

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

Dallas Field Services Group
Plaza of the Americas, North Tower
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Dallas, TX 75201

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

Appellant: [appellant]

Agency classification: Quality Assurance Specialist
GS-1910-11

Organization: Technical Assessment Group
Contracts Technical Assessment
Contract Management Office
[organizational name]
Defense Contract Management
Agency (DCMA) [District name]
DCMA
Department of Defense
[location]

OPM decision: Quality Assurance Specialist
GS-1910-11

OPM decision number: C-1910-11-03

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

March 28, 2005

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]

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Introduction

On May 4, 2004, the Dallas Field Services Group, U.S. Office of Personnel Management (OPM), accepted a position classification appeal submitted on behalf of [appellant]. His position is assigned to the Technical Assessment Group (TAG), Contracts Technical Assessment, Contract Management Office (CMO), [installation location], DCMA, Department of Defense (DOD), located in [city and state]. The position is classified as a Quality Assurance Specialist, GS-1910-11, however, the appellant believes it should be classified at the GS-13 grade level. We received the agency's administrative report on May 20, 2004. We accepted and decided the appeal under the provisions of section 5112 of title 5, United States Code (U.S.C.).

Background information

The appellant, his supervisor, and the servicing human resources (HR) office reviewed and redescribed the appellant's position description (PD), classifying the PD, number [number], as Program Analyst, GS-343-11, on September 24, 2003. The position had previously been classified in the GS-1910 Quality Assurance Series. The appellant filed an appeal with the DOD Civilian Personnel Management Service (CPMS), requesting a grade level change to GS-13. The CPMS decision, dated March 19, 2004, found the position properly classified as Quality Assurance Specialist, GS-1910-11.

The appellant questions the CPMS findings in his appeal to OPM. He states that his work is equally divided between two "completely different" program areas and the CPMS decision addressed only one program. He questions the title assigned and believes that the classification standards for both the GS-1910 Quality Assurance and GS-343 Program Analyst Series should have been used to evaluate his work. The appellant contests the levels assigned for all but Factors 1 and 8.

General issues

The appellant believes that the agency's classification determination is not consistent because other employees who have performed the same or identical functions have been graded at the GS-13 level. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others that may or may not be classified correctly, as a basis for deciding this appeal. Other positions, which may appear similar to the appellant's, may involve work that is more complex or broader in scope, include additional duties that form the basis for the higher grade, or may simply be classified incorrectly.

Like OPM, the appellant's agency must classify positions based on comparison with OPM standards and guidelines. However, the agency also has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellant considers his position so similar to others that they all warrant the same classification, he may pursue the matter by writing to his agency headquarters human resources office. In doing so, he should specify the precise organizational location, classification, duties, and responsibilities of the

positions in question. If the positions are found to be basically the same as his, the agency must correct their classification to be consistent with the appeal decision. Otherwise, the agency should explain to him the differences between his position and the others.

The appellant, through his representative, indicates that the GS-1910 Standard is outdated and therefore, proper credit cannot be given to the knowledge, skill, and abilities required for today's employees. The adequacy of grade-level criteria in OPM standards is not appealable (section 511.607 of title 5, Code of Federal Regulations). OPM standards are consistent with the grade level definitions of work established by law (5 U.S.C. 5104). These definitions are based on the difficulty and responsibility of the work at each level and the qualifications required to do that work. All occupations change over time, some more rapidly and profoundly than others, but the fundamental duty and responsibility patterns and qualifications required in an occupation normally remain stable. Therefore, careful application of the appropriate standard to the work performed by the appellant should yield the correct grade for his position. Any duties not specifically referenced in the standard can be evaluated properly by comparison with similar or related duties that the standard does describe as well as with the entire pattern of grade-level characteristics.

Other comments were made pertaining to the agency's decision and the CPMS process in reaching their decision. Because our decision sets aside all previous agency decisions, the appellants' concerns regarding their agency's classification review process are not germane to this decision.

