

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

**Appellant:** [Name of appellant]

**Agency classification:** Program Support Assistant  
GS-303-7

**Organization:** [Appellant's organization/work location]  
Veterans Affairs Medical Center  
Veterans Health Administration  
U.S. Department of Veterans Affairs

**OPM decision:** GS-303-7 (Title at agency discretion)

**OPM decision number:** C-0303-07-11

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Robert D. Hendler  
Classification and Pay Claims  
Program Manager  
Center for Merit System Accountability

March 13, 2009

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Date

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

**Decision sent to:**

[Appellant's name/mailling address]

[Address of appellant's servicing human resources office]  
Department of Veterans Affairs

Deputy Assistant Secretary  
for Human Resources Management (05)  
Department of Veterans Affairs  
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## **Introduction**

On February 23, 2008, the San Francisco Oversight and Accountability Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [name of appellant]. On March 14, 2008, we received the agency's complete administrative report. The appellant's position is currently classified as Program Support Assistant, GS-303-7. However, he believes it should be classified in the Miscellaneous Administration and Program Series, GS-301, at the GS-9 grade level because his duties and responsibilities have increased since he was hired. The appellant works in the [appellant's organization/work location] Veterans Affairs Medical Center, Veterans Health Administration, U.S. Department of Veterans Affairs (VA). We have accepted and decided this appeal under section 5112(b) of title 5, United States Code (U.S.C.).

## **General issues**

The appellant makes various statements about the classification review process conducted by his agency. In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of this position. By law, we must make that decision solely by comparing his current duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison. Because our decision sets aside all previous agency decisions, the classification practices used by the appellant's agency in classifying his position are not germane to the classification appeal process.

The appellant discusses the large amount of work he performs, indicating it has increased since he was hired. However, volume of work cannot be considered in determining the grade of a position (*The Classifier's Handbook*, chapter 5).

## **Position information**

Both the appellant and his first- and second-level supervisors have certified to the accuracy of the appellant's official position description (PD) [number]. The appellant's position at the [appellant's organization] provides support to the largest research activity in VA. [Name of installation] carries out and/or supports an annual research program totaling approximately \$67 million dollars, which includes research efforts by staff of the [name of university and research organization]. Approximately 200 Principal Investigators oversee or conduct 800 active research projects at the [name of installation]. The appellant provides technical support for up to 80 permanent [name of installation] service staff, employees paid by [name of university], and a large number of volunteers. His duties include tracking use and inventorying all [name of research unit] equipment and furniture used by Principal Investigators, including ensuring the accuracy of maintenance records, accountability and transfer, and disposition of obsolete equipment; conducting training sessions for staff and contractors on bio-safety and security as required by the agency, and documenting individual training records; serving as facilities coordinator between his service and other services within [name of installation] (e.g., engineering, environmental maintenance, supply, medical safety, radiation), and with private contractors, covering training, removal of bio-hazards, preparing documents for equipment

transfer, clearing of research space for renovation and monitoring timeliness for completion of projects; monitoring records and internal control and issuance of keys and key cards for [name of research unit] and the animal research facility; coordinating individual computer system access and training, and hardware/software installation with [name of installation] information technology staff, and the installation of telephone equipment within [name of research unit].

In reaching our classification decision, we have carefully reviewed all information furnished by the appellant and his agency, including the official PD which we find sufficient for purposes of classification and incorporate it by reference into this decision. However, we note the PD's use of such terms as "technical expert" and "technical advisor" overstate the difficulty and complexity of the work actually performed by the appellant. In addition, to help decide the appeal we conducted separate telephone interviews with the appellant and his first- and second-level supervisors.

### **Series, title, and standard determination**

The agency has classified the appellant's position in the Miscellaneous Clerk and Assistant Series, GS-303, but the appellant believes it should be classified to the GS-301 series. The GS-301 series includes positions which perform, supervise, or manage non-professional, two-grade interval work for which no other series is appropriate. The work requires analytical ability, judgment, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives. The administrative work of this series involves skills such as analytical, research and writing ability, and requires the application of judgment typically demonstrated by substantial, responsible experience, or that equivalent to a college level education.

The GS-303 series includes positions which perform or supervise clerical, assistant or technician, one-grade interval work for which no other series is appropriate. 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.

Classification guidance in the *Introduction* and *The Classifier's Handbook* describe distinctions between positions properly classified in two-grade interval administrative series and those classified in one-grade interval support series. Administrative positions (two-grade interval) are involved in work primarily requiring a high order of analytical ability. This ability is 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 positions are involved with analyzing, evaluating, modifying, and developing basic programs, policies, and procedures that facilitate the work of Federal agencies and programs.

