

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

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

Appellant: [appeal]

Agency classification: Naval Architecture Technician
GS-802-11

Organization: Department of the Navy

OPM decision: Naval Architecture Technician
GS-802-11

OPM decision number: C-0802-11-07

Virginia L. Magnuson
Classification Appeals Officer

January 20, 2003

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]

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Introduction

On September 26, 2002, the Atlanta Oversight Division, U.S. Office of Personnel Management (OPM), accepted a group classification appeal for a position classified as Naval Architecture Technician, GS-802-11, in the [organizational location], Department of the Navy, [geographical location]. The appellants request that their positions be reclassified to GS-802-12. We received a complete administrative report on October 23, 2002. The appeal has been accepted and processed under section 5112(b) of title 5, United States Code (U.S.C.).

In reaching our classification decision, we have carefully reviewed all information furnished by the appellants and their agency. In addition, to help decide the appeal, an OPM representative conducted separate telephone interviews with the appellants and their supervisor.

General issues

The appellants believe that they are performing naval architectural duties having the same degree of complexity and level of independence and responsibility as those evaluated as GS-12 at similar naval facilities. By law, OPM must make classification decisions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). We cannot consider the classification of other positions as a basis for deciding an appeal.

Position information

The appellants are assigned to position description number [#]. The appellants and the supervisor agree that the position description accurately reflects the duties performed. The appellants report to and receive general supervision from the Structural Surveillance Branch's Supervisory Naval Architecture Technician, GS-802-12.

The [organizational location], where the appellants are assigned, provides engineering and planning services to resolve problems involving the structural systems and components of Ohio class ballistic missile submarines, other classes of submarines and surface ships assigned by higher authority. The appellants function as Naval Architecture Technicians with responsibility for complete projects involving the resolution of a wide range of complex nuclear and non-nuclear system and structural problems discovered during required inspections of submarines undergoing incremental overhaul, refit, and/or repair. Their work is primarily concerned with the administration and accomplishment of the Unrestricted Operation Maintenance Requirement Cards (URO/MRC) Program. This maintenance program certifies submarines for continued operation at design test depths. The work ensures the water tightness and structural integrity of the submarine's pressure hull structure, framing components, various tanks, control surface structures and other components and structures related to the vessel's deep dive capability. The appellants serve as Project Technicians for their assigned submarines and conduct required URO/MRC inspections for pitting, corrosion, cracks, deformation and deterioration involving structural components and systems. They recommend locations for non-destructive testing (NDT) measurements, analyze data taken, determine the need for repairs, and provide detailed repair guidelines for production personnel. The appellants provide technical guidance for and

prepare procedures to accomplish required repairs. They review, evaluate, and check design drawings to confirm that material specifications and project requirements are met and provide direction and coordination of the activities of production personnel. The appellants track the progress of refit and repair work and analyze reports prepared by production personnel to ensure that work performed meets required specifications. They develop reports of inspection results and repairs accomplished for submission to higher authority.

Series, title, and standard determination

The agency classified the appellants' position in the Engineering Technician Series, GS-802, and titled it Naval Architecture Technician. The appellants do not contest the agency's series or title determination for their position. We agree.

The Engineering Technician Series, GS-802, includes technical positions that require primarily application of a practical knowledge of (a) the methods and techniques of engineering or architecture; and (b) the construction, application, properties, operation, and limitations of engineering systems, processes, structures, machinery, devices, and materials. The positions do not require professional knowledge and abilities for full performance and, therefore, do not require training equivalent in type and scope to that represented by the completion of a professional curriculum leading to a bachelor's degree in engineering or architecture.

The GS-802 standard contains grade-level criteria only up to the GS-11 level. The grade-level criteria at grades GS-9 and GS-11 are designed to provide consistency in the classification of positions of technicians and engineers who perform similar work. Engineering technician positions that clearly exceed the GS-11 grade level may be evaluated by extension of the criteria in the GS-802 standard in combination with grade-level criteria in appropriate standards for engineering positions.

As discussed later in this decision, the appellants' position does not clearly exceed the GS-11 level by application of the grade level criteria in the GS-802 standard. Therefore, their position is properly evaluated using that standard alone. However, to further address the appellants' concerns regarding the grade of their position, we also evaluated the position by cross reference to the standard for the Naval Architecture Series, GS-871. We used the GS-871 standard with caution since it describes professional engineering knowledge and skills, which are not required in the position occupied by the appellants.

Grade determination

Evaluation using the GS-802 standard

The GS-802 standard uses two factors to evaluate positions: *Nature of assignment* and *Level of responsibility*.

Nature of assignment

This factor includes the scope and difficulty of the project and the skills and knowledge required to complete the assignment.

