

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

Atlanta Oversight Division
75 Spring Street, SW., Suite 1018
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Classification Appeal Decision
Under section 5112 of title 5, United States Code

Appellant: [appellants]

Agency classification: Health Technician
GS-640-4

Organization: U.S. Military Entrance Processing
Command
Department of Defense

OPM decision: Health Technician
GS-640-4

OPM decision number: C-0640-04-01

/s/

Virginia L. Magnuson
Classification Appeals Officer

December 28, 2002

Date

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

Decision sent to:

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Introduction

On September 6, 2002, the Atlanta Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a group classification appeal for the position of Health Technician, GS-640-4, from four employees at the [organizational location], U.S. Military Entrance Processing Command, Department of Defense, [geographical location]. The appellants believe their position should be reclassified as GS-5. We have accepted and decided the appeal under section 5112 of title 5, United States Code (U.S.C.). We received a complete administrative report on September 30, 2002.

In February 2002, several of the appellants filed an appeal to their agency requesting a position upgrade to GS-5 based on significant changes in their duties and responsibilities. The agency issued a decision on July 15, 2002, sustaining the current classification.

The agency furnished an appeal decision issued by OPM on March 15, 1983, for a Health Technician, GS-699-4, at a Military Enlistment Processing Station in Los Angeles, California. While the previously appealed position is similar to this position, some of the tests and examinations and record keeping duties have changed and several of the standards used to evaluate that position have been abolished and replaced with newer standards. We reviewed the previous decision to ensure consistent interpretation of the standard for the Nursing Assistant Series, GS-621, which was one of the standards used for the 1983 appeal decision and is still applicable.

General issues

The appellants make various statements about the agency's evaluation of their position and the classification of similar positions at the MEPS that are higher graded. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of their position. By law, we must classify positions solely by comparing their duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards and guidelines is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding the appeal. Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

This appeal decision is based on a careful review of all information furnished by the appellants and the agency. In addition, to help decide the appeal, an Atlanta Oversight Division representative interviewed both the spokesperson for the appellant group and the appellants' immediate supervisor, by telephone. The appellants and their supervisor have certified the accuracy of the official position description,[#].

Position information

The appellants perform various health screening tests, procedures, and administrative functions in support of the MEPS. The position's primary duties include performing a variety of tests and examinations on applicants for the Armed Forces' enlistment and re-enlistment, officer candidate

physicals for commissioning and entry into officer training programs, and physicals for active and reserve forces personnel. The appellants greet applicants and explain all processing forms, draw blood and organize samples, and conduct standard tests such as Breath Alcohol Tests (BAT), Incremental Lifting Device (weight lifting) tests, and pregnancy tests. They measure and record applicant's height and weight, take blood pressure, and record pulse rates, eye, and hair color. They use a variety of common medical instruments and equipment to perform diagnostic tests and examination. The appellants also perform various procedural preparatory and support tasks such as coding forms, inputting medical data, performing quality control procedures on medical documentation and records, filing records, and assuring that the medical supplies are stocked at the appropriate levels.

The appellants receive guidance and/or instruction from a Lead Health Technician, GS-640-5, and are supervised by a military Medical Non-Commissioned Officer in Charge (NCOIC). They work independently and without day-to-day instructions, but may consult with the Lead Health Technician on unusual matters. Finished work is checked for procedural accuracy.

Series and title determination

The appellants did not contest the series or title of their position. We concur with the agency's allocation of the appellants' position to the Health Aid and Technician Series, GS-640. This series covers positions that involve nonprofessional health and medical work of such generalized, specialized, or miscellaneous nature that there is no other more appropriate series. Positions are classified in this series when the primary responsibility is for personal patient care, supporting diagnostic procedures, technical nursing treatments, patient charting and patient teaching. This series covers mixed positions, those which involve a combination of two or more technical functions characteristic of other technician series in the GS-600 group.

The appellants' position involves different kinds of work that are not adequately covered by a single series. It consists primarily of practical nursing duties, medical specimen testing, and medical test instrument operation, performed for approximately 50 percent of the time, and medical record keeping work, performed for approximately 50 percent of the time, and is appropriate for the GS-640 series. Classification titles are not prescribed for positions in this series, although Health Technician is the suggested title for positions at grades GS-4 and above. The agency titled this position as Health Technician and we concur.

