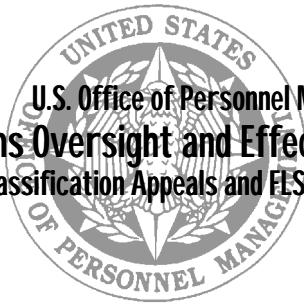


U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and ELSA Programs



Washington Oversight Division
1900 E Street, N.W.
Washington, D.C. 20415

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

Appellant: [name]

Agency classification: Management Analyst
GS-343-13

Organization: [branch]
[division]
Office of the Deputy Under Secretary for
International Affairs
Department of the Air Force
Department of Defense
Rosslyn, Virginia

OPM decision: Management Analyst
GS-343-12

OPM Decision Number: C-0343-12-02

Richard Quasney
Classification Appeals Officer

July 27, 1998 _____ 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, 511.614, as cited in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Since this decision 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 servicing personnel office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

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

Decision sent to:

[appellant]

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Introduction

On March 16, 1998, the Washington Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who is employed as a Management Analyst, GS-343-13, in the [branch and division], Office of the Deputy Under Secretary for International Affairs, Department of the Air Force, in Arlington, Virginia. [Appellant] requested that her position be classified as Management Analyst, GS-343-14. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code.

An on-site position audit was conducted by a Washington Oversight Division representative on June 8, 1998, supplemented by follow-up meeting with the appellant and interview with the appellant's first-line supervisor (Branch Chief), [name], on July 14, 1998. 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 8-53243-0, classified by the servicing personnel office as Management Analyst, GS-343-13, on October 7, 1997.

General Issues

In presenting her request for a higher grade, the appellant cited her attempts to have her position reclassified by her agency. The servicing personnel office, after extended review of the position, had indicated that her position description met GS-14 criteria, but that the position could not be upgraded because the organization was over its high grade target. However, the Office of Personnel Management adjudicates appeals based on a *de novo* review of the appellant's position. Thus, any previous classification decisions or opinions on the part of the appellant's agency have no bearing on the outcome of the OPM review.

The appellant's position description, in its introductory section, is overstated in relation to the duties the appellant actually performs. First, the primary purpose of the appellant's position is not the "development, implementation, and analysis of USAF-wide policies and procedures" related to Security Assistance manpower management, since this is a relatively infrequent requirement. Rather, the majority of the appellant's time is spent on the review and approval of manpower requests identified in Letters of Offer and Acceptance (LOA), presented in the position description as duty 1. She is not the "final approval authority" for all facets of USAF Security Assistance manpower matters or program management lines on Foreign Military Sales (FMS) cases. Regardless of how cursory the technical review of her final products may be or how much her technical expertise may be relied upon, approvals for these manpower requests are signed by the Division Chief, after review by the Branch Chief, who is thereby held accountable for their content. Further, she does not "manage" any subordinate FMS organizations. She reviews portions of LOA's prepared and submitted by these organizations for compliance with established policy and procedures in determining and categorizing manpower requirements, but she does not direct these organizations' overall operations nor does she control their total budget or resources. Lastly, although she may occasionally accompany her supervisor to the Office of the Secretary of Defense (OSD) to explain the technical basis for manpower decisions, there is no indication that she is called on to personally present and defend the USAF position to "OMB, GAO, and Congressional committees."

The narrative descriptions under the various factors in the position description are similarly overstated. Most notably, under Factor 1 (Knowledge Required by the Position), the position's required knowledges are narrower than stated, in that the appellant is neither required to possess nor does she apply broad knowledge of the Arms Export Control Act and Foreign Assistance Act, or understanding of how broad policies related to Security Assistance and National Security Strategy are developed. This is evidenced in that she does not perform such work governed by this legislation as determining what defense items are exportable to what countries and under what conditions. Rather, her position requires primarily knowledge and understanding of the markedly more circumscribed area of USAF and DoD manpower management regulations. Under Factor 2 (Supervisory Controls), she is not afforded "a wide latitude of authority" for policy and decision-making, since she has no actual signature authority on even routine manpower approvals. Under Factor 4, she does not "provide oversight to MAJCOM programs" but rather to the more limited manpower aspects of Foreign Military Sales agreements. Overall, the position description is misrepresentative of the duties and responsibilities assigned and portrays these functions as being of greater breadth, complexity, and impact than can be supported by the actual work performed.

