

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

Appellant: [name]

Agency classification: Program Support Assistant
GS-303-7

Organization: Management and Organization Division
Office of the Chief Financial Officer
Office of the Assistant Administrator
[bureau]
[agency]
[department]
[city and State]

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

OPM decision number: C-0303-05-23

/s/ Kevin Mahoney
Kevin E. Mahoney
Acting Deputy Associate Director
Center for Merit System Accountability

7/27/07
Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under the conditions and time limits specified in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

Since this decision lowers the grade of the appealed position, it is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The applicable provisions of parts 351, 432, 536, and 752 of title 5, Code of Federal Regulations, must be followed in implementing this decision. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented. The servicing human resources office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action to the OPM office which accepted the appeal.

Decision sent to:

[appellant]

[agency human resources office]

[department human resources office]

Introduction

On November 7, 2006, the Center for Merit System Accountability, U.S. Office of Personnel Management (OPM), accepted a position classification appeal from [appellant], who occupies the position of Program Support Assistant, GS-303-7, in the Management and Organization Division, Office of the Chief Financial Officer, Office of the Assistant Administrator, at the [bureau], in [city and State]. She requested that her position be classified to either the GS-301 or GS-342 series at the GS-11 level. We accepted and decided this appeal under the provisions of section 5112 of title 5, United States Code (U.S.C.)

General issues

The appellant submitted a large volume of work samples and other associated materials in connection with her appeal, most of which are dated from the late 1990's to several years ago and some of which relate to duties she is no longer assigned. Under 5 U.S.C. 5112, we can consider only current duties and responsibilities in classifying positions. OPM guidelines and previous decisions show that in evaluating positions such as the appellant's, current duties are those that have occurred in about the past year. Therefore, we could not consider duties performed over a year ago or duties that are no longer assigned to the appellant in deciding this appeal.

In a related vein, the appellant cited various special projects she has performed during her tenure in this position in support of her request for a higher grade, for example, writing four administrative directives in 2004, serving on a source selection panel in 2003, and participating in the conversion to a new directives system in 2002. In addition to the fact that most of these projects were performed several years ago and thus are not current duties, the grade of a position is based entirely on the *regular and recurring* work performed. One-time projects or short-term assignments cannot determine the grade of a position. In this case, these special projects are neither recent nor representative of the regular, ongoing work of the appellant's position and thus have no influence on its grade.

The appellant also submitted materials related to advocacy work she has performed during duty hours in various venues related to access and accommodation for people with disabilities in the Federal workforce. Participation in activities of this nature may be permitted or endorsed by management, but they are not *assigned duties* and are not part of the employee's official position. These activities thus cannot be considered in the grade evaluation of the appellant's position.

The appellant cited instances where tasks she performed were also assigned to higher-graded employees. This has no bearing on the grade value of the particular assignments. Lower-graded tasks may be and often are performed by higher-level staff for workload or practical considerations. This does not indicate the tasks themselves constitute higher-graded work.

Position information

The appellant's primary responsibility is to maintain the [bureau] National Directives System (NDS) tracking system by processing directives from receipt through review, clearance, and posting. She reviews new and revised directives for format and procedural errors; coordinates internal agency review by transmitting proposed directives to the union and their subsequent comments back to the submitting offices; regularly updates the tracking system and notifies affected offices of review status, clearances, and signature; prepares and transmits signed directives for Web posting; checks that enacted directives have been posted and reviews them for accuracy and to ensure all portions can be opened; and maintains archival copies of outdated or replaced directives. The appellant notifies the responsible offices of directives entering the biennial review period and advises them on procedural questions related to the NDS.

