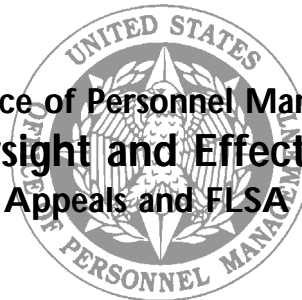


U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA Programs



Washington Oversight Division
1900 E Street, N.W.
Washington, DC 20415

Classification Appeal Decision
Under Section 5112 of Title 5, United States Code

Appellant: [names]

Agency classification: Standard Termination Examiner
GS-303-6

Organization: [branch]
[division]
[department]
Pension Benefit Guaranty Corporation
Washington, D.C.

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

OPM decision number: C-0303-05-13

Linda Kazinetz
Classification Appeals Officer

January 3, 2001
Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a classification 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 title 5, Code of Federal Regulations, sections 511.605, 511.613, and 511.614, as cited in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Since this decision changes the grade of the appealed position, it is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The servicing personnel office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

The personnel office must also determine if the appellants are entitled to grade or pay retention, or both, under 5 U.S.C. 5362 and 5363 and 5 CFR 536. If the appellants are entitled to grade retention, the two-year retention period begins on the date this decision is implemented.

Decision sent to:

[representative]

[servicing personnel officer]

Introduction

On July 27, 2000, the Washington Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from four employees whose position is classified as Standard Termination Examiner, GS-303-6, in the [branch] of the [division], [department], at the Pension Benefit Guaranty Corporation (PBGC) in Washington, D.C. The appellants requested that their position be classified as Pension Law Specialist, GS-958-9. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code.

An on-site position audit was conducted by a Washington Oversight Division representative on September 26, 2000, including an interview with the appellant's supervisor, [name]. This appeal was decided by considering the audit findings and all information of record furnished by the appellants and their agency, including their official position descriptions, numbers 8867 and 8968, which were classified by the servicing personnel office as Standard Termination Examiner, GS-303-6, on September 24, 1997, and August 12, 1998, respectively.

Position Information

The appellants are responsible for reviewing and processing standard termination filings (PBGC Form 500, Standard Termination Notice) under the Employee Retirement Income Security Act (ERISA). Standard termination notices are filed by employers who intend to terminate a fully funded pension plan by purchasing annuities for or paying lump sums to the covered employees. The appellants review Form 500 for completeness, accuracy, and timeliness and input the information into a database, which applies edit checks to determine if the information falls within predetermined parameters and if the manual and computer records on the individual plan are consistent. If the filing fails edit checks, the appellants contact the plan representative to obtain additional or corrected information. In the course of this review, the appellants identify filings that must be rejected based on two coverage exclusions, i.e., substantial owner plans, where there are only 1-2 plan participants who are in effect the company owners, and professional service employers (e.g., physicians, dentists, attorneys) with 25 or less employees. The appellants issue standard letters to filers in response to a limited number of circumstances indicated on Form 500, such as these two coverage exclusions, premature distribution of funds, zero participants, and requests for withdrawal of filing. After a filing is accepted, the appellants issue a standard confirmation letter requesting submission of post-termination documentation certifying that the pension funds were distributed, and follow-up continuously with reminders and if necessary, noncompliance letters nullifying the termination, if the documentation is not received.

The above information is intended only as a synopsis rather than a comprehensive listing of the appellants' duties. More detailed information is contained in the appellants' position description, supplemented by additional documentation that was submitted by the appellants and the agency in connection with the appeal.

Series Determination

The appellants believe that their position should be classified to the two-grade interval Pension Law Specialist Series, GS-958, rather than the one-grade interval Miscellaneous Clerk and Assistant Series, GS-303. Guidance on distinguishing between work properly classified in two-grade interval administrative series and that classified in one-grade interval support series is contained in the Classifier's Handbook, dated August 1991.

Support work usually involves proficiency in one or more functional areas or in certain limited phases of a specified program. Normally a support position can be identified with the mission of a particular organization or 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. Support employees typically learn to do the work on the job through what may sometimes be many years of experience.