Position Information

The appellant reviews and validates manpower requirements identified in Letters of Offer and Acceptance in connection with the sale of defense articles and associated services to foreign customers, to include ensuring that required documentation is included and that manpower is appropriately categorized in accordance with DoD and USAF instructions. The appellant is also responsible for revising and updating the manpower policy portions of USAF manuals and instructions in response to new requirements imposed by DoD, USAF, or Congressional directives.

Series Determination

The appellant's position is properly assigned to the Management and Program Analysis Series, GS-343, which covers staff administrative analytical and evaluative work related to program operations or management and organizational efficiency and productivity, including such work as identifying resources (staff, funding, equipment, or facilities) required to support varied levels of program operations. Neither the appellant nor the agency disagrees.

Title Determination

The appellant's position is correctly titled as Management Analyst, which is the authorized title for nonsupervisory positions primarily concerned with analyzing, evaluating, and/or improving the efficiency of internal administrative operations, organizations, or management. Neither the appellant nor the agency disagrees.

Standard Determination

There are no grade-level criteria provided in the GS-343 standard. In accordance with instructions provided in that standard, the position was evaluated by reference to the Administrative Analysis Grade-Evaluation Guide, dated August 1990.

Grade Determination

This guide is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade conversion table provided in the guide. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor level description. If the position fails in any significant aspect to meet a particular factor level description, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of information an employee must understand in order to do the work, and the skills needed to apply that knowledge.

At Level 1-7, assignments require knowledge and skill in applying analytical and evaluative techniques to studies concerning the efficiency and effectiveness of program operations or substantive administrative support functions; knowledge of pertinent laws, policies, and precedents; and knowledge of the major issues, program goals, and work processes of the organization. This knowledge is applied in planning, scheduling, and conducting studies to evaluate and recommend ways to improve the effectiveness and efficiency of work operations in a program setting. An assignment example provided in the guide illustrating Level 1-7 knowledge requirements is as follows:

Knowledge of organization, programs, missions, and functions of the parent military command along with knowledge of analytical and investigative techniques to conduct staffing requirements and utilization surveys of headquarters organizations and/or field installations. Assignments require skill in conducting detailed analyses of complex functions and work processes including: examination of production standards; past, present, and programmed workloads; nonproductive time; and deviations from standards to determine validated staffing requirements for the function studied. Work requires considerable interpersonal skills in presenting staffing recommendations and negotiating solutions to disputed recommendations.

The knowledge required by the appellant's position is consistent with Level 1-7. The work requires skill in analyzing and evaluating manpower requests for administrative case management and program management support associated with Foreign Military Sales agreements, to ensure the validity of the identified requirements in relation to such considerations as duration of the contract, relationship to other positions, and funding source; knowledge of USAF and DoD manpower regulations; and understanding of the work processes being carried out under these agreements as they pertain to manpower needs. This knowledge is applied in evaluating and recommending ways to "improve the effectiveness and efficiency of work operations in a program setting" by identifying more efficient and economical uses of manpower resources associated with individual work projects. The illustrative assignment cited above basically expresses the primary function of the appellant's position.

The position does not meet Level 1-8. That level is described as the level of the "expert analyst," where assignments require a mastery of a wide range of qualitative and quantitative methods for the assessment and improvement of complex management processes and systems; comprehensive knowledge of pertinent laws, policies, and precedents applicable to the administration of one or more important public programs; knowledge of agency program goals, the sequence and timing of key program milestones, and methods of evaluating the worth of program accomplishments; and knowledge of relationships with other programs and key administrative support functions within the employing agency or in other agencies. This knowledge is applied in carrying out such difficult assignments as designing and conducting comprehensive management studies where the boundaries are extremely broad and difficult to determine in advance, and where the problems studied are characterized by their breadth, importance, and severity; preparing or evaluating the impact of new legislation on agency programs or translating basic legislation into program goals and services; or directing team study work and negotiating with management to accept recommendations that involve substantial agency resources or require extensive changes in established procedures. An assignment example provided in the guide illustrating Level 1-8 knowledge requirements is as follows:

Knowledge of military command structure, missions, programs, and organizational relationships plus a thorough knowledge of quantitative and qualitative methods and techniques to develop staffing standards covering complex program functions or missions, e.g., management of agency research operations, or staffing requirements for new or substantially altered training or operational missions and programs. Studies and analyses are of such scope that they frequently require a team effort. Projects typically involve development of new approaches in identifying meaningful workload factors and performance quality levels, and determining accurate measurement techniques.

