

U.S. Office of Personnel Management  
Division for Human Capital Leadership & Merit System Accountability  
Classification Appeals Program

Philadelphia Field Services Group  
600 Arch Street, Room 3400  
Philadelphia, PA 19106-1596

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

**Appellant:** [appellant]

**Agency classification:** Administrative Support Assistant  
GS-303-6

**Organization:** Office of Food Production and Service  
Veterans Affairs Medical Center  
Department of Veterans Affairs  
[location]

**OPM decision:** GS-303-6  
(Title at agency discretion)

**OPM decision number:** C-0303-06-12

/s/

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Robert D. Hendler  
Classification and Pay Claims  
Program Manager

February 17, 2006

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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 conditions and time limits specified in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

**Decision sent to:**

[appellant]  
[address]

Chief, Human Resources  
[location] VAMC  
Department of Veterans Affairs  
[address]

Office of Human Resources  
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## **Introduction**

On October 17, 2005 the Philadelphia Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant]. We received the agency's complete administrative report on November 22, 2005. The appellant's position is currently classified as Administrative Support Assistant, GS-0303-6, supporting both Nutrition and Food Service (NFS) and Environment Management Services(EMS) Units, Facilities Management, [location] Veteran's Affairs Medical Center (VAMC), U.S. Department of Veterans Affairs (VA), in [location]. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

To help in deciding this appeal, we conducted telephone interviews with the appellant on January 4, 2006 and January 10, 2006, and with the Veteran's Integrated Service Network (VISN-#) program manager for the Government Inventory Package (GIP) on January 5, 2006. We also conducted a telephone interview with the appellant's supervisor, Program Manager for Nutrition and Food Services and Environmental Management Services, on January 12, 2006.

## **Background**

In March of 2004, the appellant requested a review of his position description (PD), classified as Budget Technician, GS-561-6, because he believed it to be inaccurate. The position was reviewed by the [location] VAMC, Human Resources (HR) Office. They issued their findings on September 14, 2004, recommending that a new PD be prepared and submitted for classification as Purchasing Agent, GS-1105-7. The appellant's supervisor disagreed with the [location] VAMC HR Office's findings, and prepared the appellant's current PD which was classified as Administrative Support Assistant, GS-0303-6, on January 14, 2005.

The appellant subsequently filed a classification appeal with the agency requesting his position be classified as Purchasing Agent, GS-1105-7, in accordance with the findings of the [location] VAMC, HR Office. On September 15, 2005, the agency issued their decision finding the position to be properly classified as Purchasing Agent, GS-1105-6. The appellant disagreed with the agency's decision and filed this classification appeal with OPM requesting again that his position be classified as Purchasing Agent, GS-1105-7. Information provided to date by both the agency and the appellant concerning this appeal indicate that he is currently assigned to PD Number [#], classified as Administrative Support Assistant, GS-303-6.

## **General issues**

In his appeal letter to OPM, dated November 14, 2005, the appellant stresses his belief that his purchasing duties and responsibilities warrant classifying his position as a Purchasing Agent GS-1105-7, and compares his work to higher-grade Purchasing Agent positions in the VAMC. He also makes various statements concerning previous agency reviews of his position and the resulting disparate evaluation decisions. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of his position. Because our decision sets aside any previously issued agency decision, the actions previously

taken by the agency in their review of the appellant's position, and other personnel related actions described by the appellant, are not germane to the classification appeal process.

A PD is the official record of the major duties and responsibilities assigned to a position by an official with the authority to assign work. A position is the duties and responsibilities that make up the work performed by an employee. Position classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the actual duties and responsibilities assigned by management and performed by the employee. An OPM appeal decision grades a real operating position, and not simply the PD. Therefore, this decision is based on the actual work assigned to and performed by the appellant.

By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others, that may or may not have been properly classified, as a basis for deciding his appeal.

Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellant considers his position so similar to others that they all warrant the same classification, he may pursue the matter by writing to his agency headquarters HR office. In doing so, he should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same as his, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to him the differences between his position and the others.

In reaching our classification decision, we have carefully considered all information furnished by the appellant and agency, including the interviews with the appellant, his supervisor and VISN-# GIP coordinator, his current PD, and all other information of record. We find the appellant's current PD contains the major functions assigned to, and performed by him, and incorporate it by reference into this decision.

