

U.S. Office of Personnel Management
Division for Human Capital Leadership and Merit System Accountability
Classification Appeals and FLSA Programs

Center for Merit System Compliance
1900 E Street, NW., Room 6484
Washington, DC 20415-6000

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

Appellant: [name]

Agency classification: Administrative Officer
GS-341-12

Organization: [division]
[bureau]
Department of Agriculture
[city and State]

OPM decision: Administrative Officer
GS-341-12

OPM decision number: C-0341-12-08

_____/s/ Robert D. Hendler
Robert D. Hendler
Classification and Pay Claims
Program Manager

_____/8/12/05
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).

Decision sent to:

[appellant]

[servicing HR director]

Director, Human Resources Management
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Introduction

On September 21, 2004, the Center for Merit System Compliance of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who is employed as an Administrative Officer, GS-341-12, in the [division] of the [bureau], U.S. Department of Agriculture (USDA), in [city and State]. [Appellant] requested that her position be classified at the GS-13 level. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code.

We conducted a desk audit with the appellant on February 4, 2005, and a subsequent telephone interview with the appellant's supervisor, [name]. This appeal was decided by considering the audit findings and all information of record furnished by the appellant and her agency, including her official position description [number] and other material received in the agency administrative report on December 20, 2004.

Position information

The appellant provides a range of management services essential to the operation of [division]. The division conducts research on the interactions between agricultural activities and environmental issues, including effects on natural resources, preservation of species and genetic diversity, and environmental quality. The research results are disseminated through Department-level reports, articles in publications, professional journals and conferences, economic data bases, briefings for policy officials, and responses to economic analysis requests from program and regulatory agencies. The division has five branches with a total of about 112 employees.

The appellant provides support and assistance to [division] management in the areas of budget, procurement, cooperative/reimbursable agreements, human resources management, management analysis, property/space management, and other miscellaneous administrative services. She supervises one GS-8 budget assistant and one GS-8 program assistant. Her major functional responsibilities consist of the following.

Budget – Budget formulation for [bureau] is performed by the agency's budget officer, who is organizationally assigned to the Office of the Administrator. However, the budget execution function is delegated to the four major operating divisions. The appellant performs all budget execution work for [division], including developing salary and benefit projections; preparing quarterly allotments, monthly fund reviews, and other activities for financial reporting; reconciling division accounts to the general ledger and resolving discrepancies; tracking monthly income and expenditures for appropriated, trust, and reimbursable funds; resolving accounting errors and processing invoices for payment under cooperative agreements; and tracking and ensuring accurate accounting of purchase card expenditures.

The total division budget is approximately \$12 million, of which about \$10 million is allotted for salaries and benefits, about \$1 million for cooperative agreements, and the remainder for other non-salary expenses such as travel, training, supplies and equipment, and data acquisition.

Procurement – The appellant has a Government credit card with purchasing authority for materials and services under \$2500. She prepares procurement requests and justifications for items exceeding that amount and submits them to the procurement office at the [bureau], a larger bureau within USDA with which [bureau] has an administrative servicing agreement.

Cooperative/reimbursable agreements – The appellant assists management in developing and structuring the agreements, prepares the related budget documentation, and tracks and records payments. The division currently has about 60 active cooperative agreements with universities for the conduct of joint research projects and, at any given time, about three to five active interagency reimbursable agreements. Payments made under these agreements are primarily for salary reimbursements.

Human resources – The appellant prepares personnel action requests, develops position descriptions and vacancy announcements, resolves payroll problems and conducts leave audits, provides division employees with basic information on taxes and benefits, organizes and ensures completion of the division's performance appraisal process, manages the pay pool, and serves as liaison between the division and the servicing human resources office at [bureau].

Related to these major functional responsibilities, the appellant compiles and interprets data and prepares reports in response to a wide variety of information requests from the department.

Series determination

The appellant's position is properly assigned to the Administrative Officer Series, GS-341, which covers work involved in the provision of a variety of management services essential to the direction and operation of an organization. Neither the appellant nor the agency disagrees.

Title determination

The authorized title for all nontrainee positions in this series is Administrative Officer. Neither the appellant nor the agency disagrees.

