

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



San Francisco Oversight Division
120 Howard Street, Room 760
San Francisco, CA 94105

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

Appellant: [Appellant]

Agency classification: Program Parts Monitor
GS-301-9

Organization: [Air Force Base]

OPM decision: GS-301-9
title at agency discretion

OPM decision number: C-0301-09-01

Signed by Denis J. Whitebook
Denis J. Whitebook
Classification Appeals Officer

September 26, 1997
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).

Introduction

On June 3, 1997, the San Francisco Oversight Division of the U.S. Office of Personnel Management (OPM) received a classification appeal from [Appellant], whose position is classified as Parts Program Monitor, GS-301-9. However, he believes that his position should be titled Government Industry Data Exchange Program Manager and classified at the GS-11 level. The appellant works in the [division] at the Air Force Base. We have accepted and decided his appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

The appellant makes various statements about his agency and how it handled his downgrade to his current position. He believes his position is comparable to other positions that are graded higher. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of his position. By law, we must make that decision solely by comparing his duties and responsibilities to OPM standards and guidelines (U.S.C. 5106, 5107, and 5112). Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

The agency had initially provided us with estimates of the percentage of time the appellant spends on his various duties and responsibilities. The appellant subsequently provided his estimates of the percentage of his time he spends on his assigned duties. The estimates provided by the agency and the appellant differ to some extent. However, we have carefully considered both sets of estimates in evaluating the appellant's position and in making our determination. We find that our classification determination remains the same regardless of which set of estimates we use.

Position information

The purpose of the appellant's position is to serve as representative and to provide direction for its overall Defective Parts and Components Control Program (DPCCP). This program provides for interface with the Government-Industry Data Exchange Program (GIDEP). The purpose of GIDEP is to identify, eliminate, control or prevent defective parts from entering or remaining in the Air Force inventory. GIDEP is a cooperative activity between the Federal Government and industry participants seeking to reduce or eliminate expenditures of time and money by making maximum use of the exchange of certain types of technical data essential in the research, design, development, production, and operational phases of the life cycle of systems and equipment. The GIDEP system is composed of five major electronic databases. The appellant's primary duties include the following:

- (1) Serves as the DPCCP program manager and GIDEP representative for the [agency], responsible for interpreting established policy, procedures and guidance. Advises both government and industry users on problems concerning the interchange of data and recommends improvements to higher headquarters.
- (2) Receives Alerts and Urgent Data Requests from other Air Logistic Centers. Screens these for completion, coordinates Alerts with the manufacturer, and submits such data to the GIDEP Operations Center.
- (3) Receives automated Alerts, test reports, and Urgent Data Requests through the GIDEP Electronic Automated Information System (EFAIS). Determines which Air Logistics Center organization should receive the data for action and supports these organizations by querying EFAIS, when requested, and provides Alert information to the next higher assembly user of a part.
- (4) Communicates with other GIDEP representatives, including private industry, to facilitate resolutions of a problem for an item manager, equipment specialist or engineering office. Represents the [agency] on all matters relating to GIDEP and DPCCP, especially at joint command meetings. Attends the annual GIDEP workshops and participates as required in specialized committees and working groups.
- (5) Receives Diminishing Manufacturing Source and Material Shortages (DMSMS) reports/ messages from the Defense Logistics Agency and manufacturers on items the manufacturer will discontinue or cease manufacturing. Items managed by [agency] are queried to determine if there are users of the listed items at any of the five Air Logistic Centers. Items listed for discontinuance, listed by stock part number, are queried through the requirements data band and the D043A data bank to determine the users that are listed in the Air Force inventory. Coordination between an equipment specialist or item manager at each logistic center is critical to equipment and systems that require continued use of these items.

The appellant's position description (PD) and the other material of record furnish much more information about his duties and responsibilities and how they are carried out.

Series determination

Based on our review of the record, we find that the position is properly classified in the Miscellaneous Administration and Program Series, GS-301. As discussed in the Handbook of Occupational Groups and Series, that series includes positions which are to perform, supervise, or manage nonprofessional, two-grade interval work for which no other series is appropriate. The work requires analytical ability, judgement, discretion, and knowledge of a substantial body of administrative or program principles, concepts, policies, and objectives.

