U.S. Office of Personnel Management Classification Appeals and FLSA Programs



1900 E Street, N.W. Washington, DC 20415

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

Appellant: [name]

Agency classification: Safety and Occupational Health Specialist

GS-018-12

Organization: Overseas Management Support Division

Office of Administrative Services

Bureau for Management

[agency]

Washington, D.C.

OPM decision: Safety and Occupational Health Specialist

GS-018-9

OPM decision no.: C-0018-09-02

Richard Quasney

Classification Appeals Officer

August 31, 1999

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a classification 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 the conditions and time limits specified in title 5, Code of Federal Regulations, sections 511.605, 511.613, and 511.614, as cited in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[agency human resources officer]

[appellant]

Introduction

On April 22, 1999, the Washington Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who is employed as a Safety and Occupational Health Specialist, GS-018-12, in the Overseas Management Support Division of the Office of Administrative Services, Bureau for Management, [agency], in Washington, D.C. [Appellant] requested that her position be classified as Safety and Occupational Health Manager, GS-018-14. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code.

An on-site position audit was conducted by a Washington Oversight Division representative on July 14, 1999, and a telephone interview with the appellant's first-line supervisor, [name], on August 18, 1999. This appeal was decided by considering the audit findings and all information of record furnished by the appellant and her agency, including her official position description, number 23232, most recently classified by the servicing personnel office as Safety and Occupational Health Specialist, GS-018-12, on March 22, 1999.

General Issues

The appellant included a large number of work samples in her appeal submission, many of them dating back to the early and mid-1990's, during which time she performed occasional assignments relating to safety and occupational health issues in [agency] overseas [activities]. However, in 1995 a new position of foreign service officer was established to serve as the overseas safety officer and later as the appellant's immediate supervisor, and since then the appellant's direct involvement in these functions has been limited to acting in her supervisor's absence. Other work samples submitted relate to various assignments the appellant carried out in connection with the agency's move to the [building name] in 1997. These were, in effect, one-time special projects related to coordinating and setting up safety procedures and systems in the new building. In classifying positions, only current duties and responsibilities, rather than duties performed in the past, may be considered (5 U.S.C. 5112). This has generally been interpreted by OPM as those duties that have occurred within the past year. Also, duties that are not regular and recurring cannot affect the grade of a position, including onetime only and temporary duties (Introduction to the Position Classification Standards, section III.F.2), and duties performed only in the absence of another employee (The Classifier's Handbook, chapter 5). Therefore, this evaluation considers only those duties regularly performed by the appellant within approximately the past year, and for which she is personally responsible.

The appellant also submitted several position descriptions of safety and occupational health managers classified at the GS-13 level in other agencies as justification for upgrading her position. By law, positions must be classified solely by comparing their current duties and responsibilities to standards and guidelines issued by the Office of Personnel Management (5 U.S.C. 5106, 5107, and 5112). Since comparison to OPM standards is the exclusive method for classifying positions, the appellant's position cannot be compared to others as a basis for deciding her appeal. The practical reason for this is twofold. First, other positions selected for comparison purposes may not necessarily be correctly classified. Second, positions that appear superficially similar based on comparison of the position descriptions may in fact have significant differences that affect their grade levels. For example, our review of the position descriptions submitted by the appellant indicates that in each case, the size, scope, and complexity of the programs represented are much broader than the appellant's

assignments. They include the safety and occupational health programs of: the largest civilian Department and its many subordinate bureaus, innumerable field locations, and a complex, multifaceted mission; a service center of another major Department whose mission includes aircraft and fleet operations and the performance of work in remote locations under adverse conditions; and the General Services Administration with its attendant regional and Governmentwide responsibilities. Thus, positions with the same general functional responsibilities may differ dramatically in the complexity and impact of the work performed.

Lastly, the appellant makes various statements in her appeal about the perceived fairness of her agency's classification process in regard to their evaluation of her position. In adjudicating this appeal, our only concern has been to make an independent decision on the proper classification of the position. By law, we must make that decision solely by comparing the current duties and responsibilities to OPM standards and guidelines. Any prior actions or decisions on the part of the agency have no bearing on that process and thus are not addressed in this evaluation.

Position Information

The appellant coordinates and resolves issues related to safety and occupational health and environmental concerns affecting the approximately 2000 [agency] employees duty-stationed at the [building name] in Washington, D.C., and two small warehouses in outlying suburbs. This includes such duties as conducting regular inspections of office space for potential hazards and identifying corrective actions required, investigating complaints regarding interior air quality, developing and updating evacuation plans and emergency procedures, preparing notices regarding safety and motor vehicle issues, receiving and maintaining injury reports, developing statements of work for contractor training of employees designated as collateral duty safety personnel, preparing annual reports on safety and occupational health activities and incidents, preparing annual funding estimates for training, equipment, brochures, and other safety-related materials, and other related functions. As [agency] is the lead tenant agency in the [building name] for safety and occupational health, the appellant is also assigned responsibility for safety issues related to the on-site child development center, and is designated as the point of contact for certain limited matters related to the health unit, such as preparing notices regarding the unit's operation and coordinating with the Department of Health and Human Services on the number of [agency] employees to be served by the unit and the associated costs.