This level is intended to cover those work situations where the assignments are of such a scale as to require a breadth of knowledge, both regulatory and methodological, that is not evident in the appellant's position. Although the appellant has acquired expertise in her assigned functional area, as does any journeyman worker who has been in a position for several years and has thus become proficient in the various facets of the work, this is not necessarily equivalent to the distinction of "expert analyst" as that term is used in the guide at Level 1-8. That is, the term must be viewed

within the context of the work assignments otherwise associated with that level. In this case, the appellant does not apply a “wide range of qualitative and quantitative methods” (e.g., work measurement, task analysis, organization design, flowcharting of work processes, graphing, statistical tools) in assessing “complex management processes and systems.” Rather, she reviews Manpower Requirements Packages submitted in connection with Foreign Military Sales agreements to ensure that there is adequate justification for the positions requested, that the duration of the positions coincides with the time frame for the work to be performed, and that the proper funding sources have been identified. Further, the appellant does not perform an in-depth substantive review of these requests to determine the actual need for the positions (except where there may be overlap with other positions), as she basically accepts that the submitting organization has developed its requirements correctly. Rather, her review is for more peripheral matters such as time frames and funding category. This cannot be characterized as assessing “complex” management processes and systems, equivalent in scope to the examples provided above of agencywide research operations or new operational missions requiring team effort. Her position does not require “comprehensive knowledge of pertinent laws, policies, and precedents” applicable to “one or more important public programs.” Rather, her position requires knowledge of USAF and DoD manpower regulations related to Foreign Military Sales. Manpower management is just one small facet of the broader Security Assistance area and cannot in itself be considered an important public program. The position does not require broad knowledge of agency program goals and accomplishments and relationships with other programs. The boundaries of her work are not difficult to determine in advance, since her area of assigned responsibility is quite clear and somewhat limited, i.e., she reviews Manpower Requirements Packages submitted with LOA’s. Although she may determine what parts of these documents require further justification, any other aspects of these agreements are outside the realm of her assigned functional responsibilities and are within the province of other employees in the Branch. Any problems that may be encountered are not characterized by “breadth, importance, and severity,” or the expenditure of “substantial agency resources,” as the appellant is not, for example, conducting studies that would influence or determine whether to initiate or terminate large, expensive projects. Individual work assignments are nowhere near the magnitude to require team study effort in that they involve rather limited manpower analysis for discrete projects rather than broader studies of agencywide or even installation-wide activities.

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.

At Level 2-4, the employee works within a framework of priorities, funding, and overall project objectives, but is responsible for planning and organizing the study, estimating costs, coordinating with staff and line management, and conducting all phases of the project. This frequently involves the definitive interpretation of regulations and study procedures and the initial application of new methods. The employee informs the supervisor of potentially controversial findings, issues, or

problems with widespread impact. Completed work is reviewed by the supervisor for compatibility with organizational goals, guidelines, and effectiveness in achieving intended objectives.

The appellant's level of responsibility is consistent with Level 2-4, which describes the level of the experienced analyst who works largely independently within the established parameters of the work (in this case, the manpower aspects of LOA's), makes the necessary contacts to complete the assignments, and informs the supervisor of any developing controversies that may eventually be elevated to his level. As the final level of technical review for the manpower allocations identified in LOA's, her findings represent the "definitive interpretation" of regulations and procedural requirements. Her recommendations for approval of individual manpower requests are reviewed cursorily by the supervisor, who otherwise has been kept apprised of work progress and developments through review of the appellant's electronic communications with submitting organizations, and assumes that she has carried out the necessary level of technical review to ensure the validity of the request. This is detail-oriented work that does not lend itself to close review without basically replicating the analysis the appellant has performed.

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 concerned with the analysis and evaluation of programs or organizational effectiveness, and to determine whether to broaden or narrow the scope of the studies or projects. Analyses and recommendations are normally reviewed by management officials only for potential influence on broad agency policy objectives and program goals, and are normally accepted without significant change.