The appellant is also responsible for several other regular, ongoing functions. She signs for badges and keys from employees departing [agency], removes their names from the [agency] locator and property pass list, and prepares monthly listings of badges received for the Security Field Office. She maintains and updates the property pass signature authorization list and signature cards and provides these to the Security Field Office as required. She keeps [bureau] directories current, prepares and submits updates to the [agency] locator for [bureau] headquarters personnel and the [bureau] portion of the [agency] organizational directory, provides updates to other Federal directories as requested, and updates and distributes personnel emergency contact cards. She updates distribution lists of [bureau] offices and external addressees and prepares and submits the [bureau] portion of [agency] mailing lists as instructed. She ensures the maintenance of adequate stock of [bureau] letterhead. She coordinates the review of suggestions within [bureau] by logging them in, transmitting them to the appropriate program office for evaluation, and periodically following up on their status. She responds to general information requests from the public or [bureau] employees related to her areas of responsibility.

We conducted an on-site desk audit with the appellant on April 12, 2007, and a subsequent telephone interview with her supervisor. We decided this appeal by considering the audit findings and all other information of record furnished by the appellant and her agency, including her official position description and other material received in the agency administrative report on March 15, 2007. The appeal record contains additional descriptive information which, along with the official PD, contains the major duties and responsibilities assigned to and performed by the appellant, and we incorporate it by reference into our decision. Further, the appellant submitted a large volume of work samples and other related materials which we reviewed and fully considered in our decision.

Series and title determination

The appellant believes her position should be classified to a two-grade interval series such as GS-301 or to the GS-342 series or a "program management classification." As the basis for this, she cites her position description listing her duties under three major headings - Administrative Manager, Program Manager, and Documentation Manager - and she asserts that she manages several "programs." She submitted a copy of correspondence written by her supervisor wherein

he refers to her being required to “manage the organization’s archive administration.” For classification purposes, however, her duties do not constitute program management as it is commonly understood or defined. The terms “managerial” and “program” are defined in the General Schedule Supervisory Guide as follows:

MANAGERIAL – The authority vested in some positions under the General Schedule which direct the work of an organizational unit, are held accountable for the success of specific line or staff functions, monitor and evaluate the progress of the organization toward meeting goals, and make adjustments in objectives, work plans, schedules, and commitment of resources. As described in 5 U.S.C. 5104, such positions may serve as head or assistant head of a major organization within a bureau; or direct a specialized program of marked difficulty, responsibility, and national significance.

PROGRAM – The mission, functions, projects, activities, laws, rules, and regulations which an agency is authorized and funded by statute to administer and enforce. Exercise of delegated authority to carry out program functions and services constitutes the essential purpose for the establishment and continuing existence of an agency. The focus of a program may be on providing products and services to the public, State and local government, private industry, foreign countries, or Federal agencies. Most programs have an impact or effect which is external to the administering agency. In addition, comparable agencywide line or staff programs essential to the operation of an agency are considered programs in applying this guide; the impact of these programs may be limited to activities within one or a few Federal agencies.

The functions carried out by the appellant, such as maintaining a tracking system, completing employee exit processing, updating directories, and coordinating the review of suggestions, are not agencywide line or staff programs. They do not constitute the mission of the agency and are not in themselves essential to its operation. Rather, they are *support activities and services* constituting very limited aspects of the broader administrative programs with which they are associated. Further, although the appellant has continuing responsibility for carrying out these assigned activities, her position is not that of a “manager” because she does not direct the work of an organizational unit and is not responsible for the accomplishment of a broad function with the attendant planning, scheduling, and resource responsibilities. Although the term “manage” may be used informally by agencies to connote assigned responsibility for carrying out a discrete set of activities, this term has a very specific meaning for classification purposes, and the use of this terminology in respect to the appellant’s position has no bearing on the grade evaluation.

Guidance on distinguishing between two-grade interval administrative series and one-grade interval support series is contained in The Classifier’s Handbook. This guidance notes these distinctions are not always obvious, since assistant duties can be found in some administrative positions and vice versa, and some tasks are common to both types of occupations, particularly at the higher levels of support work.