### **Position information**

The appellant's purchasing duties and responsibilities occupy about 40 percent of the appellant's time. He purchases goods and services, and acts as contact point for NFS and EMS; laundry and linen; and VAMC furniture requirements. He acquires products and services using U.S. Government issued credit cards or by issuing delivery or purchase orders under established contracts and/or agreements. The appellant typically uses informal/simplified purchase methods and procedures such as oral solicitation and written request for quotations. Primary considerations involve the nature of the requirements, price, delivery timeframes, and contractor capabilities. The appellant applies purchasing guidelines and credit card policies and maintains all required documentation for the transactions. His work is performed in direct support of the day-to-day activities and operations of the VAMC. Services include the disposal of medical waste, window washing, pest control and recycling.

Products purchased range from common off-the-shelf items to, occasionally, special request/unique items. The appellant operates with a significant degree of independence in making purchases for requirements and commonly available services. He ensures transactions are properly funded and documented, and prepares all required reports. The appellant selects, adapts and applies procedures for obtaining the goods and/or services, and verifies the availability of funds within the affected fund control point prior to purchase. When sufficient funds are not available, he initiates requests for additional funds from the VAMC financial coordinator. The appellant places orders with the prime vendor or other suppliers under established contracts; selects vendors from a limited number of Government mandated suppliers; orally solicits and evaluates basic quotes from a few sources to meet stated requirements; or, when unable to locate an item through normal pre-approved sources, searches for alternative suppliers using the internet. He uses judgment in selecting and applying appropriate methods for solicitation, ordering and reporting considering the nature of the purchased item(s), quantity, cost and urgency of the requirements. The appellant ensures that quoted prices are reasonable and that suppliers are capable of meeting stated quantity, quality and delivery requirements. He types purchase orders; verifies receipt through invoice, ensures vendors are paid and checks the condition of item(s) received. The appellant contacts vendors as necessary to resolve any problems and/or discrepancies with shipments received or services rendered. Individual purchases exceeding \$2,500 are processed through the VA's Acquisitions and Management Office. The appellant's supervisor approves all of his purchases. The appellant assists his supervisor in dealing with larger, more involved purchases, e.g., furniture purchases for the VAMC, by coordinating with the contacting vendors, soliciting quotes, etc.

The appellant occasionally serves as designated Contracting Officers Technical Representative (COTR) for service contracts. Based on his experience with such contracts, the appellant suggests practical language and/or information for inclusion in new service contracts to eliminate previously encountered problems and provide bidders with accurate and adequate information. As COTR, based on familiarity with the requirements as specified in the contract, the appellant reviews, assesses and reports on the quality of contractor performed work. The work also involves serving as the facility liaison, coordinator and scheduler for the contracted work. For example, the appellant may tell the contractor how many windows need to be washed on a particular day, their location, and what time the work can start. He must also coordinate internally with those affected by the work. The purpose of the appellant's COTR work is to ensure that the contractual work is properly performed and meets stated VAMC requirements.

The appellant's supervisor serves as program manager for both the NFS and EMS offices which includes financial and budgetary responsibility for these programs. The appellant spends 20 percent of his time on budgetary/financial clerical and administrative functions. On a day-to-day basis, he independently maintains a running balance sheet of all charges, credits and discounts for individual purchases ensuring that they are received and recorded appropriately; maintains documentation of all purchase orders and voucher receipts for food and operating supply items; monitors financial commitments and obligations, tracks expenditures and maintains accurate accounting records of available NFS and EMS fund balances in accordance with established policies, practices and procedures. As necessary, he

verifies fiscal control point activity listings and reconciles the information with NFS and EMS accounting records to eliminate any discrepancies in the data resulting from the processing of daily transactions. The appellant informs the supervisor when additional funds need to be requested from the VAMC financial coordinator.

The financial records, maintained by the appellant for his assigned fund control points, provide base data for the development of the annual NFS and EMS budgets. The appellant provides clerical and administrative assistance to his supervisor during the NFS and EMS annual budgetary review and new fiscal year projection/proposal process. He gathers and presents necessary base data in appropriate formats as requested by the supervisor; prepares cost comparison data for budget planning and development purposes reflecting cost trends and percentage changes; reviews preliminary financial data with NFS and EMS supervisors to confirm past and present funding/expenditure information and validate projections, prepares preliminary budget documents for current and future budget years; and as directed, prepares reports to address particular budgetary/financial issues relating to specific aspects or segments of NFS and EMS operations.

