

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



Dallas Oversight Division  
1100 Commerce Street, Room 4C22  
Dallas, TX 75242

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

**Appellant:** [The Appellant]

**Agency classification:** Administrative Officer  
GS- 341- 12

**Organization:** [the activity]  
Animal and Plant Health Inspection Service  
Department of Agriculture  
[A Large City]

**OPM decision:** Administrative Officer  
GS-341-12

**OPM decision number:** C-0341-12-02

/s/ Bonnie J. Brandon  
Bonnie J. Brandon  
Classification Appeals Officer

October 7, 1998  
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:**

[The Appellant]

Chief, Human Resources Operations  
Animal and Plant Health Inspection Service  
U.S. Department of Agriculture  
100 North 6th Street, 5th Floor  
Minneapolis, MN 55403

Director, Office of Human Resources  
Management  
U.S. Department of Agriculture  
J.L. Whitten Building, Room 316W  
1400 Independence Avenue, SW  
Washington, DC 20250

## **Introduction**

On June 17, 1998, the Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [the appellant]. Her position is currently classified as Administrative Officer, GS-341-12. However, she believes her position warrants an upgrade. The appealed position is assigned to [the activity], Animal and Health Inspection Service (APHIS), Department of Agriculture, [in a large city]. We have accepted and decided this appeal under section 5112 of title 5, United States Code.

The appellant contends that her position of record does not accurately convey her duties and responsibilities. She says the following duties and responsibilities have been added: the number and type of positions supervised, additional human resources responsibilities, additional financial systems, changes in information technology, and additional purchasing and safety responsibilities.

In September 1993 the appellant's supervisor submitted a revised position description to the personnel office requesting review and upgrade. The agency noted these differences in the duties, knowledge required, and complexity, but found that the position still warranted classification as Administrative Officer, GS-341-12. The position was reevaluated in March 1995 and the same classification was found to be warranted. The appellant disagreed with the personnel office decision and, therefore, exercised her right to file an appeal to OPM.

In deciding this appeal, we considered information obtained through telephone interviews with the appellant, her supervisor, and an agency personnel official and written information provided by the appellant and the agency.

## **Position information**

The appellant serves as Administrative Officer for the [state] Wildlife Damage Management Program [Program], which is a cooperative venture with [a state] through the [state] University System, [the state] Agricultural Extension Service, [state] Wildlife Damage Management Service, and the [state] Wildlife Damage Management Association, Inc., [state] Wildlife Damage Management Fund. The mission of the [Program] is to provide Federal leadership in managing problems caused by wildlife. The [Program] has about 200 Federal, State, and nongovernment employees located in the State Office and nine District Offices. The program has multiple funding sources and budgets that have two separate and different fiscal years.

The appellant is responsible for developing, planning, supervising, organizing, implementing, and executing the following functions of the [Program].

Budget. The appellant manages three major funding sources: State of [state], Federal, and [state] Wildlife Damage Management Association, Inc. Funding from the State of [state] includes appropriated funds, expenses paid by the State Treasury, reimbursable interagency contracts, nonreimbursable interagency cooperation contracts, unexpended funds carried over, salary increases, revolving funds, contingency reductions, and contracts with municipalities. Federal funding includes appropriated funds, cooperative service agreements, and contingency funds. Funding from [state] Wildlife Damage Management Association, Inc., includes individual field

agreements, special field agreements, and memorandum of agreement and understanding. These funding sources represent a multimillion dollar budget totaling more than eight and a half million dollars. The appellant is the contact point for the formulation and execution of the budget. The appellant plans for the timely acquisition and use of funds, adjusts long-range budget forecasts, and monitors the execution of the budgets by analyzing costs, benefits, and trends. She is involved in the development of policies and strategies that support the development of the different budgets. The appellant prepares a detailed budget request and actively participates in making the appropriations request presentation to the [state] Legislative Budget Board, the Governor's Budget Board, and committees of the [state] House of Representatives and Senate. She annually prepares a detailed operating budget by program and sub-activity.

Personnel. The appellant writes, approves, and classifies position descriptions for State employees, prepares performance plans for State and Federal employees, prepares performance improvement plans for State and Federal employees, provides program and technical training semiannually to the nine District Office managers, acts as liaison with her servicing personnel office on the provision of personnel services, and maintains a performance pay plan that she developed for State employees.

Miscellaneous Administrative. The appellant supervises or performs a number of duties related to procurement, travel, contracting, information technology, property management, safety management, and vehicle management.