Standard determination

There are no grade-level criteria for the GS-341 series. The GS-341 standard instructs that other individual standards for work related to the major duties or functions performed be used to evaluate positions in this series. In order for a set of duties to be grade-controlling, those duties must occupy at least 25 percent of the employee's time. Duties performed for a lesser percentage of time do not influence the grade of a position.

The GS-341 standard recognizes two broad types of administrative officer positions. One type is the chief of a central administrative unit which provides services to a number of operating divisions. In this situation, the administrative unit includes subordinate specialist positions in various administrative areas, such as budget, human resources, contracting, etc., which are directly supervised by the administrative officer. In other words, the administrative officer is

directly responsible for the provision of these services to the organization and has the associated delegated authority in these areas.

The second broad type is the administrative officer position in an operating subdivision of an organization which receives services, such as human resources and procurement, from central servicing offices which have substantial delegated authority to complete actions. This second type of administrative officer position has few or no subordinate specialists and limited authority in the various administrative functional areas, and serves primarily as liaison between the organization and the central servicing offices. In this situation, the administrative officer performs such duties as helping management to identify its financial, personnel, and material needs and problems; developing budget estimates and justifications; 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 resources; collaborating with human resources specialists in finding solutions to management problems; and advising on and negotiating contracts, agreements, and cooperative arrangements with other Government agencies, universities, or private organizations.

The appellant's position is typical of the second type of administrative officer position described above, in that her position is located in one of the major operating divisions of [bureau] and receives administrative services, including human resources management and contracting support, from central servicing offices that have substantial authority to complete actions in their respective areas.

The appellant indicated that the proportions of time she spends on the various functional responsibilities of her position vary depending on program needs. However, budget and fiscal management invariably constitutes the major portion of her time, from at least 25 percent to higher depending on the budget cycle. For this reason, we first evaluated these budget and fiscal duties using the Job Family Position Classification Standard for Professional and Administrative Work in the Accounting and Budget Group, GS-500. The appellant's other functional responsibilities, including procurement, human resources management, and property/space management, are ongoing and constitute the remainder of her time, but individually in smaller proportions. We did not evaluate these other functional areas separately because no one of them would be grade-controlling either in terms of their time percentage or grade value. Because the appellant's division receives administrative services from other organizations, including human resources management and contracting, the appellant does not have the delegated responsibilities that would support higher grade levels within these occupational fields. Further, evaluating these duties in isolation would not capture the overall management advisory responsibilities inherent in the administrative officer role.

Thus, we used the Administrative Analysis Grade Evaluation Guide (AAGEG) to determine the overall grade value of the appellant's administrative analysis and advisory work. This Guide is designed to evaluate staff analytical, planning, and evaluative work concerned with the administrative and operational aspects of agency programs and management. Although line work is excluded from coverage, the Guide specifies that it may also be used to evaluate staff analytical duties of positions primarily engaged in line management or program administration.

The AAGEG more accurately represents the appellant's overall responsibility for advising management on the planning and execution of the division's administrative functions.

Grade determination

Both the GS-500 standard and the AAGEG are 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.

Evaluation using the GS-500 standard

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 (e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts) and the nature and extent of the skills needed to apply that knowledge.

The agency assigned Level 1-7 under this factor.

The knowledge required by the appellant's position matches Level 1-7. At that level, work requires detailed, intensive knowledge of a functional area such as financial oversight, budget formulation, or *budget execution*. This knowledge is applied in evaluating continual changes in program plans and funding and their effect on financial and budget program milestones and in recommending financial or budgetary actions when there are difficult complicating factors, such as short deadlines, missing or conflicting information, and a lack of predictive data.

Correspondingly, the appellant has full responsibility for the division's budget execution function. She evaluates new program activities and their associated funding in relation to the budgetary and financial actions required and obtains the information needed for tracking and reporting purposes.

The position does not meet Level 1-8. At that level, work requires mastery of budgeting and of the financial and budgetary relationships between subordinate and senior levels of budgeting and financial management within the employing entity, and/or between the organization and programs of other Federal, State, and local Governments. This knowledge is applied in the performance of such work as analyzing national-level programs or exceptionally large and complex programs (e.g., *multi-million dollar* research grants, contracts, or cooperative agreements); developing and implementing budgetary policies; interpreting and assessing the impact of new legislation; projecting the potential effects of budgetary actions on program viability; rendering authoritative interpretations of Executive Orders, OMB guidelines and

directives, and policies and precedents *within and across agency lines*; and developing new methods and techniques of budgeting to forecast *long-range* funding needs.

