Office of Merit Systems Oversight and Effectiveness Classification Appeals and FLSA Programs

Atlanta Oversight Division 75 Spring Street, SW., Suite 972 Atlanta, GA 30303-3109

Classification Appeal Decision Under Section 5112 of Title 5, United States Code

Appellant:[appellant]Agency classification:Engineering Technician
GS-802-9Organization:Department of the NavyOPM decision:Engineering Technician
GS-802-9OPM decision number:C-0802-09-33

Kathy W. Day Classification Appeals Officer

Date 6/4/98

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

Decision sent to:

[appellant]

[personnel office]

Director, Plans, Programs, and Diversity Office of the Deputy Assistant Secretary of Navy, Civilian Personnel (CP/EEO) Department of the Navy 800 North Quincy Street Arlington, VA 22203-1998

Chief, Classification Branch Field Advisory Services Division Defense Civilian Personnel Management Service 1400 Key Boulevard, Suite B-200 Arlington, VA 22209-5144

Introduction

On February 4, 1998, the Atlanta Oversight Division, Office of Personnel Management (OPM), accepted a classification appeal for the position of Engineering Technician, GS-802-9. This position is assigned to the, Department of Navy, Panama [city\state]. The appellant is requesting that his position be changed to Engineering Technician, GS-802-11.

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 these positions subject to discretionary review only under the limited conditions and time limits specified in part 511, subpart F, of title 5, Code of Federal Regulations.

General issues

The appellant was assigned to this position on July 22, 1997, by means of a reduction-in-force. He filed a classification appeal with his agency, and a decision was issued on November 6, 1997, sustaining the classification as Engineering Technician, GS-802-9. The appellant states that inconsistent language was used by his supervisor, that the wrong criteria was used for the evaluation, and that some of the language in his position description is identical to two previous GS-11 position descriptions.

By law, OPM must classify positions solely by comparing their current duties and responsibilities to published OPM standards and guidelines. Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding his appeal.

The appellant believes that his position description does not reflect the correct grade level because of new responsibilities added to the position, such as coordinating and rewriting the Ocean Simulation Facility (OSF) Operation/Maintenance (O&M) manual to bring it up-to-date. According to the supervisor, rewriting the OSF is an isolated assignment which, for the moment, is an intensive effort. He indicated that once the manual is completed, this work will decline, and the appellant will only be responsible for maintaining the manuals and drawings and will have more time to perform his normal assignments. One-time only or temporary duties generally do not affect the series or grade level of a position.

In processing this appeal, we carefully considered all information furnished by the appellant, his supervisor, and the agency, including information obtained from telephone interviews with the appellant and his supervisor.

Position information

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

The appellant performs engineering technician duties in support of the [agency] hyperbaric chamber complexes. The duties include certifying documentation and final design drawings for construction, design, repair, and maintenance of the chambers at the command. He prepares all drawings and certification documentation under the guidance of a design engineer by using the AutoCAD computer system. The work includes prototype and experimental design and fabrication of components and systems required to modify all test systems, underwater and deep diving breathing apparatus and diving life support to conduct manned and equipment evaluations. He also analyzes, reviews, collects, compiles, and interprets technical information to make recommendations on certification requirements and changes. The appellant performs standard testing of commercial air compressors to verify that the manufactures' parameters are valid. He is temporarily writing and revising technical manuals that provide step-by-step instructions on how to maintain and repair components of the life support and hyperbaric systems.

Supervision is provided by the Engineering Department Head, however, the appellant works under the general supervision of the Design Certification/Engineer who assigns work identifying major objectives and provides background information and guidance. Unusual problems involving the projects are discussed by the appellant and the Design Certification/Engineer. Typically, the appellant determines the methods to be used and the approaches taken in solving problems. The Design Certification/Engineer provides minimal procedural or technical assistance and completed work is reviewed for technical adequacy, consistency, and soundness.

Series determination

We find the position involves preparing preliminary and final design drawings and preparing certification requirements for hyperbaric, life support, test apparatus, and associated systems within [agency] facilities. The work requires an understanding of engineering design and drawing and the ability to review, analyze, collect and interpret technical information to provide assistance and make recommendations in the modifications, repairs, maintenance, testing, and certification requirements for the life support and hyperbaric systems at [agency].

