

OFFICE OF PERSONNEL MANAGEMENT  
ATLANTA OVERSIGHT DIVISION  
ATLANTA, GEORGIA

**CLASSIFICATION APPEAL DECISION**

Under section 5112(b) of title 5, United States Code

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

**Position:** **Supervisory General Engineer**  
**GS-801-13**

**Organization:** Engineering Service  
Administrative Services  
Veterans Administration Medical Center  
[city, state]

**Decision:** **GS-801-13** (Title at the Discretion of the Agency)  
(Appeal Denied)

**OPM decision number:** C-0801-13-01

Kathy W. Day  
Classification Appeals Officer

Date: 8/6/1997

RD # 0801137A.AT

**COPY OF DECISION SENT TO:**

[appellant's name and address]

[name and address of appellant's servicing personnel office]

[name and address of higher level personnel office]

[name and address of agency regional office]

## **Background**

On March 11, 1997, the Atlanta Oversight Division, Office of Personnel Management, accepted an appeal for the position of General Engineer, GS-801-13, Engineering Service, Administrative Services, Veterans Administration Medical Center, [in a city]. The appellant is requesting that his position be changed to GS-801-14.

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

## **Sources of Information**

This appeal decision is based on information from the following sources:

1. The appellant's letter dated March 6, 1997, appealing the classification of his position.
2. The agency's letter dated April 4, 1997, providing position and organizational information.
3. A telephone interview with [the servicing personnel management specialist], on May 16, 1997.
4. A telephone interview with [servicing classification specialist], on May 19, 1997.
5. Telephone interviews with the appellant on May 28, and June 11, 1997.
6. A telephone interview with [the appellant's immediate supervisor], on June 4, 1997.

## **Position Information**

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

The position description does not provide sufficient information to evaluate the nature and extent of supervisory responsibilities and does not meet the standards of adequacy as described on pages 14 and 15 in the Introduction to the Position Classification Standards. The standards of adequacy for position descriptions states the description of each position must be kept up to date and include information about the job which is significant to its classification. For a supervisory position, the description should identify the information necessary to evaluate the position by the appropriate supervisory criteria.

The appellant's position description indicates that he spends 10 percent of his time on computers, 25 percent on nonrecurring maintenance and construction projects, 10 percent on energy conservation, 25 percent on safety, and 30 percent on maintenance and operations duties. However, there is no information in the position description identifying the nature and extent of his supervisory duties. Although the position description does not indicate supervisory responsibilities, there is sufficient evidence in the appeal record that the position does perform supervisory work. For example, the agency furnished an administrative report which included an organizational chart showing the number, kind and variety of positions supervised and a functional statement describing the supervisory and managerial responsibilities delegated to the position. Since supervisory responsibilities are a significant aspect of the appellant's position, the agency is directed to correct the position description by incorporating a clear description of and the percentage of time spent on supervisory responsibilities.

The appellant's duties and supervisory responsibilities are as follows:

The appellant is the Chief, Engineering Services, for the Medical Center and is responsible for the management and supervision of the engineering project management, safety, and maintenance and operations programs. He effectively selects, trains, utilizes and evaluates the staff, appraises staff performance, uses appropriate rewards and corrective action principles in employee management, deals effectively with union officials and effectively applies the provisions of the union contract. He ensures time and leave are properly administered. He applies Equal Employment Opportunity (EEO) and affirmative action principles to recruit and retain minority group members, women, handicapped individuals and disabled veterans; makes efforts to resolve EEO complaints at the informal level including a review of attempts at resolution by lower level supervisors and intervention as needed; and applies effective position management techniques in organizational and position design. He sets short- and long-range goals that are realistic and responsive to VA and Medical Center goals and priorities, plans milestones to permit successful monitoring and control of goal accomplishment, contributes to the center's efforts to maximize the generation of workload and minimize costs, and plans for effective resource management and accountability.

According to the appellant's immediate supervisor, the appellant is delegated full authority for the Engineering Program, as well as responsibility for effectively managing resources for assigned projects. As a supervisor, the appellant is delegated administrative and technical supervisory authorities with the exception of authorities such as initiating formal disciplinary actions, approving organizational designs, approving leave without pay over thirty days, and approving specific personnel actions requiring higher level approval in accordance with the delegations of authority policy.

The appellant is the authority on all aspects of professional engineering within the Medical Center. He provides professional engineering consultative services to medical and administrative personnel to ensure the facilities developed will meet desired functions within project cost limitations. He also serves as a key member of the Medical Center Space Committee reviewing space utilization requirements and making recommendations consistent with the master plan and

established criteria. He ensures continued reliable service from existing systems and provides new and renovated medical facilities for patient care. He develops, prepares and updates the Facility Five Year Construction, Energy, and Lease Plans including all capital improvements in the Major, Minor Miscellaneous and Nonrecurring Maintenance Programs and energy projects to meet the long-term energy goals established for the facility, as well as leases for space to house outreach clinics, access points, and veterans centers.

The appellant is the Safety Officer for the center and staff advisor to the Director. He oversees the development, implementation, and monitoring of the Safety Management Plan and is delegated full, immediate authority when intervening in matters relative to safety.

The appellant develops and implements the Maintenance and Operations Program for all real and personal property to ensure facilities and equipment needed to deliver health care are available when needed, to economically extend the usefulness of facilities and equipment, and to provide to employees and the public a facility which is maintained in accordance with contemporary standards of society.

The appellant receives administrative direction from the Assistant Medical Director, who provides assignments in terms of broadly defined objectives identifying problem areas and recommending end results with no specific procedures identified. He utilizes his technical background to develop procedures and to investigate, identify and resolve problems. He must often deviate from traditional engineering practices and procedures and use initiative, resourcefulness, and creativity in the application of governing guidelines. As the technical authority on all engineering matters, the appellant plays a major role in the development of Medical Center policy and program planning. He provides professional engineering direction to comply with legislative and accrediting requirements of the facility, covering a broad based knowledge of many engineering technical disciplines to provide the Medical Center with the necessary expertise in those technical areas. He is relied upon to give authoritative advice to hospital managers in planning their programs. If work is reviewed, the review is limited to how the work relates to Medical Center program objectives, rather than for technical or professional engineering competency.

The appellant disagrees with the agency's classification advisory opinion and states that the agency did not consider complete information which he believes is relevant to the classification of his position. The techniques and procedures used by the agency to develop information about a position are selected by the agency and are not relevant to our decision. Since the agency and the appellant have had an opportunity to present information during this appeal process, it is our opinion that we have received sufficient information on which to base our decision.

The appellant also expressed concern with the agency's proposed reorganization plans which will affect his position and provided a copy of a proposed supervisory position description for the new organization. Under section 511.607(b), of title 5, United States Code, neither the agency's proposed classification decision or a position to which an employee is not officially assigned are appealable nor reviewable by the Office of Personnel Management.

The appellant disagrees with the agency's classification determination for Factors I and II in the Hospital Engineering Grade Evaluation Guide. He also disagrees with Factors 3, 4, 5 and 6 in the General Schedule Supervisory Guide (GSSG). These factors will be addressed in our decision.

The appellant's disagreement with Factor 5 is based on his belief that grade GS-12 positions under his direct supervision should be credited for base level purposes. The GSSG requires all subordinate positions in the organization be reviewed when determining the appropriate grade level for Factor 5. In our review of all the subordinate positions in the appellant's organization, we found several positions misclassified. The misclassified positions are identified in the workload analysis at the end of the decision and should be reviewed by the agency.

### **Standards Referenced**

General Engineering Series Definition, GS-801.

General Schedule Supervisory Guide (GSSG), April 1993.

Hospital Engineer Grade Evaluation Guide, GS-800, October 1981.

### **Series and Title Determination**

The agency placed the position in the GS-801 series. The appellant does not contest the agency's determination.

The GS-801 series includes all classes of positions the duties of which are to advise on, administer, supervise, or perform research or other professional and scientific work of a special or miscellaneous character which is not specifically classifiable in any other engineering series, but which involves the application of knowledge of such engineering fundamentals as the strength and strain analysis of engineering materials and structures, the physical and chemical characteristics of engineering materials such as elastic limits, maximum unit stresses, coefficients of expansion, workability, hardness, tendency to fatigue, resistance to corrosion, engineering adaptability, engineering methods of construction and processing, etc.; or positions involving professional work in several branches of engineering.

The appellant's work requires a broad knowledge of professional engineering and related fields to manage and supervise an entire engineering program. The nature of the work in the organization cuts across several professional engineering disciplines for a variety of projects covering construction, restoration, modification and repair of facilities, equipment, utilities and services within the Medical Center. We agree the position is properly placed in the GS-801 series.

There are no prescribed titles for positions allocated to the GS-801 series. The agency should designate a title in accordance with the titling instructions in the Introduction to the Position Classification Standards.

The position is properly coded as GS-801, with the title at the discretion of the agency.

## **Grade Determination**

The agency used the Hospital Engineer Grade Evaluation Guide, GS-800, to evaluate the position's engineering program responsibilities and the GSSG to evaluate the position's supervisory responsibilities. The appellant does not contest the agency's use of these standards but disagrees with their findings.

The GS-801 series does not contain grade criteria. The guidance provided in the Introduction to the Position Classification Standards states, in determining the proper grade level of positions, an appropriate general classification guide or criteria in a standard for related work should be used which provides a basis for comparison for work which is similar to the appellant's position with respect to the kind of work processes, functions, or subject matter of work performed, the qualifications required to do the work, the level of difficulty and responsibilities, and the combination of classification factors which have the greatest influence on the grade level. Since the position is responsible for the management and supervision of the Medical Center's engineering program, we agree that the Hospital Engineer Grade Evaluation Guide, GS-800, and the GSSG are appropriate for grading purposes.

### **Hospital Engineering Program Responsibilities**

The Hospital Engineer Grade Evaluation Guide, GS-800, is used in determining grades of professional engineering positions that are involved primarily in managing a hospital engineering program. Positions are evaluated in terms of two factors: Factor I, Level of Professional Engineering Responsibility and Factor II, Complexity of Operating Situation. The material under these factors is described in terms of typical characteristics and the levels are expressed in terms of relative degrees. A degree specifies the particular combination of basic professional, hospital, or program characteristics which typify the different levels of chief engineer positions. Each degree is based on the presence of the full range of characteristics described. When a position fails to fully meet the characteristics established for a given degree, it must be credited with a degree below unless there is a showing of other combinations of compensating features.

Some of the factors utilize monetary value as an indicator of the complexity of the work performed. Since economic fluctuations over time must be considered in measuring the true value intended at a specific factor level, the Consumer Price Index was referenced to adjust the monetary values in the standard to present day dollar values.

#### **Factor I, Level of Professional Engineering Responsibility:**

The agency evaluated this factor at Degree B. The appellant believes his position should be credited at Degree A.

Factor I measures the impact of the professional engineering responsibilities upon the chief engineer's position and is divided into two parts: Element 1, Knowledge and Skills, and Element 2, Complexity of the Work Environment.