Position information

DCMA is the DOD component that works directly with Defense suppliers/contractors to help ensure that supplies and services are delivered on time, at projected cost, and meet all performance requirements. The DCMA [organization] office (the CMO) was established in 1992 to manage the Army's multi-billion dollar contract for the Family of Medium Tactical Vehicles (FMTV). The FMTV is replacing the Army's aging fleet of 2.5- and 5-ton trucks and trailers. That office's role is to provide on-site surveillance by designated, certified agents. They provide business management, financial, and technical services to ensure quality products and services, timely delivery, and reasonable prices. The office has two components, Contracts Operations and Contracts Technical Assessment (CTA), with a combined staff of approximately 25 people. The Contracts Operations organization is staffed primarily with Contract Specialists and Quality Assurance Specialists, primarily at the GS-11 grade level.

The appellant is assigned to the Technical Assessment Group (TAG) which is one of two component of CTA; the other is the Corporate Support Group (CSG). He is responsible for providing multi-functional technical assistance in contract administration and keeping the Commander advised of issues related to their assigned functions. CTA is supervised by the Contract Technical Assessment Manager, GS-1101-13. The CSG includes a General Engineer, GS-802-12; a Mechanical Engineer, GS-830-12; and an Industrial Specialist, GS-1150-11. The CTA includes a Lead Program Analyst, GS-343-12; a Performance Improvement Officer, GS-1101-12; a Readiness Officer, GS-1101-11; an Administrative Support Assistant, GS-303-6; and the appellant's position.

The appellant is assigned a variety of duties. He is responsible for managing the Product Quality Deficiency Report (PQDR) program (35 percent of his time); serving as Management Control Review and Assessment Coordinator (MCR) program (30 percent); serving as quality assurance specialist in the TAG (10 percent); and serving as senior training officer for the CMO (10 percent). He also serves as CMO representative to the Government/Industry Data Exchange Program (GIDEP) (5 percent). We will discuss these program duties separately.

Briefly, when a vehicle or component fails or does not perform to specifications, the buyer files a PQDR report. The appellant receives this report, determines the correct category, logs it into an Army database, and notifies both CMO management and the contractor, when appropriate. Exhibits, i.e., the faulty part, may be requested and he is responsible for their collection and disposition. Both the CMO and contractor are requested to investigate and report corrective action. He reviews these investigative reports for completeness, returning incomplete reports to investigators as needed, and forwards completed work to the customer. He coordinates progress of investigations and monitors corrective actions. The Buying Command makes the final decision to take corrective action. Problems may be referred to the Administrative Contracting Officer. This work relies on the appellant's knowledge of the quality assurance processes for the vehicles and parts supported. Typically, the appellant receives 2-3 of these reports per month.

The Management Control Review and Assessment is a DCMA requirement to provide reasonable assurance that programs, organizations, and organizational units achieve intended results; that resources are used consistent with mission; programs and resources are protected from waste, fraud, and mismanagement; laws and regulations are followed; and reliable and timely information is obtained, maintained, reported, and used for decision making. CMO managers risk rate their contract administration mission and administrative processes annually. After the rating process, the appellant selects those processes rated highest and establishes a schedule for a self-assessment of those processes, coordinating the scheduling with the in-house process owner. The appellant will research and collect data prior to conducting the audit and document his findings on a standard form after completion.

The appellant serves as a quality assurance specialist (QAS) in the TAG. In this capacity, the appellant has primarily been involved in the after-market services functions, assuring the quality of the spare parts produced to support the FMTV vehicles. The appellant indicates he serves as a back-up for the Contract Operations organization, providing assistance in cases of personnel shortages or workload demands on their own QAS staff.

As training officer, the appellant coordinates with the DCMA District's HR Workforce Development staff to set up and coordinate the required certification and developmental training for CMO employees. He coordinates scheduling, maintains a data base, and provides monthly reports to the District.

