

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

Appellant: [Name of appellant]

Agency classification: Locksmith
WG-4804-8

Organization: [Appellant's organization/work location]
U.S. Marine Corps

OPM decision: Locksmith
WG-4804-8

OPM decision number: C-4804-08-01

//signed//

Robert D. Hendler
Classification and Pay Claims
Program Manager
Center for Merit System Accountability

October 8, 2008

Date

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

Decision sent to:

[Appellant's mailing address]

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U.S. Marine Corps

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Introduction

On January 29, 2008, the San Francisco Oversight and Accountability Group of the U.S. Office of Personnel Management (OPM) accepted a job grading appeal from [name of appellant]. On February 29, 2008, we received the agency's complete administrative report. The appellant's job is currently graded as Locksmith, WG-4804-8, but he believes it warrants a higher grade level based on his work on computer-managed electronic locks. The appellant works in the [appellant's organization and work location], U.S. Marine Corps. We have accepted and decided this appeal under section 5346 of title 5, United States Code (U.S.C.).

General issues

The appellant believes the Job Grading Standard (JGS) for Locksmithing, 4804, is outdated. However, the content of JGSs established for his job is not appealable (5 CFR 532.701). All occupations change over time, some more rapidly and profoundly than others, but the fundamental duty and responsibility patterns and qualifications required in an occupation normally remain stable. Therefore, careful application of the appropriate JGS to the work performed should yield the correct grade for a job. Any duties not specifically referenced in the JGS can be evaluated properly by comparison with similar or related duties which the JGS describes as well as with the entire pattern of grade-level characteristics.

Job information

Both the appellant and his supervisor have certified to the accuracy of the appellant's official job description (JD) [number]. Under general supervision, the appellant performs locksmithing functions at the [appellant's installation]. The [appellant's installation] conducts live-fire combined arms training, urban operations, and Joint/Coalition-level integration training which promotes operational forces readiness and provides the facilities, services, and support responsive to the needs of resident organizations. The appellant's primary function is to maintain, adjust, repair, and open a wide variety of commercially manufactured locking devices including combination, electrical door, cipher, and electromechanical locks, and panic devices. The security units typically secured by such devices include safes, vaults, cabinets, and chests.

The appellant sets and changes combination locks as requested by authorized customers, and duplicates and re-issues keys to rooms and buildings due to request, damage, or loss by the authorized keyholder. He provides emergency lock services for incidents requiring entrance into offices, barracks, safes, and any other areas or equipment that is secured using a combination, key, cypher or electronic lock. The appellant restores repairable locks to operating condition by disassembling, cleaning, and replacing worn, bent, or broken parts. During inspections, he checks for signs of tampering with safes and file cabinets and notifies security for investigation if tampering is detected. The appellant master keys other locks, maintains control of keys by proper identification and documentation, and conducts training of tenant organizations on the use of the electronic key coding systems.

The appellant uses a variety of hand, power, and specialty tools to do the work, e.g., files, chisels, hammers, picks, tweezers, drills, punches, grips, duplicating machines, lathes, grinders,

buffers, drills, torches, and soldering irons. He maintains a safe, clean, and secure work environment and performs a variety of clean-up duties, such as cleaning equipment, sweeping, straightening, and lining up tools and other property in the assigned area.

In reaching our job-grading decision, we have carefully reviewed all information furnished by the appellant and his agency, including his official JD which we find sufficient for purposes of grading and incorporate it by reference into this decision. In addition, to help decide the appeal we conducted separate telephone interviews with the appellant and his immediate supervisor.

Series, title, and standard determination

The agency allocated the appellant's job to the 4804 Locksmithing occupational series, titling it Locksmith, and the appellant does not disagree. We concur with the agency's title and occupational series determination. The JGS for the 4804 series is the published directly applicable JGS which must be used for grading purposes and which we have applied below to the appellant's job.

Grade determination

The 4804 JGS uses four factors to determine the grade level of a job: *Skill and Knowledge*, *Responsibility*, *Physical Effort*, and *Working Conditions*. A job is graded as a whole against the level of demands found at different grades. No single factor is considered by itself, but only in relation to its impact on the other factors. A job is allocated to the grade best representing the overall demands of the work.

Skill and Knowledge

Grade 8 level locksmiths apply a thorough knowledge of the internal structure and operating characteristics of a wide range of makes, models, and types of common mechanical locking mechanisms and of their working interrelationships with related components comprising the locking system of the security units in which they are installed in order to select methods used in neutralizing, troubleshooting and repairing the locking mechanisms. Trouble-shooting at this level is more complicated than at the grade 7 level since the locking devices are typically connected to locking bolts within the container, may be linked to other combination locks and/or are activated by timing mechanisms. Thus in the event of lockouts caused by defective parts, locksmiths at this level must determine through operational tests which of the components is malfunctioning. They apply sound judgment in the selection of commonly used neutralization techniques. Based upon knowledge of points of least resistance of the locking mechanisms and/or containers, they determine precise locations and angles for drilling and/or burning without harming the contents or causing irrevocable damage to the locking mechanisms or the containers. Depending upon what is malfunctioning, they may aim for safe relocking devices, lock fence removal, lock lever screw removal, lock trigger removal or locking bolt work removal. They have knowledge of a variety of metals in order to select the drill bits or torches to be used in neutralizing the lockouts.