Administrative work, on the other hand, requires a high order of analytical ability combined with a comprehensive knowledge of (1) the functions, processes, theories, and principles of management, and (2) the methods used to gather, analyze, and evaluate information. Administrative work also requires skill in applying problem solving techniques and in communicating effectively both orally and in writing. Administrative positions do not require specialized education, but they do involve the types of skills (analysis, research, writing, judgment) typically gained through college level education or through progressively responsible experience. Administrative work often involves planning for and developing systems, functions, and services; formulating, developing, recommending, and establishing policies, operating methods, or procedures; and adapting established policy to the unique requirements of a particular program.

The appellants' duties consist of one-grade interval support work as it is characterized above. Their work is directly identified with the administration of the standard termination function and its performance is based on a practical knowledge of the procedures and guidelines used in that function. They follow established methods and procedures in the sense that their assignments are recurring and the various tasks associated with the work can be accomplished by essentially repeating the same processes in the same sequence. Their work can be learned through on-the-job training without any prior education or experience.

The appellants' duties do not constitute administrative work. The duties do not require analytical ability, knowledge of management principles, or the ability to evaluate information. The appellants are responsible for *processing* standard termination filings. This work does not involve analysis, evaluation, or research. The appellants review Form 500 to ensure that the required blocks have been completed and input the information into a database. The computer runs an edit check that identifies discrepancies in the data input. The appellants then call the plan administrator to request corrections. In this process, the exercise of independent judgment is limited. They do not review filings to determine their propriety except for two very clearly defined and readily apparent coverage issues.

They do not research regulations or precedent cases. They do not compose original correspondence but rather use templates that have been prepared for the major aspects of their work. They are guided in their telephone contacts by standardized questionnaires designed to elicit the information required to complete different transactions. If they encounter any circumstances that cannot be resolved through the application of established procedures, they refer the case to one of the pension law specialists. The work does not require the types of skills that would normally be acquired through college education or through progressively responsible experience in that an individual without college-level education and with minimal work experience could be readily trained to perform the work.

The appellants contend that their position meets the following provision in the definition for the GS-958 Pension Law Specialist Series:

This series includes positions that involve administering, supervising, or performing work requiring specialized knowledge of the provisions governing the administration of employee pension and welfare plans and the management of the plan funds. This knowledge is used to (1) **interpret such laws as the Employee Retirement Income Security Act (ERISA)** . . . as well as relevant court decisions, regulations, rulings, opinions, and appeal decisions . . .

We do not find that the appellants *interpret* ERISA or its implementing regulations in any manner. The appellants' work is governed by a processing manual that prescribes the steps to be taken in reviewing standard termination filings. While ERISA and its associated regulations provide the basic foundation of requirements on which the processing manual is based, this manual is ultimately a *procedural* guide. The actual legal requirements set forth by ERISA that directly pertain to the appellants' processing work (for example, how much notice of termination must be given to participants, how much time is allotted for distribution of funds) are clearly stated within the manual. In the appellants' contacts with, for example, plan administrators, they *convey* these basic requirements under ERISA that directly pertain to their processing function. However, there are no circumstances in the appellants' work where they would have to refer to and interpret the law itself, or the implementing regulations or relevant court decisions, in the sense of determining their meaning, intent, or applicability. In a case processing environment, this interpretation would be necessary in resolving questions or issues that are not specifically covered by established guidance. In other types of work settings, it would form the basis for the development of program guidelines or policy issuances. In the appellants' position, any situation encountered that deviates from the norm or that is not specifically covered by their processing guidelines is referred to a pension law specialist for resolution. Thus, although it may be said that the appellants *apply* ERISA requirements to the extent that these requirements are expressed in their processing guidelines, they are not authorized to *interpret* ERISA or the regulations to determine their applicability to nonstandard cases.

The appellants' position is properly assigned to the Miscellaneous Clerk and Assistant Series, GS-303, which includes positions the duties of which involve performing clerical, assistant, or technician work for which no other series is appropriate.

Title Determination

Since there are no titles prescribed for the GS-303 series, the position may be titled at the agency's discretion.

Grade Determination

There are no published grade-level criteria for the GS-303 series. The series standard instructs that clerical positions classified to this series be evaluated by application of the criteria contained in the Grade Level Guide for Clerical and Assistance Work. This standard is written in a narrative format with grade level criteria expressed in terms of two factors, Nature of Assignment and Level of Responsibility.