The appellant supervises six Federal employees and two non-Federal employees. The positions for the Federal employees are GS-9 Budget Analyst, GS-9 Supply Management Specialist, GS-7 Administrative Support Assistant, two GS-5/6 Accounting Assistants, and GS-5 Accounting Assistant.

Information provided by the appellant indicates that she spends approximately 30 percent of her time on budget work, 30 percent on personnel-related matters, 10 percent on miscellaneous administrative services, and 30 percent on supervisory responsibilities.

The appellant's immediate supervisor is the State Director. The State Director's position is two reporting levels below an SES position.

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

The appellant does not question the series or title of her position. We agree with the agency's determination that the appellant's duties and responsibilities meet the definition of the Administrative Officer Series, GS-341, and the proper title for the position is Administrative Officer.

The GS-341 series covers positions "responsible for providing or obtaining a variety of management services essential to the direction and operation of an organization," where the "paramount qualifications required are extensive knowledge and understanding of management principles,

practices, methods, and techniques, and skill in integrating management services with the general management of an organization.” Administrative officer positions typically include such duties and responsibilities as the following, or comparable duties: (1) helping management to identify its financial, personnel, and material needs and problems; (2) developing budget estimates and justifications and making sure that funds are used in accordance with operating budget; (3) counseling management in developing and maintaining sound organization structures, improving management methods and procedures, and seeing to the effective use of labor, money, and materials; (4) collaborating with personnel specialists in finding solutions to management problems arising out of changes in work which have an impact on jobs and employees; and (5) advising on and negotiating contracts, agreements, and cooperative arrangements with other government agencies, universities, or private organizations.

The GS-341 standard notes that administrative officer positions are mainly of two broad types. The first type is that of “the chief of a central administrative unit which provides services to a number of operating divisions, field offices, or other units each headed by an operating manager.” In this type of situation, “the central administrative unit includes specialist positions in various areas such as budget, data processing, etc.,” and the administrative officer has “considerable authority to complete personnel actions, obligate funds, make purchases, etc.” The appellant’s position falls into this category of administrative officer. In her case, most of the substantive, two-grade interval administrative support in the various functional areas (e.g., personnel, budget, and procurement) is under the appellant’s organizational control. Therefore, she has the degree of authority inherent in the type of position described above.

The GS-341 standard does not include grade-level criteria. Rather, the standard instructs that these positions be evaluated using the standards for the various administrative specialty areas (such as the Personnel Management Series, GS-201, or the Budget Analysis Series, GS-560), depending on what aspects of a particular position are predominant and/or which represent the highest grade level of work performed. In the appellant’s case, the budget work represents the highest level of work performed, as discussed under “grade determination.” The nonsupervisory grade-controlling budget duties of the appellant’s position are evaluated by application of the criteria in the Position Classification Standard for the Budget Analysis Series, GS-560. The work performed in the other administrative areas, such as personnel, procurement, contracting, travel, information technology, property management, safety management, and vehicle management, is not of a high enough level or performed for a sufficient amount of time to influence the grade of the appellant’s position, and thus will not be addressed in this evaluation.

The appellant’s supervisory duties meet the minimum criteria for application of the General Schedule Supervisory Guide, dated April 1998. We agree with the agency’s determination that the appellant’s supervisory duties are properly graded at the GS-11 level. The appellant does not disagree with the agency’s determination. As discussed under “grade determination,” the appellant’s budget work is at a higher grade level than the supervisory duties; therefore, we will not further address the supervisory duties.

## Grade determination

The GS-560 standard is written in the Factor Evaluation System (FES) format. This format has nine grade influencing factors. Each factor is evaluated separately and is assigned a point value consistent with factor-level descriptions (FLD's) provided in the standard. Under FES, in order for a duty or responsibility to warrant a given point value, it must be fully equivalent to the overall intent of the selected FLD. If the responsibility fails in any significant aspect to meet a particular FLD in the standard, the lower point value must be assigned. When all the factors have been evaluated, the total points are converted to a grade by using the standard's grade conversion table.

### *Factor 1, Knowledge required by the position*

This factor measures the nature and extent of information or facts which the analyst 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 those knowledges. To be used as a basis for selecting a level under this factor, a knowledge must be required and applied.