*Element 1: Knowledge and Skills*

This element measures the nature and extent of information or facts which the engineer must understand to do professionally competent work (e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts) and the nature and extent of skills necessary to apply this knowledge. The professional knowledge and skills of a chief engineer relate mostly to facilities, systems, and equipment in several fields of engineering. To assess the degree of professional knowledge required, several considerations are necessary. The total dollar cost of projects exceeding \$23,000 for maintenance, repair, renovation, modernization, and new construction assigned to the chief engineer during the past 3 years should be reviewed. A 3 year review provides a time weighted perspective to assess the overall impact of the program.

At Degree B, professional engineering workload has substantial impact on the chief engineer's position. The number of projects involved range between 20 and 40 with a total cost of \$6.9 million to \$11.5 million over a 3 year period. At this level, the support staff normally consists of one or more engineers and technical and clerical personnel. Some projects present substantial professional difficulties such as: a) the modernization or establishment of medical treatment areas involving specialized equipment, utilities and structural capabilities; b) the renovation of an entire structure or major portion of a structure where the work must be carefully phased to minimize disruption of ongoing activities; or, c) projects which have a substantial impact on the day-to-day activities of the hospital. To accomplish the project workload, the chief engineer usually has the professional knowledge and abilities needed to modify standard practices and adapt equipment or techniques to solve a variety of engineering problems. The chief engineer at this level typically adapts precedents or makes significant departures from previous approaches to similar projects in order to provide for the specialized requirements of the users.

Degree B is exceeded. The appellant furnished a project summary list with 95 projects for the Medical Center covering a 3 year period. Forty-four of the projects are each valued in excess of \$23,000 for maintenance, repair, renovation, modernization, and new construction work. Projects are categorized into Major, Minor, Minor Miscellaneous, Nonrecurring Maintenance (NRM) and Station level projects, with a total estimated cost of \$13,600,000 over a 3 year period. With respect to the number and cost of workload assignments, Degree B is slightly exceeded. In addition, the appellant provided examples of projects where the knowledges and skills required to accomplish project workload exceeded Degree B. For example, Project [number] required knowledge and skills to design a room for the catheterization laboratory for which no agency design standards existed. The work involved using engineering standards and principles to develop a new design to meet special medical equipment requirements for the laboratory. Another example is Project [number] which presented substantial problems due to the physical constraints of the Medical Center's electrical power capacity. The work required



knowledge and skill to create an alternative servicing unit which was capable of supplying the required electrical capacity to power the Computerized Tomography (CT) Scan for the Radiology Service. The results of this work ended in the construction of a fully equipped mobile Magnetic Resonance Imaging (MRI) Unit. In addition, there are several projects carried out simultaneously or which are interrelated, substantially increasing problems with scheduling and coordination of work due to the oversight required which is beyond the extent of work characteristic at Degree B.

At Degree A, the professional engineering workload will have a major impact on the chief engineer's position. Projects usually exceed 50 in number with a total cost in excess of \$16.1 million over a 3 year period. At this level there are normally several professional and technical employees assigned full time to project work. Projects, such as those described at Degree B, occur with such frequency as to constitute a substantial portion of the total dollar cost. These projects are commonly in progress simultaneously or are so closely interrelated that substantial planning and coordination is necessary to minimize disruption of essential services and activities in the hospital. The chief engineer may be required to apply new developments and experienced judgment to solve novel or obscure problems.

Degree A is not fully met. Over the last 3 years, the appellant has been responsible for 44 projects valued in excess of \$23,000, for a total cost of \$13.6 million. His projects consisted of a variety of multi-purpose short-term and long-term renovation, construction and modernization projects, often planned and scheduled in a series of phases over a period of several years. The projects representing substantial professional difficulties such as those described at Degree B represent approximately 25 percent of the workload and approximately 30 percent of the total dollar value of the projects. The majority of the appellant's projects deal with problems that can be resolved by adapting or modifying engineering practices, precedents or procedures and do not involve the substantial problems of coordination and scheduling or present novel and obscure problems described at Degree A. Although Degree B is exceeded, the full intent of Degree A is not met in terms of the complexity and scope of the projects assigned. Therefore, Degree B must be assigned.

Element 1 is credited with Degree B.

*Element 2: Complexity of the Work Environment*

This element measures the complexity of the chief engineer's position in managing a hospital engineering program which includes professional engineering review and direction of assigned program. Complexity covers the nature and variety of tasks, steps, processes, methods, or activities in the work performed; and the degree to which the chief engineer must vary the work, discern interrelationships and deviations, or develop new techniques, criteria, or information. While most, if not all, chief engineers have similar program responsibilities, these program magnitudes and complexities depend upon several factors. The age and type of construction of the hospital can complicate the problems involved with construction, renovation, and

modernization. For example, older structures built with interior load bearing walls limit options available for modernization and renovation. The number of buildings and the accompanying acreage of the hospital can complicate the problems involved with maintenance, repair, and operations. For example, a chief engineer with responsibility for 25 buildings may need to develop a computerized system to control energy use of the utility systems in these buildings. Hospitals remote from population centers often require a greater degree of self-sufficiency. For example, the chief engineer may need to provide water and sewerage treatment facilities or develop a strong biomedical engineering program because of slow response time from commercial sources.

At Degree B, the hospital may have from 200-700 operating beds with a physical complex of 350,000 to 700,000 square feet. The annual budget, excluding salaries, controlled by the chief engineer ranges from \$1.75 to \$3.5 million, with 60 to 100 employees. Assignments are typically diverse covering a number of essentially different mechanical, electrical, and pneumatic systems and equipment in the hospital. The work requires recognition of the relationship of problems and practices of related engineering fields either to solve the engineering problem or refer it to the appropriate source for resolution.

Degree B is met. The Medical Center consists of 5 major buildings totaling approximately 580,000 gross square feet on 61.9 acres of land and includes a 6 story hospital, 3 story nursing home care unit, 3 story administration building, 4 story clinic/administrative building, a 2 story laundry, and 15 housekeeping quarters. The hospital is approximately 30 years old, and the remaining buildings are approximately 60 years old. There are a total of 462 beds with 160 in Medical, 65 in Intermediate, 72 in Surgical, 45 in Psychiatric, and 120 for Extended Geriatric in the Nursing Home Unit. The appellant's recurring annual budget, excluding salaries, in FY 97 was \$3,163,345; in FY 96, \$3,066,800; and in FY 95, \$2,543,900. The appellant has an authorized full-time staff of 50 employees. The Construction Coordinator and the engineers in the Projects Unit and Safety Unit are primarily engaged in the overall engineering planning, development, design, modification and evaluation work while 34 employees in the Maintenance and Operations Unit are primarily responsible for the maintenance, repair, installation, and operations of various mechanical, electrical, and pneumatic systems and equipment within the Medical Center, and perform occasional project related work. This compares favorably to Degree B.

At Degree A, the programs are substantially greater than those of Degree B. The operating bed capacity exceeds 900 with more than 1 million square feet of space. The yearly operating budget, excluding salaries, will exceed \$5 million with more than 130 employees. Assignments typically involve design, modifications, requirements, definitions and engineering evaluations. Assignments are diverse in nature and cover a number of essentially different mechanical, electrical and pneumatic systems and equipment found in large multi-story or multi-building hospitals. In some instances, assignments deal with the inapplicability of established criteria and technical precedents to program objectives thus requiring sound judgment to solve problems and major objectives without compromising engineering principles. The work also requires recognition of the

relationship or problems and practices of related engineering fields either to solve engineering problems or refer them to the appropriate source for resolution.

Degree A is not met. Unlike Degree A, the appellant's work environment does not require management of a large staff where substantial coordination and scheduling skills are required and the review and direction of work requires a broader knowledge and skills base as found in projects for which engineering standards are obsolete or nonexistent. Additionally, the appellant's annual budget for the last 3 years did not exceed \$5 million dollars, and the number of employees involved in the substantial work of the organization is less than half the number characterized at Degree A. Since the appellant's work environment fails to meet Degree A in all respects, that level cannot be credited.

Element 2 is credited at Degree B.

Since both elements are credited at Degree B, the overall factor is credited at Degree B, and Level II is assigned in accordance with the chart on page 17.

#### Factor II, Complexity of Operating Situation:

The agency evaluated this factor at Degree B. The appellant believes his position should be credited at Degree A.

This factor measures the impact of the hospital's operational and environmental characteristics on the managerial complexity of the chief engineer's position. Increases in managerial complexity are manifested in areas such as increased complexity of organizational relationships; a greater need for executive knowledge, skills and abilities as the chief engineer supports and assists top hospital management in planning, coordinating, controlling and directing programs and operations; and increased occasions for making difficult decisions and resolving substantive problems. Although not all inclusive, activities in the hospital such as medical school affiliations, special medical programs, and the kind and amount of medical equipment, have a direct bearing on the managerial complexity of the chief engineer. Active medical school affiliations, with the influx of medical students and residents along with consulting and attending physicians who supervise them, create additional problems in personnel and resource management. The rapid turnover of the medical school affiliates, and their unfamiliarity with government hospital operations, make it especially critical for the chief engineer to support top hospital management efforts to establish stable and effective management systems to integrate these affiliates into the hospital organization and its patient care program.

At Degree B, hospitals provide health care services of moderate variety and intensity, but they typically are not equipped to treat patients who require the most specialized and sophisticated medical and surgical procedures. The hospitals typically have medical school affiliations that substantially impact the operation of the hospital. They have between 10-15 medical school affiliated residency programs and between 9 and 11 special medical programs. These special

medical programs are of sufficient complexity to have substantial impact on the chief engineer's programs. The acquisition value of medical equipment is between \$5 million and \$14 million, representing an inventory of substantial variety and sophistication.

Degree B is exceeded. The operational characteristics of the Medical Center were listed in a "Trip Package." This document and other information in the appeal record indicate the appellant actively participates and makes recommendations and decisions affecting the operational characteristics of the Medical Center. The Medical Center includes primary and secondary care plus tertiary care in all areas except hemodialysis, neurosurgery and plastic surgery; special programs in cardiac catheterization, nuclear medicine, respiratory care, pulmonary function, audiology and speech pathology; a Geriatric Evaluation and Management program; a strong cardiac, vascular and thoracic surgery program; a 35 Average Daily Census Hospital Based Primary Care program; a mental health program; a 25 bed substance abuse program; and a community nursing home census of 52. The Medical Center operates 462 hospital beds, with 65 in Intermediate Care, 160 in Medicine, 45 in Psychiatry, and 72 in Surgery. Extended geriatric care provides a 120 bed Nursing Home Care Unit. The Medical Center's surgical program is affiliated with Duke University School of Medicine as is a residency program in pathology. There are also Dental Residency, Dental Externship, and Pharmacy programs in conjunction with the Medical Center and the University of North Carolina. Medical Center personnel train physicians assistants from Bowman Gray and Duke, professional nursing students from Western Carolina University and Haywood Technical College, Nurse Practitioners from the Local Mountain Area Health Education Center Family Nurse Program and students associated with programs in audiology and speech pathology, occupational therapy, medical technology, dental hygiene, dental assistant, medical records, social work, pastoral care, health occupations, radiology, management internship and hospital administration.