Evaluation using Grade Level Guide for Clerical and Assistance Work

Nature of Assignment

This factor includes the elements of knowledge required and complexity of the work.

At the GS-4 level, work consists of performing a full range of standard clerical assignments and resolving recurring problems. The work consists of related steps, processes, or methods which require the employee to identify and recognize differences among a variety of recurring situations. Actions to be taken differ in nature and sequence because of differences in the particular characteristics of each case or transaction. The work requires some subject-matter knowledge of an organization's programs and operations or of a body of standardized rules, processes, or operations.

The bulk of the appellants' work is at this level. The processing of standard termination filings is a largely repetitive operation. The majority of filings handled by the appellants are covered by ERISA. These filings would be considered "standard" within the meaning of the above criteria. The appellants resolve recurring problems in the form of discrepancies in the data that are flagged by the computer. Although filings do not differ in the amount or type of information that must be reviewed and processed, they are handled differently depending on whether or not, and how expeditiously, the post-termination documentation is submitted.

At the GS-5 level, work consists of performing a full range of standard and nonstandard clerical assignments involving different and unrelated steps, processes, or methods and resolving a variety of nonrecurring problems. 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.

The appellants' work meets this level to the extent that filings meeting the criteria for coverage exclusion based on substantial ownership or professional services are considered as "nonstandard" assignments. The appellants are also assigned responsibility for processing cases involving a few other specifically identified circumstances, including requests for withdrawal of filing and plans with no remaining participants, which can also be considered as "nonstandard." In this sense, their work includes a limited variety of assignments involving different steps and processes. However, the appellants do not resolve a variety of *nonrecurring* problems, nor do they carry out any complex, *one-of-a-kind* clerical processes. The circumstances which they are authorized to handle independently have been specifically prescribed by the supervisor, and they have been provided with correspondence templates to use in processing these cases. Any filings that are so unusual as to be characterized as "one-of-a-kind" would be referred to a pension law specialist for resolution.

At the GS-6 level, work may consist of either clerical work or technical assistance work. Clerical work includes such assignments as preparing, receiving, reviewing, and verifying documents. Assistance work involves performing technical work to support the administration or operation of the programs of an organizational unit.

If the work is clerical in nature, it involves processing a wide variety of transactions for more than one type of assigned activity or functional specialization, where the assignments are subject to different sets of rules, regulations, and procedures. This does not apply to the appellants' position as they process transactions for basically one type of activity (standard terminations).

If the work is of a technical assistance nature, it may involve providing direct assistance to specialists by performing a segment of their work, or it may involve responsibility for a stream of products or continuing processes based on direct application of established policies, practices, and criteria. Assignments involve a relatively narrow range of case situations that occur in a broad administrative program or function. The work typically involves identifying issues, problems, or conditions and seeking alternative solutions based on evaluation of the intent of applicable rules, regulations, and procedures. Assignments requiring evaluative judgment are narrowly focused, address a single product or action, and are relatively clear cut, and involve problems where there is not one absolutely correct solution, only a best or most appropriate one. The work requires practical knowledge of guidelines and precedent case actions and skill in expressing ideas in writing.

The appellants' assignments do not constitute technical assistance work as that term is applied in the guide. Their work consists of receiving and reviewing documents, not performing technical work to support the program operations of the organizational unit. The primary purpose of their work is not to review these documents (i.e., standard termination notices) for propriety, but rather to "perfect the filing" by ensuring that all required information has been included and that there are no obvious inconsistencies in the information. The appellants are responsible for identifying cases that fall within two coverage exclusions. However, these cases are readily apparent based on information contained in the filing, such as the number of participants specified, the business code, or the title of the company, and do not require the exercise of any appreciable judgment or discretion in determining if a particular plan is covered. Their work does not present problems where they would have to

determine the solutions since the steps to be taken in various situations have been prescribed. Cases with complicating circumstances that cannot be handled by standard processing procedures are referred to a pension law specialist. Original writing is minimal since correspondence templates are provided for the various actions taken. Thus, their work is a clerical processing rather than a technical assistance function and the GS-6 level consequently does not apply.

Level of Responsibility

This factor includes the elements of supervisory controls, guidelines, and contacts.