Generally speaking, support work usually involves proficiency in one or more functional areas or in certain limited phases of a specific program. Employees who perform support work follow established methods and procedures. They may occasionally develop work plans or recommend

new procedures, but these are typically related to the employee's individual assignment or immediate work unit. 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 personnel 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 skill in communicating effectively both orally and in writing. Administrative positions do not require specialized education, but they do involve the type 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 appellant's duties cannot be construed as two-grade interval administrative work. Her duties are transactional rather than analytical; i.e., they involve carrying out established processes and procedures based on practical knowledge of the requirements associated with the discrete functional assignments. Thus, while the appellant may know the steps involved in coordinating the review of directives within the agency and getting them posted on the Web site, and she may understand the general design of the directives system, she is not required to understand or make decisions or recommendations regarding the content of the directives. She may know the steps involved in employee exit processing and maintaining the property pass signature authorization list, but she is not required to know any broader security program policies or regulations. Within each functional assignment, her work involves the application of a limited set of methods and procedures that do not vary significantly. Her work neither requires nor permits the exercise of a high order of analytical ability, comprehensive knowledge of management principles and processes, or skill in problem solving or written communication. Her work does not involve planning and devising systems or services, formulating and developing policies or operating procedures, or adapting policy to unique operating situations. Instead, it involves carrying out prescribed steps involved in such activities as coordinating the review of materials by others and updating organizational directories and other records. The appellant submitted no recent written work products exhibiting any significant degree of analysis or problem solving. The work samples submitted consisted almost entirely of email messages either transmitting materials (for example, proposed directives with summaries written by the originators) or conveying factual information, such as the status of actions, format instructions, or established procedural requirements. The appellant's duties could be learned on-the-job by following an instructional manual without any deeper insight into the mission and programs of the agency or the broader program interrelationships associated with the work. These characteristics are directly associated with one-grade interval support or assistance work.

The appellant's position cannot be classified to the GS-342, Support Services Administration Series. The GS-342 series covers positions which involve supervising, directing, or planning and

coordinating a variety of services functions that are primarily work-supporting, such as communications, purchasing, printing, property management, space management, records management, mail service, facilities maintenance, and transportation. The standard notes “incumbents of positions covered by this series share a common responsibility for assuring the performance of those functions that facilitate the work of the organization serviced;” i.e., assuring their performance by others rather than through personal performance of work. By definition, operating-level positions in this series are responsible for supervising the work of others. Nonsupervisory positions in this series are limited to staff-level assignments concerned with planning, policy, or advisory functions pertaining to support services programs; i.e., developing guidance or planning for such programs to be implemented by others at lower levels of the organization. The appellant is responsible only for the performance of her own work. She does not direct, supervise, oversee, or develop policy for these program functions as they are carried out by other staff.

The appellant’s position does not fit the GS-344 Management and Program Clerical and Assistance Series. The GS-344 series covers clerical and technical work in support of management analysis or program analysis, the purposes of which are to evaluate and improve the efficiency, effectiveness, and productivity of organizations and programs, when the work requires a practical knowledge of the purposes, methods, and techniques of management analysis or program analysis and the structures, functions, processes, products, services, resource requirements, and similar features of Government programs and organizations. Employees in this series perform the routine, procedural, or standard assignments that support management or program analytical work. Some employees in this series perform the basic procedural tasks needed to complete management or program analysis projects and processes, such as maintaining, gathering, and compiling records of organizational and workflow charts, staffing levels, mission and function statements, and internal audit reports; compiling and distributing reports on proposed program goals, budgets, staff levels, and performance criteria to operating officials for review and comment; making and verifying routine calculations such as standard cost estimates, production rates, staff hours, and workload figures; or preparing charts, graphs, and narrative information for management analysis reports from material provided by higher-level employees. Other employees in this series perform limited management analysis projects or segments of larger projects or studies under the direction of higher-level employees, such as monitoring and reviewing program resource and forecasted requirements to identify trends and discrepancies; studying reports on program workload figures and production rates and determining the extent of deviations from goals; and interviewing operating personnel to collect information on and produce charts showing workflow patterns, lines of authority, or organizational layout.