The term “mastery” as it is used at Level 1-8 is not intended as a performance indicator but rather to reflect the degree of *knowledge and skills required* as a direct consequence of the *breadth and complexity of the work*. Factor 1 is designed to measure the “nature and extent of information needed to do the work . . . and the skills needed to apply that knowledge;” i.e., the requirements of the position rather than the capabilities of the employee. The broader, more complex, or undefined the assignment, the greater the knowledge and skills needed to carry it out. Within this context, although the appellant performs her work with a high degree of acquired expertise, her assignments are much narrower from a programmatic standpoint *and* the functions she performs are less demanding than those described as typical of this level. For example, the appellant administers the budget for a relatively small program constituting one division, with a total annual budget of about \$12 million appropriated on a one-year basis. Most of this budget consists of salaries and administrative expenses. Only about \$1 million of this budget is devoted to the division’s cooperative agreements, which individually are relatively small and consist mainly of salary reimbursement. The appellant also manages the funds for a bureau-wide grants program amounting to about \$1 million. This is in contrast to the exceptionally large and complex, multi-million dollar grants and cooperative agreements described at Level 1-8. The appellant carries out budget execution functions with diverse procedural requirements; but these processes are considerably more well-defined than such assignments as developing budget policies, interpreting new legislation, assessing program viability in light of budget reductions, or rendering authoritative budgetary guidance across agency lines (and thus in relation to a broad array of programs and issues). In short, the nature of the appellant’s work does not demand either the scope of knowledge or range of skills expected at Level 1-8.

Level 1-7 is credited (1250 points).

Factor 2, Supervisory controls

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

The agency assigned Level 2-4 under this factor.

The supervisory controls exercised over the appellant’s position match Level 2-4. At that level, the supervisor outlines overall objectives and available resources; and the employee and supervisor, in consultation, discuss time frames, scope of the assignment, and possible approaches. The employee is fully experienced and knowledgeable in the functional program and is a technical authority with responsibility for planning and carrying out the work, directing other functional specialists, resolving conflicts, coordinating with others, interpreting policy and regulations, developing changes to plans, and recommending improvements. The employee keeps the supervisor informed of progress and potential controversies, such as the need for supplemental appropriations or the inability to meet key budget deadlines. The supervisor

reviews the work for soundness of overall approach, effectiveness in meeting requirements, and the feasibility of recommendations.

Consistent with this level, the appellant works largely independently, working under only general supervisory guidance as to resources available and desired results. The appellant is fully experienced in the requirements of the work and is regarded as the technical authority in the division on all matters related to budget execution. Her work is reviewed only from the standpoint of overall effectiveness and reliability.

The position does not meet Level 2-5. At that level, the supervisor provides administrative and policy direction in terms of broadly defined missions or functions of the organization. The employee is responsible for a significant program or function and is a technical authority. The employee defines objectives, interprets policy promulgated by authorities senior to the immediate supervisor, and independently plans, designs, and carries out the work. The supervisor's review of the work covers such matters as fulfillment of program objectives and the effect of advice or decisions on the overall program. The supervisor evaluates the employee's recommendations for new systems or projects in light of the availability of funds, personnel, equipment capabilities, priorities, and available resources.

Factor 2 is designed to measure not only the degree of independence with which the employee operates but also the *extent of the responsibility* inherent in the assignment. Within this context, implicit at Level 2-5 is a significant degree of *program management* responsibility; i.e., authority over the use of funds and personnel. The employee is responsible not only for individual performance of certain assigned tasks but also for the overall conduct of a broader program or function. This program or function must be of sufficient size and scope to permit the implementation of "new systems or projects" requiring consideration of funding and staffing needs. Further, the work must involve the interpretation of policy "promulgated by authorities senior to the immediate supervisor;" i.e., the employee must work at an organizational level at which budgetary policy is developed. In contrast, the appellant is responsible only for defined budget execution functions for her division. She may develop new procedures or mechanisms to assist her in carrying out her own work, but these are not akin to the new systems or projects involving additional investments of money or personnel described at Level 2-5. Because budgetary *policy* is promulgated at the departmental level, the organizational location of her position at the division level, within a bureau component of USDA, does not allow for the broad and original policy interpretation intended at this level.

