

**OPM decision number:** C- 0350-04-01, 2/18/97

PH:OD:96-26

[Appellant]

Dear [Appellant]:

This is our decision on the classification appeal filed with our office which we accepted under the authority contained in section 5112(b) of title 5, U.S. Code (U.S.C.).

This appellate decision constitutes a certificate which is mandatory and binding on administrative, certifying, payroll, disbursing and accounting officials of the Government. It is the final administrative decision on the classification of this position, and is not subject to further appeal. It is subject to review only under the limited conditions and time limits specified in 5 Code of Federal Regulations (CFR) 511.603 and 511.613, and in the Introduction to the Position Classification Standards (Introduction), Appendix 4. It must be implemented in accordance with the provisions contained in 5 CFR 511.612.

Position Information:

Appellant:	[Appellant]
Current Classification:	Computer Operator, GS-332-6
Position Description Number:	501
Requested Classification:	Computer Operator, GS-332-7
OPM Decision:	Peripheral Equipment Operator, GS-350-4

Organizational Information: Department of the Treasury  
Financial Management Service (FMS)  
[installation] Financial Center (Center)  
Electronic Operations Branch  
Computer Operations Section  
[city state]

### Analysis and Decision

In considering your appeal, we carefully reviewed all of the information submitted by you or on your behalf; information obtained during a desk audit with you and an interview with your supervisor, on January 14, 1997; and, other pertinent classification information provided by your employing activity at our request.

It is our decision that the proper classification of your position is Peripheral Equipment Operator, GS-350-4. Accordingly, your appeal is denied and your position downgraded for the reasons discussed below.

In your initial appeal letter of September 9, 1996, you indicated that your position had been audited by a personnelist from your activity "to evaluate the justification for change in classification of the Troy Operations from GS-0332-06 to GS-0332-07." You provided a "Factor by Factor breakdown of the discrepancies which exist between the position description, the desk audit, and how the duties of the position are actually performed." You did not dispute the crediting of your position at Levels 1-4, 3-2, 4-3, 6-2, 7-2, and 9-2. You did, however, disagree with the crediting of Levels 2-2, 5-3, and 8-2, claiming that these three factors warranted evaluation at the next higher factor level.

You provided a number of statements in support of evaluation at a higher grade level. These included: (1) the length of time needed to operate the Troy system; four months to operate a single system and six months to run two systems simultaneously; (2) the added difficulty entailed in operating two systems, especially the paperwork; (3) the training demands of the work which were not recognized under Factors 1 and 4; and (4) the demands of the Bar Code Printer in which:

Any failure of these three [Bar coder operations] could, and has, cost FMS thousands of dollars. Although not reflected in the position description [PD], maintenance of the Barcode Printer is a major duty performed. This aspect was not addressed in the May 1995 Desk Audit.

3.

Your undated letter responding to your activity's appeal administrative report contained additional comments on Factors 2, 5, 6, and 8. You stressed your: (1) responsibility for the Preliminary Balancing function, assuring that all "rejects and voids" are accounted for at the completion of the "run" prior to releasing the truck to the Balancing Unit; (2) calling in the manufacturer's service representative (as identified in the PD of record), described by you as the "customer service engineer" (CE), to service the equipment despite the continuing policy that service calls be placed by the supervisor; (3) belief that Factor 5 can be extended beyond the highest level in the Computer Operator Series, GS-332 position classification standard (PCS) as provided for in The Classifier's Handbook; and, (4) the impact of facility tours on production numbers that are "addressed as a Critical Element" in your performance standards. You provided additional information supporting your claim that the physical demands entailed in moving 400 pound webs of checks and your PD's statement that you lift objects "weighing up to 60 pounds" meets the intent of Level 8-3. You also addressed comments made by your agency on your original appeal rationale, providing additional remarks on the internal activity audit of your position, observing that is inappropriate for your activity to refer to the content of and classification of other FMS PD's in its classification analysis of your position.

It is my understanding that Classification is based on Position Description and Classification Standards for the position being evaluated. I did not know that Classification was conducted by comparing position descriptions from one Center to another.

Your appeal submissions have raised several procedural issues that warrant clarification. We believe there may be some misunderstanding concerning the basis of classifying a position, and that a brief explanation of the classification process is warranted. 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 combined duties and responsibilities which make up the work performed by an employee. Section 5106 of title 5, U.S.C., prescribes the use of these duties and responsibilities, and the qualifications required by these duties and responsibilities, as the basis for determining the classification of a position. The Introduction to the Position Classification Standards (Introduction) further provides that "As a rule, a position is classified on the basis of the duties actually performed." Additionally, 5 CFR 511.607(a)(1), in discussing PD accuracy issues, provides that OPM will decide classification appeals on the basis of the actual duties and responsibilities assigned by management **and** performed by the employee. The point here is that it is a real operating position that is classified, and not simply the PD.