Standard determination

Nursing Assistant Series, GS-621

Job Family Position Classification Standard (JFS) for Assistance and Technical Work in the Medical, Hospital, Dental, and Public Health Group, GS-600; Medical Records Technician Series, GS-675

Medical Instrument Technician Series, GS-649

Medical Technician Series, GS-645

The standard for the GS-640 series does not provide grade level criteria. The appellants' position, therefore, must be classified by reference to standards that are as similar as possible to the subject position considering the kind of work performed, qualification requirements of the

work, level of difficulty and responsibility, and the combination of classification factors which have the greatest influence on the grade level. The appellants' position consists of duties and responsibilities in areas corresponding to several different classification series. The GS-621 series includes positions which involve a variety of personal care, nursing care, or related procedures. Positions in this series do not require (a) the knowledge and skills represented by the licensure of practical and vocational nurses by a State, Territory, or the District of Columbia, or (b) fully professional nurse education. We used the standard for the GS-621 series to evaluate the nursing assistance duties in the position.

The GS-675 series includes positions that perform support work in connection with processing and maintaining medical records for compliance with regulatory requirements. It also covers positions that review, analyze, code, abstract, and compile or extract medical records data. The work requires a practical knowledge of medical record procedures and references and the organization and consistency of medical records. Positions also require a basic knowledge of human anatomy, physiology, and medical terminology. The appellants' position requires knowledge to perform the full scope of non-physician medical tests performed at the MEPS and the associated anatomy and medical terminology. We used the GS-675 criteria in the GS-600 JFS to evaluate the appellants' medical documentation quality control procedures, records filing, correspondence, and medical supply stocking duties.

We also reviewed, and briefly summarize, the GS-649 standard to evaluate the test operation duties in the position.

We used the GS-645 standard to evaluate the medical laboratory work performed by the appellants. This includes conducting urine tests to determine albumin, sugar content, and pregnancy and collecting and organizing blood samples.

Grade determination

Three of the standards used to determine the grade level of the appellants' work are written in the Factor Evaluation System (FES) format. The FES employs nine factors. Under the FES, work must be fully equivalent to the factor level described in the standard to warrant credit at that level's point value. If work is not fully equivalent to the overall intent of a particular level described in the standard, a lower level and point value must be assigned, unless the deficiency is balanced by an equally important aspect of the work that meets a higher level.

Evaluation using the GS-621 standard

The appellants disagree with the agency's evaluation of factors 2, 3, and 5 in the GS-621 standard. We have reviewed the agency's evaluation of factors 1, 4, 6, 7, 8 and 9 in the GS-621 standard and agree with their findings for factors 4, 6, 8, and 9. Therefore, our evaluation using this standard will address only those factors contested by the appellants and factors 1 and 7.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts which the employee must understand to do acceptable work, such as the steps, procedures, practices, rules, policies,

theories, principles, and concepts; and the nature and extent of the skills needed to apply this knowledge. The agency evaluated this factor at Level 1-3. We disagree.

At Level 1-2, employees have knowledge and skill sufficient to perform common procedures. Employees take a variety of samples, such as sputum or urine, seal samples for analysis by others, and conduct simple tests, such as vital signs, and record results. This typically includes explaining the patient's part in the procedure to the patient. It also includes knowledge and skill sufficient to enter specific information onto patients' records using medical terminology, observe and report on simple reactions on the part of patients to medications, and store medical supply items and equipment.

Level 1-2 is met. The appellants perform a variety of examinations and common tests in support of the MEPS. These include color vision, common laboratory tests, blood pressure check, and hearing examinations. They draw blood samples for analysis by others. They assist with visual inspections to identify body birthmarks, tattoos, branding, etc. The information is then coded to the applicants' medical records for processing. The appellants also maintain stock levels of medical supplies.

At Level 1-3, employees must have knowledge of an extensive body of rules, procedures, or operations that require extended training and experience to perform a wide variety of interrelated or nonstandard procedural assignments and resolve a wide range of problems. Tasks include changing established catheters, performing pharyngeal suction, regulating oxygen flow, monitoring the level of intravenous fluids, charting patients, or providing medical staff with information regarding changes in a patient's condition, etc.

Level 1-3 is not fully met. While the appellants' work requires considerable knowledge of a variety of established procedures for various tests, the tests are standard and the procedures are repetitive. They present limited opportunity for the exercise of independent decision-making on the part of the appellants. Their assignments do not include the more difficult tasks identified at Level 1-3 and the appellants do not resolve a comparable wide range of problems.

Level 1-2 is credited for 200 points.

Factor 2, Supervisory controls

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the extent of review of completed work. The appellants believe that Level 2-3 should be assigned. The agency evaluated this factor at Level 2-2. We agree.