GIDEP is a program managed by Navy to have government and industry work together to resolve common problems and come up with common solutions to problems such as product changes, failure experiences, and material shortages. The appellant is the CMO representative

and works with a contractor representative reviewing notices from the GIDEP operations center, forwarding them to CMO staff as appropriate, and completing an annual report on usage.

The PD and material in the record provide much more information about the duties and responsibilities of the position and we incorporate it by reference into this decision. The appellant and his supervisor certified as to the accuracy of the PD at the time of the appeal to CPMS. In reaching our decision, we have very carefully considered all the information included in the written record provided both by the appellant and his agency. At the request of the appellant, we emailed interview questions directly to him for response in lieu of a verbal interview. We subsequently had a brief interview with him by telephone. In addition, we conducted telephone interviews with the appellant's immediate supervisor on August 9, 2004, and February 7, 2005, and with the team leader for the TAG on July 14, 2004.

Series, title, and standard determination

The Quality Assurance Series, GS-1910, includes positions the duties of which are to perform, administer, or advise on work concerned with assuring the quality of products acquired and used by the Federal government. This work involves: (1) the development of plans and programs for achieving and maintaining product quality throughout the item's life cycle; (2) monitoring operations to prevent the production of defects and to verify adherence to quality plans and requirements; and (3) analysis and investigation of adverse quality trends or conditions and initiation of corrective action. The duties of these positions require analytical ability combined with knowledge and application of assurance principles and techniques, and knowledge of pertinent product characteristics and the associated manufacturing processes and techniques.

Positions within the Management and Program Analysis Series, GS-343, are primarily analysts and advisors to management on the evaluation of the effectiveness of government programs and operations, or the productivity and efficiency of management of Federal agencies, or both. These positions require knowledge of agency programs, missions, policies, and objectives; management principles and processes; and the analytical and evaluative methods and techniques for assessing program development or execution; and the improving organizational effectiveness and efficiency.

A key consideration in determining the series of a position is the "paramount requirement" for the position. In the GS position classification process, "paramount requirement" is defined as the essential prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the position was established. The appellant's duties relating to the MCR process involve work that may be assigned to and performed by positions in the GS-343 series. However, the appellant's knowledge of the agency's mission and programs is combined with the analytical and investigative skills used to make assessments of product quality which parallels the qualification requirements for GS-1910 work. The appellant is making assessments of the management controls and processes relating to the quality program and its administration.

The work of the total position must be considered in determining its proper series. The work related to the PDQR program and the after market services which occupy 45 to 50 percent of the appellant's time requires the knowledge of the products and processes of the quality assurance

program. This knowledge is included in the appellant's PD, i.e., comprehensive and thorough knowledge of the full range of principles, concepts, and methodology related to one or more of the quality assurance functional programs and broad knowledge of semi-complex products including quality characteristics, assembly methods, special processes, interrelationships of parts and subassemblies, measurement and test techniques, and skill in developing plans to insure control of product quality. Further, the position is subject to Defense Acquisition Workforce Improvement Act (DAWIA) certification, and the appellant possesses a current (DAWIA) certification for quality assurance work. This required certification clearly establishes quality assurance as the paramount knowledge for this position. Therefore, the appellant's position is correctly classified to the GS-1910 Quality Assurance Series. The position is titled Quality Assurance Specialist and evaluated by application of the position classification standard for the GS-1910 series.

Grade Determination

The position classification standard for the Quality Assurance Series, GS-1910, is written in the Factor Evaluation System (FES) format. Positions are placed in grades on the basis of their duties, responsibilities, and the qualifications required as evaluated in terms of the nine FES factors common to nonsupervisory General Schedule positions. Point values are assigned for each of the nine factors, with the total numerical score being converted to a grade level using the Grade Conversion Chart provided in the standard. Under the FES, the factor point values mark the lower end of the ranges for each factor level. For a position to warrant a given point value, it must be fully equivalent to the overall intent of the description. If the position fails in any significant aspect to meet a particular factor level description, the point value for the next lower factor must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

As indicated previously, the appellant contests Factors 2, 3, 4, 5, 6, 7, and 9. We have reviewed the agency's evaluation of Factors 1 and 8 and agree with their determination. Our evaluation with respect to the remaining seven FES factors follows.