The GS-11 level is the highest level described in the standard. Positions at this level perform work of broad scope and complexity requiring the ability to interpret, select, adapt, and apply many guidelines, precedents, and engineering principles and practices related to the area of specialization. The work also requires that the technician possess and apply some knowledge of related scientific and engineering fields. At this level, technicians plan and accomplish complete projects or studies of conventional nature requiring the independent adaptation of background data and information and interpretation and use of precedents. They are typically confronted with a variety of complex problems that call for considerable judgment in making sound engineering compromises and decisions. The work often requires constant coordination with personnel in other organizations having a role in accomplishing the projects.

The work typically performed by the appellants is comparable to the GS-11 level. The nature of their regular and recurring assignments requires that they interpret, select, adapt and modify existing standard engineering principles and practices, precedents, technical specifications, and standard procedures established by Navy headquarters, Naval Sea Systems Command (NAVSEA) and manufacturers. Similar to the GS-11 level, they must apply some knowledge of related disciplines, such as electrical and mechanical engineering, when analyzing data to determine the cause of structural problems and how those systems interact with or affect structural components/systems. Also similar to the GS-11 level, the appellants are responsible for the planning and accomplishment of complete projects of conventional nature. They must independently plan and accomplish work involving the inspection, repair and modification of structural components/systems of their assigned vessels. Their work typically requires that they independently adapt existing data and information and interpret and make use of precedents. The work typically involves a variety of complex problems which require that they use considerable judgment to make sound engineering compromises and decisions. For example, they developed a fix that involved detaching torpedo room sanitary tanks from the internal frames of submarines to prevent cracking resulting from flexing of the hull structure when the vessel dives and surfaces. They developed a procedure for adding deflector plates in tanks that are flooded with water under high pressure during dives. The plates prevent the erosion of the hull structure caused by the force of the water. They also developed a procedure for welding stiffeners in other tanks to prevent cracking resulting from flexing. Their recommendations are forwarded to NAVSEA for approval prior to implementation. In the instances cited above, their procedures were approved and adopted for fleet-wide use by NAVSEA.

The appellants' assignments clearly meet, but do not exceed, the GS-11 level.

Level of responsibility

This factor considers the nature and purpose of person-to-person work relationships and supervision received in terms of intensity of review of work as well as guidance received during the course of the work cycle.

The GS-11 level is the highest level described in the standard. At this level, technicians have considerable freedom in planning work and carrying out assignments. The supervisor makes assignments in terms of the major objectives and provides background information and advice on specific unusual problems which are anticipated or on matters requiring coordination with other groups. Unusual or controversial problems, or policy questions arising in the course of a project,

may be discussed with the supervisor, but technical supervisory assistance is infrequently sought or required. The supervisor is usually informally advised regarding progress, but there is little review during progress of typical assignments. Completed work in the form of recommendations, plans, designs, reports, or correspondence is reviewed for general adequacy, conformity to purpose of the assignment, and sound engineering judgment. By comparison, technicians at lower grade levels receive advice and guidance on the application of nonstandard methods and techniques or in the solution of complex problems requiring significant deviations from established practice.

GS-11 technicians customarily make contacts in the course of their work with the same groups of individuals (e.g., using agencies, contractors, and architect-engineer firms) as do technicians at lower grade levels, and the purpose of the contacts is similar. Because of the increased scope of GS-11 assignments, these contacts tend to become more extensive than at lower levels. Contacts with contractors and other personnel regarding complex engineering and administrative problems are carried out without close supervision. However, the technicians generally discuss with the supervisor the approach to be taken.

Similar to the GS-11 level, the appellants work under general supervision. They have considerable freedom in planning and carrying maintenance and repair assignments through to completion, resolving the majority of conflicts that may arise, coordinating their work with that of production personnel, and interpreting policy in terms of established objectives. The supervisor is kept advised of how work is progressing and unusual problems and policy issues that could cause controversy. The appellants carry out their assignments with very little technical assistance or oversight from their supervisor. The supervisor stated that he may prioritize the appellants' work, but 90 percent of their inspection and evaluation work is done without his review or oversight. As at the GS-11 level, the appellants' completed work assignments are reviewed in terms of adequacy and accuracy of repair procedures, compliance with policy and regulations, soundness of engineering decisions, and adherence with technical requirements/specifications. The results of their work are considered technically correct and are not normally significantly changed or modified by the supervisor.

The appellants' contacts are also similar to the GS-11 level. The appellants' contacts are for the purpose of coordinating their work with that of others, resolving complex or unusual engineering and administrative problems and persuading parties at higher levels to agree to or approve technical methods or procedures they have developed. Their regular contacts are with production personnel at their installation, personnel at NAVSEA and Navy headquarters organizations, contractors and personnel at other shipyards and fleet maintenance activities. Their contacts are usually made without coordination through their supervisor though he is kept advised of issues.

