

U.S. Office of Personnel Management  
Division for Human Capital Leadership & Merit System Accountability  
Classification Appeals Program

Atlanta Field Services Group  
75 Spring Street, SW., Suite 1018  
Atlanta, GA 30303-3109

**Job Grading Appeal Decision**  
**Under section 5346 of title 5, United States Code**

**Appellant:** [appellant]

**Agency classification:** Sign Painter  
WG-4104-9

**Organization:** [name] Shop  
[name] Department  
[organization]  
Department of the Navy  
[location]

**OPM decision:** Sign Painter  
WG-4104-9

**OPM decision number:** C-4104-09-01

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Marta Brito Pérez  
Associate Director  
Human Capital Leadership  
and Merit System Accountability

October 13, 2004

Date

As provided in section S7-8 of the *Operating Manual, Federal Wage System*, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in section 532.705(f) of title 5, Code of Federal Regulations (address provided in the *Introduction to the Position Classification Standards*, appendix 4, section H).

Since job descriptions must meet the standard of adequacy in the *Introduction to the Position Classification Standards*, section III.E, the appellant's job description must be revised, as discussed in this decision. The report must be submitted within 30 days from the date of this decision.

**Decision sent to:**

[appellant]  
[address]  
[location]

[Director]  
Director, [name] Department  
Department of the Navy  
[organization]  
[organization]  
[address]  
[location]

Chief, Classification Appeals  
Adjudication Section  
Department of Defense  
Civilian Personnel Management Service  
1400 Key Boulevard  
Arlington, VA 22209-5144

Mr. Wayne Tripp  
Acting Classification Program Director  
Department of the Navy  
Human Resources Service Center, Southwest  
525 B Street, Suite 600  
San Diego, CA 92101-4418

Director, Office of Civilian Human Resources  
Department of the Navy  
ATTN: Code 00  
614 Sicard Street, SE., Suite 100  
Washington Navy Yard, DC 20374-5072

## **Introduction**

On June 8, 2004, the Atlanta Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a job grading appeal from [appellant] who is employed as a Sign Painter, WG-4104-9. His job is located in the [name] Shop, [name] Department, [organization], Department of the Navy, [location]. The appellant requests that his job be graded as Graphic Arts Mechanic, WG-4101-10. We also received a complete administrative report for the appeal on June 7, 2004. The appellant filed a job grading appeal with his agency and on March 16, 2004, the agency sustained the current grading of his job. He filed his appeal with OPM through his servicing Human Resources Office on March 30, 2004. We accepted and decided this appeal under section 5346 of title 5, United States Code (U.S.C.).

Both the appellant and his supervisor certified the accuracy of the job description, number [#]. In reaching our job grading decision, we have carefully reviewed all information furnished by the appellant and the agency, including his official job description and information obtained from a telephone audit of the appellant's job. We also interviewed the appellant's first level supervisor, a Painter Supervisor.

## **General issues**

The appellant makes various statements regarding the agency's identification of his duties and evaluation of his job. By law, job grading decisions must be based solely upon a comparison between the actual duties and responsibilities of the job and the appropriate Job Grading Standards (5 U.S.C. 5346). Since comparison to standards and guidelines is the exclusive method for grading jobs, we also cannot compare the appellant's job to others as a basis for deciding the appeal. Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

The appellant compares his job to a Graphic Arts Mechanic, WG-4101-10, job description prepared by his agency as supplementary guidance for grading jobs in the Federal Wage System (FWS). He identifies his agency's use of this description and a similar job description for several WG-4101-10 jobs within his local geographic area. The appellant states that the incumbents do not perform all of the duties described in the job descriptions, e.g., performing photolithography or photoengraving or making lithographic plates and rubber stamps, but rather, perform the same duties he performs.

The job descriptions provided in support of the appellant's rationale contain some duties that parallel work performed by the appellant. However, those duties are taken out of the context of those documents since they contain other duties that are substantially different from those assigned to the appellant. For example, unlike the appellant's job, the WG-10 job descriptions include work requiring use of the photolithographic or acid etch process and photoengraving processes, refinish of miscellaneous items, and operation of an offset press, a multi-graph machine, and other equipment. The work requires a thorough knowledge of the photoengraving process.