Administrative work is defined in section III.C.2 of the Introduction to the Position Classification Standards as work that "involves the exercise of analytical ability, judgement, discretion, and personal

responsibility, and the application of a substantial body of knowledge of principles, concepts, and practices applicable to one or more fields of administration or management.” As further described, administrative work may be performed as a part of the principal mission or program of an agency or subcomponent, or it can be performed as a service function which supports the agency’s mission or program.

Title determination

The appellant believes his position should be titled Government Industry Data Exchange Program Manager. OPM has prescribed no titles for positions in the Miscellaneous Administrative and Program Series, GS-301. Therefore, according to section III.H.2 of the Introduction to the Position Classification Standards, the appellant’s agency may choose the official title for this position. In doing so, his agency should follow the titling guidance in that section.

Guide and grade determination

There are no published grade evaluation criteria for positions classified in the GS-301 series. In such cases the Introduction to the Position Classification Standards explains (section III.H.i) that if there are no specific grade level criteria for the work, an appropriate general classification guide or criteria in a standard or standards for related kinds of work should be used. In using other guides or standards, the criteria selected as the basis for comparison should be for a kind of work as similar as possible to the position to be evaluated with respect to the kind of work processes, functions, or subject matter of work performed; the qualifications required to do the work; the level of difficulty and responsibility; and the combination of classification factors which have the greatest influence on the grade level.

The Administrative Analysis Grade-Evaluation Guide provides grade level criteria for evaluating nonsupervisory staff administrative, analytical, planning and evaluative work. Work covered requires a high degree of qualitative and/or quantitative analytical skills, the ability to research problems and issues, written and oral communication skills, and the application of mature judgement in problem solving. We find that this guide is properly used to evaluate the appellant’s work.

The Administrative Analysis Grade-Evaluation Guide uses the Factor Evaluation System (FES), which employs nine factors. Under the FES, each factor level description in a guide or standard describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. As explained above, because the factor level descriptions of the guide describe *minimum* criteria, positions assigned a certain factor level always meet or exceed the guide’s criteria. Thus, it is expected that the appellant’s actual duties and responsibilities will often exceed the criteria for the awarded level. The critical issue is whether the appellant’s duties and responsibilities *meet or exceed* the criteria for the next higher level. Our evaluation with respect to the nine FES factors follows.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts required to do acceptable work and the nature and extent of skill necessary to apply this knowledge. To be used as a basis for selecting a level under this factor, a knowledge must be required and applied.

At Level 1-6, positions with this level of knowledge require skill in applying analytical and evaluative techniques to the identification, consideration, and resolution of issues or problems of a procedural or factual nature. The issues or problems deal with readily observable conditions (e.g., office or shop layout, workflow, or working conditions), written guidelines covering work methods and procedures such as performance and production standards, and information of a factual nature (e.g., number and type of units actually produced or capability of equipment). Included at this level is knowledge of the theory and principles of management and organization, including administrative practices and procedures common to organizations, such as those pertaining to areas of responsibility, channels of communication, delegation of authority, routing of correspondence, filing systems, and storage of files and records. Assignments typically involve using qualitative and quantitative analytical techniques and require skill in conducting interviews with supervisors and employees to obtain information about organizational missions, functions, and work procedures.

The appellant's position meets Level 1-6. Comparable to this level of knowledge, his position requires skill in the application of administrative policy, practices and procedures within the DPCCP, GIDEP and related assigned programs. As described at Level 1-6, this skill is applied in the identification, consideration, and resolution of issues or problems that are of a procedural or factual nature, such as reviewing or providing data on the performance of parts or components and on the discontinuance of the production of items in inventory. As typical at Level 1-6, these problems are readily observable in that information is received through alerts and data requests. The appellant communicates such data to, and coordinates with, appropriate personnel on needed followup action(s). As is also described at this level, written guidelines cover procedures and work methods.

The appellant's position does not meet Level 1-7. Level 1-7 requires knowledge and skill in applying analytical and evaluative methods and techniques to issues or studies concerning the efficiency and effectiveness of program operations carried out by administrative or professional personnel, or substantive administrative support functions (i.e., internal activities or functions such as supply, budget, procurement, or personnel which serve to facilitate line or program operations). This level includes knowledge of pertinent laws, regulations, policies, and precedents which affect the use of program and related support resources in the area studied. Projects and studies typically require knowledge of the major issues, program goals and objectives, work processes, and administrative operations of the organization. At Level 1-7, the knowledge is used to plan, schedule, and conduct projects and studies to evaluate and recommend ways to improve effectiveness and efficiency of work operations in a program or support setting. Knowledge is applied in developing new or modified work methods, organizational structures, records and files, management processes, staffing patterns, procedures for administering program services, guidelines and procedures, and automating work processes for the conduct of administrative support functions or program operations.