The appellant's position requires (1) a high degree of knowledge of Federal planning and financial management concepts and practices as contained in the Annual Work Plan Advice, Program and Financial Management Information System, Program Advice, and the organization's Management Information System to supervise, maintain, control, and evaluate the State Office's financial management, accounting, and general administrative functions; (2) detailed knowledge of the methods and techniques involved in the creative analysis of financial matters in order to assure the State Director that all available funds are being utilized to support the various different missions of the [Program]; (3) in-depth knowledge of [state] legislative budget and financial management concepts, processes, and procedures to prepare budget request submissions along with appropriate narrative justification; (4) knowledge of zero-based budget procedures used by the State of [state] Legislature; (5) extensive and thorough knowledge of the Federal rules, regulations, and policies, in both appropriated and nonappropriated funding related to multiple funding sources; and (6) an in-depth and detailed knowledge of budgetary planning and execution in order to administer the funds available and assure the missions of the organization are accomplished.

The appellant's position meets Level 1-7. At this level, the employee must apply detailed and extensive knowledge of the budgetary policies, precedents, goals, objectives, regulations, and guidelines of the employing component which apply to assigned organizations and programs; the sources, types, and methods of funding for assigned organizations and programs; and budgetary and financial relationships between the assigned budget(s) and the budgets and programs of other agency components and organizations. At this level, skill is also required in analyzing budgetary relationships and developing recommendations for budgetary actions under conditions of time pressure and uncertainty due to a variety of reasons.

The appealed position does not meet Level 1-8. At this level, employees apply a mastery of the concepts, principles, practices, laws, and regulations which apply to budgeting for substantive

*national* programs and services. Employees with this level of knowledge typically serve as advisors and consultants to *top* management of the employing agency on the Federal budget process. It requires comprehensive and detailed knowledge of the process through which budgets are developed, transmitted, presented, examined by Office of Management and Budget (OMB), and reviewed by Congress and how budgetary and program legislation is enacted by Congress. It also involves expert knowledge of financial and budgetary relationships between the organization's budget and the budget programs of other Federal agencies.

There is no evidence that the appellant performs work comparable to that described at Level 1-8. The appellant does not apply concepts, principles, practices, laws, and regulations which apply to budgeting for substantive *national* programs. She does not serve as advisor or consultant to top management of the employing agency on the Federal process. She is not required to have the knowledge of the process through which budgets are developed, transmitted, presented, examined by OMB, and reviewed by Congress. Further, the appellant's position does not require *expert* knowledge of financial and budgetary relationships between the organization's budget and the budget programs of other Federal agencies.

Level 1-7 and 1250 points are 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 the review of completed work.

The appellant's position meets Level 2-4 of the standard. Similar to this level, the appellant has continuing responsibility for independently performing functions in all phases of the budget process. As at Level 2-4, the appellant is delegated responsibility for independently planning and carrying out the budget work on an extended basis and for making a wide range of technical decisions, commitments, and recommendations as the work proceeds.

Consistent with Level 2-4, the appellant and the State Director develop deadlines for analysis and preparation of budget estimates, reports, etc. The appellant is responsible for independently planning, performing, coordinating, and scheduling the budgetary financing for new programs and activities of a substantive nature and resolving and interpreting ambiguous and conflicting budgetary and program objectives. As is typical of Level 2-4, the appellant's completed work is reviewed for effectiveness in meeting budgetary and program objectives and for consistency and agreement of budgetary actions and recommendations with objectives of the programs of the organization.

The appellant does not work under supervisory controls that match Level 2-5. Employees who receive this level of supervision are responsible for, and expert in, all phases and methods of budgeting for substantive *nationwide* programs administered by the employing agency or a component thereof. At this level, the supervisor provides only broad administrative and policy direction through discussion of financial and program goals and related Presidential, congressional,

or political considerations which affect the budget administered. While the appellant is delegated responsibility and authority for independently planning, scheduling, coordinating, carrying out, and evaluating budgetary operations in [Program] and is the technical authority on budgetary matters, Level 2-5 is appropriate for positions that function at a level in an organization (e.g., department or agency) which allows the employee to recommend new or revised budgetary policies, procedures, and controls that could have an impact on the accomplishment of substantive program goals and national priorities. The appellant does not function at a level within APHIS that permits this kind of major impact on the budgeting function.

Level 2-4 and 450 points are credited.

### *Factor 3, Guidelines*

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

The appellant regularly uses guidelines developed by the Federal government and the State of [state]. The guidelines are broadly stated policies, regulations, and rules. They include the APHIS Budget and Accounting Manual, Internal Revenue Service directives, OMB regulations, Comptroller General decisions, the [state] legislative General Appropriations Act, the [state] University System Administrative Policy and Reporting Manual, [state] Agricultural Extension Service Fiscal and Management Memoranda, and the State of [state] Detailed Instructions for Preparing and Submitting Requests for Legislative Appropriations. There is considerable interpretation of the guidelines because of the two different budgets and the various funding sources. The appellant uses independent judgment and creativity in the development and modification of guidelines. For example, she develops guidelines specifically for use by the employees she supervises and by field office personnel. The appellant's supervisor is consulted on major and precedent-setting circumstances.