All positions subject to the Classification Law contained in title 5, U.S.C., must be classified in conformance with the published position classification standards (PCS's) issued by the Office of Personnel Management or, if there are no directly applicable PCS's, consistently with PCS's for related work. Therefore, as you noted, other methods or factors of evaluation, such as comparison to other positions that may or may not be classified correctly, are not authorized for use in determining the classification of a position. The classification appeals process is a de novo review which includes a determination as to these duties and responsibilities. Thus, the classification review methodology and conclusions drawn by your activity previously have no bearing on our adjudication of the appeal.

Your value and the value of your position to the organization are not in question under the classification appeal process. The classification of a position is based on work that is performed properly. This classification principle is enunciated in the Introduction, Appendix 3, Primary Standard, under Factor 5, Scope and Effect, which states that "only the **effect** of **properly** performed work" is to be considered in assigning a level to the factor. The perceived value of a position to the organization, the quantity of the work produced, and the quality of work performance are not classification factors. They are matters typically dealt with under the performance management program regulations and procedures.

Our fact-finding revealed that while your PD contains the major duties and responsibilities of your position, it overstates the difficulty and complexity entailed in operating Troy CFO-480 check printers. For example, your PD of record states that the position requires:

- Knowledge of computer operating principles and techniques.
- Knowledge of operating system, equipment capabilities, input/output devices required by each job, relationship of system components, software functions, and basic computer programming principles.
- Knowledge of system control language to enable incumbent to assist in the testing of programs and the installation of new programs.

These knowledges link directly to such major duties as:

- Helps test new programs and monitors computer runs for malfunctions. Notifies programmers and systems analysts of program errors and, as requested, works with them to make corrections.

These statements in the PD of record would cause a reader to infer that: (1) the Troy CFO-480 is the equivalent of a large mainframe computer system; (2) its operation requires a substantial depth and breadth of computer operating and programming principles and techniques knowledge; (3) day-to-day check printing and less frequent program testing duties require knowledge and use of sophisticated job control (system control) commands in order to control the computer system and multiple peripheral devices (input/output devices) which are selected based on the requirements of each job run; and, (4) you are deeply involved in testing new applications and system software programs requiring a substantial depth of computer programming knowledges.

Our fact-finding revealed, however, that the Troy CFO-480 is not a computer within the meaning of the position classification system. Rather, it is a piece of peripheral equipment; i.e., a high speed check printer, run off-line from the Center mainframe system. The printer is controlled by a minicomputer. In order to operate the system, you select one of the two files available on the single program tape used on the system. This tape and the accompanying data tape are provided by the Center mainframe organization. For example, Social Security and Supplemental Security Income tapes used to generate checks require the use of File #1. Other jobs, such as printing vendor checks, require you to select File #2. The Troy CFO-480 is operated by entering a limited number of data items through menu prompts. As stated in the Operator's Guide:

The computer directly controls the printing and logging operations. The remaining operations are semi-automatic to the extent that the computer is notified only if there is a malfunction. . . . When the system is initially powered up, the Custom Application Print Software (CAPS) program must be loaded into the computer from a magnetic tape via the dual-tape drive unit. Once CAPS is loaded, the computer is ready. . . . The information printed on the checks is supplied by magnetic tapes loaded into the dual-tape unit by the operator. The dual-tape unit allows for data tape replacement without disturbing the printing process. The logging printer located on the dual tape unit logs pertinent information such as: end of current print job, current job

statistics, irrecoverable tape error has occurred, [and] input file has been repositioned.

This work entails circumscribed computer-related decision making as evidenced by the list of operator requirements that include: (1) performing the initial start-up procedures; (2) monitoring the system; (3) emptying and replacing the magazine; (4) replacing the data tapes when required; (5) replacing, rethreading, and aligning the check stock; (6) replacing print ribbons; (7) emptying the cutter bin; (8) clearing the malfunctions upon occurrence; and, (9) performing the daily preventive maintenance procedures. As you described during the audit, and confirmed by your supervisor, start-up procedures are limited in the number of steps and time required to perform them, including: (1) powering up the system and modules/units, e.g., paper feeder, check cutter, check stacker; (2) verifying that all units/modules are ready; (3) installing the system program tape, CAPS, and a data tape in the dual tape unit; (4) loading the system program into the computer; (5) performing operator log-in steps; (6) starting the print process; and, (7) replacing the system tape with other data tape.

Your troubleshooting duties are preponderantly machine rather than program related. For example, if a parity error is displayed when starting a job, and the system goes off line, you perform the start up procedure again. If the second attempt produces another parity error, you obtain a duplicate program tape. If the duplicate tape also produces parity errors, you request that the tape be recreated. These program related decisions are go/no go. The system does not require or permit you to manipulate the system software itself. Your involvement in computer related program testing is limited to reporting errors messages displayed on the menu screen and companion printer, e.g., the block is too big to print in the selected space.