As described above, the appellant's work does not require this level or breadth of knowledge to accomplish assignments. For instance, his work does not require the extent of involvement in planning, scheduling, and conducting studies to analyze and evaluate the efficiency and effectiveness of program operations that are described at this level. The nature of the appellant's work is more narrow and is more involved with carrying out and coordinating administrative activities related to operation of the DPCCP, GIDEP and related programs. In addition, his work does not typically require application of the level of knowledge needed to develop new or modified work methods, organizational structures, records and files, management processes, staffing patterns or other administrative functions or processes equivalent to those described at this level.

This factor is evaluated at Level 1-6 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 agency has evaluated this factor at Level 2-4. Information in the record indicates that the appellant and his supervisor develop a mutually acceptable project plan which typically includes the identification of the work to be done and the scope of the project. Within the parameters of the approved project plan, the appellant is responsible for conducting all phases of the project. This is similar to the description of Level 2-4, where the employee is responsible for planning and organizing the study, estimating costs, coordinating with staff and line management personnel, 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. At Level 2-4, the employee informs the supervisor of potentially controversial findings, issues, or problems with widespread impact.

While there is not sufficient information in the record to overturn the agency's determination of Level 2-4, we do add a caution. The factor relationship table on page 4 of the guide illustrates which FES factor levels are typically assigned at various levels for administrative analytical positions. Typically, Level 2-3 is the highest level assigned for Level 1-6. Also, in *The Classifier's Handbook* on page 16 there is a factor relationship table for all administrative occupations. Level 2-4 is not assigned until Level 1-7 is also assigned. As discussed above, the appellant's work does not meet Level 1-7 knowledge requirements primarily because the DPCCP and GIDEP do not approach the scope of the programs or complexity of management problems studied or typically dealt with at Level 1-7. A careful reading of the grade level criteria and these tables demonstrates that there is a direct correlation between the scope and importance of the subject studied and the factor levels assigned. While this typical pattern does not preclude assignment of Level 2-4 to a specific position where Knowledge required has been evaluated at Level 1-6, it would be unusual for a position to vary from the pattern. We also note that, in this case, assignment of Level 2-3 or Level 2-4 would not change our final grade determination.

This factor is assigned Level 2-4 and 450 points are credited.

Factor 3, Guidelines

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

At Level 3-3, guidelines consist of standard reference material, texts and manuals covering the application of analytical methods and techniques and instructions and manuals covering the subjects involved. Analytical methods contained in the guidelines are not always directly applicable to specific work assignments. The employee uses judgment in choosing, interpreting, or adapting available guidelines to specific issues or subjects studied. The subject studied is covered by a wide variety of administrative regulations and procedural guidelines, and the employee must use judgment in researching regulations and in determining the relationship between guidelines and organizational efficiency, program effectiveness, or employee productivity.

Comparable to Level 3-3, the appellant's guidelines include the GIDEP Operations Manual, Air Force Instruction 63-108, the Military Standard for the Parts Control Program (MIL-STD-965B), and previously developed local regulations covering assigned programs. As is typical of Level 3-3, the appellant uses judgment in choosing, interpreting, and adapting these guidelines to specific issues within the DPCCP and GIDEP with the overall goal of promoting effectiveness of these programs.

The appellant's guidelines do not meet Level 3-4. At this level, guidelines consist of general administrative policies and management and organizational theories which require considerable adaptation and/or interpretation for application to the issues and problems studied. Administrative policies and precedent studies provide a basic outline of the results desired, but do not go into detail as to the methods used to accomplish the project. Administrative guidelines usually cover program goals and objectives of the organization, such as agency controls on size of workforce, productivity targets, and similar objectives. The guidelines used by the appellant are more specific in that they are not general administrative policies and management and organizational theories. As described above, the appellant's guidelines are manuals and standards that provide more details and require less adaptation or interpretation for application to issues than do policies and theories described at Level 3-4.

