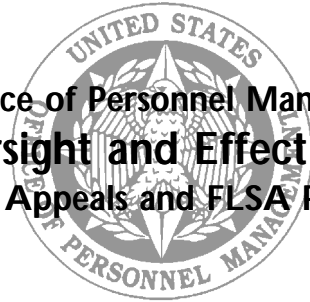


U.S. Office of Personnel Management  
Office of Merit Systems Oversight and Effectiveness  
Classification Appeals and FLSA Programs



Atlanta Oversight Division  
75 Spring Street, SW., Room 972  
Atlanta, GA 30303

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

**Appellant:** [appellant's name]

**Agency classification:** Safety and Occupational Health Specialist  
GS-018-9

**Organization:** Mountain Home AFB, Idaho

**OPM decision:** Safety and Occupational Health Specialist  
GS-018-9

**OPM decision number:** C-0018-09-01

\_\_\_\_\_  
Kathy W. Day  
Classification Appeals Officer

\_\_\_\_\_  
8/11/99

\_\_\_\_\_  
Date

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

**Decision sent to:**

[appellant's name and address]

[appellant's agency's name and address]

Director of Civilian Personnel  
U. S. Department of the Air Force  
HQ USAF/DPCC  
1040 Air Force Pentagon  
Washington, DC 20330-1040

Chief, Classification Branch  
Field Advisory Services Division  
Defense Civilian Personnel Management  
Service  
1400 Key Boulevard, Suite B-200  
Arlington, VA 22209-5144

## **Introduction**

On July 29, 1999, the Atlanta Oversight Division, U. S. Office of Personnel Management (OPM), accepted a classification appeal for the position of Safety and Occupational Health Specialist, GS-018-9, Ground Safety Branch, Safety Office, 366th Wing, Air Combat Command, Mountain Home AFB, Idaho. The appellant believes her position should be classified at the GS-11 level.

The appeal has been accepted and processed under section 5112(b) of title 5, United States Code. This is the final administrative decision on the classification of the position subject to discretionary review only under the limited conditions and time outlined in part 511, subpart F, of title 5, Code of Federal Regulations.

## **General issues**

The appellant filed an appeal with the Department of Defense Civilian Personnel Management Service (CPMS) contesting her agency's evaluation of factors 1, 2, and 4. The decision issued by CPMS determined that factor 2 should be evaluated at a higher level; however, the grade of the position remained GS-9. The appellant forwarded her appeal to OPM contesting the evaluation of factors 1 and 4.

## **Position information**

The appellant is assigned to [position description number]. The appellant, her supervisor and the agency have certified the accuracy of the position description.

The appellant assists the chief of ground safety in planning, developing, and implementing the base ground safety program. She conducts comprehensive investigations of all classes and categories of ground mishaps involving injuries, fatalities, and property damage involving Air Force personnel or property or resulting from Air Force operations. She prepares mishap reports identifying causes and makes recommendations for corrective actions to prevent recurrence. The appellant compiles data and analyzes trends; conducts safety inspections, program evaluations, no notice inspections, and staff assistance visits; participates in inspections to detect and prevent hazards; and reviews base construction plans to ensure compliance with safety requirements. She also monitors the flight line to ensure compliance with established safety standards and evaluates new procedures in the aircraft ground handling and maintenance area. In addition, she conducts training and develops and procures educational and promotional material. Most of her duties are planned and performed within the framework of applicable standards, regulations, and accepted safety and occupational health practices.

The chief of ground safety makes assignments by defining objectives, priorities and deadlines and provides assistance in unusual situations where previous precedents are unclear. The appellant independently evaluates findings in investigations, assesses identified hazards, and makes recommendations to the responsible commander, supervisor, or manager.

### **Series determination**

The appellant does not contest the occupational series of her position.

The agency determined that the appellant's position was properly placed in the Safety and Occupational Health Management Series, GS-018, which covers positions which involve the management, administration, or operation of a safety and occupational health program or performance of administrative work concerned with safety and occupational health activities and includes the development, implementation, and evaluation of related program functions. The primary objective of this work is the elimination or minimization of human injury and property and productivity losses caused by harmful contact through the design of effective management policies, programs, or practices. We agree with the agency determination.

### **Title determination**

The GS-018 standard mandates the use of the title *Safety and Occupational Health Specialist* for nonsupervisory positions at grades GS-12 and below, such as the appellant's, which are assigned a number of program elements such as inspection, evaluation, training, or responsibility for providing administrative and technical services to management representatives and employees.