The appellant uses GIP which is a standardized automated inventory management/supply tracking program used throughout the VA. At the VAMC there are a number of primary GIP operators, each responsible for applying the program within their defined functional areas. The appellant spends 20 percent of his time as the primary GIP operator at the VAMC for NFS and EMS. In this capacity he: maintains accurate inventory management records; assigns Integrated Funds Distribution Control Point Activity, Accounting and Procurement numbers; creates primary and secondary inventories, auto-generate orders, item file editor, bar-coding; uploads data and posts distribution orders. He also runs monthly reports, resolves identified discrepancies, and serves as the contact point for any NFS and EMS issues concerning GIP operations and data. At VISN-#, the GIP is managed by a program coordinator who oversees, analyzes and reports on operations regarding expendable inventory items purchased throughout the VISN. The appellant consults with, and receives guidance from the VISN-2 GIP program coordinator as needed to resolve difficult/unique issues or problem situations.

The appellant spends 20 percent of his time preparing a variety of NFS and EMS monthly and annual reports. NFS reports include the: monthly workload cost report tracking the cost per meal served; monthly benchmarking report used to compare VAMC [location] operations to other VA and private sector medical facilities by providing information on salary costs, number of full time equivalent positions, cost of provisions and operating materials, number of productive staff hours, etc.; quarterly cost distribution report used in developing the next year's budget; and the narrative annual report based on information compiled throughout the year that provides information to all VAMCs concerning VAMC [location] activities. EMS reports include the: laundry linen report/spreadsheet which is maintained and updated throughout the year indicating concerning the amount of pieces washed and distributed; and the recycling report also maintained throughout the year and reported annually, tracking the amount of trash, medical waste, etc. processed and indicating how much money was saved through recycling efforts.

## **Series and standard determination**

The agency's appeal decision classified the appellant's position to the Purchasing Series, GS-1105, which covers positions involving supervising or performing work to acquire supplies, services, and construction by purchase, rental, or lease through delivery orders and/or small purchase procedures. The appellant agrees with the agency that his position should be classified to the GS-1105 series. We disagree.

The appellant's current PD is classified to the Miscellaneous Clerk and Assistant Series, GS-303. The appellant's work includes a mixture of duties classifiable to the Budget Clerical and Technician Series, GS-561, the Purchasing Series, GS-1105, and the Supply Clerical and Technician Series, GS-2005. The Classifier's Handbook provides guidance on classifying mixed-series positions. It instructs that for most positions the grade-controlling work determines the series. However, when the work of the position falls into more than one occupational group, other factors, such as the main reason for the existence of the position, the paramount knowledge requirements, and the recruitment sources, must be considered.

The primary purpose for the appellant's position is to provide a variety of administrative and clerical support functions in direct support of NFS and EMS daily operations and activities at the VAMC. In the appellant's case, none of the associated individual series adequately represent the full range of requirements of the position for recruitment purposes. Therefore, the appellant's position is properly classified to the Miscellaneous Clerk and Assistant Series, GS-303, which covers one grade interval positions that perform or supervise clerical, assistant, or technical work for which no other series is appropriate, or mixtures of work where an individual occupational series would not provide adequate avenues for recruitment.

## **Title Determination**

Since there are no titles prescribed for the GS-303 series, the agency may construct an appropriate title.

## **Grade Determination**

The appellant filed this appeal with OPM based on his belief that his assigned purchasing duties and responsibilities warranted a higher grade, citing the classification decision rendered on September 14, 2004 by the HR Office, [location] VAMC. We have, therefore, applied grade criteria from the position classification standard (PCS) for the GS-1105, Purchasing Series in evaluating the appellants purchasing duties and responsibilities to address these concerns.

### *Evaluation using the GS-1105 PCS*

The GS-1105 standard is written in the Factor Evaluation System (FES) format. Under the FES, grades are determined by comparing a position's duties, responsibilities, and qualification requirements with the nine FES factors. A point value is assigned to each factor based on a comparison of the position's duties and responsibilities with the factor-level

descriptions in the PCS. The points assigned to an individual factor level mark the lower end of the range for that factor level. To warrant a given level, the position must fully equate to the overall intent of the factor-level description. If the position fails in any significant aspect to fully satisfy a particular factor-level description, the point value for the next lower level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level. The total points assigned are converted to a grade by use of the grade conversion table in the PCS.

*Factor 1, Knowledge required by the position*

This factor measures the nature and extent of information or facts that a worker must understand to do acceptable work, e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts, and the nature and extent of the skills needed to apply this knowledge. To be used as a basis for selecting a level under this factor, knowledge must be required and applied.