Additional factors considered and impacting on the appellant's decisions and recommendations include the allocated project resources available; priorities in terms of current and projected workload; technological changes; and medical, hospital, safety, and building standards, codes and requirements. The rotation of students and residents, the changes in administrative and medical staff, and the requirement for state-of-the-art medical equipment requires a high degree of managerial skill and coordination to ensure space and facility requirements are met, medical equipment and controlled environments for training purposes are available, and equipment precision is checked and validated for use by medical trainees and residents. There is an active research program with 18 approved projects which are primarily clinical investigations. The Research Service also has facilities for basic research, including an American Association for the Accreditation of Laboratory Animal Care accredited animal care facility and a fully equipped tissue culture laboratory.

At Degree A, the intensity of care, rate of activity, and broad program mission of hospitals generate numerous, complex problems which constantly tax the management skills of the chief engineer. These problems arise from the rapid fluctuation in various program requirements and the many conflicts between program requirements and available resources. In this situation, the

engineer frequently must make prompt decisions which require consideration of a wide range of factors and have a direct impact on the mission of the hospital. Degree A hospitals typically have medical school affiliations of high activity with major impact upon the operation of the hospital. They generally have more than 20 medical school affiliated residency programs and usually more than 15 special medical programs. The acquisition value of medical equipment usually exceeds \$19 million and represents some of the most sophisticated state-of-the-art technology available.

Degree A is not fully met. The diversity and volume of operations of the Medical Center does present problems but none which significantly impact or magnify the scope, complexity, or variety of the work performed to the extent intended by Degree A. For example, there is no evidence in the appeal record to show that there are continuous changes in program requirements which place a higher demand on the appellant's managerial skills. Although the appellant stated that changes in the agency's organizational structure, buy outs, and retirements limited the availability of technical program expertise and guidance to field offices and required him to utilize a higher level of technical skills, we found that there are still program offices at the Central Headquarters Office level available to him for technical guidance, as well as program direction. Decisions affecting the engineering program priorities are made on a cooperative basis by chief engineers throughout the region and changes in resources are made by the Veterans Integrated Service Network (VISN) director. Therefore, the appellant's position is not impacted to the degree described at Degree A. We also found several of the more complex clinical operations are not performed at the Medical Center. For example, the Medical Center owns and maintains expensive biomedical equipment, however, there is a high technology mutual sharing agreement for a VA-owned lithotritor and a contractual agreement for the purchase of radiation therapy with [hospital name]. Although the biomedical equipment owned by the Medical Center is valued at approximately \$22 million, two major items of equipment, a nuclear camera and the mobile MRI system, are maintained and repaired by service contracts. We find the appellant's position falls short of meeting all of the significant aspects of Degree A, and Degree B must be credited.

This factor is evaluated at Degree B.

### **Summary**

According to the grade conversion table on page 20, a position meeting Level II-B converts to the GS-13 grade level.

### **Supervisory Responsibilities**

The GSSG is used to determine the grade of General Schedule (GS or GM) supervisory positions in grades GS-5 through GS-15. The GSSG employs a factor-point evaluation method that assesses six factors common to all supervisory positions. To grade a position, each factor is evaluated by comparing the position to the factor-level descriptions for that factor and crediting the points designated for the highest factor-level which is fully met, in accordance with the instructions specific

to the factor being evaluated. The total points accumulated under all factors are then converted to a grade by using the point-to-grade conversion table in the Guide.

Factor 1, Program Scope and Effect:

The agency evaluated this Factor at Level 1-2. The appellant does not contest the agency's determination.

This factor assesses the general complexity, breadth, and impact of the program areas and work directed, including the organizational and geographic coverage. It also assesses the impact of the work both within and outside the immediate organization. To credit a particular factor-level, the criteria for both scope and effect must be met.

a. Scope

This element addresses the general complexity and breadth of: (1) the program (or program segment) directed; and (2) the work directed, the products produced, or the services delivered. The geographic and organizational coverage of the program (or program segment) within the agency structure is addressed under this element.

At Level 1-2, the program segment or work directed is administrative, technical, complex clerical, or comparable in nature; has limited geographic coverage, and supports most of the activities comprising a typical agency field office, an area office, a small to medium military installation, or comparable activities within agency program segments.

Level 1-2 is met. The appellant directs the professional engineering support program for all elements of the Medical Center, including the residency programs with [university name] and the [university name], a research program and other specialized programs offered at the facility. The facility consists of five major buildings totaling approximately 580,000 gross square feet on 61.9 acres of land and has a staff of approximately 970 full-time employees, and treats approximately 7,000 inpatients and provides services for over 80,000 outpatients. The appellant directs the work of professional, technical, administrative, and clerical positions and a variety of wage occupations which provide services in biomedical, electrical, electronic, mechanical, civil, architectural, fire and safety engineering; maintenance of the utility plants; energy management; maintenance of all buildings, roads, grounds, and equipment; development, design and management of construction projects; conduction of the facility's Safety/Fire Protection and Industrial Hygiene programs; and the development and implementation of an effective maintenance and repair program for all personal and real property.

At Level 1-3, the position directs a program segment that performs technical, administrative, protective, investigative, or professional work covering a major metropolitan area, a State, or a small region of several States; or, when most of an area's taxpayers or businesses are covered, comparable

to a small city. Providing complex administrative or technical or professional services directly affecting a large or complex multi-mission military installation also falls at this level.

Level 1-3 is not met. The scope of the engineering support program does not encompass the complexity, breadth, and impact of the program areas and work directed or the organizational and geographic coverage as described at this level.

This subfactor is credited at Level 1-2.

b. Effect

This element addresses the impact of the work, the products, and/or the programs described under "Scope" on the mission and programs of the customer(s), the activity, other activities in or outside of the Federal Government, the agency, other agencies, the general public, or other entities.

At Level 1-2, the services or products support and significantly affect installation level, area office level, or field office operations and objectives, or comparable program segments; or provide services to a moderate, local or limited population of clients or users comparable to a major portion of a small city or rural county.

Level 1-2 is met. The engineering program directly affects the accomplishment of the total hospital mission, i.e., quality of patient care facilities, economy of operations, budget management, planning and overall operation and supports a limited population.

At Level 1-3, the activities, functions, or services accomplished directly and significantly impact a wide range of agency activities, the work of other agencies, the operations of outside interests (e.g., a segment of a regulated industry), or the general public. At the field activity level (i.e., large, complex multi-mission organizations or very large serviced populations), the work directly involves or substantially impacts the provision of essential support services to numerous, varied, and complex technical, professional, or administrative functions.

Level 1-3 is not met. The impact of the work, the products, and the programs directed do not extend beyond the Medical Center.

This subfactor is credited at Level 1-2.

Since both subfactors are evaluated at Level 1-2, the overall factor is credited at Level 1-2, for 350 points.

Factor 2, Organizational Setting

The agency evaluated this factor at Level 2-2. The appellant does not contest the agency's determination.

This factor considers the organizational situation of the supervisory position in relation to higher levels of management.

At Level 2-2, the position is accountable to a position that is one level below the first Senior Executive Service (SES), flag or general officer, or equivalent or higher level position in the direct supervisory chain.

Level 2-2 is met. The appellant reports to the Associate Medical Center Director who acts as deputy to the Medical Center Director. The Medical Center Director is an SES position. Although the Associate Director is considered a full deputy and shares in the planning and administering of the Medical Center's operation, his position description states that the position directs and supervises all of the Administrative Services excluding the Chief of Staff and the Associate Director of Patient Care. This indicates that the position has limited supervisory or administrative direction and does not fully share in the administration of the entire Medical Center operation. Therefore, the Associate Director would be considered one level below the first SES position, and Level 2-2 is appropriate.

This level is credited at Level 2-2, for 250 points.

### Factor 3, Supervisory and Managerial Authority Exercised

The agency evaluated this factor at Level 3-3. The appellant believes his position meets paragraphs a and b at Level 3-4.

This factor covers the delegated supervisory and managerial authorities that are exercised on a recurring basis. To be credited with a level under this factor, a position must carry out the authorities and responsibilities to the extent described for the specific level. Levels under this factor apply equally to the direction of specialized program management organizations, line functions, staff functions, and operating and support activities.

Level 3-3 describes two situations, either of which meets the level. In the first situation, the position exercises delegated managerial authority to set a series of annual, multi year, or similar long-range work plans and schedules for in-service or contracted work; assures implementation by subordinate organizational units of program goals and objectives; determines which goals and objectives need additional emphasis; determines the best solution to budget shortages; and plans for long-range staffing needs. Positions in this situation are closely involved with high level program officials or comparable agency staff personnel in developing overall goals and objectives for assigned functions or programs. The second situation covers second-level supervisory positions that perform the full range of supervisory functions described at Level 3-2, and at least half of the conditions described at Level 3-3, including such matters as using subordinates to direct or lead work, exercising significant advisory or coordinating responsibilities, assuring equity of performance standards and ratings among subordinate units, directing a program segment with significant resources, making decisions on matters elevated by subordinate supervisors, exercising personnel authority over



subordinate supervisors and employees, approving serious disciplinary actions, making routine decisions, and approving the expenditure of funds.

Level 3-3a is not met. The appellant is delegated responsibility to carry out the Medical Center's engineering program. In this capacity, he is limited to making decisions and recommendations affecting the workload and budget for assigned projects. Although he participates in the development of short-range and long-range plans affecting the 5 year plan, his involvement is limited to prioritizing projects in terms of need. Final decisions affecting the overall goals and objectives, budget, or agency short-term and long-term plans are retained at a higher level; therefore, Level 3-3a cannot be credited.

Level 3-3b is met. The appellant's supervisor stated the appellant is delegated all of the authorities listed under 3-2c. In addition, the appellant uses subordinate supervisors to oversee the work performed, serves as an advisor to other program managers and the Medical Center Director, and participates on various committees in making recommendations for decisions affecting the Medical Center. The appellant recommends, selects, hires, appraises, develops performance standards, evaluates performance, recommends awards, trains or approves funds which provide training to employees, and manages an operating budget of approximately \$3 million. He can approve leave except leave without pay actions exceeding 30 days, cannot effect serious disciplinary actions, and is not authorized to make organizational changes without the approval of the Associate Director. The appellant initiates personnel actions for both supervisory and nonsupervisory employees. He selects, hires, promotes, and reassigns employees.

Level 3-4 also describes two situations, either of which meets the level. In the first situation, the position being evaluated exercises delegated authority to oversee the overall planning, direction, and timely execution of a program, several program segments managed through separate organizational units, or comparable staff functions. Such positions include responsibility for development, assignment, and higher level clearance of goals and objectives for subordinate organizations; approving multi year and long-range work plans developed by subordinate supervisors; overseeing the revision of long-range plans, goals and objectives; managing the development of policy changes; managing organizational change; and exercising discretionary authority to distribute funds in the organization's budget. In the second situation, the supervisor exercises final authority for the full range of personnel actions and organization design proposals.

Level 3-4a is not met. In an advisory opinion, the Office of Classification advised that both paragraphs a and b of Level 3-3 must be met before level 3-4 can be met. Since the appellant's position does not meet 3-3a, level 3-4 cannot be considered.

This level is credited at Level 3-3b, for 775 points.

#### Factor 4, Personal Contacts:

This is a two-part factor which assesses the nature and the purpose of personal contacts related to supervisory and managerial responsibilities. The same contacts that serve as the basis for the level credited under Subfactor 4A must be used to determine the correct level under Subfactor 4B.

#### Subfactor 4A, Nature of Contacts

The agency evaluated this subfactor at Level 4A-2. The appellant believes his position meets Level 4A-3.