Although the appellant’s position is located in a management analysis organization, she works in an *administrative* support rather than a *management analysis* support capacity. Her work does not require knowledge of the purposes, methods, and techniques of management analysis or the structures, functions, processes, objectives, products, services, resource requirements, or similar features of Government programs and organizations. Her work involves carrying out established procedures requiring knowledge of certain administrative requirements prescribed by the agency that are not directly associated with the field of management analysis.

Although the appellant asserts that she is responsible for records management for the agency, the information and materials she provided relate to her participation in an [bureau] records schedule project several years ago. She describes her participation as having “provided guidance to [bureau] offices for NARA [National Archive and Records Administration] on what offices are affected and coordinated meetings with [bureau] personnel, describing the structure of each office, their programs and roles within [bureau] and their responsibilities to the public.” Aside from the fact that the appellant’s role as described was administrative in nature and did not involve any substantive involvement in the review of records or determining their disposition, this project is not a current or ongoing assignment and thus is not addressed in this evaluation. The appellant provided no information supporting the conclusion she performs any significant degree of regular and recurring work related to records management.

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

Standard and grade determination

The agency evaluated the appellant’s position by applying the grade-level criteria in the GS-344 series standard. In particular, the agency favorably compared the appellant’s work to an illustration in the standard where the employee controls the maintenance and development of administrative directives. In this illustration, the employee reviews proposed directives for proper arrangement of material, consistency with existing directives, and proper distribution; reviews existing directives to detect and eliminate conflict, overlap, and duplication and to ensure that only current material is retained; devises ways to improve directives by simplifying, consolidating, or eliminating them; and discusses recommendations for changes with the using offices to gain concurrence.

This is not a valid comparison. First, the use of the GS-344 series standard for grade determination is not appropriate as it presupposes possession of the knowledge associated with that occupation. Second, the illustration cited by the agency is similar to the appellant’s position only to the very limited extent that both deal with directives, albeit for very different purposes. The illustration describes a technical management assistant assignment wherein the employee reviews proposed and existing administrative directives not only for procedural aspects, such as format and distribution, but also for matters related to their actual content, such as consistency or overlap, and proposes changes to simplify, consolidate, or replace materials. The appellant, on the other hand, provides an administrative support service by maintaining a tracking system for the agency’s directive system. She reviews proposed directives only for format and procedural correctness rather than for content, transmits them to the reviewing office, and tracks their status. The fact that the documents being processed are directives is immaterial to the classification of the appellant’s position as her role is exclusively coordinative rather than substantive, i.e., her

focus is on transmitting and tracking materials rather than on reviewing or developing them. The highly technical nature of most of these directives would not permit the appellant to perform the type of review described in this GS-344 illustration.

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

The appellant performs duties of varying grade levels which are addressed separately below:

Directories, employee exit processing, property passes, mailing lists, and other related assignments

GS-4

Nature of Assignment

Work consists of performing a full range of standard clerical assignments and resolving recurring problems. Work consists of related steps, processes, or methods which require the employee to identify and resolve differences among a variety of recurring situations. Actions to be taken or responses to be made differ in nature and sequence because of differences in the particular characteristics of each case or transaction. In addition to knowledge of how to carry out procedures, the work requires some knowledge of a type of business practice such as maintaining inventory records and replenishing supplies, or of a body of standardized rules, processes, or operations.

Level of Responsibility

The supervisor provides little assistance with recurring assignments. The employee uses initiative to complete work in accordance with accepted practices. Unusual situations may require the assistance of the supervisor or a 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 number and similarity of guidelines and work situations require the employee to use judgment in locating and selecting the most appropriate guidelines, references, and procedures. The employee makes minor deviations to adapt the guidelines in specific cases. The employee has contact with co-workers and those outside the organization to exchange information and in some cases to resolve problems in connection with the immediate assignment.