At the Level 1-3, the work requires knowledge of a body of standardized purchasing regulations, polices and procedures; established commodities and markets; and common business practices to make purchases involving commercial requirements and average complexity. This includes for example: knowledge of solicitation and purchasing methods, such as oral solicitations, calls against Blanket Purchasing Agreements, delivery orders, or priced purchase orders, to make noncompetitive open market purchase or purchases under established contracts; knowledge of frequently used and easily understood regulations, such as those related to required sources, the use of mandatory schedules, or ordering and documentation procedures for routine purchases, to ensure regulatory compliance throughout the purchasing process; knowledge of basic price evaluation techniques to assess price reasonableness using well-established references, such as price lists and previous history files; knowledge of commercial commodities and established markets to identify sources of supply, and determine the appropriateness or adequacy of item descriptions; knowledge of basic arithmetic used in business to make simple comparisons of price, discounts, costs, or similar terms; knowledge of post award procedures sufficient to resolve typical problems with deliveries; and knowledge of automated or manual small purchase systems sufficient to locate, add, and retrieve information.

At the Level 1-4, the work requires an in-depth or broad knowledge of a body of purchasing regulations, methods, procedures and business practices to make purchases involving specialized requirements and/or commercial requirements that have unstable price or product characteristics or similar complicating factors. Work at this level requires: knowledge of solicitation or purchasing methods, such as would be acquired through extended training or experience, to make competitive or sole source small purchases that involve, for example, collecting data to determine price reasonableness for new items, preparing detailed written solicitations, tailoring special terms and conditions, or matters of similar complexity; skill in analyzing descriptions that have unique aspects and many critical characteristics to identify problem areas I specifications or work statements, determine if quotations are responsive, or decide if substitutions are acceptable or should be referred to other personnel for further review; knowledge of price analysis techniques to evaluate prices or costs for requirements



with inadequate price history or evaluate allowable charges for requirements involving special cost features; knowledge of various acquisition clauses, such as those pertaining to inspections, acceptance, packaging, or testing to select or tailor clauses for purchases that involve special handling; and knowledge of post-award procedures to discuss equitable price adjustments for modifications to purchase order, determine whether to recommend termination of an accepted purchase order for convenience, or perform similar actions.

As at Level 1-3, the appellant's purchasing work, as described above, requires knowledge of: standardized purchasing regulations, policies, and procedures; established commodities and markets; and common business practices in order to make purchases of average complexity involving commercial requirements. The vast majority of the purchases made by the appellant are accomplished by using a Government purchase card. Purchases are for common services and routine/repetitively stocked items. The appellant determines the appropriate procedures to obtain goods and services.

Purchasing work at Level 1-4 requires in-depth or broad knowledge of a body of purchasing regulations, methods, procedures, and business practices to make purchases involving specialized requirements and/or commercial requirements that have unstable price or product characteristics, hard-to-locate sources, many critical characteristics, or similar complicating characteristics. Level 1-4 is not met in that the appellant does not deal with purchases requiring the application of those types of skill and knowledge. Therefore, Level 1-3 (350 points) is credited.

#### *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 how the work is reviewed or controlled. Controls are exercised by the supervisor in the way assignments are made, instructions are given to the employee, priorities and deadlines are set, and objectives and boundaries are defined. Responsibility of the employee depends upon the extent to which the employee is expected to develop the sequence and timing of various aspects of the work, to modify or recommend modification of instructions, and to participate in establishing priorities and defining objectives. The degree of review of completed work depends upon the nature and extent of the review.

At Level 2-2, the supervisor assigns work with standing instructions on applicable procedures and policies to follow, performance expected, and priorities and deadlines to meet. For example, standing instructions may provide information on how to decide if the requirements should be purchased against an established contract or through open market procedures. This guidance may include an explanation of the applicable Federal Acquisition Regulation parts and sections, forms required to prepare delivery or purchase orders, and any documentation required to justify the method of purchase. The supervisor provides additional specific guidance on new, difficult, or unusual assignments and suggests work methods or source materials available. The employee uses initiative to make or recommend purchases for recurring requirements independently. The employee refers situations not covered by instructions or practice to the supervisor for decision or help. The supervisor reviews

recommended awards and completed purchase files to ensure that the methods used by the employee are technically accurate and that they comply with established procedures. Some employees at this level work more independently than others because of their experience and familiarity with the purchasing methods and procedures used to acquire a variety of standardized requirements (i.e., repetitive purchases for basically the same goods and services) at varying dollar values.