Factor 2, Supervisory controls

This factor measures the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility for carrying out assignments, and how completed work is reviewed and approved.

At Level 2-4, the supervisor provides assignments in terms of overall objectives and any limitations on the scope of the work. The specialist consults with and advises the supervisor on such aspects as priorities, staffing, or finding requirements, and project milestones. The specialist plans and carries out assignments independently, interprets and applies general quality assurance policies and procedures, and effects coordination/consultation with other activities as required. At this level, considerable quality assurance expertise has been developed and the specialist is able to resolve problems involving deviations from established procedures, unfamiliar situations, or unusual requirements. The specialist makes authoritative determinations on conformance with requirements, and coordinates corrective action. The supervisor is briefed

periodically on the progress of assignments and any potential problems or conditions encountered. At this level, assignments are assessed in terms of overall effectiveness through periodic reports, statistical production data, and the review of program documentation and accomplishments.

At Level 2-5, the supervisor provides only administrative guidance in making work assignments. Assignments are discussed in terms of broad agency missions, giving the employee wide latitude for identifying specific problems for investigation, projects to be initiated, and goals to be met. The specialist independently designs, organizes, and carries out large scale projects or special studies related to overall program administration, or quality compliance issues in a technical program area. The specialist independently monitors and evaluates the effectiveness of the agency's programs and develops new procedures or recommendations for broad policy changes to augment program effectiveness.

The supervision received by the appellant is comparable to Level 2-4 in that new assignments are received in terms of overall objectives. He plans and carries out assignments independently following established procedures and coordinates resolution of product deficiencies with contractors as necessary. Because of the appellant's considerable expertise in "trouble-shooting" defects or product inconsistencies as a regular part of his job, the supervisor rarely intervenes in the process. Because of his experience, the appellant's completed work products are generally accepted as technically sound. However, Category I deficiencies, i.e., which may cause death, injury, or severe occupational illness; loss or major damage to a weapon system; critically restricts combat readiness; do require shorter suspense dates and a higher level of review. These must be approved by the Commander. Similar to Level 2-4, the appellant's work assignments involve a high degree of independence, expertise, and program responsibility.

Unlike positions at Level 2-5; the appellant does not have total responsibility for a significant program or function. The supervisor retains ultimate responsibility and final approval authority for the appellant's major program function areas. The appellant receives more than the administrative guidance, as typical at Level 2-5, and does not have responsibility for large scale projects. While his technical expertise is recognized locally, he does not serve as an agency level technical expert as envisioned at Level 2-5.

This factor is evaluated at Level 2-4, 450 points.

Factor 3, Guidelines

This factor covers the nature of the guidelines used to perform the work of the position and the judgment needed to apply them.

At Level 3-3, a number of guidelines used are similar to those at Level 3-2, e.g., specific guides containing established procedures, material specifications and standards, production drawing, etc. However, at Level 3-3, specialists are responsible for adapting and extending agency guides and regulations to situations encountered in the work. Because of the variety of tasks or situations, the guidelines are not always applicable or do not provide specific guidance. The specialist exercises judgment in interpreting and adapting general agency guides and regulations

to individual situations and problems arising from the work. At this level, some specialists may be responsible for preparing operating instructions applicable to the local organization, plant, or activity.

At Level 3-4, the principal guidelines include agency quality assurance policy statements and program directives, government procurement regulations, and general administrative instructions. Guidelines are presented in general terms and outline the major areas of program planning along with suggested approaches. The specialist uses initiative, extensive experience, and a broad knowledge of quality assurance principles and practices to develop new methods and recommend policy changes.