The appellants' assignments clearly meet, but do not exceed, the GS-11 level.

By application of the GS-802 evaluation criteria, we find that both the *Nature of assignments* and *Level of responsibility* meet the GS-11 level.

Evaluation using the GS-871 standard

As previously mentioned, to give full consideration to the appellants' concerns, we also evaluated their position by cross reference to the grade level criteria in the standard for the Naval Architecture Series, GS-871, to demonstrate that the use of the professional engineering standard does not yield a different grade for the position. The GS-871 standard has limited applicability in evaluating the appellants' position, and consideration must be given to any significant differences in required scope and intensity of theoretical and practical knowledge and insight.

The GS-871 standard uses six factors to evaluate positions assigned to this series: *Nature of work*, *Mental demands*, *Supervision received*, *Recommendations and decisions*, *Personal contacts*, and *Qualifications required*.

Nature of work

While GS-11 engineers independently plan and conduct complete projects of a conventional nature involving extensions to or modifications in existing design features, GS-12 engineering assignments are characterized by (1) more extensive scope and importance of operations; (2) increased need and opportunity for innovation, skillful improvisation, and diversified application of the specialized knowledge, precedents, techniques, and procedures pertinent to an area of specialization; and (3) comparative freedom from supervisory direction. For example, some GS-12 engineers act as troubleshooters on structural problems involved in development of working plans during construction. This entails such duties as conducting structural analyses, providing methods for solving various structural problems; establishing new methods and approaches for the solution of structural problems; providing structural guides for use by other engineers; and advising on and making recommendations relative to structural problems in conferences.

The GS-12 level is not met. The appellants' work does not have the scope or operational importance envisioned at the GS-12 level. The appellants provide engineering support for the resolution of problems related to the various systems affecting a submarine's dive capability. They conduct inspections of submarine hull structures and other dive-related systems/components for corrosion, cracks, deterioration, etc., that may prevent safe deep dive operations. The appellants research technical documents and criteria to determine the steps required to accomplish repairs. They prepare documents detailing testing and repair procedures and specifications to be followed by production personnel and track work progress to ensure that specified timetables for work accomplishment are met. Their normal work does not routinely involve the need or opportunity for innovative improvisation or the diverse application of specialized knowledge, precedents, techniques and procedures typical of GS-12 engineers.

This factor is evaluated at the GS-11 level.

Mental demands

At the GS-12 level, a high degree of technical judgment, initiative, originality, and resourcefulness is required to (1) apply training and experience to develop and execute specific plans of action for extensive and complex project assignments from the broad objectives outlined

by the supervisor; (2) recognize possible new directions of approach and devise new or improved techniques and methods for obtaining effective results; (3) overcome difficult and unusual problems where guides and precedents are not directly applicable; (4) anticipate future requirements and trends; (5) apply the latest technological advances relating to the specialization; and (6) analyze and evaluate designs, proposals, and ideas submitted by others. In contrast, at the GS-11 level, considerations frequently require ingenuity, resourcefulness, and judgment in making compromises between the theoretical and the practical to arrive at solutions. However, creative thinking is confined primarily to developments from existing designs, methods, and procedures, and does not involve completely novel and unusual concepts covering the entire or the major portions of an assignment. Details or segments of assignments at the GS-11 level may concern novel or unusual concepts.

The GS-12 level is not met. The appellants' work does not require the regular and recurring exercise of the high level of technical judgment, initiative, originality, and resourcefulness, or the analysis and evaluation of designs, proposals, and ideas submitted by others typical of GS-12 level work.

This factor is evaluated at the GS-11 level.

Supervision received

At the GS-12 level, engineers usually receive general administrative and technical supervision from a higher-grade engineer. The supervisor normally indicates general responsibilities and problems, pointing out overall objectives and furnishing guidance on critical issues and policy matters. Engineers at this level independently determine the technical action necessary in developing objectives and programs, facets of which often exceed available precedents and guides. Completed work is reviewed for attainment of objectives and for compliance with agency policies and practices. This exceeds the GS-11 level at which engineers function with considerable freedom in planning and carrying out typical GS-11 assignments and completed work is reviewed for results obtained, soundness of technical conclusions and recommendations, and accuracy of important design computations and critical elements.

The GS-12 level is not met. Although the appellants also receive general administrative supervision or technical guidance while carrying out their assignments, their normal work does not involve determinations of technical actions required for development of objectives or programs for which precedents or guides do not exist. Their work receives more technical review than is typical at the GS-12 level in that it is reviewed in terms of procedural correctness and adherence to applicable technical requirements.