Implicit in Level 2-5 is a degree of program or project management authority that is not delegated to the appellant's position. Specifically, the appellant does not evaluate broad programs and issues such that her work would be subject to this type of review (e.g., policy direction as to how the agency is to implement certain legislative provisions). She looks at individual requests for manpower allocations for such considerations as whether the correct funding source is identified or to ensure that there is no duplication or overlap of positions. These cannot be construed as major projects involving the degree of planning, scheduling, and coordination which this level presupposes. Her work is self-contained and does not require any associated resources, such as funds or personnel, that she would control in order to accomplish the work. Although she determines what specific aspects of each request must be questioned, this is not equivalent to deciding whether to "broaden or narrow the scope of the studies or projects," since her role in the LOA review process is prescribed. The nature of her work is not such that it would have an influence on "broad agency objectives and program goals", thus this aspect of the criteria is inapplicable to her position. In short, the level of responsibility represented by Level 2-5 is predicated on the delegated authority for carrying out broad analytical functions of such breadth that only policy and administrative direction could be reasonably applied. It represents not merely a high degree of technical independence but also a corresponding management role that is well beyond the scope of authority inherent in the appellant's position. It derives not only from an employee's expertise in a given field and the corresponding technical latitude

afforded, but also from the position's role in the organization and the authority delegated to define the basic content and operation of the program or projects beyond just the technical aspects of discrete assignments.

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.

At Level 3-4, guidelines consist of general administrative policies and management and organizational theories which require considerable adaptation and/or interpretation. They provide a basic outline of the results desired, but do not go into detail as to the methods used to accomplish the project. Within the context of broad regulatory guidelines, the employee may refine or develop more specific guidelines such as implementing regulations or methods for the measurement and improvement of effectiveness and productivity in the administration of operating programs.

The appellant's use and development of guidelines is comparable to Level 3-4. The appellant reviews manpower requests submitted by subordinate organizations for compliance with instructions and guidance provided in Air Force Manual 16-101 and Air Force Instructions 38-201. These are general guidelines that explain how to prepare a Manpower Requirements Package, the supporting documentation required, and the five basic categories into which requested positions must be placed. As at that level, they provide a general outline of the types of information needed but cannot cover every possible situation that may arise. The appellant also prepares revisions to these guidelines in response to the issuance of changes in the corresponding DOD regulations, or to clarify instructions based on recurring errors or misunderstandings on the part of the subordinate organizations.

The position does not meet Level 3-5. At that level, guidelines consist of basic administrative policy statements and reference to pertinent legislative history, related court decisions, State and local laws, or policy initiatives of agency management. The employee performs such work as interpreting and revising existing policy and regulatory guidance for use by others within and outside the organization; reviewing proposed legislation or regulations which would significantly change the basic character of agency programs or the way the agency conducts its business with outside parties; or developing study formats for use by others on a project team or at subordinate echelons in the organization. At this level, employees are recognized as experts in the development and/or interpretation of guidance on program planning and evaluation in their area of specialization.

The intended coverage of this level is for those positions responsible for developing policy or regulatory materials where there is only very general guidance indicating the basic content, such as new legislation or policy statements and initiatives emanating from higher organizational levels. In the appellant's case, "policy development" is neither a primary nor frequent aspect of her position, nor is the originating guidance as general and subject to interpretation as required at this level. The appellant reported that she rewrote AF Manual 16-101 in 1994, and since then has issued three policy

memos clarifying its instructions. Thus, this duty represents a very minor aspect of her position in terms of time expended. Further, these “policy revisions” generally represent amended procedural instructions based on changes in the corresponding DOD regulations. They do not require her to analyze such basic materials as new legislation or court decisions and to develop the implementing regulations, or to prepare policy guidance instructing subordinate organizations on how to deal with various situations or issues based on the stated positions of top agency management (as opposed to clarifying existing guidelines and procedures). Thus, her area of expertise is not as broad as expected at this level, nor does it relate to the types of assignments associated with the term “expert” as it is applied at this level.

Level 3-4 is credited.