The record indicates the primary guidelines are the U.S. Code, DOD and DCMA regulations (including "one book"), program directives, manuals, and general administrative regulations. The guidelines used range from general terms to specific procedures regarding the range of technical decisions to guide the CMO in their mission. They cover overall functional requirements and provide a framework for the appellant to interpret and apply to specific issues and problems. The appellant's primary assignments include the PQDR and the MCR programs, both of which are ongoing programs that have extensive guidelines and procedures, comparable to Level 3-3. The appellant indicates that he wrote instructions and developed a flow chart for the PQDR program when it was set up at the new CMO. These were specific instructions for the local office based on the DCMA regulations and guidance, as described at Level 3-3.

The guidelines used by the appellant are more specific than the policy statements and general instructions described at Level 3-4. Work found at Level 3-4, including the development of new quality methods and recommending policy changes, is performed at higher levels within the appellant's employing agency.

This factor is evaluated at Level 3-3, 275 points.

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of the tasks, 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.

Level 4-4 describes varied functions aimed at insuring the acceptability of products. The work involves application of a complete range of quality assurance principles and methodology to plan and accomplish projects for products having complex characteristics. Broad functions concerned with planning and completing the work include developing overall plans and approaches based on technical requirements, monitoring the application and effectiveness of controls and methods, and adjusting quality assurance activities as indicated by quality data trends or conditions.

Decisions concerning what needs to be done involve review and analysis of project or program documents to ensure critical quality requirements are identified and provided for, tailoring the approach to product/project requirements, making major modifications in approach or emphasis as conditions warrant, and coordinating resolution of nonconformances. The work requires

making many decisions concerning such things as determining adequacy and completeness of technical data in achieving quality requirements, evaluating capabilities of the manufacturing activities for producing acceptable products, judging the adequacy of documentation of quality problems and making authoritative interpretation of complex quality requirements. Assignments with these characteristics are found in a variety of situations at the operation level, in staff organizations, or in command/management level programs. Assignments at Level 4-4 involve greater responsibility than those at Level 4-3 as the nature of the products involved are complex and quality characteristics must be progressively verified through precise measurements and tests and controls are required throughout the complete production cycle.

At Level 4-5, assignments include a broad range of duties with substantial breadth and depth of analysis; consideration of numerous interrelationships and variables to develop new approaches; or to resolve persistent, widespread, or critical quality problems. Specialists frequently serve in a program/project leader capacity to accomplish particularly complex, sensitive, or long-term special studies with major agency quality assurance programs, e.g., major studies being carried out at diverse locations of the country. Decisions are complicated because of the wide dispersion of organizations and activities involved; difficulties in determining scope of the problems in those activities; multiple authorities, policies, and regulations governing the activities; relationship to and interdependence of activities; and impact of quality costs on programmed resources. The work involves developing innovative solutions along with implementing instructions for effecting changes involving new methodology, policies, or procedures. Assignments at this level are more commonly found in organizational levels having management responsibility for major quality programs of agencies.

The record indicates the work requires a high degree of technical knowledge and judgment to prevent product quality/process problems and to assess/resolve complex situations such as insufficient/conflicting process requirements, evolving/changing regulatory directives and process controls, and state-of-the-art technical requirements. This work requires application of a complete range of quality assurance principles and audit techniques to plan and perform risk assessments for the assigned processes. The products dealt with include a variety of medium- to heavy-weight trucks on two basic platforms with 17 variants equipped for a variety of work, such as cargo hauling, dump, load handling equipment, etc. The facility performs the assembly of the complete vehicle which involves complex quality characteristics. Illustration 1 at Level 4-4, is most comparable to the appellant's work situation. As the PDQR manager, the appellant is the point of contact and, in collaboration with contractors, CMO investigators, and design engineers, helps to identify the root cause of problems and refines methods and techniques in efforts to formulate a corrective plan of action. Deficiencies have involved parts such as hydraulic lifts, alternators, starters, various relays, electronic diagnostics, glass breakage, etc. He must be familiar with the overall quality plan and the specifics concerning the parts/components involved in order to determine the probable cause for the failure and assist in determining how to avoid such problems in the future. The appellant is responsible for recognizing problems or systematic deficiencies and implementing new designs developed by others to ensure that contractor quality systems are consistent with program and product requirements. In MCR work, he schedules quarterly audits, develops reports, and provides quarterly reports to the DCMA District.