Like OPM, the appellant's agency must grade jobs based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring that its jobs are accurately described and classified consistently with OPM appeal decisions. If the appellant considers his job so similar to others that they all warrant the same grading, he may pursue the matter by writing to the agency's Human Resources Service Center for his area. In doing so, he should specify the precise organizational location, classification, duties, and responsibilities of the jobs in question. If the jobs are found to be basically the same as his, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to him the differences between his job and the others.

The appellant states that the standard used to grade his job was written before the personal computer was invented and that new equipment and new methods have changed what was once a Sign Painting Shop to a Graphics Shop which produces products directly from a computer, graphics art software, plotter, and other equipment. All occupations change over a period of time, but the fundamental skills and knowledge and responsibility patterns generally remain stable. Careful application of the appropriate job grading standard to the appellant's work will consider any technological changes in the appellant's work and yield the correct grade for the job.

A job description is the official record of the major duties and responsibilities assigned to a position or job by an official with the authority to assign work. A job is the duties and responsibilities that make up the work performed by an employee. Job grading appeal regulations permit OPM to investigate or audit a job and decide an appeal on the basis of the actual duties and responsibilities currently assigned by management and performed by the employee. An OPM appeal decision grades a real operating job, and not simply the job description. Therefore, this decision is based on the work currently assigned to and performed by the appellant and sets aside any previous agency decision.

### **Job information**

Although the appellant certified the accuracy of his position description, he has stated that his job description is not accurate because it identifies processes, such as hand painting letters on signs, which he has not done in years. The record, including the official job description, shows that the appellant uses a computer and graphics art software to design and layout art work, logos, and lettering for signs. However, the job description contains some duties that are no longer regular and recurring which include lettering in and shading letters and designs using a brush, painting decorations freehand, laying out lettering design areas with a camel hair brush, finishing surfaces by staining, varnishing, polishing, and waxing, etc. These tasks, though not significant in the grading of this job as demonstrated in the evaluation discussion which follows, represent a specific skill requirement. Since management has indicated that these tasks may have to be performed again in certain situations which have not actually occurred in years, e.g., if the computer is not functioning, these tasks are not considered as regular and recurring, or typical, when grading a job and should not be described as if they are regular and recurring functions of the job.

Since job descriptions must meet the standard of adequacy in the *Introduction to the Position Classification Standards*, the appellant's agency must revise his job description to meet that standard.

The paramount purpose of the appellant's work is the layout, design, and production of signs, decals, and other multicolor graphics. The appellant fabricates various sizes and configurations of signs, including very large banners, decals, and other multicolor graphics for use on ships or at the shipyard. He uses the customers' work orders, requirements, and logo or design samples, if available, to select the correct methods, techniques, materials, and shop equipment that is best suited for the most efficient fabrication. The appellant generally uses prefabricated metal or plastic sign blanks and fabric for banners. He may have to prepare the sign blanks by mixing and applying paint. He uses free hand or mechanical sketching to make patterns, designs, or lettering for logos or other graphics for scanning into the computer using a flat bed scanner. The appellant uses the computer with graphic arts software to design and layout art work, logos and lettering for signs and available software options and controls to create the correct size copy for the signs and other products. The appellant uses a plotter, linked to the computer, and rolls of colored vinyl to cut letters, lines, arcs, and shapes which he adheres to signs, including banners, uses for decals, etc.

The appellant mixes inks and paints to obtain desired colors for sign making tasks. He constructs screen prints, screens, stencils, templates, or patterns. Preparation work often requires use of the silk screen printing production technique which involves use of film, laser printers, exposure lamp, vacuum frame, developer chemicals, and squeegees. When necessary, the appellant spray paints some sign blanks, hard hats, and other equipment. He also performs administrative tasks, such as consulting with customers to identify and clarify requirements, completing job order forms, maintaining shop records, and initiating orders for and receiving supplies. He trains and assigns work to personnel (usually two) assigned to help in the shop. The appellant estimates that banners represent approximately 50 percent of his work, directional signs represent 25 percent, and screen printing represents 25 percent.