The appellant's position meets Level 3-4. As at this level, the appellant regularly applies broad budgetary guidance, such as circulars, directives, and regulations issued by OMB which relate to the division of Federal funds among agency programs; regulations published by the Department of the Treasury; Comptroller General decisions and similar documents; and broad voluminous and ambiguous or conflicting guidelines of more than one Federal agency or department which apply to the budgets of assigned programs and organizations. In addition, the appellant must frequently apply, cross-reference, and correlate budgetary policies developed by the State of [state] and [state] University and laws enacted by the [state] legislature.

The appellant's position does not meet Level 3-5. At this level the employee is a recognized technical authority on the development and interpretation of budgetary guidelines, policies, legislation, and regulations covering the budgetary operations of one or more substantive national programs and the organizations which administer them. Guidelines are nonspecific and stated in terms of broad national policies and goals, often in legal and technical terminology, which necessitates extensive interpretation to define the extent and intent of coverage. Guidelines characteristic of this level consist of appropriations language in budgets approved by Congress; enabling legislation enacted by Congress



pertaining to the establishment and financing of important national programs and agencies; Acts of Congress (e.g., the Impoundment Control Act of 1974) with respect to the acquisition and use of appropriated and nonappropriated funds (e.g., revenues from industrially-funded operations); and Presidential budgetary and fiscal policies.

Level 3-4 and 450 points are 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. This factor also covers the interrelationships between budgets and programs which must be identified, considered, and analyzed in performing the work.

The [Program] is unique in that the program receives funding from both State and Federal allocations and runs on different fiscal years, which adds to the complexity of the situation. These funding sources represent an annual multimillion dollar budget totaling more than eight and a half million dollars. Accordingly, the appellant must assure that the complex budget structure covers all the various needs throughout the state of [state]. She has the authority to make projections for each funding source (projections are 10 years out for private funds, five years out for State funds, and three years out for Federal funds). The appellant is the contact point for the formulation and execution of the budget. The appellant plays an essential role in the presentation of the [Program] budget. She is responsible for attending meetings, conferences, and State legislative hearings to make presentations. She has the authority to represent the program and is involved in the actual negotiations for funds. She coordinates with the State Director and District Directors matters related to various program needs and direction. The appellant makes independent decisions in all areas of responsibilities.

The appellant's position meets Level 4-5 of the standard. As at this level, the appellant's work requires her to select and use many different and unrelated analytical techniques and methods in the formulation, presentation, and/or execution of the multiyear budget forecasts and requests that cover widely varying needs, goals, objectives, work processes, and timetables. As at Level 4-5, she develops the strategy for presenting the budget by developing questions and answers for use by the State Director in the presentation of the budget, developing narrative and statistical justification for requested funds, and participating in the briefing of the State Director on the nature of the testimony to be given, responding to questions or comments on the proposed budget, and making necessary adjustments to the budget as the result of decisions concerning funding. As at Level 4-5, recommendations made by the appellant concerning the acquisition, use, or availability of funds for program purposes are based upon detailed analysis and consideration of program requirements in relation to budgetary requirements, policies, methods, and sources and types of funding.

The appellant's position does not meet Level 4-6 of the standard. At this level, assignments are characterized by the need to develop and submit to OMB and/or Congress for appropriations,

supplemental appropriations, apportionments, reapportionments, deferrals, rescissions, and borrowing from the U.S. Treasury, or through the sale of bonds. Decisions and recommendations require consideration and analysis of the intent of budgetary and program legislation, effect on achievement of national economic and social goals; impact of budgetary actions upon the finances of prime contractors (e.g., those producing weapons systems, aircraft, ships, or large construction projects); legislation; delivery of benefits and services to the national public; and provision of grants and subsidies to the nation's states and cities. At this level long-range budget plans must continually be modified in accordance with changes in Congressional and Presidential program goals and adjusted to reflect feedback from the budget execution process.

Level 4-5 and 325 points are credited.

*Factor 5, Scope and effect*

This factor covers the relationship between the purpose, breadth, and depth of the assignment and effect of the work products or services.

The appellant's position meets Level 5-4 of the standard. As at Level 5-4, the appellant's budget formulation responsibilities involve developing long-range detailed estimates of funding needed to support the important programs and projects and written narrative justification for the funds requested. Her budget execution duties involve monitoring the status of funds and making recommendations to management officials on the most appropriate use of funds to accomplish program objectives. As at Level 5-4, she makes recommendations on ways to improve the utilization of funds which will result in cost savings and effective accomplishment of mission and program objectives. Her recommendations and technical interpretations affect the amount and availability of funds for the conduct of major substantive programs.