This subfactor covers the organizational relationships, authority or influence level, setting, and difficulty of preparation associated with making personal contacts involved in supervisory and managerial work. To be credited, the level of contacts must contribute to the successful performance of the work, be a recurring requirement, have a demonstrable impact on the difficulty and responsibility of the position, and require direct contact.

At Level 4A-2, frequent contacts are with members of the business community or the general public; higher ranking managers, supervisors, and staff of other units throughout the activity or at levels below bureau or major military command level; representatives of local public interest groups; case workers in Congressional district offices; technical or operating personnel in State and local government; reporters for local or other limited media outlets; or comparable contacts. These contacts may be informal, occur in conferences and meetings, or take place through telephone, televised, radio, or similar contact, and sometimes require nonroutine or special preparation.

Level 4A-2 is met. The appellant states that he speaks to Congressional aides, on occasion, and veterans organizations concerning matters such as construction projects and leasing; staff level management and program officials within the Medical Center, VISN, and at headquarters office; local utility companies, such as the [city name] Water Authority and the Metropolitan Sewer District; local, State and Federal government agencies such as [county name] Air Pollution Control Authority, Environmental Protection Agency, and Occupational Safety and Health Administration; and owners of architectural firms and contractors.

At Level 4A-3, recurring contacts are with high ranking military or civilian managers at bureau and major organizational levels within the agency, with agency administrative personnel, or with comparable personnel in other agencies; key staff of public interest groups with significant political influence or media coverage; journalists representing influential city or county news media; Congressional committee and subcommittee staff assistants; contracting officials and high level technical staff of large industrial firms; or local officers of regional or national trade associations, public action groups or professional organizations, or with State and local government managers. These contacts take place in meetings and conferences and often require extensive preparation.

Level 4A-3 is not met. Although the appellant stated that he has contacts with other chief engineers within the VISN, program managers within the headquarters office on programming, space and specification issues, a consulting support office, principals of architect-engineer firms, owners of construction firms, and primary representatives from veterans organizations concerning leasing activities of the center, these contacts are comparable to those described at level 4A-2. His contacts do not have the political influence or attract the level of national interest intended at Level 4A-3.

This subfactor is credited with Level 4A-2, for 50 points.

#### Subfactor 4B. Purpose of Contacts

The agency credited this subfactor at Level 4B-3. The appellant does not contest their findings.

This subfactor covers the purpose of the personal contacts credited in Subfactor 4A, including the advisory, representational, negotiating, and commitment-making responsibilities related to supervision and management.

At Level 4B-3, the purpose of contacts is to justify, defend, or negotiate in representing the project, program segment, or organizational unit, in obtaining or committing resources, and in gaining compliance with established policies, regulations, or contracts. Contacts at this level usually involve active participation in conferences, meetings, hearings, or presentations involving problems or issues of considerable significance or importance to the program or program segment.

Level 4B-3 is met. The appellant's contacts are for the purpose of prioritizing projects; obtaining technical, program, budget or policy guidance on issues affecting his program; negotiating contracts; resolving complex design and technical issues with architect-engineers; and obtaining compliance with construction companies on contract specifications, changes, and modifications. These contacts take place in formal meetings and are a regular part of the position's program responsibilities.

At Level 4B-4, contacts are made to influence, motivate, or persuade persons or groups to accept opinions or take actions advancing the fundamental goals and objectives of the program or segments directed, or to obtain the commitment or distribution of major resources, when intense opposition or resistance is encountered due to significant organizational or philosophical conflict, competing objectives, major resource limitations, or comparable issues. The persons contacted are fearful, skeptical, or uncooperative, and the contacts require highly developed communications, negotiation, conflict resolution, or leadership skills.

Level 4B-4 is not met. There is no evidence in the appeal record to indicate that the appellant routinely encounters the level of resistance described here or that he must use negotiation and conflict resolution to deal with skeptical or uncooperative people.

This subfactor is credited at Level 4B-3, for 100 points.

### Factor 5, Difficulty of Typical Work Directed

The agency evaluated this factor at Level 5-7. The appellant believes his position should be credited at Level 5-8.

This factor measures the difficulty and complexity of the basic work most typical of the organization(s) directed, as well as other line, staff, or contracted work for which the supervisor has technical or oversight responsibility, either directly or through subordinate supervisors, team leaders, or others.

Based on our findings, the highest grade which best characterizes the nature of the basic (mission oriented) nonsupervisory work performed or overseen by the organization directed and which constitutes 25 percent or more of the workload (not positions or employees of the organization) is GS-7. GS-7 converts to Level 5-4 according to the chart on page 24 of the guide.

A workload analysis is attached at the end of the decision.

This factor is credited at Level 5-4, for 505 points.

### Factor 6, Other Conditions

The agency credited the position with Level 6-5. The appellant believes his position should be credited with Level 6-6.

This factor measures the extent to which various conditions contribute to the difficulty and complexity of carrying out supervisory duties, authorities, and responsibilities. To evaluate Factor 6, two steps are used. First, the highest level that a position substantially meets is initially credited. Then, if the level selected is either 6-1, 6-2, or 6-3, the Special Situations listed after the factor level definitions are considered. If a position meets three or more of the situations, then a single level is added to the level selected in Step 1. If the level selected under Step 1 is either 6-4, 6-5, or 6-6, the Special Situations may not be considered in determining whether a higher factor level is creditable.

The GSSG describes two situations, either of which meets Level 6-3. The first situation involves coordination, integration, or consolidation of administrative, technical, or complex technician or other support work comparable to GS-9 or 10, or work at the GS-7 or 8 level where the supervisor has full and final technical authority (i.e., is responsible for all technical determinations arising from the work without technical advice or assistance from others or further review of the work). Directing work at this level requires consolidation or coordination to ensure consistency of product, service, interpretation, or advice; or conformance with the output or other units, with formal standards, or agency policy. This situation also covers direction of analytical, interpretive, judgmental, evaluative, or creative work where the supervisor must resolve conflicts and maintain compatibility of interpretation, judgment, logic, and policy application. The second situation covers positions which direct subordinate supervisors over positions in grades GS-7 or 8, requiring consolidation or

coordination to ensure consistency of product, service, interpretation, or advice; or conformance with the output of other units, with formal standards, or agency policy.

Level 6-3 is met. The appellant directs subordinate supervisors who supervise jobs comparable in grade to GS-7. He is required to coordinate and integrate all facets of maintenance and operations services and makes final decisions on technical problems, issues, procedures, and practices to be used in the accomplishment of assignments.

The GSSG describes two situations, either one of which meets Level 6-4. The first situation involves substantial coordination and integration of a number of major work assignments, projects, or program segments of professional, scientific, technical, or administrative work comparable to the GS-11 level. The second situation involves directing subordinate supervisors or contractors who each direct substantial workloads comparable to the GS-9 or GS-10 level.

Level 6-4 is not met. As documented in the workload analysis, the appellant does not direct a substantial workload comparable to GS-11 nor does he direct supervisors who direct a substantial workload comparable to GS-9 or GS-10. The GS-11 level represents approximately 15 percent of the work directed by the appellant, and the GS-9 and GS-10 levels combined represent approximately 6 percent.

This factor is tentatively credited at Level 6-3, for 975 points.

### Special Situations

Supervisory and oversight work may be complicated by special situations and/or conditions. For credit, the condition must be present and dealt with on a regular basis.

1. *Variety of Work.* This situation is credited when more than one kind of work, each kind representing a requirement for a distinctly different additional body of knowledge on the part of the supervisor, is present in the work of the unit. A “kind of work” usually will be the equivalent of a classification series. Each “kind of work” requires substantially full qualification in distinctly separate areas, or full knowledge and understanding of rules, regulations, procedures, and subject matter of a distinctly separate area of work.

This condition is credited. The appellant supervises a variety of different positions at different grade levels that require him to have full knowledge and understanding of the work performed.

2. *Shift Operations.* This situation is credited when the position supervises an operation carried out on at least two fully staffed shifts.

This condition is credited. The appellant supervises the utilities systems operations which is a 24 hour operation covered by 3 shifts.

3. *Fluctuating Work Force or Constantly Changing Deadlines.* This situation is credited when the workforce supervised by the position has large fluctuations in size (e.g., when there are significant seasonal variations in staff) and these fluctuations impose on the supervisor a substantially greater responsibility for training, adjusting assignments, or maintaining a smooth flow of work while absorbing and releasing employees. This situation is also credited when frequent, abrupt, and unexpected changes in work assignments, goals, and deadlines require the supervisor to constantly adjust operations under pressure of continuously changing and unpredictable conditions.

This condition is not credited. The appeal record indicates that temporary appointments may be made to accommodate periods of heavy workload. However, there is no evidence that the appellant has large fluctuations in staff, nor is he required to constantly adjust operations due to frequent, abrupt or unexpected changes in workload or deadlines. Therefore, neither situation is met, and this condition cannot be credited.

4. *Physical Dispersion.* This situation is credited when a substantial portion of the workload for which the subject is responsible is regularly carried out at one or more locations which are physically removed from the main unit (as in different buildings, or widely dispersed locations in a large warehouse or factory building), under conditions which make day-to-day supervision difficult to administer.

The work is carried out in separate buildings and construction sites; however, the appellant is the second-level supervisor and does not make daily onsite visits to monitor the maintenance and construction activities being performed. Although the appellant supervises a workload carried out in many locations, this does not impact the difficulty of his day-to-day supervisory responsibilities. This situation cannot be credited.

5. *Special Staffing Situations.* This situation is credited when: (1) a substantial portion of the workforce is regularly involved in special employment programs or in similar situations which require involvement with employee representatives to resolve difficult or complex human resources management issues and problems; (2) requirements for counseling and motivational activities are regular and recurring; and (3) job assignments, work tasks, working conditions, and/or training must be tailored to fit the special circumstances.

No special staffing situations exist and no credit is assigned.

6. *Impact of Specialized Programs.* This situation is credited when supervisors are responsible for a significant technical or administrative workload in grades above the level of work credited in Factor 5, provided the grades of this work are not based upon independence of action, freedom of supervision, or personal impact on the job.

According to the workload data, there are several positions above the GS-7 level. However, these positions equate to only approximately 20 percent of the workload directed by the appellant and do

not represent a *significant* technical or administrative workload. Therefore, this situation is not credited.

7. *Changing Technology*. This situation is credited when work processes and procedures vary constantly because of the impact of changing technology, creating a requirement for extensive training and guidance of subordinate staff.

There is no evidence in the appeal record that indicates this situation is present; therefore, it is not credited.

8. *Special Hazard and Safety Conditions*. This situation is credited when the supervisory position is regularly made more difficult by the need to make provisions for significant unsafe or hazardous conditions occurring during performance of the work of the organization.

This situation is credited due to the fact that operations are carried out in a hospital environment. There is a continuous need for ensuring the safety of patients and the safety of employees because of the presence of infectious diseases, as well as hazardous and toxic waste elements found at the construction sites.

The position meets 3 of the 8 special conditions. Therefore, Level 6-4 is credited, for 1120 points.