We determined after a careful review of the appellant's duties, that the position involves work covered by the Engineering Technician Series, GS-802, and some work covered by the Equipment Specialist Series, GS-1670.

The GS-802 series includes technical positions that require primarily application of a practical knowledge of (a) the methods and techniques of engineering or architecture; and (b) the construction, application, properties, operation, and limitations of engineering systems, processes, structures, machinery, devices, and materials. The positions do not require professional knowledges and abilities for full performance, and therefore, do not require training equivalent in type and scope to that represented by the completion of a professional curriculum leading to a bachelor's degree in engineering or architecture.

The GS-1670 series involves supervision or performance of work that requires primarily an intensive, practical knowledge of equipment and its characteristics, properties, and uses in order to (1) collect, analyze, interpret, and provide specialized information about equipment together with related advice to those who design, test, produce, procure, supply, operate, repair, or dispose of equipment; (2) identify and recommend practical solutions to engineering design and manufacturing defects and recommend use of substitute testing or support equipment; or (3) develop, install, inspect, or revise equipment maintenance programs and techniques.

Standard determination

Engineering Technician Series, GS-802, June 1969. Equipment Specialist Series, GS-1670, November 1994.

Title determination

For positions whose duties fall in more than one occupational group, the most appropriate series for the position depends on consideration of a number of factors, such as the paramount qualifications required, sources of recruitment and line of progression, the reason for establishing the position, and the background required. Based on the information in the record and the interviews with the supervisor and the appellant, we find that the primary knowledges required for the position are those of the Engineering Technician, GS-802, series. The GS-802 series authorizes the title *Engineering Technician* for positions that cover two or more subject-matter specializations, none of which are paramount, and for positions for which none of the authorized specializations is appropriate.

Grade determination

The engineering technician work is evaluated by reference to the criteria in the GS-802, Engineering Technician, standard, and the equipment specialist work will be evaluated by reference to the GS-1670, Equipment Specialist, standard.

GS-802, Engineering Technician

The GS-802 standard defines grade levels GS-1 through 9 and 11 using the following criteria: *Nature of Assignment* and *Level of Responsibility*. The appellant's duties and responsibilities must fully meet the grade level criteria at a particular level in order to be graded at that level. The GS-802 standard states "because positions at GS-10 level were found to be highly individualized, it was not practical to develop standard criteria for positions at this level. Accordingly, such positions should be evaluated by comparison with the criteria for GS-9 and GS-11 Judgment must be applied in determining the degree to which the specific position being classified fits the intent of the standards."

Nature of Assignment

This includes the scope and difficulty of the work and the skills and knowledge required to complete the assignment.

The standard at the GS-9 level states that engineering technicians "typically perform a variety of work relating to the area of specialization that requires the application of a considerable number of different basic but established methods, procedures, and techniques." The employee has independent responsibility for planning and conducting a block of work which may be a complete conventional project or a portion of a larger more diverse project. When phases or details are preformed by other groups or personnel outside the organizational unit, the technician reviews, analyzes, and integrates their work. In addition, assignments at this level require a good understanding of the effect that recommendations made or other results of the assignments may have on an item, system, or process and its end-use application. At the GS-9 level, the employee often must deviate from original plans to incorporate additional factors encountered after the beginning of the assignment.

At the GS-11 level, the technician performs work of broad scope and complexity which requires interpreting and adapting many guidelines, engineering principles and practices. At this level, the technician is typically confronted with a variety of complex problems in which considerable judgment is needed to make engineering compromises and decisions. Ingenuity and creative thinking are required in devising new ways of accomplishing objectives, and in adapting existing equipment or current techniques to new uses.

The appellant's work compares favorably to the GS-9 level. The appellant applies standard engineering methods and techniques to accomplish the work. He selects the approach and plans and executes the assignments within the Navy guidelines. He is responsible for consolidating drawings and data from engineers and maintaining all drawings and documentation of the hyperbaric system's capability. The appellant must be able to read engineering and technical drawings and have a working knowledge and thorough understanding of hyperbaric and diver support systems and equipment. The appellant's assignments do not meet the GS-11 level since he is not required to interpret and adapt engineering standards, make engineering compromises, or devise new ways of accomplishing their objectives.

Nature of Assignment is credited at GS-9.