The appellant's position does not meet Level 5-5 of the standard. At this level, the purpose of the work is to analyze, advise on, and recommend solutions to budgetary problems in all phases of budget administration which budget officers and budget analysts at subordinate echelons and components within the agency have been unable to resolve or lack delegated authority to act on. The appellant's work does not affect the acquisition, amount, distribution, and sequence of funds for important substantive national programs on a long-term basis (i.e., for several years or more). Her recommendations do not affect funds available to carry out all APHIS programs. Nor do her recommendations affect the allotment of funds to other APHIS components and subcomponents.

Level 5-4 and 225 points are credited.

*Factor 6, Personal contacts*

The appellant's contacts are with staff within the [Program], regional office, headquarters, other Federal agencies, city, State and county officials, committees of the [state] House of Representatives and Senate, officials of [state] University, private business interests, and the general public. These

contacts generally take place in structured meetings, conferences, and face-to-face meetings. These contacts are comparable to Level 6-3 of the standard, which describes contacts with individuals from outside the agency who represent the budget and program interests of other Federal agencies, contractors, private business and financial interests, State and local governments, or colleges and universities. Contacts normally take place at formal budget briefings, conferences, hearings, or negotiations which are arranged well in advance. The appellant's contacts do not meet Level 6-4 where contacts are recurring face-to-face and/or telephone contacts with members of Congress and/or top Presidential advisors. At this level the employee appears before Congressional appropriations committees to provide testimony on behalf of the agency's annual and long-range budget requests and/or expenditures.

Level 6-3 and 60 points are credited.

*Factor 7, Purpose of contacts*

The purpose of the appellant's contacts meets Level 7-3 of the standard. As at this level, the appellant's contacts are for the purpose of persuading program managers and other officials in positions of decision-making authority with widely differing goals and interests to follow a recommended course of action consistent with established budget policies, objectives, and regulations. Level 7-3 is exemplified by contacts with managers, often in an advisory relationship, for the purpose of persuading them to reduce their levels of spending, program operations, or number of employees, or change program plans so that funds may be used to greater benefit in other areas. As at Level 7-3, the appellant must use persuasion and negotiation due to the presence of conflicting budgetary and program objectives which must be resolved.

The purpose of the appellant's contacts does not meet Level 7-4 of the standard. At this level, the purpose of contacts is to present, justify, and defend before fund granting and approving authorities controversial budgetary recommendations and actions such as requests for deficiency appropriations, deferrals, and recessions; views on proposed legislation; plans to combine, consolidate, or modify nationwide programs; budgetary reforms which result in substantial program cutbacks and decreased services to the American public; alternative methods of financing substantive program operations; or the redistribution of appropriated funds and programs among components. At Level 7-4, formal contacts with cabinet officials and directors of Federal departments are for the purpose of negotiating and resolving controversial budget and program issues of considerable significance which are not susceptible to resolution at lower echelons in government.

Level 7-3 and 120 points are credited.

*Factor 8, Physical demands*

The work is primarily sedentary and requires no special physical demands. Level 8-1 and 5 points are credited.

*Factor 9, Work environment*

The appellant's work is generally performed in an office setting involving everyday risks or discomforts. Level 9-1 and 5 points are credited.

*Summary*

In sum, we evaluated the appellant's nonsupervisory budget duties and responsibilities as follows:

Factor	Level	Points
1. Knowledge required by the position	1-7	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-4	450
4. Complexity	4-5	325
5. Scope and effect	5-4	225
6. Personal contacts	6-3	60
7. Purpose of contacts	7-3	120
8. Physical demands	8-1	5
9. Work environment	9-1	5
Total points		2890

The total of 2890 points falls within the GS-12 point range (2755-3150) on the grade conversion table provided in the standard. Therefore, the appellant's nonsupervisory budget duties are evaluated at GS-12.

**Decision**

The appellant's supervisory work is evaluated at the GS-11 level by reference to the General Schedule Supervisory Guide. Her nonsupervisory budget work is evaluated at the GS-12 level by reference to the standard for the Budget Analysis Series, GS-560. According to guidance in the *Introduction to the Position Classification Standards*, the overall grade for such positions should reflect the highest level of program management or supervisory work performed. Therefore the final grade is GS-12 based on the appellant's nonsupervisory work. The position is properly classified as Administrative Officer, GS-341-12.