At Level 2-2, the supervisor provides continuing or individual assignments by indicating generally what is to be done, limitations, quality and quantity expected, deadlines, and priority tasks. Employees use initiative in carrying out recurring tasks independently without specific instruction, but refer deviations, problems, and unfamiliar situations not covered by instructions to the supervisor for decision or help. The supervisor assures that finished work and methods are technically accurate and in compliance with instructions or established procedures. Review of

the work increases with more difficult tasks if the employee has not previously performed similar tasks.

Level 2-2 is met. The appellants receive their assignments, as well as any changes to normal routines and procedures, from the Lead Health Technician at the beginning of the week. The appellants independently carry out routine daily assignments without supervision. Any situations or problems of an unusual nature or requiring deviation from established procedures are referred to the Lead Health Technician or the supervisor on duty for a decision or resolution. The Lead Health Technician as well as other Health Technicians review the appellants' work for compliance with established procedures and appropriateness at the end of each day.

At Level 2-3, the supervisor makes the patient assignments at the beginning of the shift by defining the patient cases to the employee who is responsible for a patient load or critically ill patients. Employees set priorities and deadlines for the patient care during the tour without prompting from the supervisor. The supervisor is available to assist employees with unusual situations that do not have clear precedents. Employees plan and carry out patient care independently in accordance with patient care/treatment plans, patient charts, and instructions from the nursing/treatment team throughout the shift. Employees function without specific instruction for each patient's condition and modify nursing care as conditions warrant. At this level, employees usually perform alone. Their completed work is evaluated by the oncoming nursing team for conformity to nursing policy and requirements.

Level 2-3 is not met. The appellants do not approach the degree of independence of action envisioned at this level. They show initiative and work within the established framework to complete their assignments; however, they have little or no control over the setting of priorities or deadlines related to the testing of their patients. Guidance and direction regarding what needs to be done are readily available from the licensed professionals, and this provides little opportunity for independent exercise of judgment and discretion comparable to Level 2-3. The appellants perform recurring procedural tasks and refer specific problems to the Lead Health Technician.

Level 2-2 is credited for 125 points.

Factor 3, Guidelines

This factor covers the nature of guidelines and the judgment needed to apply them. The appellants believe Level 3-2 should be assigned. The agency evaluated this factor at Level 3-1. We agree.

At Level 3-1, employees use specific guidelines covering all important aspects of assignments. The employee works in strict adherence to the guidelines. The supervisor must authorize deviations. Little or no judgment is required in selecting guidelines for application to individual cases.

Level 3-1 is met. The appellants perform their assigned duties in accordance with established guidelines, coding manuals, standard operating procedures, and assignment sheets which cover

all aspects of the recurring tasks and physical requirements for the Armed Forces military branches for which they are responsible. Only a licensed professional can authorize changes to or deviations from established guidelines, and the appellants do not make judgments as to which guideline or established procedure is applicable to a given situation.

At Level 3-2, practices and procedures are so well known by employees that reference to the guidelines is rarely necessary. Other guidelines include the tour report, patient care/treatment plan and the patient's medical history. Employees may vary the order and sequence of procedures and use judgment in selecting the most appropriate application of the guidelines based on the patient's condition and previous instructions. Unusual developments are referred to the supervisor.

Level 3-2 is not met. The appellants carry out their assigned duties in accordance with specific guidelines for each military branch of the Armed Forces. They have little or no opportunity to exercise judgment in determining the appropriate guidelines to use or sequence of most testing.

Level 3-1 is credited for 25 points.

Factor 5, Scope and effect

This factor covers the relationship between the nature of the work (i.e., the purpose, breadth, and depth of the assignment) and the effect of work products or services both within and outside the organization. The appellants believe that Level 5-3 should be assigned for this factor. The agency evaluated this factor at Level 5-2. We agree.

At Level 5-2, the highest level described in this standard, the work provides nursing care that covers personal care, diagnostic support procedures, treatment procedures, applicant charting, and applicant teaching. The work contributes to a base of standard nursing care upon which further nursing care may be planned and/or provided by nurses.

Level 5-2 is met. The appellants explain the examination procedures to applicants and record and maintain information located in the medical files. The appellants have direct interaction with the applicants throughout the entire process. Their primary concern is to provide nursing and personal care services that permit the MEPS' licensed and professional staff to focus on more complex matters related to diagnosing and treating patients. There is no indication that the appellants' position exceeds Level 5-2.

Level 5-2 is credited for 75 points.