Level 4-5 describes a more unusual situation, typically found at higher staff or management levels. In contrast, the appellant's work is performed at an operating plant facility and his responsibilities involve the products of that facility. He does not serve as a program/project leader within the context described at the Level 4-5, i.e., complex, sensitive, or long-term special studies concerning major agency quality assurance programs carried out at diverse locations of the country. Unlike Level 4-5, the appellant is not tasked with developing innovative solutions along with implementing instructions for effecting changes involving new methodology, policies, or procedures for projects of Level 4-5 complexity.

This factor is evaluated at Level 4-4, 225 points.

Factor 5, Scope and effect

This factor covers the relationship between the nature of the work, and the impact of the work products or services both within and outside the organization.

Level 5-3 work involves performance of a variety of assignments to ensure acceptability of products or acceptable levels of quality in the operations involved. Most problems encountered can be dealt with by selection and/or adaptation of formal work methods and procedures. The results of the work affect the acceptability of products in terms of conformance to technical requirements, meeting user's needs in a timely fashion, and performing as intended.

At Level 5-4, the purpose of the work is to plan, develop, and implement quality assurance projects of considerable breadth and complexity. Some assignments at this level may involve responsibility for planning and implementing program plans for ensuring that quality requirements for major products are achieved throughout the item's life cycle. The specialist may serve as a technical specialist in a broad product or commodity area or work with highly specialized products or manufacturing processes. The results of the work affect a range of agency activities being carried out at a number of locations.

The appellant is responsible for planning and coordinating programs involving the PQDR process, MCA, training, and quality assurance for spare parts for the CMO. He uses his overall knowledge of the QA processes to coordinate and review reports on reported product quality deficiencies, assessing completeness and adequacy of those investigations and for the work performed in the spare part functions. Comparable to Level 5-3, these duties may determine the source of problems affecting quality in production of contract items and may affect the quality of spare parts. His work may affect contractor liability for replacing defective parts. The MCA activities require analytical skills and providing reports to management, comparable in complexity and scope to the quality assurance processes.

The appellant's responsibilities are not as broad as typical of Level 5-4 in that he is responsible for limited aspects of the FMTV quality program and only at the [name] site. In contrast, at Level 5-4, the program plans developed affect activities beyond the acquisition stage which are typically carried out by organizations at a number of locations.

This factor is evaluated at Level 5-3, 150 points.

Factor 6, Personal contacts

This factor includes face-to-face and telephone contact with persons not in the supervisory chain. The relationship between Factors 6 and 7 presumes that the same contacts will be evaluated for both factors.

At Level 6-3, in addition to contacts at Level 6-2 (employees and officials within the agency), contacts include employees and officials of other Federal agencies and/or private industry. Contacts vary according to the situation involved and require the specialist to insure the contacts understand their respective roles. These contacts frequently require the specialist identify and locate the appropriate persons to establish working relationships.

At Level 6-4, contacts occur on a regular basis with high level program and quality assurance officials in other Federal agencies, top executives of large private industrial firms, or representatives of foreign governments.

