OFFICE OF PERSONNEL MANAGEMENT ATLANTA OVERSIGHT DIVISION ATLANTA, GEORGIA

CLASSIFICATION APPEAL DECISION

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

Appellant:	[appellants' names]	
Position:	Quality Assurance Specialist GS-1910-9	
Organization:	[appellants' activity] U.S. Department of the Navy	
Decision:	Quality Assurance Specialist GS-1910-9 (Appeal denied)	
OPM Decision Number:	C-1910-09-01	
	Kathy W. Day Classification Appeals Officer	Date 1/22/97
rd # 1910097A		

Background

On September 25, 1996, the Atlanta Oversight Division, Office of Personnel Management, accepted an appeal for the position of Quality Assurance Specialist, GS-1910-9, located in the [appellants' activity, Department of the Navy]. The appellants are requesting that their position be changed to GS-11.

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 appellants' letter of September 19, 1996, with enclosures, appealing the classification of their position.
- 2. The agency's letter of October 24, 1996, with enclosures, providing position and organizational information.
- 3. A telephone interview with [the appellants' immediate supervisor] on January 13, 1997.
- 4. A telephone interview with [the servicing classifier] on January 13, 1997.

Position Information

The appellants are assigned to Position Number M3WPCGA. The appellants, supervisor, and agency have certified to the accuracy of the position description.

The appellants assure the quality of work performed by contractors in the maintenance and repair of aircraft and aircraft flight simulators, and monitor simulator/aircraft systems instructional services contracts. They serve at facilities where contractors perform depot, intermediate and organizational level maintenance. They implement In-Plant Quality Assurance Evaluation (IQUE) program guidelines in analyzing contractor work processes to determine their adequacy in meeting contractual requirements, and recommend appropriate changes in work processes to meet requirements. This includes planning to establish process profiles, inspecting and monitoring contractor work and quality control processes to assure satisfactory functioning, and accepting or rejecting contractor work based on the adequacy of work and quality control processes. They provide guidance and assistance to others on quality assurance aspects of contracts, inspection techniques, acceptance requirements, and similar matters; and they meet with contractors to discuss and resolve issues arising in the quality assurance process.

The appellants receive direction from the Supervisory Quality Assurance Specialist GS-1910-11, who explains the objectives of assignments, priorities, and time limits. The appellants plan and carry out assignments independently within the established framework of regulations, policies, and quality assurance procedures. The supervisor is generally available to discuss and advise on staffing, funding, and milestones of the work, as well as on governing policies and procedures, however, the appellants have a great deal of independence in performing their work. Completed work is reviewed for adequacy of coverage, acceptability of techniques used, and compliance with requirements.

The appellants contend that the agency evaluation did not properly recognize the environment in which their work is performed, changes in their duties which have occurred due to reorganization, and the nature of the quality assurance program.

Standards Referenced

Quality Assurance Series, GS-1910, March 1983.

Series and Title Determination

The appellants do not contest the occupational series or title of the position. The agency determined that the position was covered by the Quality Assurance Series, GS-1910, which includes positions that perform, administer, or advise on work concerned with assuring the quality of products acquired and used by the Federal Government. We agree with the agency determination. The appellants' position is properly placed in the GS-1910 series and titled as *Quality Assurance Specialist*, following the mandatory titling practices specified in the GS-1910 standard.

Grade Determination

The GS-1910 standard is written in the Factor Evaluation System (FES) format. Under the FES, positions are placed in grades on the basis of their duties, responsibilities, and the qualifications required as evaluated in terms of nine factors common to nonsupervisory General Schedule positions. A point value is assigned to each factor based on a comparison of the position's duties with the factor-level descriptions in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position factor to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails in any significant aspect to meet a particular factor-level description in the standard, the point value for the next lower factor level must be assigned. The total sum of points assigned to the factors are converted to a grade by use of the grade conversion table in the standard.

Factor 1 - Knowledge Required by the Position:

This factor measures the nature and extent of information or facts that a worker 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 credited Level 1-6 for this factor. The appellants believe Level 1-7 is appropriate.

At Level 1-6, the work requires knowledge of established techniques, regulations, and quality assurance requirements relating to a functional program, and skill in applying this knowledge to plan and perform a variety of assignments of moderate scope and complexity for which there are precedents. In addition, the position requires demonstrated skill in interpreting, explaining, and applying technical requirements and specifications to quality problems encountered in such activities as procedures evaluation, process audits, product inspections, or investigations of defective materials. This level also requires practical knowledge of conventional fact finding or investigative techniques, and skill to develop, analyze, and evaluate facts and prepare reports of findings; and demonstrated skill in maintaining effective working relationships in the activity served.