At the GS-4 level, the supervisor provides little assistance with recurring assignments, and the employee uses initiative to complete work in accordance with accepted practices. Unusual situations may require the assistance of the supervisor or higher level employee, and the completed work may be reviewed more closely. Procedures for doing the work have been established and a number of specific guidelines are available. The employee must use judgment in locating and selecting the most appropriate guidelines, references, and procedures, and makes minor deviations to adapt the guidelines in specific cases. The employee has contacts outside the organization to exchange information and in some cases to resolve problems in connection with the immediate assignment.

The appellants' level of responsibility fully meets and exceeds this level in some respects, most notably that they receive virtually no assistance on recurring assignments and they have more extensive contacts outside the organization, with plan administrators, to resolve discrepancies identified in the filings.

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 employee must use judgment in locating and selecting the most appropriate guidelines for application and adapting them according to circumstances of the specific case or transaction. Often the employee must determine which of several alternative guidelines to use. If existing guidelines cannot be applied, the employee refers the matter to the supervisor. 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.

The appellants' position meets this level in terms of the supervisory controls in that the appellants work independently in accordance with established procedures. Although completed work of a recurring nature is generally not reviewed by the supervisor, this is a reflection of the large volume of documents processed and their repetitive nature. The position also meets this level in terms of contacts, in that the appellants routinely contact plan administrators to resolve problems identified with the filings. However, guidelines are not as extensive and varied as described at this level. The primary guideline is the processing manual, and the appellants reported that they rarely refer to it

since most of the filings can be processed based on their acquired familiarity with the different types of situations encountered. Regardless, the work does not normally present the types of situations where different or conflicting guidelines would apply.

At the GS-6 level, the supervisor assists with precedent assignments by providing policy interpretations or the concepts and theories of the occupation. Completed work is evaluated for appropriateness and effectiveness in meeting goals. Guidelines such as regulations, instructions, and prior case or action files are available, but are often not completely applicable or have gaps in specificity. The employee uses judgment in interpreting and adapting guidelines for application to specific cases or problems. The employee bases decisions and recommendations on facts and conventional interpretations of guidelines rather than on theory or opinion. Contacts are with employees within and outside the agency and with users of agency services for the purposes of providing or developing information needed to identify problems, and to coordinate work efforts or resolve problems.

The level of responsibility exercised by the appellants in no way resembles the above GS-6 level criteria. Their work is governed by clearly-defined processing procedures and offers limited opportunity for the exercise of independent judgment. Therefore, their work would not be reviewed for appropriateness and effectiveness, since that would imply the exercise of discretion in determining how to handle a particular transaction. The guidelines are specific and are directly applicable to the work.

Summary

The appellants' position fully meets the GS-4 level and at least partially meets the GS-5 level. This guide, written in a narrative format, is a "threshold" standard in that the criteria for a particular grade level must be *fully* met in order for that grade to be assigned. Therefore, in this case the position would normally revert to the GS-4 level. However, because the grade level of this position appears to be somewhat borderline, an additional standard, written in the Factor Evaluation System format, was applied. This format is based on the concept of grade ranges, wherein positions with varying degrees of strengths and weaknesses may fall at different points of the range for the same grade.

Evaluation using GS-500 standard

The position was evaluated against criteria contained in the Job Family Standard for Clerical and Technical Accounting and Budget Work, GS-500. This standard is designed to evaluate clerical and technical work that supports accounting, budget, and other related financial management work. It was selected because it addresses functions analogous to the appellants' work, particularly the review and processing of documents submitted by others, such as vouchers, tax returns, and insurance forms.

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.

At Level 1-3, the work requires knowledge of a body of standardized regulations, procedures, and operations related to the support function. This may include, for example, knowledge of procedures required to perform a full range of financial management support duties for recurring or standardized transactions that involve different forms and procedures; knowledge of automated data bases 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 content of financial management related documents to investigate and resolve routine or recurring discrepancies, check documents for adequacy, or perform comparable actions that are covered by established procedures; and knowledge of frequently used and clearly stated regulations and rules to determine if a transaction is permitted or to respond to recurring questions. The standard provides the following illustrations of Level 1-3 work:

- Processing vouchers for billing private insurance companies and performing other third-party collection, billing, and accounting tasks, to include examining vouchers for submission; entering information into a computerized system; checking computer-generated billing for correctness; and maintaining ledgers on accounts receivable.
- Reviewing billing packages to ensure completeness and inclusion of supporting documents, and examining invoices for proper documentation, authorization, accounting codes, and other justifications.
- Processing a variety of tax returns and reports, to include examining tax returns and supporting documents for current and prior year and amended returns; ensuring that all required identification, schedules, and other information is available; identifying unallowable deductions; interpreting taxpayer's intent from available documents; and adjusting tax, penalty, or interest and preparing corrected notices.