Comparable to Level 6-3, in addition to CMO staff, the appellant's contacts include managers and supervisors within the DCMA District. His contacts include representatives of the procurement office, program management office, Army field organizations, and other Government agencies. The appellant serves as the primary coordinator on PQDR matters with the CMO quality staff and contractors, as the primary interface on management control assessment activities with managers and assessment team members, and represents quality assurance in the TAG that may involve meetings with contractor management and the Army buying command.

The appellant states that on four occasions there have been representatives from NATO countries at the contractor's facilities to view the facilities and meet with the CMO staff. This does not represent the type of regular and recurring contacts required to successfully perform the work, typical of Level 6-4. As described in the illustrations at this level, the specialist would be representing the quality organization at meetings with high level management officials from other agencies and departments or leading a team concerned with quality aspects of material being delivered to foreign governments under international agreements.

Level 6-3 is credited, 60 points.

Factor 7, Purpose of contacts

The purpose of contacts in this occupation ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, views, or objectives.

In addition to those described at 7-2, contacts at Level 7-3 require considerable skill to influence and motivate individuals to correct deficiencies which would result in unacceptable products. These contacts may involve officials with a meager understanding of quality requirements, who may dispute the nature of the requirements, or have less than a cooperative attitude.

Comparable to Level 7-3, the purpose of the appellant's contacts with contractor staff is to clarify contractual technical requirements, and to discuss and resolve product quality problems. Contacts with CMO managers and process owners are to communicate findings and discuss/resolve problems and promote improvements in CMO performance. In both situations, the appellant provides technical assistance and guidance, and uses his technical knowledge and tact to persuade parties to accept corrective actions and help assure findings are accepted. Like Level 7-3, these contacts may involve the explanation of quality requirements to contractors and others who may not readily accept the rationale and/or argue the issues because of possible cost or warranty issues.

The appellant's contacts do not meet Level 7-4 where the purpose is to negotiate or settle significant issues or problems which require escalation because established channels and procedures have failed to resolve the problem. Like Level 7-3, his contacts involve clarifying information, discussing and persuading to attempt to resolve problems. However, issues that involve major problems or are especially contentious are resolved at higher levels. With regard to the PDQR program, the information developed in investigative reports by the CMO and contractor are provided through channels to the buyer for a final decision. While the appellant believes Level 7-4 should be credited, his written discussion describes Level 7-3, that has been mislabeled in the standard.

Level 7-3 is credited, 120 points.

Factor 9, Work environment

This factor considers the risks and discomforts involving physical surroundings or the nature of the work assignments and safety regulation requirements.

At Level 9-1, work is performed in a typical office setting. The specialist may occasionally visit manufacturing facilities.

At Level 9-2, duties involve regular and recurring visits to manufacturing, storage, or test areas. These visits may require protective clothing or gear such as safety glasses and shoes, ear protection, and hard hats, and observation of safety precautions.

The appellant's duties require him to travel outside the office for occasional visits to manufacturing and testing sites. These visits require the use of safety glasses, safety shoes, and ear protection in high noise areas. However, the record shows that these visits to the manufacturing areas are made approximately on a quarterly basis which is not regular and recurring for purposes of evaluating this factor in the position classification process. Since most of his work is performed in an office setting with adequate heating, lighting and ventilation, Level 9-2 is not met.

The appellant believes Level 9-3 should be credited because of job stress and disease among CMO staff. The intent of this factor is to measure the physical surroundings and safety precautions required for the work site. It does not address mental stress which may be a consideration in any job setting.

This factor is evaluated at Level 9-1, 5 points.

Grade Summary

The appellant's position is assigned the following factor levels:

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-7	1,250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and effect	5-3	150
6. Personal contacts and	6-3	60
7. Purpose of contacts	7-3	120
8. Physical demands	8-1	5
9. Work environment	9-1	5
<i>Total</i>		2,540

Using the Grade Conversion Table in the standard, 2,540 points fall within the GS-11 range of 2,355-2750.

Decision

The appealed position is properly classified as Quality Assurance Specialist, GS-1910-11.