Although the appellant no longer hand paints letters on signs, he still uses lettering and painting skills in the overall process of producing signs, decals, and other graphics. The appellant must possess knowledge of methods and techniques to produce signs, and computer technology is one of them. Computer technology represents a type of visual media relative to visual displays, in this case a substitute for hand painting, and does not in itself make the work performed intrinsically more difficult. The appellant must also have knowledge of agency sign specifications and designations, and a full working knowledge of paints and colors to obtain the desired effects and finishes. He must have a working knowledge of printing inks, synthetic printing enamels, and thinners and how to mix them to achieve desired finish colors and the manual processes for silk screen printing.

### **Pay category determination**

Although the appellant has not questioned the pay category placement of his job, he points to his performing administrative duties such as consulting with customers, completing order forms, maintaining shop work logs, identifying shop materials and supply needs, writing shop repair

orders, and reviewing work progress as adding difficulty to his job. He also emphasizes use of computers, scanners, and plotters to accomplish work previously done manually. We will address these job functions as well as artistic work involving computers and computer graphics software that is properly classified in the General Schedule (GS).

Section 5102 (c)(7) of title 5, U.S.C., exempts from coverage under the GS those “employees in recognized trades or crafts, or other skilled mechanical crafts, or in unskilled, semiskilled, or skilled manual-labor occupations, and other employees including foremen and supervisors in positions having trade, craft, or laboring experience and knowledge as the paramount requirement.” The *Introduction to the Position Classification Standards (Introduction)* defines paramount requirement as the essential, prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the position has been established. Whether particular types of positions are trades, crafts, or manual labor occupations within the meaning of title 5 depends primarily on the most important requirement for the performance of a primary duty or responsibility for which the position exists. If a position clearly requires trade, craft, or laboring experience and knowledge as a requirement for the performance of its primary duty, and this requirement is paramount, the position is under the FWS regardless of its organizational location or the nature of the activity in which it exists. Other considerations appropriate for borderline situations include the nature of the work products, working relationships with other positions in the organization, normal lines of career progression, equitable pay relationships with other positions in the immediate organization, and management’s intent in creating the position.

The *Introduction* also says that a position is exempt from the GS if its primary duty involves the performance of physical work which requires knowledge or experience of a trade, craft, or manual labor nature. The *Introduction* further states that a position is subject to the GS, even if it requires physical work, if its primary duty requires knowledge or experience of an administrative, clerical, scientific, artistic, or technical nature not related to trade, craft, or manual-labor work.

Some FWS and GS occupations share common duties. For example, employees who occupy Supply Clerical and Technician, GS-2005, positions and 6907 Materials Handler jobs regularly input data into and extract data from automated supply systems. Some of the FWS standards, including the 4104 job grading standard, specifically include administrative tasks among the job duties. The chief requirement of FWS jobs is knowledge and experience of a trades, craft, or manual-labor nature. Administrative and computerized tasks are performed in conjunction with and as a component of the primary duty requirement for the job. This is the case in the appellant’s job. Use of a computer and computer graphic arts software and performance of administrative tasks do not change the basic work of the appellant’s job or change the paramount skills and knowledge required to perform the work from FWS to the GS.

Sign painting is an established trade and crafts occupation and, as with the appellant’s job, is typically done in a shop setting. The 4104 job grading standard for Sign Painter covers the nonsupervisory work of producing signs, painting markings on ships and other vehicles, or performing other functions requiring skill in lettering. The work involves the ability to design, layout, and decorate signs, to execute freehand and mechanical lettering, and skill in various

production techniques such as silk screen printing, application of reflective sheeting, and lettering with machines.