The appellants' assignments involve varying levels of repair and maintenance to aircraft, aircraft components, and flight simulators. The complexity of the items involved somewhat exceeds the products defined in the Level 1-6 description. For example, the appellants' contracts involve maintenance of aircraft engines, systems, and flight simulators and services, with different models and the varying age of the items complicating repair and maintenance activities. However, much of the appellants' work is performed using conventional, well-accepted techniques, which are to varying degrees, fairly well-documented in terms of the maintenance procedures and specifications, to monitor substantially ongoing contracts involving a limited range of aircraft.

At Level 1-7, the work requires comprehensive and thorough knowledge of the full range of principles, concepts, and methodology related to one or more quality assurance functional programs, and considerable skill in applying this knowledge to the planning and accomplishment of a variety of difficult and complex work assignments. This level also requires broad knowledge of a range of complex products including pertinent quality characteristics, manufacturing methods and techniques, special processes, interrelationship of functional parts and subassemblies, measurement and test techniques, and skill in developing plans and approaches to ensure effective product quality control; broad knowledge of the practices, policies and procedures of related functional and administrative activities: and thorough and detailed knowledge of a skill in applying various methods and techniques for investigating, analyzing, and effective corrective action on complex quality problems.

Although Level 1-6 is exceeded, Level 1-7 is not fully met. While aircraft, aircraft components, and flight simulators are considered to be complex, the nature of the work operations performed are less than the difficult or complex work described at Level 1-7. The appellants' work assignments relate to organizational or intermediate maintenance of aircraft and components. The work processes are performed following established airworthiness requirements and item specifications, and the appellants' primary responsibility, using conventional quality assurance techniques, is the review and approval of the contractor's work and quality control processes in accordance with the IQUE process. Level 1-7 requires application of the <u>full</u> range of principles, concepts, and methodology related to quality assurance programs. The appellants' work does not encompass the kind and extent of quality program management encompassing organization, initial quality planning, work instructions, quality cost data, etc., which is involved in the full range of quality assurance principles and methodology. Consequently, the breadth and depth of the knowledge required by the appellants' position is less than that described at Level 1-7, and that level is not fully met.

Under FES, a level must be <u>fully</u> met to be credited. The highest level fully met is Level 1-6 for 950 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 for carrying out assignments, and how completed work is reviewed. The agency credited Level 2-3 for this factor. The appellants do not contest this determination.

At Level 2-3, the supervisor outlines objectives of new assignments and provides general information on priorities, any unusual requirements, time constraints, and coordination with other projects. Only minimal work instructions are provided for continuing assignments similar to those previously performed, and the supervisor or a senior level employee is available to assist in unusual situations. At this level, the specialist is responsible for planning and carrying out all the successive operations to complete assignments without direct technical assistance from the supervisor, selecting and applying established quality assurance procedures and methods, initiating reports on defective products or procedures, and approving or coordinating corrective action. The supervisor reviews reports and discusses actions with the specialist for conformity to established policies and program requirements, timeliness, and soundness.

Level 2-3 is met. The appellants' recurring work assignments are performed without direct technical assistance from the supervisor, and the appellants select and apply established operating procedures and accepted methods. They utilize their general guidance to make independent determinations on quality acceptability, initiate reports on defective products, and approve/disapprove and coordinate corrective action. Supervisory review is

accomplished through reports and discussions between the appellants and the supervisor. The supervisor is generally available to discuss significant problems, although this is seldom required due to the experience of the appellants. Specific technical methods and procedures used by the appellants to accomplish their work are not reviewed in detail by the supervisor. Some aspects of the appellants' supervisory controls exceed the Level 2-3. The appellants have great independence in performing their work and in their decision and problem resolution authority. They enjoy great supervisory confidence in their expertise and professionalism, and their products and reports are generally accepted as technically sound with little supervisory review.

Level 2-4, however, is not fully met. Although the appellants' position description for this factor is a verbatim delineation of the FES Level 2-4 description from the GS-1910 Quality Assurance Series standards, the organizational alignment and the level of command program supervision do not appear to be compatible with meeting the full intent of the scope of Level 2-4 duties. At Level 2-4, the supervisor provides assignments in terms of overall objectives and any limitations on the scope of the work, and the specialist consults with and advises the supervisor on priorities, staffing or funding, and project milestones. The specialist plans and carries out assignments independently, determines the scope and level of quality activities based on requirements, establishes priorities, interprets and applies general agency policies and procedures, and coordinates and consults with others in a variety of other organizations. The specialist resolves problems involving deviations from established procedures, unfamiliar situations, or unusual requirements, adjusting approaches and making authoritative determinations on conformance to requirements. Work assignments are assessed for overall effectiveness through review of reports or documentation. While the appellants function with considerable freedom, the objectives of and limitations on their assignments are more closely defined than is described at Level 2-4, and their authority does not include the resolution of problems involving broad deviations from established procedures or the range of independent coordination inherent at the Level 2-4. The intent of Level 2-4 is not fully met.