In contrast, support positions (one-grade interval) perform work which follows established methods, procedures, and guidelines, and may require a high degree of technical skills, care, and precision. The work can be performed based on a practical knowledge of the operations, techniques, purpose, operation, procedures, and guidelines of the specific program area or

functional assignment. Support personnel typically learn to do the work on the job and also may attend specific training courses related to their work.

We find the appellant's position does not meet the GS-301 series definition as the duties do not require a high order of analytical ability, a comprehensive knowledge of management principles and theories, or analytical methods and techniques. His work does not involve extensive skills in research methods and writing ability, nor does it require knowledge of a substantial body of administrative or program principles, concepts, and policies. There is also no requirement for the appellant to develop analytical presentations or reports on the management of the [name of research unit] program.

The appellant performs one-grade interval clerical and technical work that directly supports the administration and operation of the [name of research unit] program. For example, much of the appellant's equipment inventory work is directly addressed at Level 1-4 in the Supply Clerical and Technician Series, GS-2005 standard:

Employees maintain accurate accounting and reporting systems for non-expendable property and perform routine phases of property management. They –

-- Review proposed purchases to ensure they are in accordance with fiscal year property plan, review justifications, and recommend actions for property requests not on the plan;

-- Plan for and conduct limited segments of management studies on the utilization of property, and make informal recommendations based on data developed;

-- Review records and demand data to determine if property has become obsolete or excess to the needs of the organization and/or excess to the overall requirements of the agency; offer recommendations to operating officials for utilization; and prepare reports and necessary documentation for transfer of property;

-- Locate surplus property, determine age and probable condition by checking records, contacting local vendors, physically inspecting records, and arranging for transfer of property that can be used

The appellant's work requires a working knowledge of the work processes and techniques, and mission and operational procedures of the [name of research unit]. Similar to support positions, the appellant performs a variety of technician duties requiring knowledge and application of [name of research unit] procedural guidelines; knowledge of a variety of automated tracking systems and procedures; knowledge and ability to interpret and apply VA policy and procedures concerning VA Information System Technology Architecture (VISTA); knowledge of VA policy and procedures on equipment management; and ability to communicate orally and in writing, to explain to installation officials and external parties (e.g., vendors) the procedural and technical administrative aspects governing the operations of the [name of research unit]. As noted above, the appellant's duties do not meet the intent of two-grade interval administrative work. They match one-grade interval technical work typical of the GS-303 series which is based on a practical knowledge of the purpose of the function supported and the program's operations,

procedures, techniques and guidelines. Like the GS-303 series, the appellant's supply work is one aspect of a wide range of specialized duties for which there is no more appropriate single occupational series established.

There are no titles specified for positions in the GS-303 series. Therefore, the agency may construct a title in keeping with the nature of the support work performed. In doing so, the agency should adhere to the position titling guidance contained in the *Introduction*. Because the standard for the GS-303 series contains no grade-level criteria, to grade the appellant's technical support work we have applied the criteria in the Grade Level Guide for Clerical and Assistance Work (hereafter referred to as the Guide).

### **Grade determination**

The Guide provides grade-level criteria for administrative support work. Clerical work is defined in the Guide by examples of preparing, receiving, reviewing, and verifying documents; maintaining office records; and compiling information for reports. Assistance work is defined as technical work that supports the administration or operation of the program of an organizational unit, and requires a working knowledge of the work processes and procedures of an administrative field and the mission and operational requirements of the unit. The record shows the appellant primarily performs assistance work. The Guide uses two classification factors to evaluate the work of a position: (1) *Nature of Assignment* which includes knowledge required and complexity of the work, and (2) *Level of Responsibility* which includes supervisory controls, guidelines, and contacts. Our evaluation by application of the two classification factors in the Guide follows.

#### *Nature of assignment*

At the GS-7 level, the highest level for this factor described in the Guide, work consists of specialized duties with continuing responsibility for projects, questions, or problems that arise within an area of a program or functional specialty as defined by management. Work assignments involve a wide variety of problems or situations common to the segment of the program or function for which the employee is responsible. Each assignment typically consists of a series of related actions or decisions prior to final completion. Decisions or recommendations are based on the development and evaluation of information that comes from various sources. The work involves identifying and studying factors or conditions and determining their interrelationships as appropriate to the defined area of work. The employee must be concerned about taking or recommending actions that are consistent with the objectives and requirements of the program or functions. At this level, the work requires knowledge and skill to recognize the dimensions of the problems involved, collect the necessary information, establish the facts, and take or recommend action based upon application or interpretation of established guidelines. The work also requires practical knowledge, developed through increasingly difficult, on-the-job training or experience dealing with the operations, regulations, principles, and peculiarities of the assigned program, function, or activity.