A GS-4 work example provided in the guide describes a Security Clerk who performs a variety of recordkeeping, reporting, and informational duties in support of the organization's security program, and compiles, maintains, and updates data, lists and reports of computer passwords, security violations, and employees and visitors authorized access to the building and/or its computer system. The employee works independently in carrying out assignments of a continuing nature (e.g., preparing recurring reports and maintaining lists of computer passwords and persons to be admitted to buildings), exercising judgment in determining when deviations are appropriate. Contacts with management personnel are for the purpose of obtaining and providing information necessary to maintain and update lists and to prepare reports.

The appellant's duties related to maintaining directories, emergency contact cards, mailing lists, property pass signature cards, authorization lists, and letterhead stock do not exceed the GS-4 level criteria described above. As at that level, these duties represent standard clerical assignments consisting of related steps or processes; i.e., the appellant is notified of required changes, usually via email, and updates the relevant database or other record as instructed. The work requires only the limited knowledge associated with the procedures to be followed in updating these various records and listings, comparable to knowledge of such business practices as "maintaining inventory records and replenishing supplies." The level of the appellant's responsibility is also consistent with GS-4 in that the work is recurring and thus performed with minimal supervision in accordance with established practices. In performing these duties, the appellant has contacts with employees throughout the organization to exchange information and to resolve problems related to the specific actions being taken. This work has similar characteristics to the above GS-4 work example in that it consists of essentially recordkeeping duties involving maintaining and updating lists; the guidelines consist primarily of administrative procedures, past practice, or specific instructions from management; judgment is required to determine when deviations are appropriate; and contacts with management personnel are to obtain the information needed to maintain and update the records.

GS-5

Nature of Assignment

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

Level of Responsibility

The supervisor assigns work by defining objectives, priorities, and deadlines and provides guidance on assignments which do not have clear precedents. The employee works in accordance with accepted practices and completed work is evaluated for technical soundness,

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

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

These duties do not meet the GS-5 level because they do not constitute a combination of standard *and* nonstandard clerical assignments. The nature of the work is not such that it requires identifying and understanding the issues involved in each assignment, determining what steps and procedures are necessary, or selecting a course of action from a number of possibilities. The work does not require extensive knowledge of the organization's rules, procedures, or operations to perform the more complex clerical processing procedures. The work is not covered by extensive guidelines in the form of instructions, manuals, and regulations as in the GS-5 work example described above. These particular duties for which the appellant is responsible do not by their nature require her to consider the substance of the transactions being carried out. The work products consist of employee directories, mailing lists, signature cards, and other similar records for which the appellant is given the information required to update. For other duties, she carries out established procedures to complete uncomplicated transactions, such as ensuring that all signatures have been obtained on the exit clearance form and collecting keys and badges. The content of these work products consists of limited administrative data and listings that do not require any significant review, examination, or processing by the appellant beyond relatively simple updating or checking for basic completeness.

NDS tracking system

GS-6

At this grade level, the guide provides separate evaluation criteria for clerical and assistance work. Clerical work involves such work as preparing, receiving, reviewing, and verifying documents; maintaining office records; locating and compiling data or information from files;

compiling information for reports; and similar clerical support work. Assistance work involves performing technical work to support the administration or operation of the programs of an organizational unit which requires working knowledge of the processes and procedures of an administrative field and the mission and operational requirements of the unit.

The appellant's work is clerical in nature because it primarily involves receiving, reviewing, and coordinating material prepared by others. It does not involve performing technical work within an administrative field. Thus, only the grade level criteria for clerical work is addressed below.

Nature of Assignment

Work entails processing a wide variety of transactions for more than one type of assigned activity or functional specialization. Assignments are subject to different sets of rules, regulations, and procedures, knowledge of which is usually attained through extensive, increasingly difficult, and practical experience and training.