The 4104 job grading standard occupational information also provides guidance for pay category determinations relative to artistic work. It states that work which requires primarily the application of artistic or drafting ability to produce illustrations, charts, or drawings is included in the GS and requires knowledge and application of artistic principles such as perspective, composition, proportion, figure studies, use of tone and shading, and color harmony. While many signs are complemented with insignia or drawings, the work of sign painters is more concerned with lettering than illustration. Sign painters may prepare displays by enlarging existing diagrams and coloring the enlargement, but they are not responsible for conceiving and preparing the original views, or for other functions which require the use of several of the common art media, and extensive application of artistic principles.

The appellant's work does not require the artistic ability and knowledge typical of GS work. The appellant must have the skill to redraw and re-letter logos, emblems, and other graphic designs prior to scanning them into a page layout file in the software program. The work does not require the degree of artistic ability to conceive and prepare original views or extensive application of artistic principles. The appellant's work is concerned with lettering and redrawing rather than original illustration. In many cases, the logos, designs, and colors are pre-established or requirements for the sign lettering are established by the customer alone or in consultation with the appellant. Consequently, his job is exempt from the GS and falls under the FWS.

### **Occupational code, title, and standard determination**

The appellant believes he performs the duties characteristic of the 4101 occupation. The 4101 code is not a defined occupation within the FWS. Rather, the "01" code in each job family is designated as a general code, and is used for jobs which cannot be identified with an established occupation within the family, but which can be identified with the family itself. It is used for general jobs which are characteristic of the family, but not of any specific occupation within the family. It is also used for a second type of job which has a narrower range of duties readily identifiable with the job family but for which no specific occupation has been established.

The paramount knowledge, skills, and abilities of the appellant's job meet the definition of and requirements for placement in the 4104 occupation. The 4104 occupation includes jobs that involve producing signs and posters, decorating models and displays, painting markings on vehicles, ships, or aircraft, or performing other functions requiring skill in lettering. The work involves the ability to design, layout, and decorate signs, to execute freehand and mechanical lettering, and skill in various production techniques such as silk screen printing, application of reflective sheeting, and lettering with machines. The agency titled the appellant's job as Sign Painter and we concur. The 4104 job grading standard for Sign Painter is used for grade determination.

## Grade determination

The 4104 occupation uses four factors for grade determination. The four factors are: *Skill and knowledge*, *Responsibility*, *Physical effort*, and *Working conditions*. The standard describes only one grade level for this occupation. It states that some jobs may differ substantially from the work requirements described and may warrant grading either above or below the grade level which is described.

### *Skill and knowledge*

At the grade 9 level, employees are skilled in the fundamentals of lettering, spacing, and layout and can execute freehand one or more common sign alphabets with considerable speed and accuracy. Most work requires a steady, delicate touch, and close concentration. Using an understanding of optical effects and contrast, they can devise signs and displays with good eye appeal. They have ability to adapt lettering to the spacing, style, or effect desired. Employees must be able to prepare surfaces to receive paint or sheeting. They apply paint or ink onto other surfaces such as decalcomania, wood, cloth, or plastic, and letter in place signs or markings on metals, including ships and other vehicles. Grade 9 employees must be able to apply reflective sheeting. They select brushes and are skilled with lettering pens, lettering kits, spray-gun, saws, and drafting tools. They know the drying qualities and gloss characteristics of paints and are skilled in blending and mixing various pigments, primers, and thinners. They must be able to produce the colors and figures specified for insignia or other illustrations and execute emblems or drawings either freehand or by preparing a silk screen for each color. They use squeegees for the colors and take care to achieve close registration of colors. They operate one or more machines, such as embossing or poster machines; varitype or other composing machines; engraving tools; paper cutters; or cameras with vacuum tables used in preparing silk screen films.

The appellant's job is a close match to and does not exceed the grade 9 level. As at that level, the appellant prepares freehand and computerized, rather than mechanical, lettering and sketching. He uses lettering pens and drafting tools to convert customer supplied bitmap samples of naval ship logos or other illustrations to line art so he can resize them with proper definition in the graphics software. This also requires knowledge of cloth material being used, including mesh size. As at the grade 9 level, the appellant's work requires a delicate touch for line art drawing, meticulous attention to detail, and close concentration. The appellant uses customers' text copy, size requirements, sketches, established logos or designs, or explanations to plan and layout signs, decals, bumper stickers, or other items. He uses available software options and controls to create the correct size copy for the signs and other products. He uses skill in separating logo or design colors, preparing all the spot color lines, arcs, and shapes for the final product, and then achieving close registration of the colors for logos and graphics. Extra large designs and letters, such as are used for 12 feet tall and 30 feet wide ship banners, are difficult to prepare since they have to be done in pieces using smaller sized vinyl rolls.