Level 2-4 is credited (450 points).

Factor 3, Guidelines

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

The agency assigned Level 3-4 under this factor.

The guidelines used by the appellant match Level 3-3. At that level, guidelines typically provide preferred approaches or describe generally accepted standards rather than precisely delineating

requirements. An example would be agency handbooks developed at higher echelons covering a range of budget operations and procedures that the employee must either implement or consider in establishing local office practices. The employee must use judgment to adapt the guidelines to specific cases or problems and to interpret a large number of varied policies and regulations. Correspondingly, the appellant has specific department-level guidelines available for carrying out her budget execution work, although she must interpret and adapt them as necessary in determining how to process or report the financial transactions of the division.

The position does not meet Level 3-4. At that level, the employee works in situations where guidelines and policies are *scarce, very general, or conflicting*, and where documentation of earlier work is *unavailable or inapplicable*. Guidelines are limited to OMB circulars, Treasury regulations, Comptroller General decisions, and general agency specifications stated in terms of the goals to be accomplished rather than the approach to be taken. The employee routinely develops specific objectives and devises new methods and criteria for identifying trends and patterns, acquiring information and analyzing data, and developing solutions and presenting findings. The employee may interpret available guidance for employees at the same or subordinate levels.

Since the appellant works at the basic operating level in terms of budget administration, and her work is confined to the procedurally-established area of budget execution, there is ample specific departmental guidance available for carrying out the work. Since the budget items consist primarily of salaries and other administrative expenses, the budgetary actions required are not without applicable precedent. The organizational level at which the appellant operates does not afford much latitude for the development of methods and criteria, and the division has no subordinate budgetary echelons to which the appellant could provide interpretive guidance.

Level 3-3 is credited (275 points).

Factor 4, Complexity

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

The agency assigned Level 4-5 under this factor.

The complexity of the appellant's work is comparable to Level 4-4. At that level, work consists of performing a variety of analytical, technical, and administrative work for substantive programs and support activities funded through a number of sources such as appropriations, allotments, reimbursable accounts, and transfers of funds between organizations. Programs and funding are unstable and subject to change throughout the fiscal year, necessitating making frequent adjustments to budget estimates or conducting partial re-budgeting during the fiscal year. Program funding may extend for several years or more. The budget typically includes a wide range of object classes and line items for one or a few substantive programs and organizations, or fewer object classes and accounts through which a wide range of programs is funded.

Consistent with this level, the division's programs are funded through several sources, including appropriations, reimbursements, and trust funds. The division has about 60 active, multi-year cooperative agreements with universities for the conduct of economic research, requiring frequent budget adjustments during the fiscal year.

The position does not meet Level 4-5. At that level, work consists of using many different and unrelated analytical methods relative to *substantive agency programs with widely varying needs* that relate to *many echelons and components within a large Federal department or agency*. It includes budget execution work involving *the most difficult funds control activities*, such as multi-year procurement of major weapons systems, construction projects, law enforcement activities, and delivery of payments and benefits to the public. At this level, the employee analyzes budget requirements in relation to program needs, recommends changes in funding that may require program revisions, develops proposals for alternate sources of funding, and develops the strategy for presenting the budget and narrative justification for requested funds. The work is further complicated by conditions, such as continually changing program plans and funding requirements resulting from new legislation or expansion of services, or varying economic and fiscal circumstances, such as fluctuations in the monetary exchange rate.

The appellant supports one division within a small bureau with no subordinate echelons. She is, in effect, performing budget execution work for one program rather than several programs with widely varying needs. Although her funds control activities may be difficult due to the number of cooperative agreements, these difficulties are not on the same scale as would be encountered in controlling funds for the procurement of a major weapons system or the other activities provided as examples at this level. As a result, the appellant does not have the same degree of program input from a budgetary standpoint; i.e., although she informs management of the status of funds, she is not involved in analyzing program requirements and recommending sources and types of funding, nor is there occasion for her to recommend changes in funding and budget plans.