Level of Responsibility

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

A GS-6 work example provided in the guide describes a Reports and Financial Assistant who runs a statistical reporting and record system for a major division of a regional office, which includes analyzing feeder reports from various branches and units; preparing division-wide reports; designing detailed charts and graphs; and conducting special management studies requiring written presentations of findings, recommendations, forecasts, and justifications. The employee also reviews work measurement functions for the division to ensure that basic reporting requirements and procedures are being followed and that reports provide clear and concise information; analyzes data to determine and evaluate results, trends, and developments; and writes instructions as needed to implement changes in reporting procedures.

Assignments at GS-6 involve processing a wide variety of transactions using different rules, regulations, and procedures, where the work requires extensive practical experience and training in the subject matter field and the ability to interpret and apply regulatory and procedural requirements to process unusually difficult and complicated transactions. The appellant's work related to maintenance of the NDS tracking system and the processing of directives through review and posting does not meet these criteria. She does not process a wide variety of transactions using different rules, regulations, and procedures; she coordinates and tracks the review of directives applying the same limited administrative procedures for each. This work

does not require extensive practical experience and training in a subject matter field; it could be readily carried out with a minimum level of on-the-job training. It does not require interpreting and applying regulatory and procedural requirements; it involves carrying out the same steps repetitively for each transaction as governed by established procedures. The work does not require or permit her to examine the issues involved in a given transaction to determine the best course of action, e.g., she does not determine who should review the directive; she does not read the directive for content; and she does not evaluate the union's comments for relevance. The parameters of her work are well defined in that she is not authorized to deviate from established procedures in the coordination of directives unless specifically instructed. She carries out a structured, prescribed set of processes with limited opportunity for the application of any independent judgment or action. Thus, this work is not consistent with the nature of assignments expected at the GS-6 level.

In terms of the level of responsibility associated with this work, the appellant is not recognized as an authority on processing transactions within a complicated framework of established procedures, nor is she regarded as an expert source of information on the regulatory requirements governing the work. The processes that she carries out are relatively uncomplicated and are governed by a limited set of administrative procedures rather than by regulatory requirements that must be interpreted and applied (i.e., she reviews directives for format and procedural errors, transmits them to the union for review, notifies affected offices upon signature, updates the tracking system, and transmits them for posting). Carrying out these limited processes does not provide the framework wherein the appellant would be providing authoritative information or expertise to others on how the work must be accomplished, e.g., explaining how a particular transaction must be handled or what regulations apply to a given situation. The guidelines for this work are not numerous and varied and the appellant neither chooses nor adapts how a given directive should be handled. The nature of the work does not permit her to deviate from established procedures or regular channels in the processing of directives without specific instructions from management.

The appellant's responsibility for running a directives tracking system is not analogous to the above GS-6 work example of running a statistical reporting and records system in that the processes involved are considerably more limited. In that example, the incoming documents are not merely input into a system and tracked; they are reviewed and analyzed for results, trends, inaccuracies, or anomalies and used to generate consolidated reports, charts, and graphs. In other words, the employee in this example has a substantive role in reviewing and analyzing the documents rather than merely a transactional role in transmitting and tracking them.

The appellant's overall position does not exceed the GS-5 level as described above. It includes a variety of different types of assignments involving different steps or processes, where the employee must know the general issues involved in each assignment, the steps necessary, and the order of their performance. The work requires knowledge of the organizational structure and of the established procedures and practices governing the assigned tasks and functions. Her position is generally analogous to the GS-5 work example described above in that it involves "controlling" directives by examining them for procedural correctness, entering them into the system, tracking clearances received, transmitting them for posting, resolving discrepancies, and maintaining archival files.

Decision

The highest grade level of work performed by the appellant is GS-5. The position is thus properly classified as GS-303-5, with the title at agency discretion.