Although the appellant's position description identifies her as "one of two employees responsible for developing world-wide safety and health programs," her actual duties relate almost exclusively to [agency] facilities in the Washington, D.C., area. For example, her position description states that she "conducts inspections occasionally at overseas facilities," but she reported that this occurs perhaps only once every three or four years and that her last overseas inspection was in 1991. It describes her as developing the agency's "worldwide hazard communication program" and "worldwide ergonomic program," but for practical purposes these consist of occasional and isolated activities that do not constitute "programs" as that term is generally understood. For example, the appellant developed the hazard communication program guideline in 1995, which basically conveys to [agency] managers their responsibilities under OSHA requirements regarding the use of hazardous chemicals. However, the appellant has had no further ongoing responsibility for ensuring that these

requirements are observed. Rather, her activities in this area are limited to preparing an annual update to the inventory of hazardous products used by [agency] for transmittal to the [another agency]. The appellant developed the ergonomics program guideline in 1997, which consists of information to assist employees in avoiding musculoskeletal injuries. Again, however, subsequent activities on the appellant's part have been limited to advising employees on potential ergonomic problems observed during inspections (e.g., how to set up their workstations and position themselves properly) and on special ergonomic office equipment available.

Series Determination

The appellant's position is properly assigned to the Safety and Occupational Health Series, GS-018, which covers positions involved in the management, administration, or operation of a safety and occupational health program or performance of administrative work concerned with safety and occupational health activities and includes the development, implementation, and evaluation of related program functions. Neither the appellant nor the agency disagrees.

Title Determination

The appellant's position is correctly titled as Safety and Occupational Health Specialist, which is the authorized title for all nonsupervisory positions in this series at the GS-12 grade level or below that are assigned a number of program elements such as inspection, evaluation, training, or providing administrative and technical services to management and employees.

The title requested by the appellant, Occupational Safety and Health Manager, is not appropriate, as that title is reserved for those positions responsible for planning, directing, operating, and evaluating a safety and occupational health program for an entire agency or subordinate level, such as a bureau, command, regional office, or installation. In the appellant's case, neither the scope of her assignments nor the type of authority she exercises in carrying them out are indicative of "program management." Program management presumes the direction and oversight of work carried out by others, either through direct supervision or through the development and issuance of policy and procedural guidance for use by other employees in the program or functional area. It requires a program or function of sufficent size and complexity as to involve continual planning and direction, policy formulation, review and adjustment of funding and manpower resources, and a formalized system for evaluating the effectiveness of the work being conducted. The appellant carries out specified assignments related to safety and occupational health concerns in that portion of the [building name] occupied by [agency] employees. She reports to a foreign service officer who is designated as the overseas safety officer, who in turn reports to the Chief of the Overseas Management Support Division, who has delegated responsibility for OSHA compliance. The Division Chief reports to the Deputy Director and Director of Administrative Services, the latter of whom is the Designated Agency Safety and Health Official (DASHO). There are no other safety and occupational health personnel in the agency. Within the [agency] Washington facility, certain administrative employees are designated as collateral duty safety officers, but the appellant reported that aside from occasionally accompanying her on office inspections, they do not provide any other ongoing technical assistance or support. Thus, the context within which the appellant works does not allow for directing and overseeing the work of others, as the safety and occupational health activities carried

out at the [building name] are not extensive enough to require either additional staff or continual planning and policy development. Further, the appellant's position in the organizational hierarchy, four levels below the agency's top designated safety official, does not permit her to operate with the degree of independent authority and action normally associated with program manager positions.

Grade Determination

The position was evaluated by application of the position classification standard for the Safety and Occupational Health Management Series, GS-018, dated August 1981. This standard is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are to be assigned for each of the following nine factors, with the total then being converted to a grade level by use of the grade conversion table provided in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For a position 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, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level.

Factor 1, Knowledge Required by the Position

This factor measures the nature and extent of information an employee must understand in order to do the work, and the skills needed to apply that knowledge.

At Level 1-5, work requires a basic foundation of knowledge related to safety and occupational health principles, regulations, standards, and work processes, sufficient to perform such assignments as routine inspections where low safety and occupational health risks are anticipated, such as in office buildings and small retail stores.

