

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

Appellant: [Appellant]

Agency classification: Technical Writer-Editor
GS-1083-10

Organization: [Organization]
[Organization]
[Location] Naval Shipyard
Department of the Navy
[Location]

OPM decision: GS-0303-4
(title at agency discretion)

OPM decision number: C-0303-04-08

/signed/

Jeffrey E. Sumberg
Deputy Associate Director
Center for Merit System Accountability

03/18/09

Date

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

Since this decision lowers the grade of the appealed position, it is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The applicable provisions of parts 351, 432, 536, and 752 of title 5 CFR must be followed in implementing the decision. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented. The servicing human resources office must submit a compliance report containing the corrected position description (PD) reflecting the actual work assigned to and performed by the appellant as discussed in this decision and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action to the U.S. Office of Personnel Management (OPM) office which accepted the appeal.

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Introduction

On July 11, 2008, the Philadelphia Oversight and Accountability Group (POAG), formerly the Philadelphia Field Services Group of OPM, accepted a classification appeal from [Appellant]. His position is currently classified as Technical Writer-Editor, GS-1083-10, which the appellant believes should be upgraded to GS-12. We received the complete agency administrative report on August 6, 2008. The position is located in the [Organization], [Organization], [Location] Naval Shipyard, Department of the Navy, [Location]. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C).

To help decide this appeal, we conducted telephone audits with the appellant on November 24, 2008, and January 8, 2009, and interviewed the appellant's first-level supervisor on December 11, 2008 and second-level supervisor on January 20, 2009. In reaching our classification decision, we have carefully considered all information furnished by the appellant and the agency, interviews with the appellant and his first- and second-level supervisors, the appellant's official PD [# number], and all other information of record.

General issues

The appellant makes various statements about the classification of his position due in part to a settlement between himself and the agency, the agency's evaluation of his position, and information obtained in discussions with other employees. In adjudicating this appeal, our responsibility 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 current duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). We have considered the appellant's statements only insofar as they are relevant to making that comparison. Because our decision sets aside all previous agency decisions, the classification practices used by the appellant's agency in classifying his position are not germane to the classification appeal process.

During our fact-finding discussion and in documentation presented by the appellant, he identified the volume, quality, and efficiency of the work performed in support of his assertion the position warrants a higher grade. However, volume of work, quality of work and efficiency of performance are listed as factors which cannot be considered in determining the grade of a position (*The Classifier's Handbook*, chapter 5).

Position information

The appellant's immediate organization is responsible for performing periodic scheduled inspections of shipyard lifting and handling equipment and post-maintenance/repair; developing, administering, and implementing a shipyard surveillance program for these functions; analyzing metric data for the lifting and handling program; independent auditing of the lifting and handling program; inspecting work performed to ensure conformance to engineering approved specifications, including in-process inspection; conducting operational or load testing on shipyard lifting and handling equipment; preparing certification packages; and maintaining equipment history files.

The appellant states and his first-level supervisor agrees 70 percent of his regular and recurring duties involve coordinating and tracking data associated with crane maintenance work. They also agreed 10 percent of his regular and recurring duties include updating crane status (certification reports), 10 percent assisting with the coordination, and notification of crane and locomotive rail outages, and 10 percent assisting with the scheduling and rescheduling of trainees.

In tracking and coordinating data associated with crane maintenance work, the appellant reviews technical work documents generated by engineers, maintenance employees, or inspectors for work to be completed between work areas, and enters specific data from the technical work documents into an Oracle database in order to monitor and track the completion of work. These technical work documents may include Lifting and Handling Administrative Procedures, Lifting and Handling Work Instructions, and/or Lifting and Handling Engineering Instructions. The appellant is responsible for reviewing the technical work documents for proper dates, signatures, and codes. He tracks work pending and certifies completed files. He reviews and monitors work documents received for maintenance work to be accomplished for administrative error and inclusion of radiological controls.