Level of Responsibility

This considers the nature and purpose of person-to-person work relationships and supervision received in terms of intensity of review, as well as guidance received during the course of the work cycle.

At the GS-9 level, the supervisor outlines requirements and furnishes general instructions as to the scope of objectives, time limitations, and priorities. When significant deviations from standard

engineering practices must be made, the technician consults his supervisor. The supervisor observes the work of a GS-9 technician for progress and coordination with work performed by other employees and for adherence to completion and cost schedules. Standard methods employed by the technician are seldom reviewed but review is made for adequacy and conformance with established policies, precedents and sound engineering concepts. Personal work contacts are primarily to resolve mutual problems and coordinate work. A GS-9 technician has person-to-person contacts with clients, contractors and engineering firms to promote adherence to agency standards and advise of discrepancies.

At the GS-11 level, the technician has more freedom to plan and carry out assignments. The supervisor makes assignments in terms of major objectives, and there is little review of the technician's work during the progress of typical assignments. Technical assistance is infrequently required, but the supervisor may be consulted on unusual or controversial problems or policy questions. Person-to-person contacts are more extensive and concern complex engineering problems carried out without close supervision.

The appellant meets the GS-9 level. He receives direction and general instructions on projects from the Design/Certification Engineer, and the work is reviewed for technical accuracy. The appellant's contacts include [agency]'s management, engineers, contractors, consultants, and other technical personnel for the purpose of coordinating work efforts, providing assistance and advice on certification, drawings, and other matters pertaining to the hyperbaric systems. The appellant's level of responsibility does not meet the GS-11 level. His work assignments represent a more structured environment and do not generally involve the complexity found in GS-11 level assignments. Technical assistance is available from the Design/Certification Engineer if needed. The GS-11 level of responsibility assumes that the employee is performing assignments equivalent to the GS-11 level and would, therefore, have responsibility for adapting a general font of knowledge and interpreting precedents to handle complex assignments requiring the exercise of considerable judgment. In comparison, the appellant applies conventional engineering practices and a knowledge of the codes, specifications, and regulations to his projects. He exercises some judgment in determining the applicability of the specifications, codes, and engineering principles to the specific project, but consults with his supervisor on difficult problems or situations. This level of responsibility does not meet the intent of the GS-11 level.

Level of Responsibility is credited at GS-9.

Summary

Both Nature of Assignment and Level of Responsibility equate to the GS-9 level.

GS-1670, Equipment Specialist

The GS-1670 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 factorlevel 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, unless the deficiency is balanced by an equally important aspect which meets a higher level. The total points assigned are converted to a grade by use of the grade conversion table in the standard.

Under FES, positions which significantly exceed the highest factor level or fail to meet the lowest factor level described in a classification standard must be evaluated by reference to the Primary Standard, contained in Appendix 3 of the <u>Introduction to the Position Classification Standards</u>. The Primary Standard is the "standard-for-standards" for FES.

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.

At Level 1-6, the work requires knowledge of equipment and of the established methods, procedures, and techniques of an administrative program, including applicable underlying principles and theoretical and practical limitations, and skill to perform independently projects that include limiting features such as the following:

- the objectives are specific and well defined, and problems can be solved by varying slightly from established methods, procedures and precedents;
- the problem is straightforward and has been singled out of a larger investigation or project; unknown factors and relationships are mostly factual in nature; and
- the mechanisms involved are fairly well understood.

At Level 1-7, the work requires knowledge of a wide range of concepts, principles, and practices in the occupation, or those concepts and principles characterized as requiring extended specialized training and experience, and skill in applying this knowledge to difficult and complex assignments such as planning and conducting work that requires significant judgment in evaluating, selecting, and

adapting precedents and modifying procedures and criteria. At this level, work is conducted in agencies with nationwide/worldwide program responsibilities or employee is working with new equipment and developing policy.

The appellant's work meets Level 1-6. Comparable to the third illustration of the Equipment Specialist standard, the appellant writes and revises technical manuals for the agency's use and provides technical advice concerning the hyperbaric test facilities and support equipment. He reviews engineering drawings, standards, manufacturer's specifications, and current manuals. He drafts instructions and submits them to engineering for final approval. He reviews, analyzes, and interprets technical information related to the hyperbaric and life support systems and makes recommendations in support of the systems.