At the grade 8 level, locksmiths are skilled in the manipulation of combination locks as well as picking key locks. They also perform the full repair cycle on a wide range of commercially manufactured locking devices as well as locking bolts. They independently interpret and apply technical manuals, manufacturers diagrams and specifications while repairing and testing locking mechanisms. Many locksmiths at this level have a knowledge of master key systems in order to set up coding systems involving varying types of locks and keyways. They are skilled in using electric drills, acetylene torches, soldering irons and brazing torches, bench lathes, and drill presses.

In contrast, grade 9 locksmiths apply a thorough knowledge of the full range of locking devices and their parts in order to select substitute parts which would be suitable for use in fabricating locking devices to meet special security objectives. They experiment with various types of materials such as metals, alloys, and plastics when developing parts and components. They are able to select appropriate materials considering such factors as needed strength and hardness, machining characteristics, environmental factors, and the extent to which the materials used could complicate or hamper the use of standard neutralization techniques. In comparison, grade 8 locksmiths service a wide variety of commonly used locks, and the functions they perform involve repairing, replacing or fabricating parts covered by manufacturer parts catalogs and specifications.

Grade 9 locksmiths also apply a broad knowledge of the functions and capabilities of commercially manufactured locking devices, as well as their working interrelationships with a variety of equipment such as monitors, alarms, timing mechanisms, sensors, and other related items which make up a complete security or surveillance system in order to provide management with recommendations regarding the most suitable locks to be used in solving specific security problems. In comparison, grade 8 locksmiths need only apply knowledge of the internal structure and operating characteristics of locking devices in order to trouble-shoot and repair them. Locksmiths at this level also apply a more in-depth knowledge of neutralization techniques than grade 8 locksmiths when conducting investigations to determine if locking devices have been tampered with.

At the grade 9 level, locksmiths perform the full installation and repair cycle on commercially manufactured locking devices, as well as rework locks to improve or provide new structural or functional capabilities. They are skilled in developing drawings or diagrams which identify necessary dimensions and special parts or surfaces to be used in the manufacture and installation processes. In comparison, grade 8 locksmiths have available appropriate guidelines, manufacturer drawings, diagrams and technical manuals. Grade 9 locksmiths are skilled in reworking and finishing substitute parts and fabricating parts to close fits. They coordinate their work with personnel in other shops or trades; i.e., machinists in identifying tolerances and machining irregularly shaped parts. They assemble, test, and evaluate the completed locking devices considering the desired objectives.

The appellant's job meets the grade 8 level. Like this level, he applies a thorough knowledge of the internal structure and operating characteristics of a wide range of makes, models and types of common mechanical locking mechanisms and of their working interrelationships with related components. He applies sound judgment and improvisation in selecting commonly used

neutralization techniques such as picking, bypassing, hard-key filing, drilling, and cutting to ensure when possible a locking device can be repaired and returned to service. In the case of lockouts caused by defective parts, the appellant determines through mechanical or electronic operational tests which of the components is malfunctioning and may remove lock fences, lock lever screws, lock triggers, or locking bolts depending on the results. The appellant performs precision drilling and burning without irrevocably harming container contents or the locking mechanisms, and selects drill bits or torches based in part on knowledge of a variety of metals. Comparable to the grade 8 level, the appellant is skilled in manipulating combination locks and picking key locks, and performs the full repair cycle on commercially manufactured locking devices and locking bolts.

The appellant's job does not meet the grade 9 level. While he has knowledge of the full range of locking devices and their parts, he is not involved in substituting parts suitable for use in fabricating locking devices to meet special security objectives. He neither develops parts and components requiring experimentation with variety of materials, nor does he select such materials considering their potential to complicate or hamper neutralization techniques. Unlike the grade 9 level, he does not perform locksmithing duties in support of a complete security or surveillance system, and does not work with major elements of such a system, e.g., monitors and alarms. He determines whether customer requests for specific locks are justified and might suggest specific locks to ensure customer satisfaction with their quality, but does not provide management with recommendations for the most suitable locks to be used to solve specific security problems. While the appellant was required three or four times in the past year to fabricate replacement parts for a panic bar that needed to be modified, the modifications were needed to ensure the continued function of the device and did not involve any new or special security objective.

Although the appellant must be familiar with the installation and repair of common locking devices, and occasionally fabricates basic parts to replace worn mechanisms, unlike the grade 9 level he does not rework locks to improve or provide new structural or functional capabilities. The appellant might need to make adjustments external to a lock to make it work as intended, e.g., alter a container or assign a location where a computerized lock will work, but he does not redesign, rework, or otherwise modify the lock itself. He may also lay out how a building will be master keyed, but does not develop on a regular and recurring basis drawings or diagrams relating to the dimensions, parts, or surfaces of locking devices or the tools or processes used in manufacturing or installing them.

