

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

Appellant: [name]

Agency classification: Program Support Assistant
GS-303-9

Organization: [agency component]
Department of Education
[city & State]

OPM decision: GS-303-5
(Title at agency discretion)

OPM decision number: C-0303-05-24

//Judith A. Davis for

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

6/5/2012

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 (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, Code of Federal Regulations, 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

The U.S. Office of Personnel Management (OPM) accepted this position classification appeal on October 18, 2011. The appellant occupies the position of Program Support Assistant, GS-303-9, with the [agency component] at the Department of Education in [city & State]. She requests that her position be classified as Program Specialist, GS-301-11/12. 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 challenges the agency evaluation of her position because the agency classifier “did not compare [her position] against the Administrative/Professional Series GS301 or 343 Grade 11/12,” this having been the basis for her desk audit request to her agency and subsequent appeal to OPM. The appellant appears to be requesting OPM to evaluate her position as a two-grade interval position using an associated two-grade interval position classification standard. We will determine the correct series allocation of the appellant’s position by considering the type of work she performs, and we will determine its grade by applying the classification standard appropriate for the series and duties.

The appellant believes she is performing higher-level work because some tasks she has performed were previously assigned to higher-graded employees. However, lower-graded tasks may be and often are performed by higher-graded staff for workload or practical considerations. This does not mean the tasks themselves constitute higher-graded work. The grade of a particular set of duties is determined by comparison to the applicable classification standards. Therefore, the previous assignment of these tasks to higher-graded employees has no bearing on the classification of the appellant’s position, which must be based on our independent analysis of the duties and responsibilities currently assigned to and performed by the appellant.

Position information

The appellant’s primary responsibility is to perform intake of annual State plan revisions submitted for grant extension under the [grant program]. She receives and reviews incoming State plan revisions to ensure that all required documentation has been submitted with the correct dates and original signatures. She compares the revisions to the previous year’s submission to ensure that current data is being reported; i.e., she looks for evidence that the data has been revised, but does not review the actual data. She acknowledges receipt of the revision via email requesting any missing documentation; tracks and continually updates detailed logs on the status of submissions; and keeps a separate log of States that have indicated their intent to conduct competition. She presents completed packages to her supervisor, who in turn forwards them to the assigned area coordinators who are responsible for substantive content review. As instructed, she prepares form letters to the States confirming their revisions are complete and, as an adjunct to the revision process, prepares standardized Assessment Policy approvals to the States. She maintains paper and electronic copies of revisions.

The appellant is also responsible for the related function of compiling reports by extracting and aggregating selected portions from individual year-end narrative reports submitted on-line by the

States. For example, the appellant compiles a "State Grantee Narrative Report" by excerpting Section C from each State report and compiling these into one consolidated report. She has followed the same process in compiling other one-time reports, such as a report on English literacy and civics activities reported in the State narrative reports; a consolidated listing of tables 4 and 4b from the State narrative reports onto an Excel spreadsheet; and a consolidated listing of the States' "noteworthy practices" by excerpting these portions from the area coordinators' monitoring reports.

The appellant also performs other associated tasks such as maintaining the division's monitoring schedule reflecting confirmed dates by the area coordinators and team leaders; transmitting background information to the States prior to the area coordinators' scheduled monitoring visits; updating and transmitting monitoring visit feedback surveys to the States and compiling responses; and coordinating logistics with the area coordinators for six annual "Shop Talk" teleconferences, to include preparing the initial draft agendas, updating the participant list, organizing and distributing background materials, and arranging for telephone assistance.

The appellant asserts her position description is inaccurate and specifically that her "higher level GS11 and/or GS12 duties, tasks, and responsibilities are not recorded in [her] position description." The duties she listed are summarized below:

Reviews all incoming State plans to ensure that required certifications are attached and to determine if the State intends to conduct a competition or is requesting a one-year extension of their grant award;

Compiles various reports by aggregating information from selected portions of individual State narrative reports;

Revised the annual customer feedback survey form and questions and compiles survey results;

Reformatted the table used for the National Reporting System statistical report; and

Plans and schedules six Shop Talk teleconferences each year.