Like the grade 9 level, the appellant must be skilled with lettering pens and spray guns and know the characteristics and drying qualities of paints and inks and how to mix them and thinners. For example, in order to meet specific requirements for radiation signs in nuclear submarines, the



appellant had to mix paints to obtain the designated background color, paint it on the sign blank, and allow it to dry prior to applying the letters. Likewise, in using the silk screen printing process for work involving several colors, the appellant must allow each design to dry prior to preparing the screen for the next color. He must be able to apply adhesive backed vinyl letters and graphics. In performing his work, the appellant uses a computer with graphics software and, as at the grade 9 level, operates one or more types of equipment related to sign painting work, such as a computer, a plotter for cutting colored vinyl, laser printer using clear film with a vacuum frame and developer chemicals, a semi-automatic screen printer, and a one-man printing press or squeeze.

This factor is credited at the grade 9 level.

### *Responsibility*

Grade 9 employees work in a small shop or alone under the supervision of a painter supervisor. They inform their supervisor of supplies and materials needed and the time required to accomplish work. Jobs are usually received in the form of work orders which may provide a text or sketch, but often no other specifications. Sign painters interpret work orders with considerable latitude for determining layout, balance, spacing, and colors and contact customers to develop ideas or to reconcile customer desires with directives. They complete projects using standard trade practices. They primarily use blueprints or specifications, manuals for traffic signs, type alphabets, or directives on formats in completing projects. Supervisors check work for overall adequacy, eye appeal, and neatness.

The appellant's job is a direct match to the grade 9 level. As described at that level, the appellant operates a small sign shop, consults with customers to determine or clarify job requirements, prepares a shop form identifying supplies and materials needed, and maintains status and logs of projects. Some of the work orders are well defined, such as logos, but often the appellant assists the customer in identifying types and colors of letters desired and determines the layout, balance, and spacing. As at grade 9, the appellant uses blueprints and manuals applicable to the work. The supervisor maintains awareness of work status and reviews the appellant's work based on visual observation and adequacy as determined through customer satisfaction.

This factor is credited at the grade 9 level.

### *Physical effort*

At the grade 9 level, work requires continual movement of hand and arm, standing, reaching, and bending, as well as lifting materials up to 10 pounds. Projects may occasionally require heavier effort in doing tasks such as erecting signs or displays, kneeling to letter vehicles, or climbing ladders and may require handling items up to 40 pounds.

The appellant's job matches the grade 9 level in that in addition to sitting to operate a computer he routinely climbs stairs, stands, kneels, bends over work tables, and reaches and stoops to position letters on signs, including large banner, and performs other production tasks. He lifts

items weighing up to 40 pounds, such as shop supplies. With the assistance of other workers, he lifts 50 – 60 pound banners.

This factor is credited at the grade 9 level.

#### *Working conditions*

At the grade 9 level, most work is performed indoors in adequately lighted and heated shops, although some is performed outdoors. Some projects may require work near moving vehicles or aboard ships, and exposure to the possibility of falls. Sign painters are subject to the possibility of cuts, bruises, and irritation of eyes and skin from exposure to fumes, solvents, or paints.

The appellant's job matches the grade 9 level. The appellant primarily works indoors in an adequately lighted and heated shop which has an exhaust fan to carry away fumes. As at grade 9, he is subject to cuts, bruises, and skin irritations. The appellant may occasionally work outside. When outside, he may be required to wear hearing and eye protection, a safety helmet, respirator and foot protection.

This factor is credited at the grade 9 level.

#### **Decision**

The appellant's job is properly graded as Sign Painter, WG-4104-9.