The knowledge required by the appellant's position matches Level 1-3. This level basically expresses the knowledge requirements of their work and the types of operations they perform. Corresponding to this level, the work requires knowledge of standardized procedures for processing several recurring types of filings; knowledge of an automated data base to input information from filings and to understand edit reports and make required corrections; knowledge of the content of standard

termination notices to check them for accuracy and resolve discrepancies; and knowledge of limited aspects of the regulations governing standard terminations to determine if a filing meets basic requirements and to identify cases where two clearly-defined exclusions apply. The Level 1-3 work illustrations cited above are analogous to the appellants' position in that they describe comparable responsibilities for reviewing incoming documents for completeness, entering information into a computerized system, resolving discrepancies in the information submitted, maintaining records on the status of the documents, and notifying submitters of additional documentation required.

The position does not meet Level 1-4. At that level, work requires in-depth or broad knowledge of a body of financial management regulations, practices, procedures, and policies related to the specific function. This includes knowledge of a wide variety of interrelated steps, conditions, and procedures required to review *complex* transactions; knowledge of various regulations, laws, and requirements to ensure compliance and recommend action; ability to research or investigate problems or errors that require reconciling and reconstructing incomplete information or conducting *extensive and exhaustive* searches for required information; knowledge of automated systems to reconcile errors that require an understanding of *nonstandard* procedures; or knowledge of *extensive and diverse* financial regulations, operations, and procedures governing a *wide variety* of related transactions to resolve *nonstandard* transactions, complaints, or discrepancies, or perform other work that requires authoritative procedural knowledge. The standard provides the following illustrations of Level 1-4 work:

- Processing accounting transactions for a wide variety of functions including obligations, accrued expenditures, disbursements, appropriation refunds, reimbursable orders, earnings, collections, expenditure vouchers, cost transfers, rejected transactions, interfund bills, and other accounts.

- Reviewing, correcting, and coding a variety of multiple-page tax returns, most of which have one or more schedules attached.

- Reviewing and verifying the validity of requisitions for supplies, services, printing, and equipment; reviewing and approving travel and training orders and requests for personnel action; recording overtime usage; calculating funds for current and cumulative manpower by using staffing reports and overtime reports; and performing a variety of special assignments involving the collection, analysis, and reporting of data for budget preparation.

The documents processed by the appellants are not as complex or varied as those described at this level. The appellants basically process one form, the Standard Termination Notice, and the types of different situations encountered within that document are limited. Although they must reconcile discrepancies in the information provided or complete missing information, this involves contacting the submitter and requesting the information rather than conducting extensive and exhaustive searches or reconstructing information based on other historical data. They do not use automated systems in reconciling errors involving nonstandard procedures but rather to identify and resolve recurring edits. Their work does not require knowledge of extensive and diverse regulations, operations, and procedures governing a wide variety of related types of transactions to resolve nonstandard

discrepancies. Rather, it requires only a limited knowledge of the basic requirements and time frames associated with one type of transaction, i.e., standard terminations, in order to process filings that are largely repetitive with the exception of two clearly defined exclusion categories and a few other recurring situations for which correspondence templates are available. The Level 1-4 work illustrations cited above describe assignments involving a much wider variety of transactions or operations than performed by the appellants.

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.

At Level 2-2, the supervisor provides general standing instructions on recurring assignments that cover, for example, the steps involved in processing documents or transactions. Additional, specific instructions are provided for new or difficult assignments not covered by standing instructions. At this level, some employees may work quite independently in performing recurring assignments, receiving little day-to-day supervision. However, their work is limited or controlled by readily applicable instructions or procedures that specifically describe how the work is to be done and the kind of adaptations or exceptions that can be made. Recurring assignments are reviewed through quality control procedures, but new or unusual assignments are checked in more detail.