The appellant's position meets, but does not exceed, the GS-7 level. Like this level, he performs specialized work on a continual basis involving a variety of projects and support activities within

the [name of research unit]. His duties encompass a wide variety of problems and situations including monitoring and accounting for equipment within the service through periodic inventories, and maintenance of extensive automated records covering equipment availability, transfer, repair, and disposal. As the only administrative support employee in [name of research unit] concerned with monitoring the progress of ongoing approved renovation, construction, and facility maintenance repairs (up to five occurring simultaneously) within the installation's research space, the appellant coordinates all facility movements and temporary relocation and storage of research equipment, including the movement of chemical and bio-hazardous materials. He documents all records, coordinates safety training for contractors, and assists in determining time to project completion to meet client requirements. Like the GS-7 level, his work presents a variety of problems unique to the research environment, particularly regarding movement and storage of highly sensitive and costly research equipment, and removal and safeguarding of chemical, biological and radiation hazards within the laboratory.

Similar to the GS-7 level, his decisions and recommendations, especially regarding facility coordination, require him to develop and evaluate interrelated information from various sources including research staff, internal engineering and environmental services, contractors, communications providers, and movers on priorities, timelines, safety issues, and the physical clearance process to ensure that scheduled facility repair/renovation is accomplished within prescribed sequence and time frames, and performed within contract specifications and agency guidelines. In doing so, he must ensure his actions are consistent with the objectives and requirements of the [name of research unit] program. Like the GS-7 level, his work requires the knowledge and skill to recognize the gravity and breadth of problems, particularly concerning facility renovation, and the ability to collect needed factual information and coordinate actions with all concerned parties to resolve issues impeding progress. Such actions are based upon his extensive experience, and application/interpretation of relevant agency guidelines, program objectives and operating procedures.

#### *Level of Responsibility*

At the GS-7 level, which is the highest level for this factor described in the Guide, the supervisor makes assignments in terms of objectives, priorities, and deadlines. The employee independently completes assignments in accordance with accepted practices, resolving most conflicts which arise. Completed work is evaluated for appropriateness and conformance to policy. The guidelines for the work are more complex than at the next lower grade level because the employee encounters a wider variety of problems and situations which require choosing alternative responses. The guides, such as regulations, policy statements, and precedent cases, tend to be general and descriptive of intent, but do not specifically cover all aspects of the assignments. At this level, the guidelines apply less to specific actions and more to the operational characteristics and procedural requirements of the program or function. Employees must use significant judgment and interpretation to apply the guides to specific cases and adapt or improvise procedures to accommodate unusual or one-of-a-kind situations. At the GS-7 level, contacts and purpose of contacts are to serve as a central point-of-contact to provide authoritative explanations of requirements, regulations, and procedures, and to resolve operational problems or disagreements affecting assigned areas.

The appellant's position meets, but does not exceed the GS-7 level. Like this level, his supervisor (chief of the research administration office) assigns work by defining objectives, priorities, and deadlines. As the only Program Support Assistant in [name of research unit] serving as "Facilities Coordinator," the appellant independently coordinates his work with other services which actually plan the renovations, equipment acquisitions, etc., and contractors, resolving most conflicts that arise concerning renovation and construction projects, and facilities maintenance repairs. As a central point-of-contact, he provides authoritative explanations on requirements, regulations, and procedures, resolving operational problems or disagreements concerning the progress of renovation or construction projects. His supervisor expects him to resolve problems within his program and project area with little or no assistance. However, he keeps his supervisor apprised of any controversial issues or situations. The appellant's supervisor evaluates completed work for appropriateness of conclusions or recommendations, consistency, relevance of supporting material, and compliance with policies and requirements.

Like the GS-7 level, guidelines used by the appellant include various VA regulations, operating instructions, and [name of research unit] policies and procedures, which tend to be general in nature not specifically covering all aspects of his assignments. Due to the wide variety of problems encountered, particularly in facilities coordination, the appellant must choose between various guidelines to resolve problems at hand. Similar to the GS-7 level, his guidelines focus on the operational characteristics and procedural requirements of the functional components of the [name of research unit] program, rather than specifying particular actions to follow. Therefore, the appellant must use judgment in selecting and interpreting the correct portion of the most appropriate guideline to apply to each of a large variety of actions, and when providing guidance to installation staff through written or verbal instructions/information, or coordinating various processes for renovation, construction, or facilities maintenance projects. Like the GS-7 level, the appellant is the central point-of-contact for furnishing authoritative guidance, and resolving disagreements, on the administrative requirements and operating procedures in his areas of expertise within [name of research unit].

### *Summary*

By application of the grading criteria in the Guide, we find the nature of the appellant's assignments and his level of responsibility meet, but do not exceed, the GS-7 level. Therefore, the position is graded at that level.

### **Decision**

The proper series and grade of the appellant's position is GS-303-7. Selection of an appropriate title is at the discretion of the agency.