The appellant tracks certification dates of cranes, tanks, rails, railroads, and overdue inspections and, if necessary, manually enters established retention dates to accommodate changes in other certification (such as rail) which can impact crane certification. He also tracks crane maintenance deferred work, ensures the work is scheduled with input from the maintenance department, and updates crane status in the database when the work is completed. The appellant may periodically review certification dates or may enter dates when instructed by the Inspection Branch head for rail certification dates approaching expiration. The appellant maintains crane history files and ensures all required documentation is properly filed in the history jacket. The appellant's duties also include coordination and notification of crane and locomotive rail outages. As the contact for training, his responsibilities include sending out training notices and the rescheduling of trainees.

The appellant and his second-level supervisor certified to the accuracy of the PD of record. A PD is the official record of the major duties and responsibilities assigned to a position by a responsible management official; i.e., a person with authority to assign work to a position. A position is the duties and responsibilities which 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 (5 CFR 511.607(a)(1) and 609). An OPM decision classifies 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.

Our fact-finding revealed the appellant is not performing all of the duties identified in his PD of record, and the duties he performs do not entail the level of difficulty, complexity, and responsibility indicated in the PD. For example, the appellant does not write by working with information prepared by others who are usually experts in their fields or advise and assist the authors during the writing stage. He does not verify the information presented by researching or consulting with other subject-matter experts. He does not make necessary adjustments to the length and tone of text or edit the text for clarity and accuracy. He does not consult on design and graphics. He does not prepare material for printing and does not use desktop publishing hardware and software to draft, edit and lay out the material, and then design, print, and distribute it. Additionally, the appellant's work does not require exercise of extensive knowledge of the crane operations to perform one-of-a-kind assignments which require determining necessary procedures. Rather, the appellant performs recurring and repetitive procedural duties which do not require the extensive program knowledge used by the subject-matter experts who perform the writing which is improperly credited to the appellant in his PD of record.

The appeal record, including the official PD, contains descriptive information about the major duties and responsibilities assigned to and performed by the appellant, and we incorporate it by reference into our decision. However, the description of the work in the PD, as discussed in this appeal decision, overstates the difficulty and responsibility of the work performed.

Series, title and standard determination

The agency assigned the appellant's position to the GS-1083, Technical Writing and Editing Series, which includes positions that involve writing and editing technical materials for Government agencies. Technical writers and technical editors draw on a substantial knowledge of a particular subject matter, such as the natural or social sciences, engineering, law, or other fields, and work involves the development of information and analysis to select and present information on the specialized subject in a form and at a level suitable for the intended audience. Technical writers and technical editors use sufficient knowledge of the basic principles and specialized vocabulary of the appropriate field, or sufficient understanding of the appropriate equipment and systems, to deal with related professional, scientific, or technical information. They use this knowledge, along with new source material found during research and in interviews with subject-matter specialists, to develop or edit in-depth, technical documents concerning their particular field.

The appellant's position is excluded from the GS-1083 series since he does not write and edit technical materials. The primary purpose of the appellant's position involves performing clerical duties to review, coordinate, and monitor the completion of technical working documents through database input. This work requires knowledge of the clerical procedures used in processing these documents. The work also requires some knowledge of crane and rigging

operation rules and regulations and a general familiarity with the [Organization] Department's practices and operational needs. While the appellant's work requires knowledge of office automation software to enter information into the database, the position does not require the skill of a fully qualified typist. No specific series includes work of this nature. The appellant's position is, therefore, properly assigned to the GS-303, Miscellaneous Clerk and Assistant Series, which includes positions involved in performing clerical, assistant, or technician work for which no other series is appropriate. Clerical work in this series involves the processing or maintenance of records or documents representing the transactions of the organization. Since there are no titles prescribed for the GS-303 series, the position may be titled at the agency's discretion within guidelines established in the *Introduction*.