At Level 1-6, work requires knowledge of safety and occupational health principles, methods, and techniques related to the control or elimination of unsafe physical conditions, equipment and machine hazards, and risks in human performance which may cause injury or property damage, and practical knowledge of the laws, regulations, and policies related to safety and occupational health to interpret and explain the reasons for applying measures to minimize or abate environmental hazards. At this level, the safety risks encountered are covered by standard criteria, and control is achieved by the application of conventional safety and occupational health methods. Illustrations provided by the standard typifying the knowledge requirements of this level are as follows:

Knowledge and skill sufficient to survey specialized industrial operations and practices, including guarding on machines, plant lay-out and design, and work processes, and prepare a report of findings with proposed citations, penalties, and abatement dates.

Knowledge and skill sufficient to advise or formally instruct supervisors and employees on traffic safety techniques, proper storage of hazardous materials, common laboratory hazards, and building evacuation procedures.

The knowledge required by the appellant's position includes elements of both Levels 1-5 and 1-6. The actual inspections she conducts are indicative of Level 1-5, in that she inspects office space in a new building with low safety risks rather than industrial facilities with the associated machine hazards. However, other duties performed by the appellant are consistent with Level 1-6, such as preparing informational material on traffic and motor vehicle safety, responding to air quality complaints involving such common sources as exhaust fumes and cleaning products, and developing and coordinating building evacuation procedures for employees and the child development center.

The position does not meet Level 1-7. At that level, work requires comprehensive knowledge of regulations, standards, and techniques applicable to a broad range of safety and occupational health duties, including knowledge of the standards, procedures, and techniques applicable to construction projects including construction equipment, materials, and utility systems; technical knowledge sufficient to analyze safety design features and specifications and develop new methods and procedures to identify or control hazardous construction processes and equipment usage; and knowledge of psychological and physiological factors sufficient to evaluate the relationship of an individual to the working environment and to motivate individuals to perform in a safe manner. An illustration provided at this level is as follows:

Knowledge of safety and occupational health principles, practices, standards, and abatement measures related to diverse industrial settings sufficient to apply a wide range of methods and techniques in the inspection of private and Government-owned plants, factories, foundries, and shipyards and to determine compliance with applicable regulatory provisions.

This level clearly applies to those positions that operate within an industrial or construction setting with the wide range of attendant safety and occupational health hazards. Regardless of how well-versed the appellant may be in relation to common office safety concerns, such as fire response, tripping or falling hazards, and ergonomic issues, her position simply does not require a breadth of knowledge comparable to that associated with ensuring the safe operation of construction projects or industrial processes. This would include, for instance, the proper operation of heavy equipment such as bulldozers and cranes, safeguards for working on electrical or other power-generating systems, and human-machine interactions in a factory or assembly line setting. Within an office environment, the degree of safety and occupational health knowledge required is narrow and limited to a few common and well-defined hazards and would not exceed Level 1-6 in any respect.

Level 1-6 is credited. 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, and the review of completed work.

At Level 2-4, the supervisor sets the overall objectives and management resources available to accomplish the work. Within these parameters, the employee is responsible for independently planning and carrying out the work, coordinating with principal organizational representatives,

interpreting policies, standards, and regulations, and resolving most conflicts and hazardous situations, informing the supervisor of progress, potential controversies, or far-reaching implications. Completed work such as reports of program accomplishments are reviewed only from an overall standpoint for effectiveness.

The level of responsibility under which the appellant works is comparable to Level 2-4. The appellant's supervisor indicates general expectations related to the assigned functional responsibilities. The appellant works basically independently in carrying out recurring assignments, responding to employee complaints and inquiries, and coordinating with other tenant agency representatives, keeping the supervisor informed of any significant actions contemplated. Her work, including written products, is reviewed for overall effectiveness and customer satisfaction.

The position does not meet Level 2-5. This level is reserved for safety and occupational health managers who work under administrative direction with assignments in terms of broadly defined safety and occupational health mission or functional goals, and who independently plan, design, and carry out programs within the framework of applicable laws. As the manager at this level typically provides technical leadership, work results are considered authoritative and are reviewed only for fulfillment of program objectives or the contribution to the advancement of safety and occupational health management. Recommendations for changes in program direction or the initiation of new projects are usually evaluated for such considerations as availability of funds and other resources, relationship to broad program goals, or national priorities.