Level 4-4 is credited (225 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.

The agency assigned Level 5-5 under this factor.

At Level 5-3, work involves independently conducting a variety of tasks in limited functional areas, such as applying specific budgetary rules, regulations, principles, and procedures for assigned support activities. The work affects information on the amount, timeliness, and availability of funds for items, such as personnel salaries and expenses, routine maintenance and similar administrative support activities in appropriated- or industrial-fund organizations.

At Level 5-4, work involves such duties as formulating or monitoring the execution of long-range (i.e., three to five years) detailed budget plans to fund the implementation of substantive

agency programs; establishing financial and budgetary goals, timetables, and milestones against which the relative costs and benefits of program achievements can be measured; planning the timely acquisition and use of funds through time-phased allotments and transfers; analyzing costs, benefits, and trends in rates of obligation and expenditure of funds; and recommending ways to improve the utilization of funds. The work affects the amount and availability of funds for major substantive or administrative programs and services, such as the development of strategic weapons, housing construction, the delivery of health care services or payment of benefits to the public, research grants, or the conduct of regulatory and enforcement programs.

The appellant's work exceeds Level 5-3 in some respects, in that it relates to the budgetary requirements of a major line program of a bureau rather than "assigned support activities." Additionally, she performs some functions similar to those described at Level 5-4, such as establishing timetables for the allotment and transfer of funds and tracking trends in the expenditure of funds. However, the overall scope and effect of her work are more consonant with Level 5-3. Her work does not encompass "a wide range of agency activities" but rather is restricted to the operations of one division. The division's program is funded on an annual rather than a multi-year basis, thus limiting the scope of the work in terms of the time frames within which she operates. Although she executes the budget for a "substantive agency program" as expected at Level 5-4, the actual expenses incurred under this program consist exclusively of salaries and other expenses. Thus, her work affects the provision of funds for administrative operating expenses rather than for the major programs or services provided as examples at that level.

Level 5-3 is credited (150 points).

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

These factors include face-to-face and remote dialogue 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 agency assigned Level 3C under this factor.

Under *Personal contacts*, the appellant's contacts meet Level 3, where contacts are with various levels of agency management and representatives of other agencies and outside organizations and businesses. Level 4 is not met, where contacts are with high-ranking officials from outside the employing department at national or international levels, such as Congressional appropriations committee members or presidents of large national or international firms.

Under *Purpose of contacts*, Level B is met. At that level, the purpose of contacts is to plan, coordinate, or advise on work efforts and to obtain information. Although differences of opinion may exist, the persons contacted are usually working toward a common goal and are generally cooperative. The contacts involve such matters as the significance of guidelines, the

appropriateness of recommendations, the necessity for additional facts, resolving problems, coordinating technical support, and answering questions.

Level C is not met. At that level, the purpose of contacts is to influence, interrogate, or control persons or groups where there is *wide disagreement* on the merits of a proposed action or when the persons contacted are fearful or uncooperative. An example would be persuading program managers and other officials in positions of decision-making authority with widely differing goals and interests to follow a recommended course of action consistent with established budgetary policies or regulations. The appellant advises management on such matters as the status of funds and the actions required to accomplish budgetary objectives, but these contacts are not adversarial.

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	1-7	1250
Supervisory Controls	2-4	450
Guidelines	3-3	275
Complexity	4-4	225
Scope and Effect	5-3	150
Personal Contacts/Purpose of Contacts	3B	110
Physical Demands	8-1	5
Work Environment	9-1	<u>5</u>
Total		2470

The total of 2470 points falls within the GS-11 range (2355-2750) on the grade conversion table provided in the standard.

Evaluation using the AAGEG

Factor 1, Knowledge required by the position

The agency assigned Level 1-7 under this factor.

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

This accurately represents the knowledge required of the appellant in providing the full range of management and administrative support for [division], including defining the overall administrative needs of the division, ensuring that systems and procedures are in place to comply with administrative regulations and requirements, serving as liaison between the division and various administrative functional organizations, and advising division management on all administrative matters.