Factor 7, Purpose of contacts

Factor 7 addresses the purpose of personal contacts, which may range from factual exchange of information to situations involving significant or controversial issues and differing viewpoints or objectives. The agency credited this factor at Level 7-2. We disagree.

At Level 7-1, contacts with patients and hospital staff are for the purpose of giving, clarifying, and obtaining facts or information. Contacts are highly structured, such as providing patients with ice water or asking patients straightforward facts for the initial part of the nursing care plan (e.g., patient's name, next of kin, and major complaint).

Level 7-1 is met. The appellants' regular and recurring contacts are typically with patients, their family members, and members of the medical staff. Contacts with patients are highly structured and are for the purpose of obtaining or providing factual information when initiating the application process. Contacts with staff nurses and physicians are for the purpose of exchanging and obtaining information related to matters such as scheduling, examinations, or status of applicant records. On occasion, the appellants answer routine questions through the Dial-A-Medic program regarding applicant medical processing status.

At Level 7-2, contacts with patients are for the purpose of 1) motivating the patients to accept their illness and persuade them to stay with a treatment regimen; 2) demonstrating to the patients how to provide self-care (e.g., changing a colostomy bag); and 3) explaining to and advising the patients on proper follow-up care, the consequences of improper care, or general diet and nutrition for health maintenance. Contacts with doctors and other staff are for the purpose of coordinating work efforts.

Level 7-2 is not met. The appeal record contains no information that the appellants' normal patient contacts involve the use of persuasion or other techniques to motivate or influence the behavior of their patients. Contacts with fellow employees are to ensure quality and to exchange information relative to schedules and status. Significant coordination functions are not present in the position. The appellants provide some on-the-job training and monthly in-service procedural training, but the teaching of more complex activities, such as the proper methods for changing colostomy bags, etc., is the responsibility of licensed nurses.

Level 7-1 is credited for 20 points.

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-2	200
2. Supervisory controls	2-2	125
3. Guidelines	3-1	25
4. Complexity	4-2	75
5. Scope and effect	5-2	75
6. Personal contacts	6-2	25
7. Purpose of contacts	7-1	20
8. Physical demands	8-2	20
9. Work environment	9-2	20
<i>Total</i>		585

A total of 585 points falls within the GS-3 range of 455-650 points on the Grade Conversion Table in the GS-621 standard.

Evaluation using the GS-600 JFS for the GS-675 series

Factor 1, Knowledge required by the position

At Level 1-3, employees use knowledge of standardized medical records procedures, methods, and requirements and general medical terminology to perform a full range of routine medical records assignments. This includes knowledge and skill sufficient to enter specific medical information into applicants' records using medical terminology, standard codes, computerized data entry, and information systems. It includes review of records for completeness, accuracy, and compliance with applicable standards. Employees assemble patients' charts and retrieve reports and patient data.

Level 1-3 is met. The appellants use knowledge of military applicants' medical testing and examination requirements to review records for completeness, accuracy, and compliance with applicable medical standards. They annotate reports and logs to document test results, assign codes for patient information and test results, and monitor the files. The appellants review and ensure that all applicant information has been captured and coded correctly before applicants can complete the process. They enter information into the MEPCOM Integrated Resource System that serves as the automated system for applicant processing. They prepare correspondence and other material and adhere to Privacy Act requirements.

At Level 1-4, employees analyze medical records, maintain special registries, perform quality assurance, compile statistical data, code diagnostic and procedural information, collect and organize data, and extract data for statistical and other reports.

Level 1-4 is not met. The appellants' correspondence, summaries of medical information, and application of Privacy Act requirements do not typically depart from the routine and do not relate to the more extensive medical operations intended at this level. Though the employees review randomly selected medical files for proper format, coding, completion of forms, and correlation of pathologic, radiological, and consult diagnosis with final diagnosis, their work does not relate to the broader medical operations and more difficult medical records maintained at level 1-4. The records relate to standard operations and the coding of common and recurring examinations and test results.

Level 1-3 is credited for 350 points.

Factor 2, Supervisory controls

The agency evaluated this factor at Level 2-2. The appellants believe that this factor level warrants Level 2-3.

At Level 2-2, standard operating procedures and instructions govern the employee. The employee performs work independently; however, the work is standardized, clearly defined, and prescribed.

Level 2-2 is met. The appellants typically process applicants by standard procedures, previous experience, and long standing work policies. Although the standardized work such as that of the appellants' may appear to be performed with a high level of independence, it is the work itself that is closely defined. Standard operating procedures and previous supervisory instructions that normally allow no deviation control the work.