The appellant's position description [PD#] appears to be standardized. Section II, Major Duties and Responsibilities, is a compilation of disparate and generic tasks most of which the appellant does not perform. Specifically, the appellant does not: independently perform technical assignments such as participating in program studies and analysis of operations to achieve greater economy and efficiency; conduct paperwork and records management studies, work flow and operational analysis, cost studies, and/or equipment utilization analysis; review operational plans, make recommendations for improvement, and advise on the adequacy of budgeting; conduct studies of work processes and procedures and draft reports identifying problems, reviewing production standards, and recommending resolutions; review reports and studies to ensure appropriate rules and regulations are utilized; and serve as focal point for coordinating and commenting on proposed administrative policies and procedures and assisting in the development of directives. The only major duties in this section of the position description

actually performed by the appellant are: establishing and maintaining tracking and control systems; compiling and preparing recurring and special reports; assisting in planning and preparing for conferences; and advising customers on procedures and program requirements.

The position description is individualized by the inclusion of Section IV, Unique Position Requirements, which lists the specific duties performed by the appellant. These include: coordinating the Shop Talk teleconferences; maintaining electronic and hard copy files of incoming State plan revisions; reviewing incoming State plan revisions for completeness, acknowledging receipt, and tracking incoming documentation; updating the division's monitoring schedule; and maintaining and updating the monthly corrective action plan tracking system. These duties, combined with those specified from Section II, fully and accurately represent the work performed by the appellant and encompass the duties she listed as being unrecorded in the position description.

However, to the extent that Section II of the position description misrepresents the work actually performed by the appellant, the position description should be rewritten to remove the duties she does not perform as discussed above to meet the standards of PD accuracy for classification purposes as discussed in section III.E, *Introduction*.

Series and title determination

The appellant requests reclassification of her position from the one-grade interval GS-303 series to the two-grade interval GS-301 series.

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.

The appellant's duties cannot be construed as two-grade interval administrative work. Her duties are clearly of a support nature and are not analytical; i.e., consistent with one-grade interval support work, they involve carrying out established processes and procedures based on practical knowledge of the requirements associated with the work in certain limited phases (i.e., intake, tracking, and reporting) of the grants program. Thus, while the appellant may know what documents are required in the submission of State plan revisions, she is not required to

understand or make decisions or recommendations based on review of the substantive content of those documents. Her work neither requires nor permits the exercise of a high order of analytical ability, comprehensive knowledge of management principles and processes, or skill in problem solving or written communication. It does not involve analyzing case assignments to ascertain facts and determine the actions required, conducting research and identifying options, or preparing written products with findings and conclusions. Instead, her work involves the application of a limited set of methods and procedures that do not vary significantly from assignment to assignment.

Two-grade interval administrative work is always characterized by the conduct of some degree of analysis in reviewing documents or situations and then drawing conclusions or making recommendations based on the results of that analysis. The appellant's position description and performance standards state that she "analyzes and evaluates" incoming State plan extension documentation "for completeness." However, for classification purposes, the term "analysis" connotes studying the content of a document or the circumstances surrounding a proposal to define the issues involved, evaluate the merits of the information provided, and determine what actions should be taken in response. Within the context of the appellant's work situation, "analysis" would consist of, for example, conducting substantive content review of State plan revisions to determine their sufficiency for purposes of grant extension, because this requires evaluating the available data and information and making a judgment on its merits within the confines of program authority and relevant statute. It does not consist of reviewing a submission solely for the limited purpose of determining whether the required documentation has been included, as this does not require evaluating the content or merits of the material. Further, the process of "analysis" within the context of administrative work almost always requires the preparation of written work products expressing the analytical process in terms of findings and conclusions. The appellant submitted no work samples demonstrating any significant degree of original written communication. Her written work products consist either of brief emails requesting missing documentation, standardized letters, or compilations of material written by others.

The appellant's position is properly assigned to the one-grade interval GS-303 Miscellaneous Clerical and Assistance Series, which covers clerical, assistant, or technician work for which no other series is appropriate, where the work requires knowledge of the procedures and techniques involved in carrying out the work of an organization and involves application of procedures and practices within the framework of established guidelines. Clerical work in this series involves the processing or maintenance of records or documents which represent the transactions or business of an organization. Correspondingly, the appellant's work involves the application of established procedures in screening incoming documents for completeness and in maintaining and updating records.

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*.

Standard determination

Positions classified to the GS-303 series that involve the performance of clerical work are evaluated by use of the Grade level Guide for Clerical and Assistance Work.