The position does not meet Level 1-8. This is the level of the expert analyst who has mastered the application of a wide range of qualitative and quantitative methods for the assessment and improvement of program effectiveness or the improvement of complex management processes and systems. This knowledge is applied in carrying out such assignments as designing and conducting comprehensive management studies where the boundaries are extremely broad and difficult to determine in advance; preparing recommendations for legislation to change the way programs are carried out; or evaluating new legislation for potential program impact and to translate it into program actions and services. The proposals made involve substantial agency resources or require extensive changes in established procedures. Illustrative examples for this level in the Guide describe situations where the work is applied to a multi-layered military command and include developing resource guidance to subordinate activities.

This level addresses positions with much broader program-related responsibilities than the appellant, whose work is confined to ensuring that established administrative operations are carried out rather than defining and implementing major changes in program activities or services. At this level, the nature of the work is such that it may only be performed within the context of a very large organization. The appellant supports the program activities of a segment of a relatively small bureau, which would not permit the continuing performance of work, such

as conducting comprehensive management studies or translating new legislation into program actions.

Level 1-7 is credited (1250 points).

Factor 2, Supervisory Controls

The agency assigned Level 2-5 under this factor.

The supervisory controls exercised over the appellant's position match Level 2-4. At that level, within a framework of priorities, funding, and overall objectives, the employee and supervisor develop overall work plans covering requirements, scope, and deadlines. Within these overall parameters, the employee is responsible for planning and organizing the work, estimating costs, coordinating with staff and management, and conducting all phases of the work. This frequently involves the definitive interpretation of regulations. The employee keeps the supervisor informed of potential controversies or problems with widespread impact. Completed work is reviewed for compatibility with organizational goals and effectiveness in achieving objectives. This level describes work carried out with a high degree of independence and recognized expertise, and as such, fully represents the manner in which the appellant operates.

The position does not meet Level 2-5. At that level, the employee is a recognized authority in the analysis and evaluation of programs and issues, subject only to administrative and policy direction concerning overall priorities and objectives. The employee is typically delegated complete responsibility and authority to plan, schedule, and carry out major projects, and exercises discretion in determining whether to broaden or narrow studies. The employee's analyses and recommendations are normally reviewed only for potential influence on broad agency policy objectives and program goals.

As was noted earlier, Level 2-5 recognizes not only independence of action, but also the degree of responsibility and authority inherent in the work as the context for the independence exercised. This level is predicated on responsibility for independently planning and carrying out major program activities or projects, with only broad administrative and policy direction. Because the parameters of the work are not clearly defined, the employee has the authority to determine the most productive areas of endeavor. In contrast, the appellant carries out ongoing operational activities, the content and boundaries of which are well-established. The nature of her work is not such that it would permit the exercise of this level of responsibility and authority.

Level 2-4 is credited (450 points).

Factor 3, Guidelines

The agency assigned Level 3-3 under this factor.

At Level 3-4, guidelines consist of general administrative policies and the program goals and objectives of the organization. At this level, polices and precedents provide a basic outline of the results desired, but do not go into detail as to the methods that should be used. Within the

context of these broad regulatory guidelines, the employee may refine or develop more specific guidelines, such as implementing regulations or methods for improving the administration of operating programs.

As at this level, the appellant applies a broad knowledge of administrative laws, policies, regulations, and precedents that are applicable to the division's program activities. Although she does use standard reference material, her work extends beyond the relatively uncomplicated interpretation of clear-cut guidelines and requires that she determine the most efficient means for organizing and accomplishing the myriad administrative operations of the division. As at Level 3-4, the appellant must analyze the impact of proposed and/or issue higher-echelon program policy changes, advise management on their potential impact, and develop a course of action to assure that the division's program activities, including external agreements and projects, are fully supported.

The position does not meet Level 3-5. At that level, guidelines consist of basic administrative policy statements or initiatives, laws, or court decisions. The employee interprets and revises existing policy and regulatory guidance for use by others within or outside the employing organization. Some employees review proposed legislation or regulations which would significantly change the agency's programs. Other employees develop study formats for use by others on a project team or at subordinate levels.

The appellant performs operating-level administrative work rather than the staff-level policy and regulatory functions addressed at Level 3-5.