The decision making processes described in Factor 2, the interpretive demands in applying guidelines described in Factor 3, and the difficulty and complexity of the total work operation described in Factor 4, evidence similar overstatements. For example, Factor 2 states: "In unrecoverable error situations, the operator selects the most advantageous interrupt or dump procedures to preserve all completed work and minimize computer rerun or search time." This description would cause the reader to infer that there are numerous alternatives to terminating a tape run. Our fact-finding revealed that if such problems as a large volume of successive checks voids and/or spoils, jams in the sequencer, or similar problems occur, you stop the run to locate and fix the problem. If it involves more than the minor machine adjustments you are trained and authorized to do, the services of a CE must be requested. If the CE believes that it is a problem that you can be talked through, e.g., based on your description of the problem, the CE concludes that it appears to be a paper problem and suggests that you change the web, you act on that guidance. If those actions

do not resolve the problem, the CE is called in. The system is then started at the check number at which the job was interrupted. You must assure that you check the summary totals in order to avoid printing duplicate checks when you restart the system. If a major data tape problem appears to exist, you stop that job and move onto another job in order to maintain the production schedule.

The guidelines described in the PD state: “a significant percentage of problems and stoppages are not clearly covered and must be addressed by the incumbent, or referred to the supervisor of higher grade operator.” This implies an ex-tensive involvement in software troubleshooting. As discussed above, how-ever, our fact-finding revealed that it pertains to paper and/or bar coder printer alignment, problems with the performance of paper stock, dealing with bar coder ink supply problems, and similar problems that impede and/or halt check production.

The complexity described in the PD includes that you use “a wide range of com-puter system configurations” and that “Factors/condition to be considered differ with the type of processing operation involved; computer system utilized. . . .” This implies that you operate multiple complex computer configurations, and that your selection of which configuration to use is impacted by the wide variety of applications that are processed. As discussed above, the Troy CFO-480 check printer and its directly related equipment function as a dedicated check printer with an option to print checks with stubs. The type of check job to be run is identified by the paperwork accompanying the job.

Our fact-finding revealed your PD of record, when supplemented by the appeal record, is adequate for classification purposes and is hereby incorporated by reference into this decision.

#### Series and Title Determination

Your work is allocated properly to the Equipment Operator Series, GS-350 which covers positions that involve supervising, leading, or operating microfilm equipment, peripheral equipment, mail processing equipment, duplicating equip-ment, and copier/duplicating equipment requiring a knowledge of the operating characteristics of the equipment and controls, the skill and knowledge to set up and adjust the equipment and controls to produce acceptable products or services on a timely basis, and the skill to perform normal operator maintenance. The Troy CFO-480 meets the definition of peripheral equipment as described in the GS-350 PCS; i.e., input/output devices operated on or off line such as high speed impact printers and computer form printers.

As noted in the GS-350 PCS, some equipment operated by positions in this series, particularly peripheral computer equipment and computer output microfilming equipment, involve functions that, on the surface, appear to be beyond the scope of this series. Nevertheless, operating such equipment is covered by the GS-350 PCS when the function performed is not dependent on computer programming or computer operating skill, e.g., operating peripheral computer equipment with an internal minicomputer. As discussed previously in this decision, the Troy CFO-480 operating functions assigned by management and performed by you do not entail the depth and breadth of computer programming or computer operating skills that exceed those found in the GS-350 series; i.e., following predetermined menu selection procedures to start up and operate a high speed printer, track its operations, and respond to clearly defined error messages for which there are a limited number of courses of action.

The GS-350 PCS recognizes circumstances in which peripheral equipment operation is an integral part of positions that operate the control console of a digital computer system, e.g., computer operator trainees who are taught to operate peripheral equipment in conjunction with their computer operator training. The Computer Operation Series, GS-332 PCS explicates this distinction stating: "Positions involving the full-time operation of peripheral computer equipment or other related equipment in support of computer services" are classified in the Equipment Operator Series, GS-350. Therefore, based on the titling practices contained in the GS-350 PCS, we find that your position is allocated properly as Peripheral Equipment Operator, GS-350.

#### Grade Level Determination

The GS-350 PCS is in the Factor Evaluation System (FES) format. Under the FES, positions are placed in grades on the basis of their duties, responsibilities, and qualifications required as evaluated in terms of nine factors. Each factor is assigned a point value based on a comparison of the position's duties and responsibilities with the factor level descriptions and/or benchmarks in the PCS. The factor level descriptions assign point values which mark the lower end of the ranges for the indicated factor levels. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the factor level description. If the position fails in any significant aspect to meet a particular factor level description in the PCS, the point value for the next lower level must be assigned unless the deficiency is balanced by an equally important aspect which meets a higher level. The total points assigned are converted to a grade level by use of the Grade Conversion Table in the PCS.