450 points

Factor 4, Complexity

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

At Level 4-4, the work involves gathering information, identifying and analyzing issues, and developing recommendations to resolve substantive problems of effectiveness and efficiency of work operations in a program setting. Projects usually involve issues or problems which are not always susceptible to direct observation and analysis (e.g., projected missions and functions) and information that is often conflicting or incomplete. Examples provided in the guide of work typifying Level 4-4 complexity are as follows:

Serves as management advisor in the bureau headquarters of an agency (or equivalent organization) with responsibility for performing a range of analytical studies and projects related to field program operations in the areas of management and productivity improvement (including effectiveness of work methods, manpower utilization, and distribution of functions); management controls; and work planning. Assignments typically involve the study of organizations, work processes, or functions that are interrelated. The work requires detailed planning to conduct information gathering; interpretation of administrative records and reports; correlation of information to corroborate facts; and coordination with management representatives.

Provides advice to management on the distribution of work among positions and organizations, and the efficient utilization of positions and employees in program and program support areas staffed by employees in professional, technical, clerical, and blue-collar occupations. The nature of the work is such that the employee must continually gather, interpret, analyze, and correlate large amounts of narrative and statistical information about organizational functions, workload, and productivity. Studies involve consideration of relationships among tasks, positions, organizations,

workload distribution, employee capabilities, and requirements of applicable staffing guides.

This level basically expresses the complexity inherent in the appellant's review of Manpower Requirements Packages to ensure that the positions being requested are consistent with the nature and duration of the projects and that the correct funding sources are identified. The work matches Level 4-4 criteria related to "developing recommendations to resolve substantive problems of effectiveness and efficiency of work operations in a program setting." The appellant's work can be closely identified with both of the assignment examples cited above in different respects. That is, she serves as a management advisor at agency headquarters level responsible for reviewing field program operations (specifically, activities related to the delivery of defense items to foreign customers under contract to the USAF), in relation to the validation of manpower requirements. As such, she must consider such factors as the distribution of functions, relationships among positions, workload, time frames, and functional responsibilities.

The position does not meet Level 4-5. At that level, the work consists of projects and studies which require analysis of interrelated issues of effectiveness, efficiency, and productivity of substantive mission-oriented programs. Decisions about how to proceed are complicated by conflicting program goals and objectives which may derive from changes in legislative or regulatory guidelines, productivity, and/or variations in the demand for program services. Assignments are further complicated by: the need to deal with subjective concepts such as value judgments; the quality and quantity of actions are measurable primarily in predictive terms; and findings and recommendations are subjective and not readily susceptible to verification. Examples provided in the guide illustrating Level 4-5 complexity are as follows:

Assignments require analysis of interrelated issues of effectiveness, efficiency, and productivity affecting major administrative programs of an agency. Studies are often complicated by the need to consider and evaluate the impact of changes in legislative and regulatory requirements; long-range program goals and objectives; political, economic, and social consequences of changes in the type or amount of services provided; or the changing nature of the program's clients and beneficiaries. Difficulty characteristic of this level is encountered in planning and establishing the long-range (more than 5 year) program goals, objectives, and measurement criteria.

Analyzes and formulates agency requirements for resource management information systems to support resource allocation targets for a nationwide medical care program including inpatient care, long-term care, and outpatient care, and an extensive medical education program. The work involves developing the overall systems concepts for the resources management systems data base, providing input on state-of-the-art systems design, defining new information requirements, and developing procedures and formats for timely and accurate reporting. Leads evaluations of the output of information system components (e.g., outpatient care) to insure that resource

allocation objectives are being met and to assess effectiveness from a systems standpoint.

This level is intended to cover positions involved in the analysis of broader, more complex program operations, most typically as they are carried out at various levels of the organization or dispersed throughout many separate locations, that are undergoing changes in mission or performance due to such factors as regulatory, social, or economic changes. In contrast, although the appellant reviews a wide range of work activities to be carried out at many different installations, these are looked at in isolation as discrete projects. She is not responsible for analyzing an overall system or program on a broad scale to determine how it may function more efficiently or economically, but rather at the manpower requirements of individual projects. Thus, the work does not involve such complicating features as determining differences among program segments, identifying interrelationships, and projecting long-range program goals and requirements.

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.