When determining the grade level of a position, the standard used must cover work that is as similar as possible to the work being evaluated in terms of the kind of work processes involved, the qualifications required, and the level of difficulty and responsibility. Thus, two-grade interval work must be evaluated by the application of two-grade interval standards, and one-grade interval work must be evaluated by the application of one-grade interval standards.

The agency evaluated the appellant's position by applying the grade-level criteria in the standard for the Management and Program Clerical and Assistance Series, GS-344, supplemented by the Primary Standard. These are not valid comparisons. First, the use of the GS-344 series standard is not appropriate as it presupposes possession of the knowledges associated with that occupation. The GS-344 series covers clerical and technical work that requires a practical knowledge of the purposes, methods, and techniques of management analysis or program analysis and the structures, functions, processes, products, services, resource requirements, and similar features of Government programs and organizations. The appellant's work does not require these generalized types of knowledges applicable to a broad range of Government programs. Rather, it requires a narrower knowledge set specific to the processes and documentation requirements of the [grant program]. Second, the GS-344 series covers work dissimilar from the work performed by the appellant. Employees in this series perform the routine, procedural, or standard assignments that support management or program analytical work. Management and program analysis are staff functions involved in analyzing and evaluating the effectiveness of line or operating programs. GS-344 positions perform such basic procedural tasks to complete management or program analysis projects as: maintaining, gathering, and compiling records of organizational and workflow charts, staffing levels, mission and function statements, and internal audit reports; compiling and distributing reports on proposed program goals, budgets, staff levels, and performance criteria to operating officials for review and comment; making and verifying routine calculations such as standard cost estimates, production rates, staff hours, and workload figures; or preparing charts, graphs, and narrative information for management analysis reports from material provided by higher level employees. Because the appellant works in a function that represents the line work of the organization; i.e., grants administration, rather than in a staff management or program analysis unit, she does not perform the type of work depicted in the GS-344 standard in terms of its general nature and orientation. Therefore, the GS-344 standard would have limited applicability for evaluating her position.

The Primary Standard serves as the framework for the Factor Evaluation System (FES) and for classification standards written in FES format. It describes the basic levels of the nine factors and establishes the point values for each. The factor levels in all other FES standards must conform to the factor level concepts contained in the Primary Standard. In this way, the main purpose of the Primary Standard is to assure grade alignment among occupations. The Primary Standard may not be used alone to classify a position. It may only be used in conjunction with another FES standard, and then only to evaluate an individual factor which falls below the lowest or above the highest factor level described in the applicable FES standard.

The Grade Level Guide for Clerical and Assistance Work is not written in FES format.

Therefore, the Primary Standard may not be used in conjunction with this guide to evaluate the appellant's position.

Grade determination

The Grade Level Guide for Clerical and Assistance Work is used as a source of grade level criteria for the evaluation of clerical or assistance work which is not covered by more specific grade level criteria in other standards or guides. It addresses the work of processing transactions and performing various office support and miscellaneous clerical and assistance duties within a framework of procedures, precedents, or instructions. It describes the general characteristics of each grade level from GS-1 through GS-7 in terms of two evaluation factors: Nature of Assignment (which includes the elements of knowledge required and complexity of the work) and Level of Responsibility (which includes the elements of supervisory controls, guidelines, and contacts). It also includes general work examples to illustrate each grade level.

For the purpose of applying this guide, the terms "clerical" and "assistance" are defined as follows:

Clerical: Performing work such as preparing, receiving, reviewing, and verifying documents; maintaining office records; locating and compiling data or information from files; compiling information for reports; keeping a calendar and informing others of deadlines and other important dates; and similar clerical support work within an organization. This work requires a knowledge of the clerical requirements and processes involved in maintaining the functional programs of the unit.

Assistance: Performing technical work to support the administration or operation of the programs of an organizational unit. This work requires a working knowledge of the work processes and procedures of an administrative field (e.g., office administration, communications, and security) and the missions and operational requirements of the unit.

GS-5

Nature of Assignment

GS-5 level work consists of performing a full range of standard and non-standard clerical assignments and resolving a variety of non-recurring problems. Work includes a variety of assignments involving different and unrelated steps, processes, or methods. The employee must identify and understand the issues involved in each assignment and determine what steps and procedures are necessary and the order of their performance. Completion of each transaction typically involves selecting a course of action from a number of possibilities. The work requires extensive knowledge of an organization's rules, procedures, operations, or business practices to perform the more complex, interrelated, or one-of-a-kind clerical processing procedures.