The basis of your appeal rationale was your belief that your activity did not correctly apply and/or extend certain factor levels in its application of the GS-332 PCS to your position. As discussed above, because your position is classifiable to the GS-350 series, for which there is directly applicable published PCS with grade level criteria, it is that PCS that must be applied in determining the grade level worth of the work you perform.

The application of PCS's is governed by established classification principles, practices and procedures. It is an established classification principle as stated in the Introduction, (TS-107, August 1991), Section III.F (page 15) that:

In most positions, certain duties are performed from time to time that do not affect the position's title, series, or grade. . . . Major duties are those which represent the primary reason for the position's existence, and which govern the qualification requirements. Typically, they occupy most of the employee's time. Minor duties occupy a small portion of the time, are not the primary purpose for which the position was established, and do not determine the qualification requirements.

Section III.J (page 23) addresses the potential grade level impact of specific duties and states:

Some positions involve performing different kinds and levels of work which, when separately evaluated in terms of duties, responsibilities, and qualifications required, are at different grade levels. . . . In most cases, the highest level work assigned to and performed by the employee for the majority of the time is grade controlling. When the highest level of work is a smaller portion of the job, it may be grade controlling only if:

- The work is officially assigned to the position on a regular and recurring basis;
- It is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time); and
- The higher level knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

Our analysis of your position must be guided by these controlling principles. Therefore, your calling in the CE in the apparent absence of your supervisor, or the Computer Center operator in charge on the third shift, has no bearing on the classification of your position because it is performed in the absence of another employee. The fact that you periodically deal with tour groups is an incidental and occasional aspect of your work. While tour interruptions could impact your ability to meet performance expectations, they would not impact the fundamental nature and purpose of your position; i.e., how the Troy CFO-480 is run. In contrast, contacts with regard to resolving operating problems with the CE do impact the fundamental work of your position.

#### Factor 1. Knowledge Required by the Position

Factor 1 measures the nature and extent of information or facts which the workers 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.

At Level 1-2 (200 points), positions require a basic knowledge of standard set ups, adjustments and operating characteristics of the equipment (e.g., high speed copier/duplicators, planetary or step and repeat cameras, automatic labeling, and embossing and addressing equipment, diazo or thermal duplicators, envelope inserting equipment, impact and non-impact computer printers, card to tape converters), and basic skill to perform standard adjustments and operate the equipment. This knowledge enables the operator to set up, operate, and perform basic adjustments (e.g., adjust gas flow and drive speed on a diazo machine to compensate for quality of originals and/or light sensitivity of the diazo materials), adjust the alignment of form paper and print spacing on an impact printer due to different carriage control tapes and various sizes of print out forms, adjust paper path settings and water/ink balance on a duplicator, adjust the feed mechanisms on a mail inserting machine to change over to different size envelopes and inserts, adjust the form alignment and the CRT intensity of a computer output microfilmer prior to running perforated tapes when lighter character images are required to the equipment according to the individual job requirements, operating characteristics, and capabilities of the equipment. Typically, the basic adjustments performed at this level are routine and the need for such adjustments is readily apparent.

In contrast, Level 1-3 (350 points) requires a thorough knowledge of equipment set up, adjustment, operating procedures, and a corresponding level of skill to set up, operate, and adjust the equipment. This knowledge enables a highly skilled operator

to set up, operate, and adjust the equipment, and in addition, diagnose, solve, and correct operating problems affecting the quality and timeliness of the service or product. The operator may instruct lower graded operators how to complete the required corrective adjustment. Typically, corrective adjustments performed require the operator to consider the symptom(s), possible causes and remedies (e.g., faded or washed out copies on a duplicator may be due to a worn or poor quality master, not enough ink, too much water, a glazed blanket or insufficient pressure between blanket and impression cylinder, and may be corrected by replacing the master, increasing the ink flow, reducing the water feed rate, deglazing the blanket, or increasing the pressure between the blanket and impression cylinder).

Our fact-finding revealed that although much of your work meets Level 1-2, a sufficient portion of it entails resolving the more demanding problems that reflect the application of Level 1-3 knowledge and skill. For example, ascertaining when ink purging rather than priming is necessary to resolve a Bar Coder ink error message; determining when the frequency of voided/soiled checks indicates an error situation that warrants shutting down the printer, changing ribbons, paper webs, or other variables in order to isolate the problem; determining when paper feed, cut, and related check transport and stacking problems require the assistance of a CE reflect the exercise of skill and knowledge that meet, but does not exceed Level 1-3. This level of knowledge is exercised when you train new operators and/or other employees in the basics of printer operation and the troubleshooting techniques. It also is evidenced by your participation in tests dealing with production problems, such as the one which you described during the audit in which runs were made with several variables, e.g., old and new ribbons as well as old and new webs, in order to isolate why runs were producing an unacceptable number of voids. Therefore, we find that your position meets, but does not exceed Level 1-3, the highest level described in the GS-350 PCS, and have so credited your position.