As at Level 2-2, the appellant's day-to-day work is performed with considerable independence in accordance with established procedures, regulations, policies, instructions and deadlines. He plans and carries out the successive steps for routine actions, and handles most deviations or problems by applying knowledge of his serviced activities and following available instructions, previous training, established procedures and accepted practices. The appellant occasionally suggests practical revisions or additions to service contract requirement statements to ensure clear and complete information is provided to potential service providers prior to soliciting bids. Difficult and/or unprecedented matters are referred to the supervisor for guidance and direction. The appellant uses initiative and good judgment in selecting and applying appropriate guidance materials to perform recurring assignments and determining when to refer issues to others for assistance and/or direction. The appellant informs the supervisor of difficult problems and/or potentially sensitive matters. The supervisor spot-checks the work assignments for technical accuracy and adequacy, and ensures that all purchases are reviewed and approved prior to the expenditure of funds. The appellant occasionally also assists the supervisor by accomplishing particular designated portions of larger projects working under closer guidance and direction.

At the Level 2-3, the supervisor assigns work with standing instructions on objectives, priorities, and deadlines, and indicates special considerations or unusual requirements. Similar to the previous level, employees plan and carry out successive steps necessary to make purchases using accepted practices and procedures to resolve problems. However, at this level, they independently negotiate prices with sole source vendors, persuade reluctant vendors to bid, and collect data to determine price reasonableness for requirements not acquired previously or recently. Problems encountered may result from the specialized nature of the requirements and require employees to identify loopholes in very lengthy, detailed or otherwise difficult to understand specifications or statements of work. After searching precedents and other pertinent information, employees consult with supervisors and/or others to resolve major problems involving such matters as responding to written protests and non-selected vendors. The supervisor reviews recommended awards or complete purchase files for technical soundness, appropriateness and conformity to policy and requirements. Methods used by the employee in completing assignments are typically not reviewed in detail. The level of supervisory controls and independent judgment associated with the appellant's assigned duties and responsibilities does not compare favorably with the description of Level 2-3 work due to the more complex and difficult nature of the purchasing issues involved at this level. While the appellant works with substantial day-to-day freedom from supervision, his work does not require or permit him to exercise the greater judgment and initiative required to credit Level 2-3. Therefore, Level 2-2 (125 points) is credited.

### *Factor 3, Guidelines*

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

At Level 3-2, there is a number of established procedures and specific guidelines available and applies to work assignments. These include procurement history files, Federal Supply Schedules or other established contracts, standard operating practices, and regulations governing small purchases and delivery orders. The employee uses judgment in selecting the appropriate reference and procedure to make purchases. Guidelines cover such areas as required and optional sources of supply, types and uses of purchase orders, maximum ordering limitations, and forms to use when making purchases. There may be minor gaps in guidelines, and the employee may be expected to use some judgment and initiative in resolving aspects of the work not fully covered by instructions.

As at Level 3-2, the appellant performs the work in conformance with prescribed guidance, practices, methods and techniques. Procedures for doing work are established and specific guidelines are available as needed for reference purposes, but require some judgment in their application. Guidelines include technical bulletins, circulars, EMS and NFS Standard Operating Procedures, Center Memorandum and other VA publications and directives.

At Level 3-3, guidelines are available but are not completely applicable to many aspects of the work because of the unique or complicating nature of the requirements or circumstances. Purchases may involve specialized purchase descriptions for which there are no directly related references such as catalog descriptions, and no procurement history files. The employee applies judgment to interpret guidelines, adapt procedures and decide approaches and resolve problems including reviewing detailed non-standardized statements of work for adequacy, developing technical ranking factors for awards determinations or negotiating terminations for convenience or default.

The nature of the items purchased and the methods used to purchase them do not require or permit the appellant to interpret guidance, adapt procedures or apply the level of judgment described at Level 3-3. He does serve as COTR which may involve reviewing detailed statements of work for adequacy and making practical recommendations for improvements to those responsible for preparing the contract. However, his occasional involvement with reviewing and commenting on service contracts is a small portion of his COTR duties, which are ancillary to his purchasing work, and too infrequent to control the evaluation of this factor or the classification of his purchasing duties. Therefore, Level 3-2 (125 points) is credited.

### *Factor 4, Complexity*

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

At the Level 4-2, the work involves performing a variety of related tasks using primarily simple noncompetitive purchasing methods. Methods include, for example, placing orders

against single award Federal Supply Schedules and other similar contracts, or using imprest fund or credit card accounts. The employee makes decisions, such as whether to solicit additional sources or question a price, based on a review or knowledge of similar purchases and basic procedures. The employee selects purchasing methods by considering a few factors, such as price, availability and urgency of the requirement, and recommend awards based primarily on the factors of price and delivery. The complexity of the appellant's work exceeds this level.