Level of Responsibility

At the GS-5 level, the supervisor assigns work by defining objectives, priorities, and deadlines and provides guidance on assignments which do not have clear precedents. The employee works in accordance with accepted practices and completed work is evaluated for technical soundness, appropriateness, and effectiveness in meeting goals. Extensive guides in the form of

instructions, manuals, regulations, and precedents apply to the work. The number and similarity of guidelines and work situations require the employee to use judgment in locating and selecting the most appropriate guidelines for application and adapting them according to circumstances of the specific case or transaction. A number of procedural problems may arise which also require interpretation and adaptation of established guides. Contacts are with a variety of persons within and outside the agency for the purpose of receiving or providing information relating to the work or resolving operating problems in connection with recurring responsibilities.

A GS-5 work example provided in the guide describes an Inspectional Aid who provides specialized clerical assistance by controlling inbound manifests for air and sea cargo and inbound storage and performs such duties as: controlling manifested cargo by posting a variety of entry permits and other clearance documents against corresponding bills of lading; examining documents for completeness, discrepancies, sampling requirements, prohibited cargo, and other special requirements and identifying entries that may involve fraud, smuggling, etc., based on available intelligence data; authorizing lay order extensions, obtaining general order control numbers, resolving manifest and entry discrepancies, and preparing official and office workload reports for the inspection facility; and maintaining office files, inventorying nonexpendable equipment, preparing supply requisitions, accepting cash, and preparing daily cash transmittals. The employee independently plans and carries out successive steps according to specific requirements of each case. Contacts are to exchange information and resolve problems.

The appellant's work is generally consistent with the above GS-5 level criteria. Corresponding to this level, she performs, under general supervision, responsible administrative work which requires training and broad working knowledge of the rules, procedures, and operations of the specific grants program to which she is assigned. Her work includes a variety of assignments involving different and unrelated processes, such as performing document intake and review, maintaining tracking systems, preparing reports, and arranging teleconferences. Her work involves performing a full range of both standard and non-standard clerical assignments where she must understand the issues involved and determine the steps and procedures to be followed. For example, her review of incoming State plan revisions would be considered a standard clerical assignment because the work is basically repetitive and involves carrying out the same steps without variation; i.e., checking to ensure the certification forms are attached, the documents are signed and dated, etc. However, the work does require working knowledge of the grants program to be able to, for example, perform such non-standard clerical assignments as compiling one-time reports by extracting specified information from State narrative reports.

The appellant's level of responsibility is likewise consistent with GS-5 criteria in that the objectives, priorities, and deadlines of the work are established. The appellant works in accordance with established procedures for recurring work, such as the intake function, and is provided specific instructions for one-time assignments, such as special reports. Her work does not involve processing transactions and she is thus not required to apply the extensive guides described at this level. However, she does encounter procedural problems associated with the review and tracking of incoming documents, which must be carefully controlled to ensure that regulatory filing deadlines are met, and she has direct contacts with State officials for the purpose of requesting missing documentation and providing notifications.

The appellant's position is analogous to the GS-5 work example described above in terms of the types of processes she carries out. Corresponding to this example, the appellant receives incoming documents, examines them for completeness and discrepancies, enters them into a tracking system, and maintains the paper and electronic files. She applies knowledge of the pertinent sections of the grants program statute and regulations (i.e., only for the limited aspects dealing with required documentation) in order to carry out these procedural and processing functions.

GS-6

At this grade level, the guide provides separate evaluation criteria for clerical and assistance work as defined earlier. The appellant's work is clerical in nature because, corresponding to the definition for clerical work, it primarily involves such work as receiving, reviewing, and verifying documents (i.e., State plan revisions); locating and compiling information (from State narrative reports) and preparing aggregated reports; and updating the division's monitoring schedule. It does not involve performing technical work within an administrative field to support the programs of the organization. Thus, only the grade level criteria for clerical work are addressed below.

Nature of Assignment

GS-6 level work typically entails processing a wide variety of transactions for more than one type of assigned activity or functional specialization. Assignments are subject to different sets of rules, regulations, and procedures, knowledge of which is usually attained through extensive, increasingly difficult, and practical experience and training in the subject matter field. The work also requires ability to interpret and apply regulatory and procedural requirements to process unusually difficult and complicated transactions.