SUMMARY		
FACTOR	LEVEL	POINTS
1. Program Scope and Effect	1-2	350
2. Organizational Setting	2-2	250
3. Supervisory and Managerial Authority Exercised	3-3b	775
4. Personal Contacts		
A. Nature of Contacts	4A-2	
B. Purpose of Contacts	4B-3	150
5. Difficulty of Typical Work Directed	5-4	505
6. Other Conditions	6-4	1120
	TOTAL	3150

A total of 3150 points equates to GS-12, 2755 to 3150 points, according to the point-to-grade conversion chart on page 31 of the GSSG.

### **Summary**

Engineering program responsibilities equate to GS-13 and supervisory responsibilities equate to GS-12. The program responsibilities require 75 percent of the appellant's time and are grade controlling. Therefore, the appropriate grade for the appellant's position is GS-13.

### **Decision**

This position is properly classified as GS-801-13, with the title at the discretion of the agency. This decision constitutes a classification certificate issued under the authority of section 5112(b) of title 5, United States Code. This certificate is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government.

### ***WORKLOAD ANALYSIS FOR FACTOR 5***

The Engineering Service organizational chart shows the appellant supervises a total of 50 full-time positions with 31 presently classified as wage grade jobs. The appellant believes the base level of work should be credited at GS-12.

We reviewed the position descriptions which represented the highest level of mission oriented work and found several classified inconsistently with the appropriate position classification standards. We have considered the proper title, series and grade of the subordinate positions based on our findings for the purpose of determining the base level of work supervised. An abbreviated analysis of our findings is provided below:

#### **Construction Coordinator, GS-340-12**

The position description does not accurately reflect the nature of the work performed. For example, the position description states the position is responsible for the overall coordination of construction, review and evaluation, design, activation, space assignment, occupancy, and facilities utilization for the Nursing Home Care Unit and the Ambulatory Care Addition projects. Based on the information in the appeal record, the Chief Engineer is delegated overall responsibility for all engineering and construction activities at the Medical Center. This authority is further delegated to the Projects Unit where professional engineers carry out the planning and design, pre- and post-construction activities, as well as resident engineer responsibilities, for major, minor, NRM and station level projects, as assigned. Major construction projects, such as the Nursing Home and Ambulatory Care Addition projects, are the responsibility of Resident Engineers assigned from the Central Headquarters Office. Thus, we find that the position does not have overall program responsibility for the coordination of construction activities.

We do not find any evidence that special management, manpower, or equipment studies were performed or that the duties encompass a wide variety of complex problem areas in all aspects of the hospital organization, patient care, education, research, medical school affiliation, and coordination



with the Regional and Central Office, or any work where projects resulted in study protocols where long standing processes, relationships, and organizational structures were addressed. We did, however, find the incumbent's work involves: planning for all administrative aspects of construction operations such as preparing workload analyses based on application of current and projected workload statistics to generate space utilization studies; determining requirements including utilities, telecommunication, furniture, equipment and supply requirements with users whose facilities are under construction or modification; translating user needs and requirements to an architect who develops layout, floor plans, and preliminary designs for approval by the user; and serving as a liaison between the Resident Engineer, contractor, and the Medical Center. Work requires coordinating meetings with representatives from architect-engineer firms to evaluate space requirements and develop schematics, floor plans and several layouts to determine the one most appropriate to meet user needs; reviewing preliminary and final designs; making revisions based on user needs or special equipment requirements; and making minor modifications to drawings using electrical, plumbing, or mechanical symbols or other graphic images. The incumbent of this position coordinates with engineering staff on detailed electrical, mechanical, structural or other technical aspects of construction and resolves problems associated with the work, or he refers those not resolved to the Chief Engineer and the Resident Engineer in charge of the project. Work also involves preparing equipment specifications with users and coordinating purchase requests, performing visual inspection of contractor work in progress, and upon completion, ensuring floor plans, utilities, equipment, and systems are constructed and in place in accordance with design and specifications and compliance with contract requirements.

The position was placed in the Program Management Series, GS-340, which includes all classes of positions the duties of which are to manage or direct, or to assist in a line capacity in managing or directing, one or more programs, including appropriate supporting service organizations, when the paramount qualification requirement of the position is management and executive knowledge and ability and when the positions do not require competence in a specialized subject-matter or functional area. Since the position is not responsible for the management or direction of a program or support service, it does not require executive and management knowledge and abilities. The position requires knowledge of space management; analytical skills and techniques; understanding of aesthetics; a practical knowledge of construction, building systems and components, building codes, equipment, materials, and furnishings; skill in using technical drawing symbols and images; and skill in reading and understanding floor plans, schematics, specifications and drawings. Therefore, the position is excluded from the GS-340 series.

The performance of work draws, in varying degrees, from several functional areas such as: space planning, office layout and design; procurement of administrative supplies and equipment; placement and arrangement for utilities, telecommunication systems, and furniture such as desks, office machines, and filing equipment; and workload analysis.

The GS-342 series includes all positions the primary duties of which involve supervising, directing, or planning and coordinating a variety of services functions that are principally work-supporting (i.e., those functions without which the operations of an organization or services to the public would be

impaired, curtailed, or stopped). Such service functions include (but are not limited to) communications, procurement of administrative supplies and equipment, printing, reproduction, property management, space management, records management, mail service, facilities and equipment maintenance, and transportation. Positions classified in the GS-342 series are primarily concerned with and responsible for planning, directing, coordinating, or supervising a variety of general support service functions that are essential to the orderly and efficient accomplishment of work of an organization, or to the provision of services to the public. The position is properly placed in the GS-342 series.

The position is properly titled and coded as a Support Services Specialist, GS-342.

The GS-342 series grade evaluation criteria is specifically used for positions which: (a) are delegated authority and responsibility for supervision of at least 3 employees who perform at least six of the functions described in Level A, Factor 1, and each of the employees must perform such functions for 25% of his or her time; (b) the organization to which services are provided must be at least equivalent to Level A, Factor 2, Element 2; and (c) the supervisory position must have been assigned duties and responsibilities at least equivalent to those described at Level A, Factor 3. Since the position does not supervise subordinate employees, the GS-342 series cannot be used for grading purposes.

The agency used the Administrative Analysis Grade Evaluation Guide which is designed specifically to evaluate staff analytical, planning, and evaluative work concerned with the administrative and operational aspects of agency programs and management, or other two-grade interval administrative work not covered by published grade level criteria where the positions require knowledge and skill in the application of analytical and evaluative concepts, methods, and techniques.

We agree with the agency's use of the Administrative Analysis Grade Evaluation Guide for grade level purposes, however, we disagree with the following factors:

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

Factor 1-7 is not met. The work does not deal with the substantial program or administrative functions of the organizations studied. The assignments deal with the planning and analysis of space, facility, and equipment requirements for construction activities; translating user needs to an architect; and acting as a liaison. The duties of this position are narrower in scope and complexity and do not involve work requiring knowledge at or similar to that described at Level 1-7. For example, Level 1-7, requires knowledge and skill in applying analytical and evaluative methods and techniques to issues concerning the efficiency and effectiveness of program operations carried out by administrative or professional personnel, or substantive administrative support functions. The incumbent does not analyze or evaluate program operations, such as administrative work processes in terms of efficiency; prepare reports identifying problems of efficiency; or make recommendations for alternative, new or revised work processes, such as the automation of a manual process to improve productivity or efficiency.

At Level 1-6, knowledge requires skill in applying analytical and evaluative techniques to the identification, consideration, and resolution of issues or problems of a procedural or factual nature. The issues or problems deal with readily observable conditions (e.g., office or shop layout, workflow, or working conditions), written guidelines covering the work methods and procedures such as performance and production standards, and information of a factual nature (e.g., number and type of units actually produced or capability of equipment). Included at this level is knowledge of the theory and principles of management and organization including administrative practices and procedures common to organizations, such as those pertaining to areas of responsibility, channels of communication, delegation of authority, routing of correspondence, filing systems and storage of files and records. Assignments typically involve using qualitative and quantitative analytical techniques such as literature search; work measurement; task analysis and job structuring; productivity charting; determining staff to workload ratios (e.g, span of control); organizational design; space planning; development and administration of questionnaires; flowcharting of work processes; graphing; and calculation of means, modes, standard deviations, or similar statistical measures. Assignments require skill in conducting interviews with supervisors and employees to obtain information about organizational missions, functions, and work processes. Similar to Level 1-6, the incumbent's work requires skill in relating management's needs into a practical space utilization and occupancy plan that requires a practical knowledge of engineering and construction management, space planning design, methodologies, techniques and procedures, and analytical skills to develop workload statistics to establish space utilization studies and workload analyses used to monitor and evaluate progress of construction activities.

This factor is credited at Level 1-6, for 950 points

### Factor 3, Guidelines

At Level 3-4, guidelines consist of general administrative policies and management and organizational theories which require considerable adaptation and/or interpretation for application to issues and problems studied. At this level, administrative policies and precedent studies provide a basic outline of the results desired, but do not go into detail as to the methods used to accomplish the project. Administrative guidelines usually cover program goals and objectives of the employing organization, such as agency controls on size of workforce, productivity targets, and similar objectives. Within the context of broad regulatory guidelines, the employee may refine or develop more specific guidelines, such as implementing regulations or methods for the measurement and improvement of effectiveness and productivity in the administration of operating programs.

Level 3-4 is not met. The incumbent's planning assignments are of moderate difficulty and complexity and do not involve major deviation from established planning criteria, engineering and construction standards and requirements, or the Medical Center and agency regulations and policies. The work does not require the incumbent to refine or develop more specific guidelines to meet planning goals and objectives. For example, workload analyses and space utilization studies are based on established criteria. The current or projected workload data and other information obtained for study purposes may vary from service to service because of specialized requirements, equipment needs, the number

of personnel, changes in technology, or the nature of engineering plans for the construction of new facilities. However, there are no situations, issues or problems that require the incumbent to develop or refine existing guidelines. The evaluation of planning activities, as well as the preparation of reports and studies are based on precedents and can be adapted to meet specific requirements. Therefore, Level 3-3 is assigned.

This factor is credited at Level 3-3, for 275 points.

#### Factor 4. Complexity

At Level 4-4, work involves gathering information, identifying and analyzing issues, and developing recommendations to resolve substantive problems of effectiveness and efficiency of work operations in a program or program support setting. This is in addition to improving conditions of a procedural nature which relate to the efficiency or organizations and workers described at the previous level. By way of contrast with Level 4-3, work at this level requires the application of qualitative and quantitative analytical techniques which frequently require modification to fit a wider range of variables. Subjects and projects assigned at this level usually consist of issues, problems or concepts which are not always susceptible to direct observation and analysis (e.g., projected missions and functions). Difficulty is encountered in measuring effectiveness and productivity due to variations in the nature of administrative processes studied (e.g., those associated with processing information, reorganizing to meet changes in mission, or providing support services). Information about the subject is often conflicting or incomplete, cannot readily be obtained by direct means, or is otherwise difficult to document. For example, assignments may involve compiling, reconciling, and correlating voluminous workload data from a variety of sources with different requirements and formats, or the data must be carefully cross-checked, analyzed and interpreted to obtain accurate and relevant information. Characteristic of this level is originality in refining existing work methods and techniques for application to the analysis of specific issues or resolution of problems. For example, the employee may revise methods for collecting data on workload, adopt new measurements of productivity, or develop new approaches to a performance appraisal.

