of different procedures may result because transactions are not completely standardized, deadlines are continually changing, functions assigned are relatively broad and varied, or transactions are interrelated with other systems and require extensive coordination with other personnel. The employee decides what needs to be done by identifying the nature of the problem, question, or issue, and determining the need for and obtaining additional information through oral or written contacts or by reviewing regulations and manuals. The employee makes recommendations or takes actions (e.g., determines eligibility for deductions, entitlements, or claims, verifies factual data, or makes other financial determinations) based on a case-by-case review of the pertinent regulations, documents, or issues involved in each assignment or situation.

The appellant is assigned several budget-related responsibilities, including assisting in the development of annual budget requests, monitoring the expenditure of funds, preparing status of fund reports, and resolving open obligations. The work requires the use of different procedures and coordination with other personnel in that the appellant reviews open obligations (e.g., purchase orders, travel authorizations, and training requests) each month and for those showing no activity, contacts the obligating office to determine if the transaction is still valid or should be cancelled; contacts vendors as appropriate to obtain invoices; confirms whether travelers have been paid; and deobligates transactions with the obligating office's approval.

The position does not meet Level 4-4. This level is distinguished from Level 4-3 by (1) the variety and complexity of the transactions or systems involved; (2) the nature and variety of problems encountered and resolved; and (3) the nature of independent decisions made by the employee. Typically at this level the work may require analysis, development, or testing of a variety of established techniques and methods to evaluate alternatives and arrive at decisions, conclusions, or recommendations. For example, the employee may interpret and test user-defined specifications to modify an automated accounting system requiring broad knowledge of users' technical functions, program objectives, and impact of system changes on other functions, processes, and requirements. In any case, the work requires application of many different and unrelated processes and methods relating to examination or analysis of complex and unusual transactions requiring substantial research and thorough understanding of a wide variety of transactions and accounts. Decisions regarding what needs to be done include assessing unusual circumstances or conditions, developing variations in approach to fit specific problems, or dealing with incomplete, unreliable, or conflicting data. *The standard notes that this level is creditable only when factor level 1-5 is appropriately assigned to the position being evaluated.*

This level describes considerably more varied and complex system-related duties than those performed by the appellant and since it may only be credited when Level 1-5 has been assigned, is not creditable to her position.

Level 4-3 is credited (150 points).

Factor 5, Scope and Effect

This factor covers the relationship between the nature of the work and the effect of work products or services both within and outside the organization.

The scope and effect of the appellant's work match Level 5-2. At this level, the purpose of the work is to perform a full range of related budget clerical or technical tasks that are covered by well-defined and precise program procedures and regulations. The employee completes standard clerical transactions in the functional area by reviewing documents for missing information, searching records and files, verifying and maintaining records of transactions, and answering routine procedural questions. The work affects the adequacy and efficiency of the financial management function and may also affect the accuracy of further processes performed by related personnel in various organizations.

In line with Level 5-2, the purpose of the appellant's work is to perform budget-related procedural tasks for the HRO. As at this level, the work affects the accuracy of further budget processes within the agency.

The position does not meet Level 5-3. At this level, the purpose of the work is to apply conventional practices to treat a variety of problems in financial management transactions. Issues might result, for example, from insufficient information about the transaction, a need for more efficient processing procedures, or requests to expedite urgently needed cases. The work affects the quality, quantity, and accuracy of the organization's records, program operations, and service to clients. For example, the work ensures the integrity of the overall general ledger, its basic design and the adequacy of the overall operation of the accounting system and various operating programs; the amount and timely availability of money to pay for services; the economic well-being of employees being serviced; or compliance with legal and regulatory requirements. *The standard notes that only a few positions will be evaluated at this level.*

The purpose of the appellant's work is to record, track, and review expenditures for a small component of the agency within an established financial management system. Therefore, it does not have the broader impact depicted at Level 5-3. Further, because the appellant's position is located in a program office rather than a budget office, her work does not directly affect availability of funds.

Level 5-2 is credited (75 points).

*Factor 6 and 7, Personal Contacts and Purpose of Contacts**Persons Contacted*

This factor includes regular and recurring face-to-face and telephone contacts with persons not in the supervisory chain. The relationship between Factors 6 and 7 presumes that the same contacts will be evaluated under both factors.

The appellant's personal contacts match Level 2, where contacts are with persons in the same agency but outside the immediate organization, with employees in other agencies who are providing requested information, and/or with members of the general public in a moderately structured setting, such as with individuals who are attempting to expedite transactions.