## Factor 2. Supervisory Controls

Supervisory Controls covers the nature and the extent of direct or indirect controls exercised by the supervisor, the operator's responsibility, and the review of completed work. Controls are exercised by the supervisor in the way assignments are made, instructions are given to the operator, priorities and deadlines are set, and objectives are defined. Responsibility of the employee depends upon the extent to which the operator is expected to work independently as instructed and the use of initiative in the performance of routine assignments. The degree of review of completed work depends upon the nature and extent of the review, e.g., close and detailed review of each phase of the assignment; detailed review of the finished assignment; spot check of finished work or work in process for accuracy.

We find that your work meets, but does not exceed Level 2-2 (125 points), the highest level described in the GS-350 PCS. At Level 2-2, the supervisor provides continuing and individual assignments by indicating generally what is to be done and the quantity and quality required to complete the assignment. The supervisor provides additional instructions for new or unusual equipment set ups, operations, or adjustments. Equipment operating problems and unfamiliar situations not covered by instructions or guidelines are referred to the supervisor for assistance or a decision. Since most machine operations are well established, the operator typically works independently and uses some judgment in correcting machine adjustments to improve or maintain quality of machine service, adjusting for variations in the work, or other similar situations. The work is reviewed for quality and compliance with guidelines by spot checks or selective sampling. In addition, the structure of the work provides a continuing form of review through successive machine operations and ultimately by the user of the service or product.

Fundamental to your appeal rationale is the freedom from supervision under which you operate. As a fully skilled Troy CFO-480 operator, you receive your assignments, and determine how to run them in order to meet production requirements. This includes ending the current job and beginning another in order to deal with data tape or other problems. Your rationale suggests that the balancing functions you perform undergird your claim that you work under minimal direct control. Freedom from direct supervision alone does not control the crediting of this factor. As stated in the Classifier's Handbook, pages 24-25:

The nature and extent of review of positions range from close and detailed, to spot check, to general review. Note that it is not just the degree of independence that is evaluated, but also the degree to which the nature of the work allows the employee to make decisions and commitments and to exercise judgment. For example, many clerical employees perform their work with considerable independence and receive very general review. This work is evaluated, however, at the lower ends of this factor because there is only a limited opportunity to exercise judgment and initiative.

The limited nature and number of machine adjustments that you can perform before a CE is called, and the go/no go nature of your run decisions, e.g., parity error decisions are limited to restarting the run, replacing the tape, or calling the supervisor, limit the exercise of judgment and initiative permitted in your position. Whether you call the CE directly, or that call is referred through a higher graded employee, and whether you balance the run or that function is performed or is done again by another employee, do not change the limitations placed on your position by

the very nature of the work that you perform. These limitations are evident in the troubleshooting section of the Troy CFO-480 Print System Operator's Guide. Therefore, we find that your position meets, but does not exceed Level 2-2, the highest level described in the GS-350 PCS, and have so credited your position.

### Factor 3. Guidelines

This factor covers the nature of guidelines and the judgment needed to apply them. Guides used in General Schedule occupations include, for example, desk manuals, established procedures and policies, traditional practices, and reference materials such as dictionaries, style manuals, engineering handbooks, the Pharmacopoeia, and the Federal Personnel Manual.

Individual jobs in different occupations vary in the specificity, applicability, and availability of the guidelines for performance of assignments. Consequently, the constraints and judgmental demands placed upon employees also vary. For example, the existence of specific instructions, procedures, and policies may limit the opportunity of the employee to make or recommend decisions or actions. However, in the absence of procedures or under broadly stated objectives, employees in some occupations may use considerable judgment in researching literature and developing new methods.

Guidelines should not be confused with the knowledge described under Factor I, Knowledge Required by the Position. Guidelines either provide reference data or impose certain constraints on the use of knowledges.

You perform much of your work within the nature of guidelines and the judgment needed to apply them typical of Level 3-1 (25 points). At that level, guidelines are specific and complete. There are few guidelines, and they apply to nearly all work situations. The guidelines require little or no discretion in their selection and application. Typically, guidelines consist of manufacturers' operating manuals, standard operating procedures, and agency regulations. The guidelines and their application are easily learned. They generally pertain to basic procedures such as equipment set up and operation, clearing material jams, replenishing machines supplies, and scheduled cleaning and maintenance of equipment. The employee works in strict adherence to the guidelines, referring even minor deviations to the supervisor for decision.