The appellant stresses he applies a thorough knowledge of electronic locks and electronic locking systems requiring him to use databases, program locks, encode user cards, repair data problems, repair locksets, download information from a computer, and train other staff in the use of computerized locking devices. He believes that such work with computerized locking systems and devices requires knowledge and skill exceeding the grade 8 level.

We find the appellant's computer and electronic lock work does not require any grade-level determining knowledge of information technology, and is in support of his grade controlling locksmithing duties. He does not install, develop, or test databases; write computer code; restore corrupted data; or repair computer equipment. He enters information into a database provided by

the lock manufacturer; exchanges data between a computer and locks using a personal data assistant (PDA), coding device, and simple commands; corrects data entry errors and rare data file corruptions not by any restoration protocols but by re-keying data; calls up upon request of law enforcement and with a few simple keystrokes a lock audit trail on a computer or PDA; contacts the lock manufacturer for technical support; replaces circuit boards as necessary; and trains Marines for a couple of hours on how to use the manufacturer's computer system to make room locks. While in the aggregate such tasks are time-consuming, they reflect or build upon his primary knowledge of locks and locking systems, cover simple data processing, do not change his basic locksmith duties, and do not materially enhance the knowledge or skills required to perform them. The knowledge necessary to perform these tasks was acquired by the appellant primarily from a week or two of onsite initial and refresher training provided by the manufacturer. This knowledge and attendant skills reflect the gradual evolution of locksmithing technology. Because this knowledge supports his primary tasks, and is easily obtainable on the job, it does not significantly enhance the knowledge and skill level required to perform the appellant's work. Thus, it has no grade-level impact.

Responsibility

Grade 8 locksmiths receive assignments from the supervisor either orally or through general work orders indicating location, person to contact for further information, and priorities. Normally the supervisor supervises other trades such as machinists, carpenters, modelmakers, etc., and has little if any technical knowledge of locksmithing practices and procedures. The nature of assignments requires that work typically be performed on-site, necessitating the locksmiths to use sound judgment in independently selecting work processes, techniques, and tools and equipment; and determining work sequence and type and extent of necessary repairs. They are responsible for planning, setting up, and maintaining master key systems and assuring that no interchanges occur. They may also be responsible for providing technical assistance to lower-graded workers and for coordinating their work with others. Due to the nature of assignments and the supervisor's limited technical knowledge, completed work is not reviewed for adherence to accepted trade practices but rather for effectiveness of meeting schedules and customer needs.

Grade 9 locksmiths receive assignments from the supervisor specifying the desired final product. They independently solve problems which require modifying accepted trade practices, procedures and methods and must make more difficult judgments and decisions when modifying and reworking locking devices for special security objectives than is required of grade 8 locksmiths who apply accepted trade practices in conjunction with the application of specific guidelines and technical manuals. Grade 9 locksmiths may also be responsible for providing technical assistance and guidance to remote customer locations. They typically receive no technical supervision, and their work is reviewed on the basis of meeting user needs.

The appellant's responsibility meets the grade 8 level. He receives assignments from the supervisor (Maintenance Mechanic Supervisor) through general work orders indicating customer and location. The supervisor supervises other trades and has no technical knowledge of locksmithing practices and procedures. Work is performed on-site in accordance with standard trade practices. The appellant independently selects work processes, techniques, tools and

equipment; and determines work sequence and type and extent of necessary repairs. Completed work is reviewed only for effectiveness of meeting schedules and customer needs.

The appellant's responsibility does not meet the grade 9 level. Although he receives no technical supervision from his supervisor and work is reviewed on the basis of meeting user needs, unlike the higher level the appellant rarely deviates from accepted trade practices, procedures, and methods and does not do so for the purpose of modifying or reworking locking devices for special security objectives.

Physical Effort

The physical effort described at the grade 8 level is the same for the grade 9 level in the JGS. In addition to the physical effort described at the grade 7 level, which involves lifting or carrying items weighing in excess of 7 kilograms (15 pounds), and frequent standing, stooping, bending, or kneeling in awkward work areas, grade 8 level locksmiths may be required to lift security containers weighing up to 23 kilograms (50 pounds) and heavier weights with assistance. The appellant's job exceeds the grade 7 and meets the grade 8 level.

Working Conditions

The working conditions described at the grade 8 level are the same for the grade 9 level in the JGS. In addition to the working conditions described at the grade 7 level, which involves working inside in well lighted and ventilated areas, with occasional work outside in bad weather, and exposure to cuts and scrapes, grade 8 locksmiths are exposed to the possibility of burns while using acetylene torches, brazing torches, and soldering irons. The appellant's job exceeds the grade 7 and meets the grade 8 level.

Decision

The appellant's job is properly graded as Locksmith, WG-4804-8.