Correspondingly, the appellant has contacts with budget office staff and vendors.

Level 3 is not met, where contacts are with persons in their capacities as representatives of others such as attorneys and accountants or congressional staff members making inquiries on behalf of constituents. These contacts are not recurring or routine and the purpose, role, and authority of each party must be established each time in order for the employee to determine the nature and extent of information that can be discussed or released.

The appellant has no contacts of this nature.

Purpose of Contacts

The purpose of the appellant's contacts matches Level b, where contacts are for the purpose of planning and coordinating actions, such as obtaining a customer's cooperation in submitting paperwork, requesting others to correct errors in documentation or data entry, or assisting others in locating information.

Correspondingly, the appellant's contacts are for the purposes of planning and coordinating the work, such as coordinating the submission of information for budget development and resolving open obligations by requesting required documentation.

Level c is not met, where the purpose of contacts is to persuade individuals who are fearful, skeptical, uncooperative, or threatening to provide information, take corrective action, and accept findings in order to gain compliance with established laws and regulations.

The appellant's contacts, which relate to technical processing rather than regulatory compliance, are of a collegial nature and do not involve the types of interactions described at this level.

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 position matches Level 8-1, where the work is sedentary.

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 position matches Level 9-1, which describes a typical office environment.
Level 9-1 is credited (5 points).

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge Required by the Position	1-3	350
2. Supervisory Controls	2-3	275
3. Guidelines	3-2	275
4. Complexity	4-3	150
5. Scope and Effect	5-2	75
6. & 7. Personal Contacts and Purpose of Contacts	2b	75
8. Physical Demands	8-1	5
9. Work Environment	9-1	<u>5</u>
Total		1210

The total of 1210 points falls within the GS-6 point range (1105-1350 points) on the grade conversion table provided in the standard.

Evaluation Using the Position Classification Standard for Purchasing Series, GS-1105

Factor 1, Knowledge Required by the Position

The knowledge required by the appellant's position meets Level 1-3. At this level, the work requires knowledge of standardized purchasing regulations, policies, and procedures; established commodities and markets; and common business practices to make purchases involving commercial requirements of average complexity. This includes making noncompetitive open market purchases (through oral solicitations or calls against blanket purchase agreements), purchases under established contracts, or competitive open market purchases when specifications or statements of work are standardized, price and product characteristics are stable, and repeat vendors are used; identifying supply sources and determining the adequacy of the items offered; assessing the reasonableness of the price using well-established references, such as price lists and previous history files; and resolving typical problems with deliverables, such as differences in price or quantity, or recommending and preparing no-cost cancellations of purchase orders.

Correspondingly, the appellant purchases specified items of average complexity (e.g., office supplies and recurring services) from established sources by charging them to a Government credit card.

The position does not meet Level 1-4. At this level, the work requires in-depth or broad knowledge of purchasing regulations, methods, procedures, and business practices to make purchases involving specialized requirements and/or commercial requirements that have unstable price or product characteristics, hard-to-locate sources, many critical characteristics, or similar complicating factors. This includes making competitive or sole source small purchases that involve, for example, collecting data to determine reasonableness for new items, preparing detailed written solicitations, tailoring special terms and conditions, or other matters of similar complexity; analyzing descriptions with unique aspects and many critical characteristics to identify problem areas in specifications or work statements, determine if quotations are responsive, or decide if substitutions are acceptable or should be referred to other personnel for review; evaluating prices or costs for requirements with inadequate price history or evaluating allowable charges for requirements involving special cost features; selecting or tailoring clauses for purchases involving special handling; and discussing equitable price adjustments for modifications to a purchase order, determining whether to recommend termination of an accepted purchase order for convenience, or similar actions.

The appellant purchases relatively common office supplies and equipment and recurring services, such as readers and interpretive services, with no specialized requirements, which can be obtained from established vendors or from specified providers. She does not prepare detailed written solicitations; review specifications or work statements prepared by others to identify problems or determine if quotations are responsive; evaluate costs for reasonableness when there is no price history available; prepare special clauses; or discuss price adjustments with vendors for purchase order modifications. She is provided requisition forms by the requesting staff specifying the items to be purchased and their cost, and she purchases them from approved vendors by credit card.

Level 1-3 is credited (350 points).