The highest level fully met is Level 2-3, and that level is credited for 275 points.

Factor 3 - Guidelines:

This factor covers the nature of guidelines used and the judgment needed to apply them. For the Quality Assurance occupation, guidelines include agency policy and procedural instructions, quality assurance specifications, product specifications, material standards, technical manuals and handbooks, occupational reference material, and textbooks. The agency credited Level 3-3 for this factor, and the appellants do not contest this determination.

At Level 3-3, the guidelines include established procedures for accomplishing the work, including material specifications and standards, drawings, technical bulletins, inspection

and test procedures, and standard checklists. At this level, however, the specialist must extend and adapt the guidelines to situations encountered, and the guidelines may not be specifically applicable to or provide specific guidance on a particular assignment. Judgment is also required in interpreting general agency guides, regulations, or precedent cases and in adapting this guidance to individual situations and problems.

Similar to Level 3-3, the appellants' guidelines include product specifications and general quality assurance guidelines, but they exercise judgment in interpreting the guidelines in the light of the particular situation or problem encountered. They must review and interpret guidance materials to determine critical characteristics and ensure the processes incorporate these requirements.

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

Level 3-4 is not met. The appellants' guidelines include product specifications and procedures, as well as the general policy and regulatory guides cited at Level 3-4. These guidelines limit the involvement of the appellants in developing new methods or recommending broad policy changes.

Level 3-3 is credited for 275 points.

Factor 4 - Complexity:

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods involved in assuring the acceptability of products; the difficulty in identifying what needs to be done to complete assignments; and the difficulty and originality involved in performing the overall work of the position. The agency credited Level 4-3 for this factor. The appellants believe Level 4-4 is appropriate.

At Level 4-3, the work involves the application of a variety of quality assurance techniques and procedures or work directions to the planning and completion of assignments. The specialist uses established methodology and accepted practices to perform a variety of tasks, including the selection and application of different methods and procedures, depending on the phase of the project and the nature of the problems encountered. The specialist develops essential facts through data analysis, product inspection, procedures review, and audit or surveillance of operations on quality trends and factors contributing to unsatisfactory trends or conditions. Level 4-3 is met. The appellants plan and monitor statistical techniques to detect trends, collect and analyze inspection data to adjust review processes, and recommend actions to correct deficiencies. They perform continuing evaluation of the contractor's compliance with quality control procedures and perform inspections to ensure that the contractors are complying with requirements. The duties of the position also involve investigation of quality problems to formulate recommendations for corrective actions and responsibility for initiating follow-up checks to prevent recurrence. The intent of Level 4-3 is met.

Although the appellants' work in some respects exceeds Level 4-3, Level 4-4 is not fully met. At Level 4-4, the work involves the application of a complete range of quality assurance principles, techniques, and methodology to plan and accomplish projects for products having complex characteristics, or assignments of equivalent complexity. The complexity of the products requires that the quality characteristics be progressively verified through precise measurements and tests, and controls or preventive efforts are required throughout the complete production cycle. Decisions concerning what needs to be done involve review and analysis of project or program documents to ensure that critical quality requirements are identified and provided for in terms of appropriate specifications, procedures, or methods of quality verification; tailoring the approach to requirements; making major modifications in approach or emphasis as conditions warrant; and coordinating resolution of nonconformances. The work requires making many decisions concerning such things as determining adequacy and completeness of technical data, evaluating capabilities of contractor activities for producing acceptable products, evaluating the adequacy of a contractor's quality control system, judging the adequacy of documentation of quality problems, and making authoritative interpretations of complex quality requirements.

Level 4-4 is not met. At Level 4-4, assignments typically involve great responsibility for developing and implementing quality assurance plans and procedures, where Level 4-3 positions operate largely within plans and procedures established for specific program areas. While the appellants' work involves some complex products and decisions similar to those described at Level 4-4, the work typically involves the less complex repair and maintenance activities and a limited need or opportunity to make major modifications in approach or to determine the adequacy of technical data.

The highest level fully met is Level 4-3 which is credited for 150 points.

Factor 5 - Scope and Effect:

This factor covers the relationship between the nature of the work, as measured by the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization. The agency credited Level 5-3 for this factor. The appellants believe Level 5-4 is correct.

At Level 5-3, the work involves performance of a variety of assignments to ensure the quality and acceptability of products. Most problems can be dealt with by the selection or adaptation of formal work methods and procedures, such as established criteria and general operating procedures covering the nature and scope of quality assurance activities to be accomplished. At this level, the results of the work affect the acceptability of the products involved in conformance to technical requirements, timely meeting of user needs, and intended performance, impacting the effectiveness of operations.

Level 5-3 is met. The appellants' quality assurance work is conducted within a framework of established procedures and affects the timeliness and quality of products and services acquired by the government.