Our fact-finding revealed however, that you work a substantial portion of the time dealing with problems that reflect the application of guidelines typical of Level 3-2 (125 points), the highest level described in the GS-350 PCS. At that level, specific

guidelines for doing the work have been established and are available to the employee for reference purposes. The written guides are typically of the same nature as the guidelines noted at Level 3-1, but the number of guidelines at this level is greater and covers a wider variety of similar situations and tasks in greater detail. The employee must use judgment in selecting among and applying the appropriate methods to correct operating problems which affect the quality and/or timeliness of the product or service. Significant deviations or situations to which the guidelines do not apply are generally referred to the supervisor.

The more demanding troubleshooting requirements of your position reflect the exercise of judgment found at Level 3-2. For example, a low ink error on the bar coder, is not always resolved by adding ink. It may require priming the ink feed or purging the system. The same is true for dealing with persistent check voids, paper jams, and similar operating problems. Your regular and recurring error resolution efforts exceed the simple clearing of jams and replenishing supplies typical of Level 3-1. Representative of work at Level 3-2 is working with the CE over the telephone in attempting to isolate and deal with operating situations that do not respond to normal operator manual solutions. As at Level 3-2, problems that cannot be resolved, either by you or in discussions with the CE, are resolved by the CE, whether that individual is called in by your supervisor, the shift operator in-charge, or by you. These situations frequently occur on the night shift through which you rotate on a regular and recurring basis. Therefore, we find that your position meets, but does not exceed Level 3-2, the highest level described in the GS-350 PCS, and have so credited your position.

#### 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.

Much of your work compares favorably with Level 4-1 (25 points). At that level, work consists of operating one or more pieces of equipment to perform the duties of the position. The tasks are clear-cut, and the duties are repetitive such as operating a rotary camera to microfilm data; operating a multiple station envelope inserter to insert similar size material into envelopes; operating a copier/duplicator to produce single sided copies of originals; operating a card reader/punch to punch data into cards; or other similar duties where the actions and steps to be taken are clearly discernible. The more simple problems with which you deal, as well as replenishing supplies and scheduled cleaning and maintenance are evaluated properly at Level 4-1.

We find, however, that a substantial portion of your work meets, but does not exceed, Level 4-2 (75 points), the highest level described in the GS-350 PCS. At that level, work consists of operating one or more pieces of equipment to perform the duties of the position. The work requires the performance of several related duties and processes. The appropriate equipment set up and adjustments are determined by the operator after consideration of the nature of the product or service requested. There is generally a variety in the products or services produced and the necessary equipment set ups and adjustments are easily recognized. The variety of adjustments and set ups is limited for each piece of equipment operated.

As at Level 4-2, you must assure that the bar coder is operating for products that require this check printing feature, the script printer is enabled for runs with that requirement, and that pay stubs are printed properly for required runs, assuring that the equipment is set up properly for the nature of the product requested. Typical of Level 4-2, as illustrated in Benchmark 4-2, you correct error situations due to operating problems, defective materials, or improper set ups. You determine the corrective action after considering the problem, type of equipment, possible causes, and past experience in operating the equipment. Therefore, we find that your position meets, but does not exceed Level 4-2, the highest level described in the GS-350 PCS, and have so credited your position.

#### Factor 5. Scope and Effect

Scope and Effect covers the relationship between the nature of the work, i.e., the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization.

In General Schedule occupations, effect measures such things as whether the work output facilitates the work of others, provides timely services of a personal nature, or impacts on the adequacy of research conclusions. The concept of effect alone does not provide sufficient information to properly understand and evaluate the impact of the position. The scope of the work completes the picture, allowing consistent evaluations. Only the effect of properly performed work is to be considered. No credit is given for the consequences of employee error.

At Level 5-1 (25 points), the only level described in the GS-350 PCS, the purpose of the work is to provide equipment services and/or products to users on a timely basis. Performance affects the quality and timeliness of the service; however, the work does not affect the accuracy or reliability of the subject matter.

We find that the effect of your work appears to exceed Level 5-1 in that it represents one of your activity's final products; i.e., financial instruments sent to external customers. As part of your work process, you must scan the runs for duplicate payments, voided and spoiled checks, and improper bar coding, which potentially have significant financial implications. That is, duplicate checks can result in improper overpayments. Voided and spoiled checks, and other run corrections must be made in order to insure the prompt payment of vendors and other recipients. Improper bar coding can result in your activity's loss of the U.S. Postal Service discount for bar coding. As at Level 5-1, however, your work does not affect the actual accuracy and reliability of the subject matter; i.e., the correct payee, address, or amount of the check. Therefore, because your position does not clearly and fully exceed Level 5-1 as described in the GS-350 PCS, a higher level for this factor may not be contemplated or explored. Therefore, we have credited your position at Level 5-1.