In addition to using the procedures described above, work at the Level 4-3 involves using different processes and methods to (1) make a variety of competitive or sole source small purchases and /or (2) make a variety of purchases against various established contracts and agreements. The employee makes choices, such as whether and how to solicit quotes, or what terms and conditions apply based on a review of factors, such as the nature of the requirement, urgency of the need, estimated amount of the purchase and availability of sources.

As described above, the appellant's work involves a mixture of competitive and sole source small buys and the placement of delivery or purchase orders under established contracts. He makes decisions regarding the procurement methods and procedures to use in acquiring items based on the nature of the requirement, urgency of the need, quantity and dollar value of the buy and the availability and capability of suppliers/vendors. The appellant applies knowledgeable of the work performed by his serviced activities and the affect of his purchasing work on the accomplishment of their mission(s) to prioritize his efforts and ensure essential items are provided in a timely manner. Therefore, Level 4-3 (150 points) is credited.

#### *Factor 5, Scope and Effect*

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods 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 5-2, the work involves providing purchasing services that are covered by well-defined and precise procedures and regulations (e.g., repeat orders for commercial requirements). The employee clarifies what is needed and when, and selects purchasing methods and sources from a range of available options. The employee's work products, such as recommendation for awards, affect the smooth flow of everyday operations. As described above, the appellant's work meets Level 5-2.

At Level 5-3, the purpose of the work is to purchase various commercial and/or specialized requirements. The work involves applying conventional practices to resolve a variety of purchasing problems (e.g., inadequate or restrictive specifications, lack of multiple suppliers, urgent need, and insufficient price history). Purchasing advice and decisions directly affect the ability of serviced programs to conduct business adequately. In some situations, the quality of the purchasing advice and decisions may affect the operation of certain programs. For example, ensuring the clarity and completeness of detailed purchase descriptions for specialized equipment allows a customer to pursue a particular course of action without

lengthy delays. In other situations, the work may affect the physical well-being of persons. For example, arranging for the timely delivery of urgently needed medical supplies or equipment affect the adequacy of patient care.

The products and services purchased by the appellant do not compare favorably with those described at Level 5-3. For example, they do not typically involve specialized equipment with inadequate or restrictive specifications, lack of suppliers, or insufficient price history. The appellant's work does directly affect the ability of his services organizations to carry out their assigned functions. However, his work in doing so does not require ensuring the clarity and completeness of detailed purchase descriptions for specialized equipment. The appellant's nutrition and food service purchases do affect the well being of VAMC patients. However, this work is not comparable to the example provided at Level 5-3 involving the timely delivery of urgently needed medical supplies or equipment. Because the appellant's work does not fully meet Level 5-3, Level 5-2 (75 points) must be credited.

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

These factors assess face-to-face as well as telephone contacts with persons not in the supervisory chain. The levels of these factors are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place.

Factors 6 and 7 are interdependent. The personal contacts that serve as the basis for the level selected for Factor 7 must be the same contacts as those that are the basis for the level selected for Factor 6.

#### *Personal Contacts*

The appellant's contacts fully meet Level 2 which involve contacts with employees in the same agency or activity but outside the immediate organization and contacts outside the agency with commercial suppliers, contractors, vendors, patients and visitors.

The appellant's contacts do not include technical or legal representatives of firms who are negotiating substantial purchase order changes or terminations for default, or who are protesting the basis for non-selection for awards, as described in Level 6-3. Therefore, Level 6-2 is credited.

#### *Purpose of Contacts*

At Level a, the purpose of the contacts is to clarify or exchange information related to purchasing routine requirements. Contacts with customers are to obtain missing information, advise on status of work, and get approval for substitutes or changes in delivery dates, prices, quantities, etc. Contacts with vendors are to obtain information on items, prices, discounts and delivery dates. As described above, the appellant's contacts fully meet Level a.

At Level b, the purpose of the contacts is to plan and coordinate actions to prevent, correct, or resolve delays or misunderstandings in the purchasing process. This includes contacting vendors to clarify requirements and negotiate issues, such as establishing adequate price reductions for deviations in product or delivery, modifying certain terms, or waiving penalties for return items. The appellant's purchasing duties do not involve the types of issues requiring the types of contacts found at Level b. Therefore, Level a is credited.

Applying the conversion chart for Factors 6 and 7, Levels 2a, (45 points) are credited.