Level 4-4 is not met. The incumbent is not responsible for analyzing substantive program problems nor is he routinely required to develop new approaches or methods for the analysis and resolution of problems.

At Level 4-3, the work principally involves dealing with problems and relationships of a procedural nature rather than the substance of work operations. At this level, the employee analyzes the issues then selects and applies accepted analytical techniques. Projects usually take place within organizations with related functions and objectives, although organization and work procedures differ from one assignment to the next. Typical organizational efficiency assignments involve observing work in progress to identify and resolve problems.

Level 4-3 is met. The incumbent's work involves coordinating issues relating to space and staff requirements, workload, equipment and furniture needs for new facilities; analyzing space

deficiencies of impacted services based on agency construction criteria; coordinating user requirements with contractors; and recommending solutions to obtain desired results. Information may involve volumes of data but is easily obtained and does not require extensive cross checking or verification. Recommendations include background information, analyses and study on a variety of issues for management such as requested changes, space assignment, construction impacts on existing facility, equipment needs, patient flow, workload, project funding, and project scope. The incumbent analyzes the issue(s) which are more comparable to procedural issues than issues of substantive work programs; selects the techniques he needs to perform his evaluation/analysis; and observes the work space and workers. His assignments take place in organizations with related functions.

This factor is credited at Level 4-3, for 150 points.

#### Factor 5, Scope and Effect

At Level 5-4, the purpose of work is to assess the productivity, effectiveness, and efficiency of program operations or to analyze and resolve problems in the staffing, effectiveness and efficiency of administrative support and staff activities. Work involves establishing criteria to measure and/or predict the attainment of program or organizational goals and objectives. Work at this level may also include developing related administrative regulations, such as those governing the allocation and distribution of personnel, supplies, equipment, and other resources, or promulgating program guidance for application across organizational lines or in varied geographic locations. Work that involves the evaluation of program effectiveness usually focuses on the delivery of program benefits or services at the operating level. At Level 5-4, work contributes to the improvement of productivity, effectiveness, and efficiency in program operations and/or administrative support activities at different echelons and/or geographical locations within the organization. Work affects the plans, goals and effectiveness of missions and programs at these various echelons or locations. Work may affect the nature of administrative work done in components of other agencies (e.g., in preparation and submission of reports, in gathering and evaluating workload statistics, or in routing and storing official correspondence or files).

As opposed to the broad range of activities described at Level 5-4, the incumbent's assignments do not involve developing criteria to measure or predict the attainment of program or organizational objectives. In fact, the purpose of the incumbent's work is to plan, coordinate, and monitor all phases of space planning requirements resulting from the construction of new facilities. Plans developed by the incumbent deal with the implementation of pre-construction and post-activation changes relating to workflow, space utilization and space assignment, and evaluation involves monitoring construction phases and reporting on the progress of construction activities. Completed studies and workload analyses provide recommendations to management on the best approach to implementing construction activities to ensure as little disruptive effect as realistically possible on those services providing direct patient care. This is comparable to Level 5-3 where the purpose of the work is to plan and carry out projects to resolve conventional problems in workflow, organizational structure, and administrative operations. Employees are assigned portions of broader studies and may be required to develop detailed procedures or guidelines in accomplishing the work.

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

#### Factor 6, Persons Contacted and 7, Purpose of Contacts

We disagree with the agency's assignment of Level 3-c. First, the position has regular and recurring contacts with management officials throughout the Medical Center. There may be occasion for contacts beyond the Medical Center such as with the contractor representative in developing preliminary floor plans in the planning stages of projects and for resolving noncontroversial issues. These contacts may be credited at Level 3. However, we did not find the purpose of the position's contacts to be comparable to Level c. At Level c, the purpose of contacts is to influence managers or other officials to accept and implement findings and recommendations on organizational improvement or program effectiveness. The employee may encounter resistance due to such issues as organizational conflict, competing objectives, or resource problems. We found Level b to be more appropriate where contacts with management officials are for the purpose of providing advice to managers and making recommendations on alternatives; providing appraisals of success in meeting goals; or making recommendations for resolving administrative problems. For example, the position works with management officials to relay to contractors management's needs so that several alternative floor plans and layouts are presented for management's consideration. The parties are working toward mutual goals within the parameters of the projects, and the funding has been predetermined.

This factor is credited at Level 3-b, for 110 points.

#### Factor 8, Physical Demands

At Level 8-2, assignments regularly involve long periods of standing, bending, and stooping to observe and study work operations in an industrial, storage, or comparable work area. Space utilization studies and workload analyses, as well as other management studies do not require physical demands beyond Level 8-1. Inspections of construction activities are not comparable in scope and complexity to those carried out by Construction Inspectors or Engineers. The incumbent performs visual inspections of the work.

Level 8-1 is credited, for 5 points.

<b>SUMMARY</b>	
Factor 1-6	950
Factor 2-4	450
Factor 3-3	275
Factor 4-3	150
Factor 5-3	150
Factor 6-3/7-b	110
Factor 8-1	5
Factor 9-2	20
<b>Total Points</b>	2110

According to the Grade Conversion Table on page 3 of the Administrative Analysis Grade Evaluation Guide, 2110 points fall with the range of GS-10, 2105 to 2350 points.

The position is properly classified as a Support Services Specialist, GS-342-10.

### **Safety and Occupational Health Manager, GS-0018-12**

The position is properly placed in the Safety and Occupational Health Management Series, GS-0018. However, the titling practices on page 8 specifically designate the title of Safety and Occupational Health Manager for all positions at the GS-13, 14 or 15 grade levels. While we agree with the agency's evaluation of the position's program responsibilities at the GS-12 grade level, they did not follow the prescribed titling practices for positions classified below GS-13. The position is properly titled as Safety and Occupational Health Specialist, GS-0018. Since the position is delegated supervisory responsibilities which meet the criteria for coverage by the GSSG, the prefix *Supervisory* is appropriate for titling purposes.

The position is properly classified as Supervisory Safety and Occupational Health Specialist, GS-0018-12.

### **Supervisory Biomedical Engineer, GS-858-12**

The position directs the work of 6 Biomedical Engineering Technicians who are engaged in the maintenance and repair of biomedical equipment and systems. Work involves distributing routine and emergency work orders, monitoring the status and progress of work, making adjustments to priorities, providing technical assistance to subordinates in the completion of work, estimating and reporting on expected time to complete work, maintaining records of work accomplishments,

preparing production reports, maintaining a current preventive maintenance system, advising on the need for vendor contract maintenance and monitoring contracts in effect, and maintaining an inventory of all equipment. The position has responsibility for instructing employees in specific tasks and job techniques, requesting or providing training to employees based on need, and preparing reports for time and attendance, biweekly work order summary, inspections or other reports as requested. The incumbent approves leave requests, counsels and initiates disciplinary actions, recommends promotions, performance or achievement awards, resolves personnel problems, promotes safety on the job, and provides assistance to committees and individuals regarding equipment conditions, compatibility with existing systems and technical specifications. In addition, the position develops standard maintenance and repair operating procedures, policies, and provides technical guidance to the staff.

The position description states the individual must be a fully qualified Biomedical Engineer, and the incumbent should possess a VA certification as a Biomedical Engineering Technician. However, the criteria used in distinguishing professional engineering positions from nonprofessional positions as described in the Engineering Group, GS-800, states professional series (or occupations) shall include all classes of positions the duties of which are to perform routine, advisory, administrative, research work which is based upon established principles of a profession or science, and which requires professional, scientific, or technical training equivalent to that represented by graduation from a college or university of recognized standing. Thus, a professional position in a recognized branch of engineering comprises duties which require in their successful performance (1) the practical application of basic scientific principles, particularly those of higher mathematics, and physical and engineering sciences; (2) an intimate knowledge of the fundamental engineering concepts and terminology, the units of measurement, and their interrelationship common to all branches of engineering; (3) a thorough understanding of engineering techniques and methods such as can be gained through 4 years of engineering training in a recognized college or university, or training equivalent in type, scope and thoroughness.

The position description does not contain duties requiring the application of professional engineering knowledges. For example, the supervisor provides technical guidance and direction to the staff on maintenance and repair procedures, troubleshooting techniques, methods and practices to accomplish work order requests for repair and maintenance services of medical equipment. We also found that the VA certification may provide training to enhance job performance, but it is not considered equivalent to a professional engineering degree. Therefore, the position is misclassified.

Since the primary work of this position involves technical and administrative supervision of positions that perform maintenance and repair work which we found properly covered under the Federal Wage System (FWS), the supervisory position is also properly exempt from the General Schedule and placed under the FWS as a WS job. The agency should determine the appropriate series and grade of the position based on the proper classification of the subordinate positions.

### **Biomedical Engineering Technician, GS-802-10**



Our review found it necessary to determine, first, whether the positions are properly covered by the GS or FWS. Section 5102 (c) (7), title 5, United States code, exempts from coverage under the General Schedule those “employees in recognized trades or crafts, or other skilled mechanical crafts, or in unskilled, semi-skilled, 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 “paramount requirement” of a position refers to 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 facts of duties, responsibilities, and qualifications requirements, i.e., the most important, or chief, requirement for the performance of a primary duty or responsibility for which the position exists. If a position clearly requires trades, crafts, 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.

The Biomedical Engineering Technician, GS-802, positions perform routine and emergency corrective maintenance, inspection, evaluation, installation, calibration, and modification of biomedical instruments. The work requires comprehensive knowledge and experience including techniques, theories, and characteristics of electronics and electricity in conjunction with physics, chemistry, anatomy, physiology, optics, pneumatics, mechanics, algebra, trigonometry, and hospital procedures. Work requires proficiency in electronics including knowledge of and experience with digital logic circuits, computer circuits and architecture, microprocessor theory and interfacing, and computer networking and ability to apply this knowledge to CT Scanners, diagnostic radiology, medical imaging systems, and other biomedical instrumentation. The work also requires skill in using various troubleshooting techniques, including but not limited to use of instrument diagnostic software, interpretation and evaluation of radiographs or real-time monitor images, electronic troubleshooting to PC board or component level, and repairs and verification of proper operating performance of the instrument or system.

Work logs furnished by the supervisor indicate that the regular and recurring work assignments involve the maintenance and repair of a variety of medical equipment such as radiographic units, electrocardiographs, beds, MRI systems and equipment, nebulizers, laser imagery, centrifuges, scanners, telemetry units, infusion pumps, monitors, dialysis units, defibrillators, audiometers, radiation calibrators, acoustic and orthotic system computers, heaters and coolers, endoscopy systems, nuclear cameras, surgical instruments, dental unit systems, analyzers, anesthesia units, ultrasonic units, and a host of other kinds of equipment. Although the position description has a requirement for knowledge of the capabilities, limitations, operations, and design characteristics of equipment and systems, we found no evidence of work requiring use of this kind of knowledge. For example, the nuclear camera, radiographic unit and the MRI equipment are under a service contract, and the repair and maintenance work performed by technicians on these systems is limited to replacement of components that do not require knowledges of the type described in the position

description. Additionally, we found the more complex repair and maintenance work was not performed by the incumbents. For example, there were 46 warranty, vendor or vendor assisted repairs, and manufacturer/factory repairs for the more complex equipment, systems and components such as the CT Scanner, endoscopy system, MRI system, nuclear camera, pump infusion, urine analyzer, microbic analyzer, pulse oximeter, fiberscope, blood B refrigerator, PCA Pump, laser imager, tablet counter, surgical instruments, electron thermometer, laparoscope, telemetry unit, and technical calibration of the laser power meter.