Level 3-4 is credited (450 points).

Factor 4, Complexity

The agency assigned Level 4-4 under this factor.

At Level 4-4, work involves gathering information, identifying and analyzing issues, and developing recommendations to improve the effectiveness and efficiency of work operations in a program or program support setting. For example, assignments may involve compiling and reconciling voluminous workload data from a variety of sources with different reporting requirements and formats, or the data must be carefully crosschecked and analyzed to obtain accurate and relevant information.

At Level 4-5, work consists of projects and studies requiring analysis of interrelated issues of effectiveness, efficiency, and productivity of mission-oriented programs. Typical assignments require developing detailed plans, goals, and objectives for the long-range implementation and administration of the program. The work deals less with concrete administrative processes than with subjective issues, such as the relative advantages and disadvantages of centralizing or decentralizing work operations in organizations with several echelons of geographically separated components.

The appellant's analytical work is confined to improving the effectiveness and efficiency of the division's administrative operations, consistent with the "program support setting" described at Level 4-4. Unlike Level 4-5, she does not advise management on any aspects of the substantive professional work performed by the division involving the conduct of economic research beyond the administrative processes used to facilitate accomplishment of the work.

Level 4-4 is credited (225 points).

Factor 5, Scope and Effect

The agency assigned Level 5-3 under this factor.

At Level 5-3, the purpose of the work is to plan and carry out projects to improve the efficiency and productivity of administrative support activities; i.e., the clerical aspects of program implementation (such as claims processing or record management) at the operating or installation level. At this level, employees may be assigned portions of broader studies of largely administrative organizations or participate in the evaluation of program effectiveness at the operating level.

At Level 5-4, the purpose of the work is to assess the efficiency and productivity of program operations or to analyze and resolve problems in the staffing, effectiveness, and efficiency of administrative support and staff activities. At this level, work contributes to improvement of program operations and/or administrative support activities at different echelons and/or geographic locations in the organization or may affect the nature of administrative work done in components of other agencies.

The scope and effect of the appellant's work match Level 5-4. Both Levels 5-3 and 5-4 address improving the efficiency of administrative support activities, but with a progressively broader effect; i.e., "operating level" where the effect is exclusively local as opposed to "different echelons and/or geographic locations" or "components of other agencies." The appellant works at the division level within [bureau], which is direct operating level for an agency with no subordinate echelons or dispersed geographic sites. However, the division has administrative relationships with outside organizations through a large network of cooperative agreements, which is comparable to the broader impact expressed at Level 5-4.

The position does not meet Level 5-5. At that level, the purpose of the work is to analyze and evaluate major administrative aspects of substantive, mission-oriented programs, such as evaluating the effectiveness of programs conducted throughout a bureau or service of an independent agency, a regional structure of equivalent scope, or a large, complex multi-mission field activity. The study reports prepared contain findings and recommendations of major significance to top management of the agency and often serve as the basis for new administrative systems, legislation, regulations, or programs. The scope of the appellant's work is limited to one segment of a small bureau and its effect is to administer and facilitate administrative operations rather than to develop new systems or programs.

Level 5-4 is credited (225 points).

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

The agency assigned Level 3c under these factors.

Under *Personal contacts* the appellant's contacts match Level 3, where contacts include persons outside the agency. Level 4 is not met, where contacts are with high-ranking officials, such as the heads of other agencies, top Congressional staff, mayors of large cities, or executives of comparable private sector organizations.

Under *Purpose of contacts*, Level c is met, where contacts are to influence managers to accept recommendations and where resistance may be encountered due to such issues as organizational conflict or resource problems. Level d is not met, as it involves settling significant or controversial matters, such as recommendations affecting major programs or substantial expenditures that are well beyond the scope of the appellant's position.

Level 3c is credited (180 points).

Factor 8, Physical demands

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

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

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-7	1250
Supervisory Controls	2-4	450
Guidelines	3-4	450
Complexity	4-4	225
Scope and Effect	5-4	225
Personal Contacts/Purpose of Contacts	3c	180
Physical Demands	8-1	5
Work Environment	9-1	5
Total		<u>2790</u>

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

Decision

The appealed position is properly classified as Administrative Officer, GS-341-12.