At Level 5-4, the purpose of the work is to assess the productivity, effectiveness, and efficiency of program operations or the delivery of program services, generally at the operating level, or to resolve problems in the staffing, efficiency, and effectiveness of administrative support and staff activities. The work may also include developing related administrative regulations, such as those governing the allocation and distribution of personnel, supplies, equipment, and other resources, or promulgating program guidance for application across organizational lines or in varied geographic locations. The work contributes to the improvement of productivity and effectiveness in program operations at different echelons or geographic locations within the organization, and affects the plans, goals, and effectiveness of missions and programs at these various echelons or locations.

The scope and effect of the appellant's work matches Level 5-4. The primary purpose of the appellant's position is to review and validate requests for manpower allocations associated with individual FMS projects, comparable to "resolving problems in the staffing, effectiveness, and efficiency of administrative support and staff activities." The associated duty of revising Air Force manpower instructions related to Foreign Military Sales is comparable to "developing related administrative regulations, such as those governing the allocation and distribution of personnel." The work affects the ability of depot-level activities to deliver defense articles to foreign customers in a timely and cost-effective manner.

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. This may involve developing long-range program goals, plans, and milestones, or 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 work directly affects the accomplishment of principal program goals and objectives (e.g., the delivery of program benefits or services). Study reports typically 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 work products are complete decision packages, staff studies, and recommendations which upon implementation would significantly change major administrative aspects of missions and programs or substantially affect the quality and quantity of services provided to the agency's clients. An example provided in the guide typifying Level 5-5 scope and effect is as follows:

Serves as project officer responsible for the evaluation of the effectiveness and efficiency of major program operations throughout an agency (e.g., shipbuilding, aircraft overhaul and repair, or health care). Evaluations take into consideration factors such as cost-effectiveness, attainment of program goals and objectives, and compliance with pertinent legal and regulatory guidelines. Recommendations made by the employees usually result in changes in the way the program is conducted on a national basis, the way services and benefits are distributed to the public, or the way business is conducted with major industrial concerns.

The appellant's work is conducted on a much smaller scale than is represented at this level. Level 5-5 is clearly intended for positions involved in evaluating large-scale operations, either throughout an agency, region, or extremely large field activity. In contrast, the appellant looks at manpower requests associated with individual contracts. Although the work identified in the contracts may be carried out at any number of depot-level activities, she is still evaluating specific work projects rather than an entire system or program. Determining the legitimacy of a few additional positions cannot be regarded as comparable to evaluating a major administrative aspect of an activity's mission, nor would her recommendations on any given request normally be of major significance to top agency management, especially considering that they do not go beyond the level of her second-line supervisor (i.e., the Division Chief). The nature of her work is not such that it would serve as the basis for new legislation, regulations, or programs, nor would the results of her work significantly change major aspects of missions or programs. Rather, the effect of her work is on the way in which an individual activity structures and organizes the positions needed to manage and coordinate delivery of contracted items. This does not in itself substantially affect the quality and quantity of the services provided, either in terms of the overall FMS program or in relation to an individual contract, since these elements are outside her control or influence.

Level 5-4 is credited.

225 points

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

These factors include face-to-face and telephone contact and other dialogue with persons not in the supervisory chain and the purpose of those contacts. Factors 6 and 7 are interrelated in that the same contacts must be considered for both factors. That is, the contacts that serve as the basis for the level selected for Factor 7 must be the same as the contacts that serve as the basis for Factor 6.

Under Persons Contacted, Level 3 is assigned, where contacts may include the head of the employing agency or program officials several managerial levels removed from the employee. Level 4 is not appropriate as the appellant does not have contacts with other agency heads or top Congressional staff officials.

Under Purpose of Contacts, Level c is assigned, where the employee influences managers or other officials to accept findings and recommendations. Level d is not appropriate as the appellant does not justify or settle matters involving significant or controversial issues, e.g., recommendations affecting major programs or dealing with substantial expenditures. The appellant may accompany her supervisor to OSD as staff support in discussions related to particular cases, but primary responsibility for justifying or settling issues of this magnitude with the level of contacts identified under "Persons Contacted" above (i.e., the head of the agency or other officials several management layers above the appellant), would be assumed by her superiors.

Level 3c is credited.

180 points

Factor 8, Physical Demands

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

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	3-4	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	<u>5</u>
Total		2790

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

Decision

The appealed position is properly classified as Management Analyst, GS-343-12.