The supervisor stated that design work is limited because the Food and Drug Administration approves all manufacturer designs for medical equipment and systems and has very stringent design requirements. The design work is limited to minor adaptation of subcomponents to another item of medical equipment. He also stated that evaluation work was more extensive and involved a technical analysis of features. However, we found the evaluation work involves routine inspections of equipment, ensuring that Government safety regulations, manufacturers' specifications and contract requirements are met. Inspections are part of the preventive maintenance schedule and are performed on an incoming and outgoing basis. This is not equivalent to a technical analysis of features.

The Engineering Technician series, GS-802, includes technical positions that require primarily application of a practical knowledge of the methods and techniques of engineering and the construction, application, properties, operation and limitations of engineering systems, processes, structures, machinery, devices, and materials. This series includes positions performing nonprofessional technical work in functions such as research, development, design, evaluation, construction, inspection, production, application, standardization, and test or operation of engineering facilities, structures, systems, processes, equipment, devices or materials. The GS-802 series was not intended to cover positions in which the primary duties are repair, maintenance and hands-on modification of systems.

In comparison, the standard for Medical Equipment Repairer, WG-4805, is used to grade nonsupervisory work involved in the installation, maintenance, overhaul, repair and testing of various medical and dental equipment used in patient diagnosis and treatment and in research laboratories. This work requires a knowledge and application of mechanical, electrical, and electronic principles and circuitry, the ability to determine malfunctions, and the skill to repair and maintain a variety of medical, laboratory, and dental equipment.

We find the paramount requirement of the job is maintenance and repair work which is typically regarded as trade or FWS work and usually performed in or from a shop, while evaluation and design work is typically regarded as technician or GS work and usually performed in a laboratory or under the direction of an individual with professional training in the appropriate field of work. The Biomedical Engineering Technicians jobs are properly placed in the FWS.

The level of work performed by the incumbents can be compared to the WG-4805 standard. The WG-4805 defines only one grade level, WG-11. At this level, the repairers install, modify, troubleshoot, maintain, test, calibrate, adjust, overhaul, and repair a wide variety of medical,

laboratory, and dental equipment (electronic, electrical and mechanical). The work requires applying practical knowledge of the principles of electronic circuits, functions of electronic tubes and transistors, including X-ray tubes, in order to diagnose malfunctions, repair and test such electronic equipment as electrocardiographs, defibrillators, heart oscilloscopes, electron microscopes, electroencephalographs, and spectrophotometers. Repairers at this grade level also have a knowledge of the relationships between electrical and electronic circuitry, as well as the interrelationship of chemical, radiation, hydraulic, pneumatic, vacuum, or gas components of a piece of equipment or a system. They are knowledgeable of the principles and theories governing the maintenance and repair of electrical equipment in order to diagnose malfunctions, and repair and test such electrical equipment as sterilizers, film driers, suction apparatus, and dental units. They apply a knowledge of hydraulic systems including grips, locks, stop and release mechanisms, and have the ability to determine when they are properly adjusted with no leaks.

There are two Biomedical Engineering Technicians, GS-802-11, that represent the highest grade level of nonsupervisory work performed. One of the GS-11's is primarily responsible for the CT Scanner System in Radiology. However, work orders covering a six month period show an average of one work request per month for repairs to the CT Scanner. For example, the incumbent reseated cables on voxel Q, reset power, reseated PC boards, installed a printer, corrected an error in the B-Map transfer and assisted the Picker representative in adjusting a printer contrast. Although the position may perform work on other medical and radiological units, the primary work, as evidenced in the work order listing is not comparable to the level of difficulty described at the WG-11 grade level.

The other GS-11 position is primarily responsible for general biomedical and diagnostic radiological instrumentation and repairs and verifies proper operating performance of instruments and systems (e.g., cardiovascular radiographic and fluoroscopic and other diagnostic X-ray systems, Picker Rapido Table, Automatic Chest-Filmer, GX-850/1050 generator, Phillips Classic 850/1050 generator; BR-S4 Tomographic System; single and biplane special procedures lab, including digital subtraction angio systems; poly-diagnostic cardiac catheterization system with high resolution video recording display; GE Model AMX and Picker Capmobile Mobile X-Ray units, and various radiology support instruments such as automatic film processors, dye injectors, etc.). Work performed on radiology equipment also does not compare with the grade 11 level. For example, work orders include work for reseating cables on a voxel Q, lubing a vertical drive, installing a printer, replacing microphones, reseating PC boards, repairing a spring in a spot film device, filing edges of a table control board, installing a CRT, replacing SID tape, cleaning a card holder, replacing a UT X-ray tube and film sense relay, as well as a host of similar types of repairs.

Although the list includes one work order for rebuilding a regulator, and preventive maintenance and inspections and performance checks, most of the work is performed in accordance with established guidelines and procedures and manufacturer manuals. Repair work involves the replacement, installation or repair of components of medical equipment and systems, but less complex than the kind of systems and equipment described at the WG-11 grade level. Therefore, the knowledge and skills required for these positions do not meet the WG-11 level.

Although both position descriptions state the incumbents operate with an extraordinary degree of freedom from supervision, the supervisor stated that he provides technical supervision and reviews work performed by the unit. The supervisor also stated that he prepares repair and maintenance procedures manuals and that work is performed in accordance with his guidelines. Therefore, we find the positions do not operate with a high degree of independence.

The WG-4805 standard states if work differs substantially from the level of skill, knowledge, and other work requirement in the standard, it may warrant grading above or below the WG-11 grade level. Since the highest level of nonsupervisory work performed in the unit did not involve repair and maintenance work on complex equipment and systems requiring knowledges comparable to the WG-11 grade level criteria, we conclude the work is properly classified at a lower grade level. A cross-comparison of the work performed against grade criteria in the Electrician Series, WG-2805, standard supports our determination that the biomedical equipment repair work is comparable to the WG-10 level. A more detailed discussion of the WG-10 level is included under the Electrician, WG-2805-11, position.

These positions are properly classified at the WG-10 level.

#### **Utility Systems Operator Supervisor, WS-5406-10**

The grade level of this position should be reviewed based on the proper classification of subordinate positions.

#### **Utility Systems Operator, WG-5406-11**

These positions operate boiler and air-conditioning equipment during the assigned shift. The equipment includes gas or oil fired boilers and auxiliary equipment such as electric and steam-driven water pumps, oil pumps, electronic boiler controls, flow meters, flue-gas recorders, temperature and pressure recorders; 350 to 500 ton water chillers, and all associated components consisting of controls, valves, dampers, chilled water and condenser water pumps, cooling towers, and air-handling equipment. In addition, the operator has responsibility for operating and cleaning the medical waste incinerators.

In conjunction with a previous classification appeal adjudicated by OPM, several Utility System Operator positions within the Veterans Administration were found to be improperly classified. Similarly, these positions do not warrant an extra grade level because they operate as the operator-in-charge on nights and weekends in accordance with written guidelines and contingency procedures. In addition, the boiler and air conditioning systems at the Medical Center and the knowledge and skill required to work on these systems does not meet the WG-10 level of difficulty as described in the Air Conditioning Equipment Operations series, WG-5415, and the Boiler Plant Operations series, WG-5402. For example, at the WG-10 level, the WG-5402 work is predicated on the operation of boilers and associated pollution control equipment. The boilers in the Medical Center are operated on natural gas or oil and present few pollution control problems. The WG-5415 work at the WG-10 level

involves the operation of more complex equipment with remote sensors and related control systems serving a variety of users with differing needs. The Medical Center uses commercial air conditioning equipment and an energy management system which is interconnected to the plant that controls and regulates temperatures throughout the facility. The operator uses standard procedures and techniques for running the equipment, troubleshooting problems, and preventive maintenance. Therefore, we conclude these positions are properly classified as Utility Systems Operator, WG-5406-9.

### **Air Conditioning Equipment Mechanic Leader, WL-5306-11**

The grade of this position should be reviewed based on the proper classification of the subordinate positions.

### **Air Conditioning Equipment Mechanic, WG-5306-11**

This position installs, recognizes the cause of faulty equipment, and repairs, modifies and relocates equipment on fan cooling and self-contained units such as those used in TB isolation units, 250 and 500 ton chiller and associated cooler units, window units, heat pump systems, and small appliances such as refrigerators, large chillers, and exhaust systems. Current modification work includes changing isolation units to dedicated units and calculating load balances to ensure air change requirements are obtained. Work also requires familiarity with the operation of the Energy Control Management System.

The grade WG-11 in the WG-5306 standard is based on the requirement that the mechanic installs, repairs, modifies, and relocates equipment on various special-purpose air conditioning units and systems that are frequently modified to provide specific and critical climatic conditions in laboratories and other experimental or test activities. The kinds of equipment and systems on which the incumbents of this position work do not meet the WG-11 level. Although the mechanic maintains the air conditioning systems in various laboratories, operating rooms, recovery rooms, intensive care units, CT Scan units, morgue, and the computer room where temperature and condition of air are critical, the important difference between the WG-10 and WG-11 is the variety of critical climatic conditions needed during different stages of experimentation in a short period of time. The conditions needed for various hospital laboratories, clinics, etc., are within a constant range maintained over time. There is no frequent change of conditions from one extreme to another at various critical stages of experimentation. Therefore, the mechanic's work is not comparable to the general description of the WG-11 level.

Since the mechanic does not repair or modify special-purpose air conditioning units and systems, the work does not require knowledge of the construction characteristics to frequently modify systems and equipment to provide specific critical climatic conditions. Therefore, the skills and knowledges of this position are not comparable to the WG-11 level. Additionally, the level of responsibility is less than that described at the WG-11 because the work does not require frequent judgment and difficult decisions concerning the kind and type of work needed to modify equipment in a manner that will meet the requirements of specific and critical climatic conditions. Therefore, this factor is

properly evaluated at the WG-10 level. Since the physical effort and work conditions are the same at the WG-10 and WG-11 level, these factors are properly evaluated at the WG-10 level.

All factors are evaluated at the WG-10 level, therefore, that is the correct grade of the position. This position is properly classified as Air Conditioning Equipment Mechanic, WG-5306-10.

### **Electrician, WG-2805-11**

This job involves responsibility for troubleshooting, repairing, and performing preventive maintenance on heavy industrial rotating and solid-state electrical/electronic equipment such as industrial laundry equipment, sterilizers, electrical generators and low, medium, and high voltage switchgear. Repair work on laundry, dry cleaning and related equipment is classified in the Laundry and Dry Cleaning Equipment Repairing Series, WG-5317, while installation, repair and maintenance of electrical wiring systems, fixtures, controls, and equipment is classified in the Electrician Series, WG-2805.

There is no grade criteria for the WG-5317 series. Therefore, the nature of the work, as well as the other work requirements can be evaluated by comparison with an analogous job standard. The nature of the laundry equipment work and the skills and knowledges and other work requirements are not adequately described in the position description for grade determining purposes. For example, although there are no specific duties related to the repair of laundry equipment, the other factors do provide some information indicating the presence of such duties. None of the information, however, can be used to properly determine the appropriate series to use for comparative analysis of the grade level of the work. Therefore, the position description is not adequate for classification purposes and cannot be properly evaluated.