Level 1-7 is not met. The appellant does not have responsibility for the kind of broad specialized work associated with a worldwide organization or a nationwide agency as described at this level.

Level 1-6 is credited 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.

At Level 2-3, the supervisor makes assignments in terms of complete projects or portions of larger projects, and provides overall objectives, priorities, deadlines, and necessary background, and suggestions on potential difficulties. The supervisor gives general instructions on new policies, regulations, and procedures, and assists the specialist with controversial or especially difficult situations or those that lack clear precedents. The Equipment Specialist plans and carries out the successive steps and exercises initiative in obtaining and analyzing data and identifying, resolving, or alerting the supervisor to potential problems. The specialist handles problems and deviations in the assignment in accordance with instructions, policies, previous training, or accepted practice. The supervisor reviews completed work for technical adequacy, conformance with objectives, and compatibility with other work. The supervisor reviews work in process and upon completion when it leads to recommendations affecting policy.

At Level 2-4, the supervisor assigns continuing areas of responsibility and sets the overall objectives and resources available. Except for externally imposed deadlines such as those in contracts, the specialist and supervisor in consultation, develop the deadlines, projects, and work to be done. The equipment specialist plans and carries out the work, resolves most of the conflicts, coordinates the work with others, and interprets policy on own initiative in terms of established objectives. The employee keeps the supervisor informed of progress and potential matters. The supervisor reviews completed work only from an overall standpoint in terms of feasibility, compatibility with other work, or effectiveness in meeting requirements or expected results. Level 2-3 is met. The supervisor sets the overall guidelines and makes assignments in terms of complete projects and provides necessary objectives. For example, the supervisor assigned the appellant to be the lead in researching requirement needs for reactivating the vacuum system of the OSF and rewriting the OSF O&M manual. Although the appellant plans and carries out the steps for completing his assignments, the objectives, priorities, and deadlines were provided. The work is then reviewed for technical accuracy and conformance with the objectives, in both process and upon completion.

Level 2-4 is not met. The supervisor and appellant do not consult to develop deadlines, projects, or work to de done. The appellant coordinates the work with others but is not required to interpret policy on his own initiative.

Level 2-3 is credited for 275 points.

Factor 3 - Guidelines:

This factor covers the nature of guidelines used, and the judgment needed to apply them.

At Level 3-3, the equipment specialist uses a variety of standard, detailed guidelines and references, such as agency instructions, policies and regulations, technical publications, manufacturers' catalogs and handbooks, and supply databases. These are not completely applicable to the work or have gaps in specificity. He uses judgment to interpret and adapt the guides for application to specific problems, to analyze results, and to recommend changes.

At Level 3-4, the equipment specialist uses a wide range of technical material such as manuals, bulletins, textbooks, and manufacturers' catalogs. In addition, the specialist uses guidelines such as agency regulations and policy statements whose contents are frequently quite broad and general in nature. These provide only general guidance as to the most productive approach or methods to solve the most highly complex or unusual problems in the work. The specialist uses initiative and resourcefulness to deviate from or extend traditional methods or research trends to develop new criteria or policy proposals.

The appellant meets Level 3-3. He uses a variety of standard, detailed guidelines and references. Guidelines include [agency], NAVSEA, and NAVVAC regulations and policies and engineering standards and specifications. He uses judgment to select the approach, plan the assignment, and interpret the guidelines.

Level 3-4 is not met. The appellant is not required to use judgment to apply guidelines of this nature nor at this level of complexity. Any cases involving conflicting or controversial issues are discussed with a senior engineer.

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 in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

At Level 4-3, the equipment specialist performs assignments consisting of various tasks or duties involving different and unrelated processes and methods. The decision regarding what needs to be done depends upon the analysis of the subject, phase, or issues involved in each assignment, and the chosen course of action may have to be selected from many alternatives. The work involves conditions and elements that must be identified and analyzed to discern interrelationships.

At Level 4-4, the equipment specialist performs assignments requiring application of many different and unrelated processes and methods such as those relating to well established aspects of broad equipment stages such as preproduction and production or usage and disposal. Decisions regarding what needs to be done include the assessment of unusual circumstances, variations in approach, and incomplete or conflicting data. The work requires making many decisions concerning such things as planning the work and interpreting considerable data.