The level of responsibility under which the appellants work is comparable to Level 2-2. The appellants apply standard operating procedures that prescribe the steps to be followed in processing documents. Because the work is largely recurring, they complete most of it independently without supervisory intervention. However, any unusual situations encountered are referred to the supervisor or a specialist for instructions on how to proceed, and the types of exceptions that the appellants are authorized to handle are few and specified. Day-to-day supervision is minimal because the work is controlled by such mechanisms as prescribed procedures, correspondence templates, and telephone call questionnaires rather than due to any autonomous judgment exercised by the appellants.

The position does not meet Level 2-3. At that level, the employee likewise works under standing instructions that govern the conduct of the assignments, but independently processes the most difficult procedural and technical tasks or actions. For example, the employee independently determines the types and sources of information needed to complete the transaction, the nature and extent of deviations from established requirements, and whether standard procedures are applicable to a particular case. Completed work is reviewed for overall technical soundness and conformance to agency policies, legal, or system requirements.

This level of supervision is predicated on the independent performance of the most difficult procedural assignments. The appellants' work, in contrast, is routine and recurring. It does not present the types of problems or ambiguities that would require them to search for needed

information, make value judgments as to the extent to which a submission meets requirements, or depart from standard procedures to process the transaction. Their work does not require or receive a commensurate level of supervisory review because it does not involve the level of judgment and individual discretion that would warrant review for policy or legal conformance.

Level 2-2 is credited.

125 points

Factor 3, Guidelines

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

At Level 3-2, established procedures and specific guidelines such as processing manuals and precedent actions are readily available and clearly applicable to most transactions. However, the employee must use judgment in determining the most appropriate procedures to use or which precedent action to follow as a model, and in deciding how to handle aspects of the work not completely covered, and may make minor deviations to adapt to specific cases. Situations involving significant deviations from existing guidelines must be referred to the supervisor or another designated employee.

The guidelines used by the appellants match Level 3-2. Although a processing manual is available for use, the appellants reported that they rarely refer to it but rather rely on experience and past practice in carrying out the work. Transactions are processed in accordance with standardized procedures. There is limited occasion to deviate from these procedures. The appellants may use discretion in determining whether an extension should be granted to a participant for the submission of post-termination documentation based on the reason provided, but for the most part extensions are normally granted in keeping with the agency's customer-service philosophy. Any significant deviation from normal procedures must be cleared by the supervisor or a specialist.

The position does not meet Level 3-3. At that level, guidelines are basically the same as at Level 3-2, but because of the complicated nature of the assignments, they are not as specific, frequently change, or are not completely applicable. For example, the employee may use judgment to reconstruct incomplete files, devise more efficient methods for procedural processing, or resolve problems referred by others (e.g., those that could not be resolved at lower levels). The employee also recommends changes to processing requirements, such as specific changes to the guidelines themselves or the procedural handling of documents, the development of control mechanisms, or additional training for employees.

The processing procedures applied by the appellants are complete and cover virtually all situations encountered in their work. Their use of judgment is limited to the granting of extensions and does not include such aspects as devising improved processing methods or changes to procedural guidelines, or resolving problems referred by lower levels.

Level 3-2 is credited.

125 points

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of the 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.

At Level 4-2, the work involves performing related procedural tasks in processing financial management transactions. For example, processing a transaction may involve verifying codes and other information; reconciling balances; using standard formulas to calculate; assembling appropriate forms and reports; entering data into automated systems; distributing documents to appropriate personnel; and answering routine procedural inquiries. The employee makes decisions, such as how to locate and assemble information or correct errors based on knowledge of similar cases. Any action taken is based on established instructions, practices, or precedents for processing documents, although the specific pattern of actions taken may differ depending on the given discrepancy.

The complexity of the appellant's work is comparable to Level 4-2. The work involves performing related procedural tasks in processing Form 500, Standard Termination Notice. The appellants review the form to ensure that it is complete; input the information to an automated system; review the system's edit checks; contact the submitter to obtain additional or corrected information; send a confirmation letter to the submitter; and follow-up on the submission of post-termination documentation. The appellants are authorized to handle only a few types of situations that vary from the normal termination process, and there are established procedures for these types of cases. The appellants use correspondence templates for virtually all of their written products, and standardized questionnaires for their telephone contacts. In short, all aspects of their work are closely controlled and leave minimal latitude for improvisation on how to handle a particular transaction.