The appellant's position is properly titled *Safety and Occupational Health Specialist*.

### **Standard determination**

Safety and Occupational Health Management Series, GS-018, August 1981.

### **Grade determination**

The GS-018 standard is written in the Factor Evaluation System (FES) format. Under the FES, positions are evaluated on the basis of their duties, responsibilities, and the qualifications required as evaluated in terms of nine factors common to nonsupervisory General Schedule positions.

A point value is assigned to each factor based on a comparison of the position's duties with the factor-level descriptions in the standard. The factor point values mark the lower end of the ranges for the indicated factor level. For a position factor to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails in any significant aspect to meet a particular factor level description in the standard, the point value for the next lower factor 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 by use of the grade conversion table in the standard.

Under FES, positions which significantly exceed the highest factor level or fail to meet the lowest factor level described in a classification standard must be evaluated by reference to the Primary Standard, contained in Appendix 3 of the Introduction to the Position Classification Standards. The Primary Standard is the “standard for standards” in the FES.

Factor 1 - Knowledge Required by the Position:

This factor measures the nature and extent of information or facts that a worker must understand to do acceptable work, such as the steps, procedures, practices, rules, policies, theories, principles, and concepts; and the nature and extent of the skills needed to apply this knowledge. The agency evaluated this factor at Level 1-6 while the appellant believes that Level 1-7 is appropriate.

At Level 1-6, the work requires knowledge of safety and occupational health principles, methods, and techniques permitting the independent performance of recurring assignments to control or eliminate unsafe physical conditions, equipment and machine hazards, and risks in human performance which may cause injury to persons or damage to property. It also requires practical knowledge of the laws, regulations, policies, and procedures related to safety and occupational health to sufficiently interpret and explain the reasons and purposes for applying measures and procedures, minimizing or abating environmental hazards.

At Level 1-7, the work requires knowledge of a wide range of safety and occupational health concepts, principles, practices, laws, and regulations applicable to the performance of complex administrative responsibilities which require the planning, organizing, directing, operating, and evaluation of a safety and occupational health program; **or** comprehensive knowledge of regulations, standards, procedures, methods, and techniques applicable to a broad range of safety and occupational health duties in one or more specific areas of safety and occupational health. In addition, the following knowledge is also required:

- Knowledge of standards, procedures, methods, and techniques applicable to construction projects including construction equipment, materials, and utility systems.
- Sound technical knowledge sufficient to analyze safety design features and specifications and develop new methods and procedures to identify or control hazardous construction processes and equipment usage.
- Knowledge of psychological and physiological factors sufficient to evaluate the relationship of an individual to the working environment and to motivate individuals to perform in a safe manner.

- Knowledge and skill sufficient to:
  - manage a safety and occupational health program with diverse but recognized hazards, achieving compliance with regulatory provisions and effectively communicating multiple safety and occupational health practices and procedures to staff and line personnel; and
  - modify or significantly depart from standard techniques in devising specialized operating practices concerned with accomplishing project safety and occupational health objectives.

Level 1-6 is exceeded in that the appellant's assignments are of a wider variety and scope than described. However, Level 1-7 is not fully met. The appellant is not responsible for directing, planning, and evaluating the safety and occupational health program; her supervisor is the program manager and as such, is credited with the responsibility for directing the program. The supervisor has delegated the compliance programs, e.g., inspection, confined space, lockout/tagout, etc., to the appellant, but stated that she does retain ultimate responsibility and full authority for those programs and reviews every program. Therefore, the first part of Level 1-7 is not credited to the appellant's position.