Level 4-3 is met. The appellant performs assigned duties that require him to review, analyze, collect, and interpret technical information based on his knowledge of the hyperbaric and diver life support systems. The appellant determines what needs to be done in each assignment and makes recommendations as to actions to be taken.

Level 4-4 is not met. The appellant's assignments do not require him to perform at the breadth or level of complexity typical of Level 4-4. Unusual problems and conflicting data are taken to senior engineers for resolution.

Level 4-3 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.

At Level 5-3, the purpose of the work is to treat a variety of conventional problems, questions, or situations in conformance with established criteria. For example, the specialist identifies needed areas of emphasis or investigates common types of equipment performance or maintenance problems, identifies the causes, and develops and recommends solutions. The work product or service affects the design or operation of systems, programs, or equipment, and the adequacy of testing operations.

At Level 5-4, the purpose of the work is to establish criteria, formulate projects, assess program effectiveness, or investigate or analyze a variety of unusual conditions or problems. For example, the specialist speaks for the agency on technical panels and committees that develop general plans and procedures for the introduction of a new system. The work product or service affects the work of other experts in this or related occupations, or the development or accomplishment of major aspects of a systems program or agency mission.

The appellant meets Level 5-3, where the purpose of the work is to provide expert technical advice in the specialty area of hyperbaric systems and ensure that proper documentation is maintained on all systems and is in compliance with certification requirements. The work products affect the goals of the department.

The appellant does not meet Level 5-4. There is no evidence that the appellant formulates projects, establishes criteria, or investigates a variety of unusual conditions or problems, nor does he represent the agency on technical planning committees.

Level 5-3 is credited for 150 points.

Factor 6 - Personal Contacts and Factor 7 - Purpose of Contacts:

Factor 6 measures face-to-face contacts and telephone dialogue with persons not in the supervisory chain. In General Schedule occupations, the purpose of personal contacts ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, and objectives. The personal contacts which serve as the basis for the level selected for Factor 7 must be the contacts which are the basis for the level selected for Factor 6.

Persons contacted

At Level 2, persons contacted are civilian or military employees in the same agency but outside of the immediate organization and related or support units.

At Level 3, persons contacted are civilian or military individuals or groups from outside the employing agency, such as supply, procurement, logistics, budget, machine shop, etc. This level also includes contacts with program officials within the agency on a nonroutine basis.

Level 2 is met. The appellant's contacts are normally with individuals within the agency including all levels of [agency]'s management, as well as contractors and consultants. Level 3 is not met since contacts outside the agency are established and the role and authority of the person contacted is known in advance.

Purpose of contacts

At Level b the purpose of contacts is to plan or coordinate work efforts, or advise on or solve technical problems.

At Level c, the purpose of contacts is to persuade individuals or groups with different opinions or interest, e.g., to change criteria or methods, accept findings, or gain information.

Level b is met. The purpose of the appellant's contacts is to plan or coordinate work efforts, or to advise on or solve technical problems. He is not normally required to use persuasion and negotiation as described at Level c.

The combination of Level 2 for *Contacts* and b for *Purpose* equates to 75 points according to the table in the standard.

Factor 8 - Physical Demands:

This factor measures the requirements and physical demands placed on the employee in performing the work assignment, including the agility and dexterity required, and the extent of physical exertion.

The appellant meets Level 8-1, where the work is primarily sedentary. The employee may sit comfortably to do the work. There may be some walking, standing, bending, carrying of light items such as papers, books or small parts.

Level 8-1 is credited for 5 points.

Factor 9 - Work Environment:

This factor considers the risks and discomforts in the employee's physical surroundings, and the safety precautions required.

The appellant meets Level 9-1. At this level, the employee typically works indoors in an environment involving everyday risks or discomforts which require normal safety precautions typical of such places as offices. The appellant only occasionally works around hyperbaric chambers and machinery. He normally works in an office.

Level 9-1 is credited for 5 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 Contacts7. Purpose of Contacts	2-b	75
8. Physical Demands	8-1	5
9. Work Environment	9-1	5
	TOTAL	1885

A total of 1885 points falls within the range for a GS- 9, 1885 to 2100 points, according to the Grade Conversion Table in the GS-1670 standard.

Summary

Both the engineering technician work and equipment specialist work equate to GS-9.

Decision

The appellant's position is properly classified as Engineering Technician, GS-802-9.