At Level 2-3, the work may involve special problems and conflicting requirements where standard procedures do not apply. The employee independently plans the work, resolves problems, carries out successive steps of assignments and makes adjustments

Level 2-3 is not met. For each military branch the appellants service, they are required to follow specific guidelines for processing those applicants. There is no deviation.

Level 2-2 is credited for 125 points.

Factor 3, Guidelines

This factor covers the nature of guidelines and the judgment needed to apply them. The agency evaluated this factor at Level 3-1. The appellants believe that Level 3-2 is appropriate.

At Level 3-1, the employee would rely on specific, detailed, and written guidelines, such as medical facility manuals, technical manuals, policy and procedural manuals, or other standard guidelines covering all aspects of the work in addition to oral instructions. The work is in strict adherence to the guidelines and does not deviate from outlined steps unless authorized.

Level 3-1 is met. The appellants use a variety of procedural and regulatory guidelines that specifically cover the assigned work in addition to standard operating procedures. MEPS provides the appellants with other regulations, policies, physicians instructions, and memoranda as well. They determine which guideline is most appropriate for situations that may arise.

At Level 3-2, the employee uses judgment to identify and select from a number of similar guidelines and work situations. They apply the most appropriate guidelines, references, and procedures making minor deviations or adapting guidelines to specific cases and refer situations that do not fit instructions or guidelines to the supervisor for resolution.

Level 3-2 is not met. The appellants use judgment to identify appropriate guidelines and apply them, but they do not deviate from procedures or adapt guidelines.

Level 3-1 is credited for 25 points.

Factor 4, Complexity

At Level 4-2, employees perform work consisting of related steps, processes, or standard explanations of methods, such as compiling, recording and reviewing medical records data. They choose from a few recognizable alternatives in deciding what needs to be done. They recognize inconsistencies in the medical records and apply proper procedures and methods to validate that the record contains factual information.

Level 4-2 is met. The appellants follow standard procedures and specific guidelines in assembling applicant files, choosing codes, and recording all results. They select the appropriate tests and standards based on the military service branch for which the applicant is being tested, then ensure proper completion of medical forms and data entry of information into a standardized computer system. Work requires attention to detail and knowledge of quality control procedures. They identify record inconsistencies for correction.

At Level 4-3 work consists of different, varied, and unrelated medical record processes and methods, including reviewing the work of other employees to verify compliance with regulatory requirements. Employees determine the relevance of many facts and conditions and determine the appropriate action from many alternatives. They determine interrelationships and appropriate methods and techniques needed to resolve problems.

Level 4-3 is not met. The appellants' work involves predetermined tasks that are often repetitive. They may identify problems, but they refer unusual problems to others. The appellants perform standard, well-documented record keeping tasks and do not encounter Level 4-3 complexity.

Level 4-2 is credited for 75 points.

Factor 5, Scope and effect

At Level 5-2, the highest level identified for the GS-675 series, work involves performing general record keeping duties, giving patients correct instructions on test preparation and procedural requirements, and properly recording physicians' orders. Work affects the efficiency, accuracy, and acceptability of further processes or services.

Level 5-2 is met. The appellants perform their assignments according to specific rules or procedures that represent a significant segment of the processing of applicants at the MEPS. The appellants perform general record keeping of the applicants' test and examination results rather than specialized work relating to involved medical procedures. Their work involves data entry and maintenance of established records. It affects the efficiency of the center operations and further processes or services. There is no indication in the record that the work has greater scope or effect.

Level 5-2 is credited for 75 points.

Factor 6, Personal contacts, and Factor 7, Purpose of contacts

At Level 2, the highest level in the standard, contacts are within the facility but outside the immediate or related work units. Some contacts may be with the general public in moderately structured settings. Contacts may include representatives from insurance companies, private physicians, other care providers, and individuals from other agencies or organizations seeking information.

Level 2 is met. The appellants' contacts are with ambulatory applicants, physicians, consultants, medical staffs of local military and civilian hospitals/clinics, medical contractors/services, MEPS co-workers, and recruiting services. They are routine and recurring contacts.

At Level A, the purpose of the work is to acquire, clarify, or give facts or exchange general and medical information directly related to the work. The information may range from general admission information to highly specialized medical information. Contacts at this level are directly related to recurring functions.

Level A is met. The purpose of the appellants' contacts is an exchange of factual information, which includes verifying information to the various military branches that they serve, maintaining applicant records, and extracting information. The purpose is to provide factual information to parties requesting applicant medical information, as indicated at Level A.