Factor 2, Supervisory Controls

The level of responsibility under which the appellant works is comparable to Level 2-2. At this level, work is assigned with standing instructions on applicable procedures and policies, such as whether purchases should be made against an established contract or through open market. The supervisor provides additional guidance on difficult or unusual assignments, such as the purchase of specialized services or construction projects. The employee makes or recommends purchases for recurring requirements independently. Ordinarily at this level, the supervisor reviews recommended purchase actions and files to ensure compliance with established procedures. However, some employees work more independently than this, having become familiar with purchasing procedures for a variety of standardized requirements at varying dollar values, and thus work with less supervision than is typically found at this level because of their extensive purchasing experience.

Correspondingly, the appellant carries out routine or repetitive purchases on her own initiative within set limits. She operates within the upper limits of independence described at this level both because of her purchasing experience and because of the standardized nature of the purchasing requirements.

The position does not meet Level 2-3. At this level, work is assigned with standing instructions on objectives, priorities, and deadlines and any special considerations or unusual requirements. The employee plans and carries out the successive steps to make purchases and uses accepted practices to resolve problems and deviations, such as purchases that have fluctuating price and item characteristics, are sole source, and are urgently required, or items that are new to the market. In these situations, the employee independently performs such tasks as negotiating price with a sole source vendor, persuading reluctant vendors to bid, and collecting data to determine price reasonableness for purchases not acquired previously or recently. In other situations, problems may result from the specialized nature of the requirement, where the employee may have to identify loopholes in lengthy and detailed specifications or statements of work and suggest revisions to clarify the contractor's obligations, or prepare information to respond to written protests from nonselected vendors. The methods the employee uses to complete assignments are not reviewed in detail.

Since the appellant's purchases are not this complex (i.e., they are recurring rather than new requirements and can be readily obtained from established suppliers or providers), they do not afford her the opportunity to operate at this level of responsibility, where she would be independently negotiating with vendors, reviewing and revising lengthy and detailed specifications, or determining price reasonableness.

Level 2-2 is credited (125 points).

Factor 3, Guidelines

The guidelines used by the appellant match Level 3-2. At this level, established procedures and specific guidelines are available and applicable to the assignments, such as procurement history files, Federal Supply Schedules or other established contracts, standard operating procedures, and regulations governing small purchases and delivery orders. The employee uses judgment in resolving such situations as determining whether an item meets requirements, judging whether quotes are for equal items, or suggesting item substitutes.

Correspondingly, the appellant's work is covered by ample guidelines governing the conduct of her purchasing duties, although she must exercise judgment as to cost comparability when researching prices for particular items.

The position does not meet Level 3-3. At this level, the above guidelines are often not applicable because of the unique or complicating nature of the requirements or circumstances. For example, when ensuring the adequacy of specialized purchase descriptions there are no directly related reference sources, such as standardized descriptions in catalogs or procurement history files. The employee uses judgment in adapting procedures to resolve specific problems, such as reviewing detailed nonstandardized statements of work for adequacy, developing technical ranking factors for award determinations, or negotiating terminations for convenience or default.

In contrast, the appellant purchases common, standardized items and recurring services which have been specified by the requestors rather than any unique items or materials to meet specialized needs, and purchases exclusively by use of a Government credit card rather than the more complex award procedures described at this level.

Level 3-2 is credited (125 points).

Factor 4, Complexity

The complexity of the appellant's work is comparable to Level 4-2. At this level, the work involves performing a variety of related tasks using primarily simple noncompetitive purchasing methods, such as placing orders against single award Federal Supply Schedules and other similar contracts or using credit card accounts. Decisions to be made are limited to such matters as whether to solicit additional sources or question a price, and selection of the purchasing methods used is based on a few limited considerations such as price, available sources, and urgency of requirements.

As at this level, the appellant uses only noncompetitive purchasing methods, placing orders against a credit card account. If a particular item is unavailable, she investigates whether a similar item can be obtained elsewhere. As at this level, her primary considerations in making purchases are price and availability of the item.