This factor is evaluated at the GS-11 level.

Recommendations and decisions

While GS-11 engineers make decisions in regard to all details of planning and carrying out their assignments, engineers at the GS-12 level make recommendations, commitments, and determinations that are more important in view of the planning and coordinating responsibilities vested in these positions. These responsibilities relate to a broad scope of operations and/or the

continuing necessity for skillful improvisation, deviation, and important engineering compromise. GS-12 engineers provide professional advice, typically on complex problems with policy implications, which is given considerable credence because of the reliance placed on their technical competence. They render advice recognized as competent in giving interpretations and making technical reviews and evaluations, and recommend final action on many engineering matters. They represent the organization in conferences and meetings and take actions of a decisive character.

The GS-12 level is not met. The appellants' planning and coordinating responsibilities are of a much more limited scope than those typical of the GS-12 level. Their responsibilities in these areas are primarily focused on the accomplishment of required inspection, refit and repair work to ensure that submarines can safely meet manufacturers' dive performance standards. As technicians, they are not involved in providing professional advice on comparable complex issues and matters having policy implications, recommending final action on engineering matters, or representing their organization during conferences and meetings. In dealing with unusual problems, the appellants develop methods and procedures that are then recommended to NAVSEA.

This factor is evaluated at the GS-11 level.

Personal contacts

At the GS-12 level, engineers normally have more frequent and wider contacts than those at the GS-11 level. As a result of the broad scope of work for which they are responsible, GS-12 personnel must maintain liaison with organizational segments having related assignments, other agencies, contractors, and ship owners to discuss basic issues, resolve interferences and points of conflict, and coordinate work. Incumbents of some positions explain and interpret agency (or organizational segment) policies, practices, specifications, and other requirements to other individuals and groups, particularly those groups who must comply with these requirements. Engineers at this level are required to persuade other groups, overcome antagonism or reluctance to change, secure active cooperation, and negotiate controversial matters in a manner that will result in effective work results. They give advice on their specialty and represent their activities in technical committees. In contrast, at the GS-11 level, engineers explain and interpret agency requirements, discuss debatable technical issues, and make compromises and settle conflicts when there are clear precedents in connection with individual assignments.

The GS-12 level is not met. The appellants' contacts are not of the frequency, breadth or importance described at the GS-12 level. Their contacts outside of their immediate organization and installation typically involve issues arising from work-related problems and methods to resolve them rather than a broad area of assignment such as found at the GS-12 level. The appellants' contacts are for the purpose of gathering, exchanging and providing expert information related to problems encountered and fixes developed for submarine hull and structural systems where adaptation is required. In some instances, contacts are made to influence or persuade other technical personnel to adopt technical methods, or negotiate agreements with agency or contractor engineers when conflicting points of view are involved. The appellants do not routinely maintain liaison with organizations, agencies, or individuals to

discuss basic issues, resolve interferences and points of conflict. The appeal record contains no indication that the appellants are involved in negotiating controversial matters to achieve effective work results or represent their activity in technical committees.

This factor is evaluated at the GS-11 level.

Qualifications required

At the GS-12 level, engineers use more extensive knowledge than required at the GS-11 level. GS-11 engineers apply a variety of guidelines, precedents, and professional principles and practices and make technical compromises, adaptations, and modifications based on partially available guidelines and basic information. However, at the GS-12 level, the work requires ability to plan and carry out assignments that involve recurring complexities, such as the non-applicability of established criteria and technical procedures, and inadequacy or unavailability of data. It requires ability to recognize possible new avenues of approach and devise new or improved techniques and methods for obtaining results, and it requires ability to recognize critical issues that should be referred to the supervisor or others. Employees are able to anticipate future requirements and trends; apply the latest technological advances relating to the specialization; analyze and evaluate designs, proposals, and ideas submitted by others; and provide engineering advice on complex problems with policy implications.

The GS-12 level is not met. The appellants' work does not typically require extensive and in-depth knowledge of the wide range of engineering, technical areas and governing regulatory, procedural, and policy materials as found at the GS-12 level. They must possess the ability to evaluate and apply the most current methods and techniques to problems that cannot be resolved through the application of traditional or accepted methods or practices. Their assignments do not routinely require that they contend with recurring complexities resulting from the non-applicability of established criteria and technical procedures and inadequacy or unavailability of data.

This factor is evaluated at the GS-11 level.

Summary

By the application of the evaluation criteria in the standards for the Engineering Technician Series, GS-802, and the Naval Architecture Series, GS-871, the appellants' position meets the GS-11 level. The position is properly evaluated at the GS-11 level.

Decision

The appellants' position is properly classified as Naval Architecture Technician, GS-802-11.