This factor is evaluated at Level 3-3 and 275 points are credited.

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of tasks, 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 4-3 the work principally involves dealing with problems and relationships of a procedural nature rather than the substance of work operations, issues or other subjects studied. At this level, the employee analyzes the issues in the assignment, then selects and applies accepted analytical techniques such as task analysis, work simplification, workflow charts, workload measurement, and

trend analysis to the resolution of procedural problems affecting the efficiency, effectiveness, or productivity of the organization and/or workers studied. Work takes place within organizations with related functions and objectives. Typically, the employee prepares a narrative report containing a statement of the issue or problem, background, observations, options for change, and recommendations. Findings and recommendations are based upon analysis of production records or similar documentation and application of standard administrative guidelines (e.g., staffing guidelines or performance and production standards).

Comparable to Level 4-3, the appellant principally deals with problems and relationships of a procedural nature, such as those associated with initiating, receiving, reviewing or otherwise acting upon and following up, as necessary, on Alerts, Safe Alerts, Urgent Data Requests, and Problem Advisories. Based upon the assignment, he selects and uses accepted administrative policies and methods to accomplish his work. As is also comparable to Level 4-3, the appellant's work involves coordination with portions of other organizations having related functions and objectives, such as with other GIDEP representatives and equipment specialists.

The appellant's work does not meet the complexity of Level 4-4. At this level, the work involves gathering information, identifying and analyzing issues, and developing recommendations to resolve *substantive* problems of effectiveness and efficiency of work operations. It requires the application of qualitative and quantitative analytical techniques that *frequently require modification* to fit a wider range of variables than is described at Level 4-3. Characteristic of this level is originality in refining existing work methods and techniques for application to the analysis of specific issues or resolution of problems. An example of work at this level is an employee who serves as a management advisor in the bureau or command headquarters of an agency 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). As described above, the appellant's work is not involved with this level of substantive problems, does not require the use and frequent modification of qualitative and quantitative analytical techniques or equivalent processes, and is not of the difficulty that requires the need for originality that is envisioned at this level.

This factor is evaluated at Level 4-3 and 150 points are credited

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.

At Level 5-3, the purpose of the work is to plan and carry out projects to improve the efficiency and productivity of organizations and employees in administrative support activities. Employees at this level identify, analyze, and make recommendations to resolve conventional problems and situations in workflow, work distribution, staffing, performance appraisal, organizational structure, and/or administration. Employees may be assigned portions of broader studies of largely administrative

organizations or participate in the evaluation of program effectiveness at the operating level. Work may also involve developing detailed procedures and guidelines to supplement established administrative regulations or program guidance. Completed reports and recommendations influence decisions by managers concerning the internal administrative operations of the organizations and activities studied. The work may involve identifying problems, studying, analyzing and making recommendations concerning the efficiency and productivity of administrative operations in different components of an organization.

As is comparable to Level 5-3, the purpose of the appellant's position is to carry out assignments that improve the reliability and accuracy of materials in the Air Force inventory. He is responsible for interpreting established applicable policies, procedures and guidance, providing information on these programs and carrying out work to implement assigned programs. Along with others, this is carried out to identify, track, eliminate and generally prevent the entry or continuance of defective parts in the Air Force inventory. His work also involves noting of parts or components in the inventory that are being discontinued and so advising responsible personnel for their appropriate action. This work affects the reliability and accuracy of materials in the Air Force inventory.

The appellant's position does not meet Level 5-4. At Level 5-4 the purpose of work is to assess the productivity, effectiveness, and efficiency of program operations or to analyze and resolve problems in the staffing, effectiveness and efficiency of administrative support and staff activities. Work involves establishing criteria to measure and/or predict the attainment of program or organizational goals and objectives. Work at this level 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. Work that involves the evaluation of program effectiveness usually focuses on the delivery of program benefits or services at the operating level. The work at Level 5-4 contributes to the improvement of productivity, effectiveness, and efficiency in program operations and/or administrative support activities at different echelons and/or geographical locations within the organization. Work affects the plans, goals, and effectiveness of missions and programs at these various echelons or locations. Work may affect the nature of administrative work done in components of other agencies (e.g., in preparation and submission of reports, in gathering and evaluating workload statistics, or in routing and storing official correspondence or files).