At Level B, the purpose of the work is to initiate and follow through on work efforts or to resolve operating or technical problems related to the treatment of patients and/or the maintenance of patient records. Employees at this level influence or persuade individuals or groups who are working towards mutual goals and who have cooperative attitudes.

Level B is not met. The appellants exchange information about work schedules, but they do not perform significant coordinative functions or solve technical problems. They do not influence or persuade individuals or groups, nor do they initiate and follow through on efforts to resolve the treatment of patients.

Level A for Factor 7 combined with Level 2 for Factor 6 is credited for 45 points.

Factor 8, Physical demands

At Level 8-1, the work is mainly sedentary, but may require walking, bending, standing, and/or carrying of light objects such as files and manuals. The work does not require any special physical effort or ability.

Level 8-1 is met. The medical records work requires some walking, bending, standing, and carrying of objects; however, it is primarily conducted at a computer. The work is generally sedentary.

At Level 8-2, the work requires some physical exertion such as prolonged periods of standing, bending, reaching, crouching, stooping, stretching, and lifting moderately heavy items such as manuals and boxes.

Level 8-2 is not met. While the testing work does require physical exertion, the medical records work generally is sedentary.

Level 8-1 is credited for 5 points.

Factor 9, Work environment

At Level 9-2, the work environment involves moderate risks or discomforts that require special safety precautions, e.g., exposure to contagious diseases. Employees may be required to use protective clothing or gear such as masks, gowns, gloves, or shields.

Level 9-2 is met. The employee works under conditions of moderate risk requiring use of universal precautions including gloves, heavy protection, and protective over garments.

Level 9-2 is credited for 20 points.

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-3	350
2. Supervisory controls	2-2	125
3. Guidelines	3-1	25
4. Complexity	4-2	75
5. Scope and effect	5-2	75
6. and 7. Personal contacts and Purpose of contacts	2A	45
8. Physical demands	8-1	5
9. Work environment	9-2	20
<i>Total</i>		720

A total of 720 points falls within the GS-4 range of 655-850 points on the Grade Conversion Table in the GS-600 JFS.

Evaluation using the GS-649 standard

The appellants' use of, operator-level maintenance, and calibration of electrocardiography (EKG) equipment are evaluated using the GS-649 series. This series includes positions that perform diagnostic examinations or medical treatment procedures as part of the diagnostic or treatment plan for patients. While this series is intended for specific equipment, such as the EKG, it provides a basis for evaluation of other equipment operated by the appellants, such as the automatic vision acuity and color perception equipment and the audiometric testing equipment. At the lowest level described, the standard covers basic instruments and diagnostic or treatment procedures, knowledge of normal and abnormal results to recognize and report

obvious abnormalities during procedures, and to instruct patients in conducting the tests. There is no indication in the record that the appellants interpret physician's instructions, independently vary actions based on patient conditions or responses, or use judgment to adapt and change procedures.

The agency evaluated the medical instrument technician duties at the GS-3 level and we concur with the factor levels assigned. A factor summary follows.

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-3	350
2. Supervisory controls	2-1	25
3. Guidelines	3-1	25
4. Complexity	4-1	25
5. Scope and effect	5-1	25
6. and 7. Personal contacts and Purpose of contacts	1a	30
8. Physical demands	8-1	5
9. Work environment	9-2	20
<i>Total</i>		505

A total of 505 points falls below the point ranges identified on the Grade Conversion Table in the GS-600 JFS. By reference to the Primary Standard (the "standard for standards" that are in FES format), 505 points falls in the 455 – 650 point range for GS-3.

Evaluation using the GS-645 standard

The agency determined that the medical technician duties are evaluated at the GS-4 level using the narrative criteria in the standard. The appellants did not contest this part of the classification decision. We reviewed the agency's determination and concur. We will not further evaluate the position against the GS-645 standard criteria.

Summary

The appellants' nursing assistant work is properly graded at GS-3 using the GS-621 standard. The medical records technician work is properly graded at GS-4 using the GS-675 standard. The medical instrument technician work is evaluated at GS-3 using the GS-649 series. The medical technician work is evaluated at GS-4 using the GS-645 standard. GS-4 is the highest level of work assigned to and performed by the appellants for a majority of the time. Consequently, the appellants' position is properly evaluated at the GS-4 grade level.

Decision

The appellants' position is properly classified as GS-640-4, with the title at the agency's discretion.