While she has comprehensive knowledge of a broad range of safety and occupational health areas, reviews standard construction projects to ensure they meet safety requirements such as outlet placement and exit locations, performs inspections and investigations, and develops operating procedures to handle situations which have no standard procedures in place, the appellant does not routinely develop new methods and specialized procedures which *significantly* depart from standard, acceptable safety techniques. She stated that her guides are general in many situations, e.g., develop a confined space program, or situations arise which require her to develop safety procedures to use, e.g., in designing a skateboard park, inspecting the fuel bladder in the F-15, handling fuel pits that fill with water. She determines what safety procedures should be required in these situations. However, she is not developing new techniques but rather selecting from among accepted techniques and safety practices for dealing with such things as hazardous fumes and other bio-environmental hazards, potentially dangerous spaces, etc. She consults with firefighters, bio-environmental specialists, civil engineers, and others to determine the best methods to select for the particular situation. For example, in assessing the safety requirements involved in inspecting the fuel bladders, she had the air sampled, talked with firefighters and determined that the tank needed to remain open for 3 hours prior to inspection and that personnel needed to use oxygen hoses and wear protective gear when working. In looking at the design of the skateboard park, she looked at standard safety practices for constructing other projects, e.g., rails around ramps, and discussed with civil engineering what could be used for the skateboard park. She also discussed with base doctors the kinds of injuries typically associated with skateboarding and the kind of gear normally worn to prevent those injuries. She then determined that specific protective gear should be worn when using the skateboard park, that rails should be built at the top of ramps where they would not interfere with the skateboarding, an edge should

be built to keep the boards from flying off into the spectators, etc. These determinations take a great deal of analyses and a broad knowledge of safety factors. However, they do not represent significant departures from acceptable methods or the design and development of new methods but rather the adaptation or selection of proven techniques.

Although Level 1-6 is exceeded, the full intent of Level 1-7 is not met. To credit a specific factor level, the full intent of that factor level must be met. Otherwise, the next lower level must be credited.

Level 1-6 is credited for 950 points.

#### 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. The agency evaluated this factor at Level 4-3, and the appellant believes Level 4-4 is correct.

At Level 4-3, assignments consist of a variety of duties requiring application of different safety and occupational health methods, techniques, and procedures to complete. Typically, the unsafe acts, hazardous environmental conditions, or safety and occupational health problems encountered are conventional in nature. Safety and occupational health inspections include business firms with stable work processes and small storage facilities where hazardous materials are placed. Work assignments require the identification of elements contributing to human and machine failure which may lead to injury or property damage.

At Level 4-4, the assignments cover a wide range of work operations and environmental conditions involving a substantial number and diversity of hazards; or a wide variety of independent and continuing assignments in a specialized area of safety and occupational health that have exacting technical requirements. The safety and occupational health manager or specialist evaluates a variety of complex, interrelated physical conditions, operating practices, hazardous human-machine interactions, and serious mishaps. Assignments require analysis of unconventional safety and occupational health problems or circumstances, inconclusive facts or data, and are characterized by the uncertainty of accepted control or abatement methods that are available for selection and use. The nature of the hazards is such that generally no single approach is adequate to control or eliminate a given problem; rather, the adaptation of proven safety and occupational health techniques is necessary. The work typically requires interpretation of a variety of occupational circumstances to adapt known control or protective measures to eliminate or minimize hazardous situations.

Level 4-3 is exceeded; however, Level 4-4 is not fully met. The appellant's assignments cover a wide range of work operations and environmental conditions and involve a number of diverse safety hazards. The base is a composite wing with 5 different aircraft and the equipment and

facilities to support them including hangars, aircraft maintenance and industrial shops, squadron buildings, weapons and radar systems, commissary, gas station, recreation areas, marina, supply warehouse, base housing, hospital, etc. She is concerned with identifying, evaluating and controlling a variety of hazards and ensuring compliance with safety standards and regulations. There are a number of complex conditions present at the base; however, there are also a number of standard safety regulations, practices and methods prescribed that cover most of the situations. She does in some instances have to select from several possible solutions and adapt techniques to unusual situations, but the majority of her work cannot be characterized as unconventional with the degree of uncertainty about how to control or abate the risks as Level 4-4 describes.

Although Level 4-3 is exceeded, the full intent of Level 4-4 is not met and, therefore, cannot be credited.

Level 4-3 is credited for 150 points.

<b>SUMMARY</b>		
<b>FACTOR</b>	<b>LEVEL</b>	<b>POINTS</b>
1-Knowledge Required by the Position	1-6	950
2-Supervisory Control	2-3	275
3-Guidelines	3-3	275
4-Complexity	4-3	150
5-Scope and Effect	5-3	150
6-Personal Contacts	6-3	60
7-Purpose of Contacts	7-3	120
8-Physical Demands	8-2	20
9-Work Environment	9-2	20
	<b>TOTAL</b>	<b>2020</b>

A total of 2020 points falls within the GS-9 range, 1855 to 2100 points, according to the Grade Conversion Table in the GS-018 standard.

### **Decision**

The appellant's position is correctly classified as Safety and Occupational Health Specialist, GS-018-9.