*Factor 8, Physical Demands*

This factor covers the requirements and physical demands placed on the employee by the work assignment. At Level 8-1, work requires some physical effort such as standing, walking, bending or sitting. Work at Level 8-2 involves special physical demands such as above average physical agility or moving heavy equipment on a regular and recurring basis. The physical requirements of the appellant's work do not entail the physical demands described at Level 8-2. Therefore, Level 8-1 (5 points) is credited.

*Factor 9, Work Environment*

This factor considers the risks and discomforts in the employee's physical surroundings and the safety precautions required. The appellant works in a typical office setting requiring routine precautions for dealing with everyday risks and discomforts found at Level 9-1. His work does not involve the moderate discomforts of Level 8-2, e.g., wearing protective clothing when visiting construction sites. Therefore, Level 9-1 (5 points) is credited.

The appellant's purchasing duties and responsibilities are evaluated as follows:

<b>Factor</b>	<b>Level</b>	<b>Points</b>
1. <i>Knowledge Required by the Position</i>	1-3	350
2. <i>Supervisory Controls</i>	2-2	125
3. <i>Guidelines</i>	3-2	125
4. <i>Complexity</i>	4-3	150
5. <i>Scope and Effect</i>	5-2	75
6. <i>Personal Contacts</i> and 7. <i>Purpose of Contacts</i>	2-a	45
8. <i>Physical Demands</i>	8-1	5
9. <i>Work Environment</i>	9-1	<u>5</u>
	<i>Total</i>	880

A total of 880 points falls within the GS-5 grade level point range of 855-1100 points of the Grade Conversion Table.

As stated above, the appellant's position is properly classified to the Miscellaneous Clerk and Assistant Series, GS-303. The flysheet for the GS-303 series does not provide grade level criteria, but rather directs that covered positions be evaluated by reference to other PCSs for occupations with analogous knowledge and skills. Because the purpose of the position is to perform a variety of clerical and administrative support duties, we find that the work is best evaluated by application of the Grade Level Guide for Clerical and Assistance Work (Guide).

The Guide provides general criteria for use in determining the grade level of non-supervisory clerical and assistance work. It describes the general characteristics of each grade level from GS-1 to GS-7 using two criteria for grading purposes: *Nature of Assignment* (which includes knowledge required and complexity of the work) and *Level of Responsibility* (which includes supervisory controls, guidelines, and contacts).

#### *Nature of Assignment*

At the GS-6 grade level, work typically 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. Decisions made by the employee regarding how to deal with particular work situations have a substantive impact on the outcome of the assignment. The work requires comprehensive knowledge of rules, regulations, and other guidelines relating to completing assignments in the program area assigned. This knowledge is usually attained through extensive, increasing difficult and practical experience and training in the subject matter field. The work also requires ability to interpret and apply regulatory and procedural requirements to process unusually difficult and complicated transactions.

Work characteristic of the GS-7 grade level 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. 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 actions 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.

As at the GS-6 grade level, the appellant's work supports separate, and functionally distinct, NFS and EMS activities by processing a wide variety of purchasing, inventory, funds control and general program record keeping and reporting actions. His duties are subject to a various

Federal, agency, and VAMC policies, rules, regulations, and guidelines. On a routine and recurring basis, the appellant selects, adapts and applies appropriate guidance to perform a number of separate and distinct work assignments, ensuring that all required supporting documentation is provided. His work requires a thorough knowledge of the processes and operational practices, policies, and instructions pertaining to NFS and EMS. He must also be knowledgeable of: purchasing and purchase card program regulations, methods and procedures; inventory (GIP) policies and procedures; have practical knowledge of bookkeeping, accounting principles and budgeting methods and techniques; working knowledge of the products used within the NFS, EMS, laundry and linen and interior design areas; and knowledge of VAMC, NFS and EMS organizational structures, functions, and program goals. The nature of the appellant's assignments minimally meets the GS-6 grade level based on the wide variety of transactions for the multiple types of assigned activity supported.

The appellant's work assignments do not involve recurring responsibility for entire projects within a defined program or functional specialty area as described at the GS-7 grade level. While he does determine the best course of action for handling particular transactions, he does not deal with the wide variety of extensive problems or situations typical of GS-7 grade level assignments. The nature of the appellant's assignments do not meet the increasingly difficult transactions and the broader program aspects described at the GS-7 grade level, nor do they require the specialized program and/or functional knowledge indicative of that grade level of work. Therefore, this factor is properly evaluated at the GS-6 grade level.