The Industrial Equipment Mechanic Series, WG-5352 covers nonsupervisory work involving the dismantling, repairing, relocating, modifying, maintaining, aligning, and installing of general nonproduction industrial plant machinery, equipment, and systems such as bridge cranes, towveyor/conveyor and pneumatic tube systems, sandblasting machines, and other industrial waste and flood control equipment such as compressors, pumps, and valves; and engraving machines, aircraft test block equipment, and fire extinguishing systems. Mechanics covered by this series typically perform work on a variety of industrial plant equipment and systems. However, some jobs may specialize in work on only one type of equipment or system, for example, conveyor and/or towveyor system. The work requires a practical knowledge of mechanical, hydraulic, and pneumatic systems and components of diverse industrial plant support machinery and equipment, and other equipment that control industrial waste and provide service to establishments such as industrial plants, machine tool repair shops, and hospitals, and detailed knowledge of the operating characteristics of the involved systems and equipment, and the applicable installation and repair procedures, methods, and trade practices. The nature of the assignment and the skills and knowledges associated with the WG-5317 work compare favorably with the work associated with the WG-5352 series, and is appropriate for comparative grade level purposes.

The WG-5352 series describes two grade levels. Similar to the WG-8 level, laundry equipment repair work involves applying specific maintenance and repair procedures to install, maintain, and repair general industrial plant machinery and equipment, and to install and repair foundations for industrial nonproduction machinery and equipment of similar complexity. Mechanics may assist higher graded mechanics on assignments involving major systems or machinery of greater complexity by disassembling and assembling the simpler components and assemblies, and locating and repairing or replacing defective parts and components. They are skilled in the use of test equipment and measuring devices, as well as portable machine and hand tools to repair, adjust and test machinery and equipment, and have the ability to interpret blueprints, diagrams, and other drawings. They use arithmetic and standard handbook formulas in performing dimensional measurements and maintaining required tolerances.

Unlike the WG-10 level, industrial laundry equipment is not technically more complex than general industrial plant machinery, equipment, and systems such as towveyor and conveyor systems, bridge cranes, air compressors, and air test blocks where the incumbent applies a variety of methods, procedures and techniques to determine the nature and extent of repairs and the materials or parts required to estimate the time required to complete repairs and determine the critical dimensions and key reference points. The skills and knowledge used to perform repair work at the WG-10 level requires that the mechanic apply a greater knowledge of installation and repair of more complex systems. Since laundry equipment is not as complex as the systems described at the WG-10 level, the knowledge required to repair and install laundry equipment equates to WG-8. In addition, the level of responsibility assigned to the job falls short of the WG-10 level. Although the incumbent plans and lays out work with little or no technical supervision from the supervisor, the position description states he requests additional help from other shops as needed. In addition, the incumbent does not troubleshoot industrial laundry equipment to determine the area of difficulty; what parts or materials are required; or the methods, techniques, and procedures to use in completing repairs. On the contrary, the incumbent works from regularly scheduled and established preventive maintenance procedures and maintains recommended spare parts and requests other parts as needed. Therefore, the WG-8 level is appropriate. The Physical Effort and Working Conditions are the same for both the WG-8 and WG-10 levels and do not impact upon the grade of the job. Since all factors evaluated at the WG-8 level, the proper grade level of the industrial laundry equipment repair and maintenance work is WG-8.

Similar to the Boiler Plant Operator Series, the WG-2508 standard allows a higher or lower grade if a job differs substantially from the skills, knowledge and other work requirements described in the standard. At the WG-10 level, the work is distinguished by the responsibility to install, repair, and modify complete systems in addition to parts of these systems. The work requires knowledge of how various electrical systems, circuits, equipment, and controls are installed, operate, fit and work together so that the electrician can decide on the type and sizes of conduit, wiring, relays, and distribution panels. The work of this position is not substantially greater in complexity than that described at the WG-10 grade level, therefore, the WG-11 level is not warranted.

The laundry equipment work equates to the WG-8 level and is incidental to the primary work, the electrician duties and responsibilities, which are properly classified at the WG-10 level. The position is, therefore, properly classified as Electrician, WG-2805-10.

### **Maintenance and Operations Foreman, WS-4701-14**

The grade of this position should be also be reviewed based on our findings of the appropriate grades for subordinate positions.

### **BASE LEVEL OF WORK DIRECTED**

The GSSG allows two methods for determining the highest level of work for a second level supervisor. The first involves determining the highest grade of nonsupervisory work which constitutes 25 percent or more of the workload. However, excluded from consideration in the basic work most typical of the organization is the work of lower level positions that primarily support or facilitate the basic work of the unit; any subordinate work that is graded based on criteria in this guide (i.e., supervisory duties) or the Work Leader Grade Evaluation Guide; work that is based on an extraordinary degree of independence from supervision (or adjust the grade for purposes of applying the guide to that appropriate for performance under normal supervision); personal research accomplishments; and work for which the supervisor or a subordinate does not have the responsibilities defined under Factor 3. FWS, military, contractor or volunteer work that is similar to that described should also be credited, adjusted or excluded from consideration.

Based on this criteria, the supervisory work performed by subordinate supervisory GS, WS and leader positions such as the Supervisory Safety and Occupational Health Specialist, GS-0018-12; Supervisory General Engineer, GS-801-12; the Air Conditioning Equipment Mechanic Leader, WL-5306; wage supervisors; and all administrative and clerical support positions are excluded from consideration in the base level of work. The General Engineer, GS-801-12, is adjusted to GS-11 since the GS-12 level is based on an extraordinary degree of independence. The highest level of nonsupervisory GS work is performed by two General Engineers, GS-801-11, and one Industrial Hygienist, GS-690-11.

The highest level of nonsupervisory WG work is carried out by Air Conditioning Equipment Mechanics, WG-5306-10; an Industrial Equipment Mechanic, WG-5352-10; a Pipefitter, WG-4204-10; Electricians, WG-2805-10; and Medical Equipment Repairers, WG-4805-10. While there is no direct correlation between GS and FWS grades, the level of work performed by the WG-10 positions does not exceed the level of work performed at the GS-7 grade level. For example, the complexity of work assignments, and the skills and knowledges of Electricians, WG-2805, who install, modify, repair, maintain, troubleshoot, test and load a variety of complete electrical systems and equipment; who are skilled in planning, layout, positioning of complete systems and portions of systems in industrial complexes and buildings or structures of similar complexity; who must have the ability to interpret and apply the National Electrical Code, local codes, blueprints, wiring diagrams, and engineering drawings, and to use trade formulas to calculate common properties; who know the



characteristics of and use the full range of electrical materials, equipment and components; who are skilled in the use of various electrical tools and test equipment; who frequently require familiarity with electronics to the extent of troubleshooting electrical circuits containing electronic components; and, who are responsible for planning and laying out the routing, placement, and arrangement of industrial or similar complex systems, circuits, controls, and equipment, do not exceed the level of complexity of Engineering Technician, GS-802-7, work.

At the GS-7 level, Engineering Technicians perform work which involves planning nonroutine assignments of substantial variety and complexity; selecting guidelines to resolve operational problems not fully covered by precedents; developing revisions to standard work methods; modifying parts, instruments, and equipment; and taking actions to or making recommendations based on preliminary interpretation of data or results of analysis. For example, some Engineering Technicians, GS-802-7, review designated portions of plans submitted by contractors for interior electrical wiring of residential or office buildings for light and power; check the accuracy of calculations of loads, illuminations, conductor size, etc., and the adequacy of switches, controls, and other equipment selected by the contractor. They base their review on a practical knowledge of methods and techniques of electrical engineering design, and review drawings, the basis for design, and design analysis for conformance with established engineering standards and criteria set forth in manuals, codes, and other guides, and the specific project requirements.

At the WG-10 level, Electricians work within the bounds of available guides and trade techniques and are responsible for assuring the selection and application of the appropriate electrical practices and techniques based on code and project requirements; and plan and layout the routings, placement, and arrangement of systems, circuits, controls and equipment of WG-10 complexity. They complete installations, modifications, and repairs, and load and test systems, circuits, equipment, and controls with little or no check during the progress or upon completion of work. The supervisor checks overall work to see that it meets accepted trade practices and is completed timely. Recurring work assignments performed by Engineering Technicians, GS-802-7, are occasionally observed and are subject to only occasional spot checks for technical adequacy.

While the Electrician, WG-2805-10, and Engineering Technician, GS-802-7, carry out their assignments within comparable degrees of established procedures, the overriding consideration is the level of complexity of the work performed. The comparison of the kind of assignments performed in the two occupations demonstrates the WG-10 electrical work is not inherently more complex than GS-7 Engineering Technician work. Applying the same rationale to the other FWS positions and without attempting to equate FWS and GS grades, we conclude that the representative FWS work performed within the Maintenance and Operations Unit does not provide a basis for crediting a higher level than GS-7.

The positions performing nonsupervisory work representing the substantial mission oriented work for base level consideration are:

- 1 Supervisory Safety and Occupational Health Specialist, GS-0018-12 (75% of time)
- 1 Supervisory General Engineer, GS-801-12 (50% of time)
- 2 General Engineers, GS-801-11
- 1 Safety and Occupational Health Specialist, GS-0018-11
- 1 Industrial Hygienist, GS-690-11
- 1 Engineering Technician, GS-802-9
- 1 Support Services Specialist, GS-342-10
- 5 Utility Systems Operators, WG-5306-9
- 4 Electricians, WG-2805-10
- 1 Electrical Worker, WG-2805-8
- 1 Maintenance Worker, WG-4749-8
- 2 Air Conditioning Equipment Mechanics, WG-5306-10
- 6 Medical Equipment Repairers, WG-4805-10
- 1 Supervisory Medical Equipment Repairer, WS-4805 (40% of time equivalent to nonsupervisory WG-10)
- 1 Pipefitter, WG-4204-10
- 1 Industrial Equipment Mechanic, WG-5352-10
- 1 Plumber, WG-4206-9
- 1 Plumbing Worker, WG-4206-8
- 1 Maintenance Mechanic, WG-4749-9
- 2 Carpenters, WG-4607-9
- 1 Painter, WG-4102-9
- 1 Carpentry Worker, WG-4607-7

The highest grade level that best characterizes the nature of the basic nonsupervisory work performed and which constitutes 25 percent or more of the nonsupervisory duty hours expended on work at or above the base level credited is GS-7. The GS-7 equivalent positions represent approximately 39 percent of the total workload hours performed in the organization. The GS-11 and above positions represent approximately 15 percent.

A second method is used to determine the base level of work when a heavy supervisory or managerial workload related to work above that base level may be present. For these positions, the guide states determine the highest grade of nonsupervisory work directed which requires *at least 50 percent of the duty time of the supervisory position under evaluation*. The resulting grade may be used as the base level for second (and higher) level supervisors over large workloads - if sound alignment with other supervisory positions in the organization and agency results. This method does not apply to the appellant's position because he spends at least 75 percent of his time performing other duties as described in his position description. Therefore, the GS-7 grade is assigned for base level purposes.

Using the chart on page 24 of the GSSG, GS-7 converts to Factor Level 5-4, for 505 points.