#### Factor 6. Personal Contacts

This factor includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. (NOTE - Personal contacts with supervisors are covered under Factor 2, Supervisory Controls.) Levels described under this factor 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 (e.g., the degree to which the employee and those contacted recognize their relative roles and authorities).

Above the lowest level, points should be credited under this factor only for contacts which are essential for successful performance of the work and which have a demonstrable impact on the difficulty and responsibility of the work performed. In addition, the relationship of Factors 6 and 7 presumes that the same contacts will be evaluated for both factors.

At Level 6-1 (10 points), a large portion of your personal contacts are primarily with employees in the immediate unit and/or support units. The personal contacts that impact the most demanding aspects of your work compare favorably with, but do not exceed, Level 6-2 (25 points). At that level, personal contacts are primarily with employees in organizations serviced. This may include recurring contacts with employees of other Federal agencies that are recipients of an equipment service, as well as manufacturers' equipment repairers and sales personnel. Contacts are routine and normally occur in the employee's immediate workplace. Your contacts with the CE on equipment operation issues are fundamental to the successful performance of your work and have a demonstrable impact on the difficulty and



responsibility of your work; i.e., printing completed products. Therefore, we find that your position meets, but does not exceed Level 6-2, the highest level described in the GS-350 PCS, and have so credited your position.

#### Factor 7 - Purpose of Contacts

In General Schedule occupations, purpose of personal contacts ranges from factual exchange of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives. The personal contacts which serve as the basis for the level selected for this factor must be the same as the contacts which are the basis for the level selected for Factor 6.

At Level 7-1 (20 points), the only level described in the PCS, personal contacts are for the purpose of exchanging, clarifying, or obtaining factual information relating to the work to be performed and the set up, operation, adjustment, etc., of the equipment operated in the position. This compares closely to the contacts described in your PD of record and confirmed during our on-site fact-finding as discussed in the body of this decision.

Information in the appeal record contains a determination by your activity that your discussions on equipment problems, advising other operators on how to deal with those problems, making suggestions and assisting other operators on new or unusual problems, passing problems encountered onto the next shift's operator, and dealing with "service engineers to discuss and mutually resolve equipment problems" meet Level 7-2 (50 points). This conclusion was based on application of the GS-332 PCS which describes contacts at Level 7-2 for the purpose of planning or coordinating work efforts or resolving questions about such topics as unusual operating or equipment problems, procedures for testing and installing new software variations, or the development of new operating procedures to accept new or modified processing requirements.

Our fact-finding does not support these observations or conclusions. Relaying problems encountered on the previous shift and providing assistance to co-workers based on previous work experiences in dealing with printer errors does not compare favorably with the more extensive coordinative and broad work planning purposes found at Level 7-2. Your work does not entail active participation in software modifications or system procedures development envisioned at Level 7-2. Therefore, we find that your position meets, but does not exceed Level 7-1, the highest level described in the GS-350 PCS, and have so credited your position.

### Factor 8. Physical Demands

The "Physical Demands" factor covers the requirements and physical demands placed on the employee by the work assignment. This includes physical characteristics and abilities (e.g, specific ability and dexterity requirements) and the physical exertion involved in the work (e.g., climbing, lifting, pushing, balancing, stooping, kneeling, crouching, crawling, or reaching). To some extent the frequency or intensity of physical exertion must also be considered, e.g., a job requiring prolonged standing involves more physical exertion than a job requiring intermittent standing.

At Level 8-2 (20 points), work requires some physical exertion such as extended periods of standing, frequent bending, reaching, stooping, or similar activities necessary to set up, operate, adjust, and monitor the operation of the equipment. The employee lifts, on a recurring basis, a variety of moderately heavy materials and supplies such as boxes of chemicals, record boxes, boxes of cards and envelopes, cartons of film; occasionally the employee may be required to lift heavy (more than 50 pounds) items such as mail bags or large stacks of paper stock.

In contrast, work at Level 8-3 (50 points), in addition to the physical demand described at Level 8-2, requires frequent lifting of heavy objects more than 50 pounds such as large boxes of paper, cartons of cards or mail bags. You have claimed that this factor should be evaluated at Level 8-3 because: (1) your PD states that you lift trays, boxes, and cartons weighing up to 60 pounds; (2) you push webs of checks weighing approximately 400 pounds; and, (3) you perform preventive maintenance on the mandrels that hold the check webs. Our fact-finding revealed that your PD is not accurate; 60 pound lifting ceased when a previous IBM check printing system was replaced by the current Troy system. We found that the cartons of printer ribbons weigh approximately 14 pounds, and that the paper trimming bins that you empty one or two times each day weigh approximately 45 pounds when full. The paper webs are moved by using a wheeled truck. You insert a spindle into the web, inflate it so that it will not pull out, crank the spindle lift on the truck down by hand, slide the truck under the web, crank the spindle lift up to contact and lift the web, and then slide the truck with the web into place in order to feed paper into the system. These functions are not equivalent to the heavy exertion entailed in the **frequent** lifting of objects more than 60 pounds found at Level 8-3. We find that the pushing and pulling of the webs, and the emptying of paper trimming bins do not exceed the bending, stooping, and lifting demands typical of Level 8-2. These physical demands, in conjunction with the constant standing involved in Troy operation, support the crediting of this factor at Level 8-2.