The nature of the appellant's work is not of the breadth described at this level, covering a narrower scope than envisioned. For instance, his work does not require assessing the productivity, effectiveness *and* efficiency of program operations, or analyzing and resolving similar problems in administrative support activities. The work as performed is more to carry out and coordinate functions within assigned programs. In addition, the appellant's work does not require establishment of criteria to measure and/or predict attainment of program or organizational objectives, or developing regulations or program guidance for application across organizational lines. Further, the effect of the appellant's work is not fully equivalent to Level 5-4. While his work may affect the preparation and submission of reports or data, it does not affect the plans, goals and effectiveness of missions and programs at various echelons or locations in the manner envisioned at this level.

This factor is evaluated at Level 5-3; therefore, 150 points are credited.

Factor 6, Personal contacts and Factor 7, Purpose of contacts

Factor 6 includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. Under Factor 7, the purpose of personal contacts ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives.

At Level 2, contacts are with employees, supervisors and managers of the same agency, but outside of the immediate office, or employees and representatives of private concerns in a moderately structured setting. This is comparable to the appellant's contacts which include other Air Force personnel involved in GIDEP and related programs, and representatives of private concerns such as contractors. These contacts are in a moderately structured setting, such as meetings or discussions covering GIDEP and related programs.

The appellant's contacts do not meet Level 3. At this level, contacts are with persons outside the agency which may include consultants, contractors, or business executives in a moderately *unstructured* setting. This level may also include contacts with the head of the employing agency or program officials several managerial levels removed from the employee when such contacts occur on an ad hoc basis. As described above, the appellants contacts within the agency are not at this level, and his contacts with persons outside the agency, such as contractors or their representatives, are in a setting that is more structured than described at this level, such as discussions or meetings to cover specific requirements or information.

Factor 7 is evaluated at Level b. The appellant's PD shows that the purpose of his contacts is to exchange information, resolve operational problems, justify recommendations, and obtain cooperation between organizational elements. He provides and receives information on GIDEP, Alerts, Safe Alerts, to exchange information and obtain cooperation. This is comparable to Level b, where noncontroversial advice on organization or program related issues and concerns is provided, such as recommendations for resolving administrative problems.

The purpose of the appellant's contacts does not reach Level c. At this level the purpose of the contacts is to influence managers or other officials to accept and implement findings and recommendations on program effectiveness, and resistance may be encountered due to such issues as organizational conflict, competing objectives, or resource problems. While some of the appellant's contacts may involve suggestions on improving program effectiveness, they are not the main purpose of most contacts and do not involve the controversy or conflict described at this level.

Factor 6 is evaluated at Level 2 and Factor 7 at Level b. According to the chart on page 25 of the Guide a total of 75 points should be credited to the appellant's position based on this combination of levels.

Factor 8, Physical demands

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

We find that Level 8-1 criteria are met. As is typical of Level 8-1, the appellant's work is primarily sedentary, although some slight physical effort may be required. Work does not regularly involve long periods of standing, bending, and stooping to observe and study work operations in an industrial, storage, or comparable work area as described at Level 8-2.

This factor is evaluated at Level 8-1 and awarded 5 points.

Factor 9, Work environment

This factor considers the risks and discomfort in the employee's physical surroundings.

We find that Level 9-1 criteria are met. As is typical of Level 9-1, the appellant typically works in an adequately lighted and climate controlled office, and occasional travel is required. Work does not regularly require visits to manufacturing, storage, or other industrial areas which involve moderate risks or discomfort, and require protective clothing and gear, and observance of safety precautions as described at Level 9-2.

This factor is evaluated at Level 9-1 and awarded 5 points.

Summary

We have evaluated the appellant's position as follows:

Factor	Level	Points
1. Knowledge required by the position	1-6	950
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-3	150
5. Scope and effect	5-3	150
6/7. Personal contacts/ Purpose of contacts	6-2 7-b	75
8. Physical demands	8-1	5
9. Work environment	9-1	<u>5</u>
Total points:		2060

The appellant's position warrants 2060 total points. Therefore, in accordance with the grade conversion table on page 11 of the guide, his position is properly graded at GS-9.

Decision

The appellant's position is properly covered by the Miscellaneous Administration and Program Series, GS-301, graded at GS-9, and titled at the agency's discretion.