The position does not meet Level 4-3. At this level, the work is less standardized and more choices have to be made on how to procure particular items. In addition to using the procedures described above, at this level the work involves using different methods to (1) make a variety of competitive or sole source small purchases and/or (2) make a variety of purchases against various established contracts and agreements, such as multiple award schedules, blanket purchase agreements, and requirements contracts. The employee uses different solicitation methods, ordering or reporting procedures, purchasing methods, or clauses and provisions depending on the type, quantity, dollar value, or urgency of the requirements. Decisions to be made include whether to order against an existing contract or through open market procedures, whether and how to solicit quotes, or what terms and conditions apply depending on the nature of the requirement, urgency of the need, estimated amount of the purchase, and availability of sources. In addition to considering price and delivery, employees may make decisions based on analysis of tradeoffs, such as the cost of renting versus purchasing, free services included, vendor reputation, or previous performance.

The appellant does not use the variety of solicitation methods described at this level, and her purchases are not complex enough to require special provisions or that other considerations (i.e., costs vs. benefits) would have to be weighed.

Level 4-2 is credited (75 points).

Factor 5, Scope and Effect

The scope and effect of the appellant's work match Level 5-2. At this level, the work involves providing purchasing services that are covered by well-defined procedures and regulations, such as repeat orders for commercial requirements. The work affects the smooth flow of everyday operations.

Correspondingly, the appellant's purchases consist of common commercial requirements and are covered by well-defined procedures and regulations governing the use of Government credit

cards, and her work affects the smooth flow of everyday operations through the provision of needed office supplies and services.

The position does not meet Level 5-3. At this level, the work involves purchasing various commercial and/or specialized requirements where the work involves resolving a variety of purchasing problems, such as inadequate or restrictive specifications, lack of multiple suppliers, urgent need, and insufficient price history. The work directly affects the ability of the serviced programs to conduct business adequately, such as through the clarity and completeness of detailed purchase descriptions for specialized equipment, or may affect the physical well-being of persons, such as through the timely delivery of urgently needed medical supplies.

The context within which the appellant operates; i.e., a typical office environment, does not generate the types of purchasing requirements that would support crediting of this level. She purchases standard office supplies and equipment that facilitate the work of the organization rather than specialized equipment or other items that directly impact whether the mission can be carried out.

Level 5-2 is credited (75 points).

Factor 6 and 7, Personal Contacts and Purpose of Contacts

Persons Contacted

The appellant's personal contacts match Level 2, where internal contacts include employees in the same agency but outside the immediate organization and external contacts include commercial suppliers, contractors, and personnel at other agencies.

This describes the types of contacts the appellant normally has in the performance of her purchasing duties.

Level 3 is not met, where in addition to the above contacts, external contacts include technical or legal representatives of firms who are negotiating substantial purchase order changes or terminations for default or convenience, or who are protesting the basis for nonselection for award.

The appellant has no contacts of this nature.

Purpose of Contacts

The purpose of the appellant's contacts match Level a, where the purpose is to clarify or exchange information related to purchasing routine requirements, such as contacts with customers to obtain missing information or get approval for substitutes, and contacts with vendors to obtain information on items, prices, discounts, and delivery dates.

This describes the purpose of the appellant's contacts in the performance of her purchasing duties.

Level b is not met, where the purpose of contacts is to plan and coordinate actions to prevent, correct, or resolve delays or misunderstandings in the purchasing process. This includes contacts

with customers to discuss specifications that may be inadequate or restrictive, realistic lead times or prices, or other avenues for filling needs, such as renting versus purchasing. Contacts with vendors are to clarify requirements and negotiate issues, such as establishing adequate price reductions for deviations in product or delivery, modifying terms, or waiving penalties for returned items.

The appellant's contacts do not involve discussion of more complicated issues, such as whether to rent or purchase, whether product specifications are too restrictive, or to negotiate prices, terms, or the waiver of penalties with vendors.

Level 2a is credited (45 points).

Factor 8, Physical Demands

The position matches Level 8-1, where the work is sedentary.

Level 8-1 is credited (5 points).

Factor 9, Work Environment

The position matches Level 9-1, which describes a typical office environment.

Level 9-1 is credited (5 points).

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge Required by the Position	1-3	350
2. Supervisory Controls	2-2	125
3. Guidelines	3-2	125
4. Complexity	4-2	75
5. Scope and Effect	5-2	75
6. & 7. Personal Contacts and Purpose of Contacts	2a	45
8. Physical Demands	8-1	5
9. Work Environment	9-1	<u>5</u>
Total		805

The total of 805 points falls within the GS-4 point range (655-850 points) on the grade conversion table provided in the standard.

Decision

Since the highest grade level work performed by the appellant is evaluated at the GS-06 level, her position is properly classified as GS-303-06, with the title at the discretion of the agency.