At Level 5-4, the purpose of the work is to plan, develop, and implement quality assurance projects of considerable breadth and complexity. Assignments at this level may involve responsibility for ensuring the quality of major products throughout the product life-cycle, serving as a technical specialist in a broad product or commodity area, or staff responsibility for various quality assurance program activities. The results of the work affect a range of agency activities or sub-ordinate activities at a number of locations.

Level 5-4 is not met. The appellants' work involves a limited number of separate contracts carried out at a single organizational entity, although several locations are involved. This does not meet the intent of Level 5-4.

Level 5-3 is credited for 150 points.

Factor 6 - Personal Contacts:

This factor measures face-to-face contacts and telephone dialogue with persons not in the supervisory chain. Levels described under this factor are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place, e.g., the degree to which the specialist and those contacted recognize their relative roles and authorities. The agency credited Level 6-3 for this factor. The appellants do not contest this determination.

At Level 6-3, regular contacts include persons within the same agency, as well as employees of other Federal agencies or private industry. The individuals contacted vary according to the situation and require that the specialist ensure the persons involved understand their respective roles. Personal contacts across agency lines frequently require the specialist to identify and locate the appropriate person to establish working relationships or resolve issues. Similar to Level 6-3, the appellants' personal contacts include employees on the installation and contractor representatives on the contractor's quality control or administrative staff.

At Level 6-4, personal contacts are with high level program and quality assurance personnel in other Federal agencies, top executives of large private firms, or representatives of foreign governments.

There is no information in the record to support that the appellants have contacts of the type described at Level 6-4.

Level 6-3 is credited for 60 points.

Factor 7 - Purpose of Contacts:

For the Quality Assurance occupation, the purpose of personal contacts ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives. The personal contacts which serve as the basis for the level selected for this factor must be the contacts which are the basis for the level selected for Factor 6. The agency credited Level 7-3 for this factor. The appellants do not contest this determination.

At Level 7-3, contacts are made to influence or motivate individuals to correct deficiencies which would otherwise result in unacceptable products. These contacts may involve dealing with officials who have a meager understanding of the quality requirements, who dispute the nature of the requirements, or who have less than a cooperative attitude. Contacts require a high degree of technical skill to explain requirements and the nature of deficiencies, plus considerable tact, persuasion, and interpersonal skills to motivate individuals to take corrective action.

Similar to Level 7-3, the appellants' contacts involve the explanation of quality requirements to contractors and others who may not readily accept the requirements, and require them to persuade contractors to correct deficiencies.

At Level 7-4, contacts are made to negotiate or settle significant issues or problems which require escalation because established channels and procedures have failed to resolve the problem. Contacts at this level may concern significant deficiencies impacting major programs where formal efforts to effect corrective actions have been unsuccessful.

Level 7-4 is not met. The appellants' contacts are typically the first level of contact and problem resolution, rather than the escalated contacts described at this level.

Level 7-3 is credited for 120 points.

Factor 8 - Physical Demands:

This factor measures the requirements and physical demands placed on the employee in performing the work assignment, including the physical characteristics such as agility and dexterity required, and the extent of physical exertion such as climbing, lifting, crawling, etc. The agency credited Level 8-2 for this factor, and the appellants do not contest this determination.

Level 8-2, the highest level described in the standard, is met, where the duties regularly require extended periods of walking, standing, or bending while observing operations, witnessing tests, or examining materials and processes.

Level 8-2 is credited for 20 points.

Factor 9 - Work Environment:

This factor considers the risks and discomforts in the employee's physical surroundings, and the safety precautions required. The agency credited Level 9-2 for this factor, and the appellants do not contest this determination.

Level 9-2 is met, where the work involves regular and recurring visits to manufacturing, storage, or test areas, requiring the use of protective clothing and gear. The appellants' work requires regular exposure to aircraft repair and maintenance areas, and the use of appropriate safety equipment.

At Level 9-3, the work involves regular and recurring exposure to known toxic environments, unexploded munitions, or similar hazards. The appellants' work does not regularly involve such hazards.

Level 9-2 is credited for 20 points.

SUMMARY			
FACTOR	LEVEL	POINTS	
1. Knowledge Required By The Position	1-6	950	
2. Supervisory Controls	2-3	275	
3. Guidelines	3-3	275	
4. Complexity	4-3	150	
5. Scope and Effect	5-3	150	
6. Personal Contacts	6-3	60	
7. Purpose of Contacts	7-3	120	
8. Physical Demands	8-2	20	
9. Work Environment	9-2	20	
	TOTAL	2020	

A total of 2020 points falls within the range for a GS-9, 1855 to 2100 points, according to the Grade Conversion Table in the GS-1910 standard.

Decision

This position is properly classified as Quality Assurance Specialist, GS-1910-9. 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.