### Factor 9. Work Environment

The “Work Environment” factor considers the risks and discomforts in the employee’s physical surroundings or the nature of the work assigned and the safety regulations required. Although the use of safety precautions can practically eliminate a certain danger or discomfort, such situations typically place additional demands upon the employee in carrying out safety regulations and techniques.

At Level 9-1 (5 points), the work environment involves normal, everyday risks typical of such places as offices or “back room” type settings. The work area is adequately lighted, heated, ventilated, and properly maintained.

In contrast, at Level 9-2 (20 points), the work involves moderate risks and discomforts such as a high level of noise; paper dust; ink; solvents, lubricants; chemicals and chemical fumes; working around equipment in operation. Special safety precautions are required. The employee may be required to use protective gear such as ear plugs or gloves during a particular equipment operation. Your equipment maintenance and operating functions involve the use of and exposure to lubricants and inks typical of Level 9-2. Therefore, we find that your position meets, but does not exceed Level 9-2, the highest level described in the GS-350 PCS, and have so credited your position.

### Summary

In summary, we have credited your position as follows:

<u>Factor</u>	<u>Level/Points</u>
1	1-3 350
2	2-2 125
3	3-2 125
4	4-2 75
5	5-1 25
6	6-2 25
7	7-1 20
8	8-2 20
9	9-2 20
	— 785 Points

A total of 785 points falls within the GS-4 grade level point range of 655-850 points in the Grade Conversion Table provided by the PCS. Therefore, it is our decision that your position is classified properly as Peripheral Equipment Operator, GS-350-4.

Under the provisions of the Classification Law, the Office of Personnel Management has the responsibility to determine whether positions are placed properly in classes and grades in conformance and consistent with published PCS's. When misclassifications are found, we have no choice but to direct corrective action. Such actions are not directed arbitrarily, and do not reflect on the employee's ability, qualifications, or quality of work.

This decision constitutes a classification certificate under the authority of section 5112(b) of title 5, U.S.C. This certificate is mandatory and binding on all administrative, certifying, payroll, disbursing and accounting officials of the Government. In accordance with 5 CFR 511.702, it must be implemented no later than the beginning of the sixth pay period following the date of this decision. Your servicing personnel office must submit a compliance report containing copies of the action taken with respect to you, e.g., SF 50. The compliance report must be submitted to this office no later than 30 days following the effective date of the SF 50. You may contact your servicing personnel office for information about the implementation of this decision.

By copy of this decision, we also are directing your servicing personnel office to correct your position description to reflect the actual duties and responsibilities assigned to your position as determined in this decision. Documentation of this must be submitted as part of the compliance report directed above.

Integral to your rationale, as evidenced in your initial appeal request citing the classification of Troy operator positions at the GS-7 grade level at the Austin Financial Center, is a concern that your position is classified inconsistently with those occupied by employees who perform work at other FMS Centers similar to the work that you perform. Our fact-finding revealed that positions engaged in Troy 480-CFO operating at other FMS Centers are classified to either the Computer Operator, GS-332 or the Equipment Operator, GS-350 series at either the GS-6 or GS-7 grade level. While your agency has the primary responsibility for intra-agency consistency, including consistency with OPM decisions, your agency may not change the classification certification in an OPM decision nor may your agency classify a position on the basis of position-to-position comparison. Based on this information, we have asked your agency to review those other positions and submit a report to the Director, Classification Appeals and FLSA Programs, Office of Merit Systems Oversight, U.S. Office of Personnel Management, in Washington, DC, explaining the

difference between your position and the other positions. If they are essentially the same, your agency will correct the classification of the other positions. We have asked the agency personnel office to inform you of the results of the study.

This decision represents the current facts regarding the duties, responsibilities and qualification requirements of your position and is the basis for its classification.

Please be assured that this decision is not intended to reflect on your ability, qualifications, or the quality of your performance. Rather, it reflects our evaluation of your position based on a comparison of your duties and responsibilities with the appropriate standards.

Sincerely,

/s/ 2/18/97

Robert D. Hendler  
Classification Appeals Officer