### ***Level of Responsibility***

At the GS-6 grade level, the supervisor reviews completed work for conformance with policy and requirements. The employee is recognized as an authority on processing transactions or completing assignments within a complicated framework of established procedures and guidelines, often when there are no clear precedents. The recognition typically extends beyond the immediate office or work unit to the overall organization or, in some cases, outside the 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 rapidly on short notice. Guidelines for the work are numerous and varied, making it difficult for the employee to choose the most appropriate instruction and decide how the various transactions are to be completed. The guidelines often do not directly apply, requiring the employee to make adaptations to cover new and unusual situations. Such situations may involve deviations from established procedures in order to process transactions that cannot be completed through regular channels or actions where guidelines are conflicting or unstable. Contacts at this level are with agency employees, employees of other agencies, or with management or providers of agency services. The employee provides information, explains the application of regulations, or resolves problems relating to the assignment.

At the GS-7 grade level, the supervisor makes assignments in terms of objectives, priorities, and deadlines. The employee independently completes assignments in accordance with accepted practices, resolving most conflicts that arise. Completed work is evaluated for appropriateness and conformance to policy. Guidelines for the work are more complex than



at the lower grade because the employee encounters a wider variety of problems and situations which require choosing alternative responses. 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. Guidelines apply less to specific actions and more to the operational characteristic and procedures requirement of the program or function. Employee 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. The contacts and purpose of contacts at this level are usually the same as the next lower level. However, to a greater degree, the employee serves as a central point of contact to provide authoritative explanations of requirements, regulations, and procedures, and to resolve operation problems or disagreements affecting assigned areas.

As at the GS-6 grade level, the appellant performs his daily work with a significant degree of independence from supervision. He plans and carries out the successive steps and handles problems and deviations in work assignments following instructions, polices, previous training, or accepted practices in the work and based on his knowledge of the overall functions, projects and priorities of his assigned areas of responsibility. The work involves dealing with a variety of problem situations either independently or as with others. Typical of the GS-6 grade level, the appellant performs his work in conformance with prescribed procedures and methods. Procedures for most work assignments are established and normally specific guidelines are available for reference purposes. Guidelines include technical bulletins, circulars, EMS and NFS Standard Operating Procedures, Center Memorandum and other VA publications and directives. He uses judgment in applying guidelines to individual transactions and particular situations. His contacts are with NFS and EMS employees, supervisors, administrative, and professional personnel in the local Medical Center Services, personnel in the VISN and/or VA Central Office and other VA Medical Centers, vendors, contractors, patients, and visitors. Persons contacted are engaged in different functions, missions, and kinds of work such as representatives from various levels within the agency, from other operating offices within the VA, or from outside groups such as vendors or contractors. The purpose of the contacts is to provide, obtain, request or clarify factual information and/or explain processes and associated requirements. This level of responsibility meets the GS-6 grade level.

The level of responsibility described at the GS-7 grade level shares characteristics to the assignments described at that grade level, in that they involve defined parameters e.g., particular projects, a specified functional specialty or program segment. In such cases, the supervisor typically would make assignments in terms of objectives, priorities, and deadlines, and review completed assignments for appropriateness and conformance to policy. Unlike the GS-7 grade level, the appellant is responsible for processing various recurring types of **transactions**, maintenance of accurate records, and preparing the associated required documentation and management reports. Should significant problems arise or unusual/sensitive situations occur, the appellant seeks guidance and assistance or refers the matter to the supervisor for resolution. The appellant uses numerous and varied guidelines. However, they are not comparable to those at the GS-7 grade level which tend to be general and descriptive of intent and apply less to specific assignments, focusing more on the operational characteristics of work functions rather than transactions. In contract to GS-7 grade level

work, the appellant is not routinely faced with improvising procedures and processes to resolve or accommodate unusual or one-of-a-kind situations. As mentioned in the Guide, the contacts and purpose of contacts at the GS-7 grade level are typically the same as those at the GS-6 grade level. Unlike the GS-7 grade level, the appellant does not serve to any significant degree as an authoritative source of information providing explanations of regulations and procedures, or resolving operational problems and /or disagreements affecting his assigned areas. These functions are vested in his supervisor's position. Therefore, this factor meets the GS-6 grade level.

### ***Summary***

The appellant's work is properly evaluated at the GS-6 grade level for both *Nature of Assignment* and *Level of Responsibility*.

### **Decision**

Based on the application of mixed grade principles, the position is properly classified to the Miscellaneous Clerk and Assistant Series, GS-303 at the GS-6 grade level. Selection of an appropriate title is at the agency's discretion.