The position does not meet Level 4-3. At that level, the work involves performing various financial management support assignments that use different and unrelated processes, procedures, or methods. The employee decides what needs to be done by identifying the nature of the problems and obtaining additional information through oral or written contacts or by reviewing regulations and manuals. The employee may have to consider previous actions and understand how they differ from the issue at hand before deciding on an approach. The employee takes action based on a case-by-case review of the pertinent regulations, documents, or issues involved in each assignment or situation.

The appellants are authorized to handle a few nonstandard types of transactions, including two exclusion categories, zero participants, and early withdrawals. However, processing procedures for these cases are similarly standardized and do not require that the appellants review regulations or historical files to determine how the case should be handled. Correspondence templates have been prepared for the appellants' use in these situations. Although they may make minor changes to these templates to fit the circumstances of a particular case, any transaction that deviates significantly from those covered by the templates would be referred to a pension law specialist.

Level 4-2 is credited.

75 points

Factor 5, Scope and Effect

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

At Level 5-2, the purpose of the work is to apply specific rules, regulations, or procedures to perform a full range of related financial management clerical or technical tasks that are covered by well-defined and precise procedures and regulations. The work affects the adequacy and efficiency of the financial management function and can affect the work of specialists in related functions.

The scope and effect of the appellants' work match Level 5-2. The purpose of their work is to process standard termination filings by applying standardized, well-defined procedures and a limited range of clearly-stated and unambiguous regulatory requirements. The work performed ensures that individual termination filings are complete and accurate. It also has the effect of separating out terminations that require closer examination by a pension law specialist.

The position does not meet Level 5-3. At that 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, operations, and service to clients. For example, the work may ensure the integrity of the overall ledger, its basic design and the adequacy of the overall operation of the accounting system and its 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 appellants do not handle transactions with problems but rather process routine termination filings. Since they are engaged exclusively in case processing work, the impact of their work is limited to individual transactions rather than the broader system impact expected at this level. Further, their work does not directly impact the economic well-being of others, or compliance with legal and regulatory requirements. If they identify cases with potential for this sort of impact, they refer them to a pension law specialist for resolution. In short, they review termination notices for completeness and accuracy of the information provided. They do not review these notices from the standpoint of determining the propriety of the action being taken with respect to the plan participants, which would directly impact the participants' economic well-being and relate to compliance with regulatory requirements. These kinds of judgments would be made by the pension law specialists. The appellants review notices that do not have these sorts of propriety issues, and thus their work has the more limited impact of affecting the timeliness with which standard terminations are processed.

Level 5-2 is credited.

75 points

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

This factor includes 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 appellants' personal contacts match Level 3 under *Persons Contacted*, where contacts are with members of the general public, including persons in their capacities as representatives of others, such as attorneys and accountants. This is the highest level described under this factor.

The purposes of the appellants' contacts match Level b under *Purpose of Contacts*, where the purpose of contacts is to correct or prevent errors or delays in the transaction cycle, such as obtaining cooperation in submitting paperwork.

Level c is not met, where the purpose of the contacts is to persuade individuals who are fearful, skeptical, uncooperative, or threatening, to provide information or comply with established laws and regulations. Although the appellants must be tactful and persistent in seeking information, the contacts are not contentious.

Level 3b is credited.

110 points

Factor 8, Physical Demands

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

The position matches Level 8-1, which covers sedentary work.

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

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-3	350
Supervisory Controls	2-2	125
Guidelines	3-2	125
Complexity	4-2	75
Scope and Effect	5-2	75
Personal Contacts/ Purpose of Contacts	3b	110
Physical Demands	8-1	5
Work Environment	9-1	<u>5</u>
Total		870

The total of 870 points falls within the GS-5 range (855-1100) on the grade conversion table provided in the standard. This is the lower end of the grade range and reinforces the earlier evaluation, derived through application of the Guide for Clerical and Assistance Work, that the position minimally meets the GS-5 level.

Decision

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