Grade determination

Due to the general clerical nature of the appellant's work, we find it properly evaluated by applying the grading criteria in the Grade Level Guide for Clerical and Assistance Work (the Guide) which provides general criteria for use in determining the grade level of nonsupervisory clerical and assistance work. Administrative support work of the kind described in the Guide is performed in offices, hospitals, and numerous other settings in Federal agencies. The Guide describes the general characteristics of each grade level from GS-1 through GS-7, and uses 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

The appellant's work assignments most closely match the GS-4 level. Comparable to this level, the appellant performs a full range of standard clerical assignments, e.g., data entry; document coordination; identification of omissions, errors and discrepancies; and resolution of recurring problems as they pertain to the coordination of these documents. His work consists of related steps, processes, or methods, which requires the appellant to identify and recognize differences among a variety of recurring situations. Like the GS-4 level, the appellant's duties require subject-matter knowledge of an organization's program and operations. This knowledge is needed to determine what is being done, why the action is being taken and how it must be accomplished. The appellant reviews working documents to identify coding errors or missing data and takes corrective action to enable data to be entered into the database. As at the GS-4 level, problems encountered are recurring and actions taken differ based on the nature of the corrective action required. Typical of the GS-4 level, the appellant applies established procedures to send out the training notices, receives phone calls or email requests from employees who are unable to attend the training and advises the training branch of the phone requests or forwards the email requests to training branch personnel for rescheduling. He assists the Inspection Branch head in a similar fashion with regard to certification dates and relaying notification of rail outages.

The appellant's work assignments do not meet the GS-5 level at which work consists of performing a full range of standard and nonstandard clerical assignments. The appellant's duties are limited to standard clerical duties. He is not involved in resolving a variety of non-recurring

problems typical at the GS-5 level. Instead, he is responsible for data input, coordination, document review, and correcting coding errors causing documents to appear as incomplete. The corrective action taken is recurring and in accordance with established guidelines. Unlike the GS-5 level, the appellant's work is performed in accordance with standard procedures, office policies, and organizational and agency instructions which are readily available and cover most situations. As a result, the work does not afford him the latitude to decide which steps, processes, or course of action should be taken, since these are basically prescribed. Decisions on substantive matters are reserved to personnel in the organizations he supports, such as the training branches and the Inspection Branch head. Unlike the GS-5 level, he does not deal with a variety of assignments each of which involves different and unrelated steps, processes, or methods. Instead, he deals with related duties, making more limited judgments such as identifying discrepancies in work documents based on established procedures.

This factor is evaluated at the GS-4 level.

Level of responsibility

Typical of the GS-4 grade level, the appellant performs his day-to-day work with little or no daily review by the supervisor. His supervisor provides assistance where new or unusual situations are encountered or trends occur which need to be brought to the attention of higher authority. Procedures for correcting work documents are established and a number of specific guidelines are available. The appellant uses judgment in locating and selecting the most appropriate guidelines, references, and procedures. There are a number of specific agency guides and reference manuals, e.g., Quality Control Manual, Naval Crane Quality Manual and the P307, Management of Weight Handling Equipment. Illustrative of the GS-4 grade level, the appellant has contact with co-workers and those outside the organization to gather information, and in some cases to resolve problems in connection with the immediate assignment.

The appellant's work does not meet the GS-5 level. At this level, the supervisor assigns work by defining objectives, priorities, and deadlines and provides guidance on assignments which do not have clear precedents. The employee works in accordance with accepted practices and completed work is evaluated for technical soundness, appropriateness, and effectiveness in meeting goals. In contrast, the appellant's work is performed in accordance with standard procedures, office policies, and organizational and agency instructions which are readily available and cover most situations. The appellant's completed work is spot checked for accuracy and adherence to established guidelines. Unlike the GS-5 grade level, the appellant's position does not require extensive use of judgment on a regular or recurring basis in interpreting or adapting available or established guidance and procedures to resolve problems which may be encountered. Guides are generally applicable and do not require interpretation or adaptation to the work as would be characteristic of GS-5 level. Instead, the appellant refers these types of problems to his supervisor or other higher-level employees to whom he provides clerical support. Additionally, the appellant is not required to select from numerous or similar guidelines to complete his assignments; and his contacts with others are primarily to resolve specific problems, e.g., with coding or forwarding requests for the rescheduling of training.

This factor is evaluated at the GS-4 level.

Since both factors are evaluated at the GS-4 level, the position is properly evaluated at the GS-4 level.

Decision

The position is properly classified as GS-303-4, with the title to be determined by the agency.