Level of Responsibility

At the GS-6 level, the supervisor reviews completed work for conformance with policy and requirements. The employee is recognized as an authority on processing transactions or completing assignments within a complicated framework of established procedures and guidelines, often where there are no clear precedents, usually extending beyond the immediate office to outside the organization. The employee is regarded as an expert source of information on regulatory requirements for the various transactions and is frequently called upon to provide accurate information on short notice. The employee must adapt guidelines as needed to cover new and unusual work situations and deviate from established procedures to process transactions which cannot be completed through regular channels. Contacts with employees in the agency or with the users of agency services are to provide information, explain the application of regulations, or resolve problems.

A GS-6 work example provided in the guide describes a Reports and Financial Assistant who runs a statistical reporting and record system for a major division of a regional office, which includes analyzing feeder reports from various branches and units; preparing divisionwide reports; designing detailed charts and graphs; and conducting special management studies

requiring written presentations of findings, recommendations, forecasts, and justifications. The employee also reviews work measurement functions for the division to ensure that basic reporting requirements and procedures are being followed and that reports provide clear and concise information; analyzes data to determine and evaluate results, trends, and developments; and writes instructions as needed to implement changes in reporting procedures. The employee consolidates annual funding estimates from subordinate offices into a complete budget request; organizes estimates by appropriation, object class, and line item; and prepares required supporting documentation for expenditures. The work requires skill in compiling and summarizing information and data, identifying inaccuracies or anomalies in the information, and making written recommendations to resolve discrepancies based on interpretation of applicable regulations and procedures.

Assignments at GS-6 involve processing a wide variety of transactions using different rules, regulations, and procedures, where the work requires extensive practical experience and training in the subject matter field and the ability to interpret and apply regulatory and procedural requirements to process unusually difficult and complicated transactions. The appellant's work related to the review and tracking of incoming State plan revisions and reports compilation does not meet these criteria. She does not process a wide variety of transactions using different rules, regulations, and procedures; she reviews and tracks incoming documents applying the same limited administrative procedures for each. This work does not require extensive practical experience and training in a subject matter field; it could be readily carried out with a minimum level of on-the-job training. It does not require interpreting and applying regulatory and procedural requirements to process difficult and complicated transactions; it involves carrying out the same basic steps for each transaction as governed by established procedures. The work does not require or permit her to examine the issues involved in a given transaction to determine the best course of action; e.g., either the required certifications are attached to the State plan revision or they are not attached. The parameters of her work are well defined in that she is not authorized to deviate from established procedures unless specifically instructed. She carries out a structured, prescribed set of processes with limited opportunity for the application of any independent judgment or action. Thus, her work is not consistent with the nature of assignments expected at the GS-6 level.

In terms of the level of responsibility associated with this work, the appellant is not recognized as an authority on processing transactions within a complicated framework of established procedures, nor is she regarded as an expert source of information on the regulatory requirements governing the work. The processes she carries out are relatively uncomplicated and are governed by a limited set of administrative procedures rather than by regulatory requirements that must be interpreted and applied; i.e., she reviews incoming State plan revisions only for the limited purpose of ensuring that the required documentation is attached, and these documentation requirements do not vary. Carrying out these limited processes does not provide the framework wherein the appellant would be providing authoritative information or expertise to others on how the work must be accomplished; e.g., explaining how a particular transaction must be handled or what regulations apply to a given situation. The guidelines for this work are not numerous and varied and the appellant neither chooses nor adapts how a given submission should be handled. The nature of the work does not permit her to deviate from established procedures without specific instructions from management.

The appellant's responsibility for reviewing and tracking State plan revisions and compiling one-time reports is not analogous to the above GS-6 work example of running a statistical reporting and records system in that the processes involved in her work are considerably more limited. In this example, the incoming documents require some degree of analysis in order to extract relevant information, design detailed charts and graphs, and prepare written findings in order to produce consolidated reports. In other words, the employee in this example has a substantive role in reviewing and analyzing the documents rather than merely a transactional role in processing and tracking them. By contrast, the appellant reviews incoming documents only for completeness and to determine if competition has been indicated. This is primarily a screening and tracking function which does not require reading and understanding the content of the documents. Similarly, she compiles reports merely by extracting specified sections from State narrative reports verbatim and aggregating them into a consolidated report. This is a mechanical exercise in extracting and rearranging data which does not require the application of any independent judgment to understand the content of the information in order to identify trends, inaccuracies, or anomalies.

Decision

The appellant's position is properly classified as GS-303-5, with the title at agency discretion.