Implicit at this level is a degree of program management authority, both in terms of the latitude allowed for independent action and the breadth and complexity of the program managed, that is not present in the appellant's position. As was discussed in the title determination section of this evaluation, the appellant's position is not that of a safety and occupational health manager, nor does she work under administrative supervision only. She reports to the overseas safety officer, who personally participates in the more difficult or sensitive matters that arise, such as those issues requiring interagency coordination, and who reviews all of her written products before they leave the office. Agencywide technical leadership, as opposed to technical expertise, is provided by the DASHO. The appellant carries out recurring assignments such as inspections, responds to employee inquiries and complaints, and may initiate some actions, such as preparing informational notices. She does not, however, determine program direction in the sense of guiding the actions of other agency safety and occupational health specialists, nor does she initiate major new projects of such magnitude that they would have to be considered from the perspectives of funding availability and national priorities.

Level 2-4 is credited. 450 points

Factor 3, Guidelines

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

At Level 3-3, guidelines include public laws, Executive Orders, State and municipal codes, OSHA standards, agency manuals, national safety association publications, and manufacturing association

criteria. The work requires independent interpretation, evaluation, selection, and application of guidelines to specific situations, including making modifications and adaptations when necessary. Judgment must be exercised in applying standard hazard control or elimination practices to different situations.

The guidelines used by the appellant match Level 3-3. Guidelines consist primarily of common building and fire safety codes and standards, supplemented by additional guidance issued by the General Services Administration, and various OSHA standards and guides, that require interpretation and application to specific situations.

The position does not meet Level 3-4. At that level, available guidelines tend to lack specificity for many applications, such as departmental or agency policies, recent developmental results, and findings of nationally recognized safety and occupational health organizations. These guidelines are often insufficient to resolve the highly complex or unusual work problems encountered, such as determining the potential hazard of detonating various experimental explosive devices in a research and development environment. The employee must evaluate new trends for policy development or for further inquiry and study leading to new methods for eliminating or controlling serious hazards to life and property.

Considering that the appellant works in an office environment, she is not routinely confronted with "highly complex or unusual" workplace hazards where elimination or abatement measures are not well known or established. This setting does not present the types of "serious hazards to life and property" inherent to this level, that would engender the establishment of a "policy development" function to guide the actions of other safety and occupational health specialists stationed throughout the agency.

Level 3-3 is credited. 275 points

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of the tasks or processes 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 work consists of a variety of duties requiring the application of different safety and occupational health methods and techniques. The hazardous conditions or safety and occupational health problems encountered are typically conventional in nature. Inspections include business firms with stable work processes and small storage facilities where hazardous materials are placed. Work assignments require the identification of elements contributing to human and machine failure which may cause injury or property damage.

The complexity of the appellant's work is comparable to Level 4-3. The appellant performs a variety of duties requiring different methods and techniques, such as inspecting office and warehouse space for physical hazards that may cause mishaps, ensuring that emergency evacuation plans are adequate, obtaining air quality testing services in response to employee complaints, and keeping abreast of

developments that may affect safety and health, such as new ergonomic office equipment or changes in local traffic laws. Within the environment of the [building name], the problems typically encountered can only be described as "conventional in nature," such as fumes from carpet cleaning or painting, slippery floors, and access/egress issues.

The position does not meet Level 4-4. At that level, assignments cover a wide range of work operations and environmental conditions involving a substantial number and diversity of hazards, or a wide variety of independent and continuing assignments in a specialized area of safety and occupational health that have exacting technical requirements. The employee must evaluate a variety of complex, interrelated physical conditions, operating practices, hazardous human-machine interaction, and serious mishaps. Assignments require analysis of unconventional problems or circumstances and are characterized by the uncertainty of accepted control or abatement methods available for use. The nature of the hazards is such that no single approach is adequate to control or eliminate a given problem; rather, the adaptation of proven safety and occupational health techniques is necessary.

The [building name] would not be expected to contain a "substantial number and diversity of hazards." This is a standard office environment and as such does not encompass a "wide range of work operations or environmental conditions" (i.e., from a physical rather than programmatic standpoint, with most of the employees performing desk work.) This type of work environment does not present the sorts of complex problems and circumstances contemplated at this level, such as hazardous human-machine interaction, that can only be abated by examination of many interrelated factors, such as equipment characteristics, operating procedures, and physiological limitations.

Level 4-3 is credited. 150 points

Factor 5, Scope and Effect

This factor covers the relationship between the nature of the work, and the effect of the work products or services both within and outside the organization.

At Level 5-3, the work involves the evaluation and analysis of safety and occupational health problems, conditions, and administrative practices affecting work operations and environmental conditions. Work efforts affect the quality of surveys and inspections conducted, the adequacy of techniques applied to control or eliminate hazards, and the physical safety and occupational health of employees and the general public.

The scope and effect of the appellant's work match Level 5-3. The purpose of her work is to carry out specific assignments affecting safety-related practices and environmental concerns related to [agency]-occupied office space at the [building name]. Her work directly concerns the identification and correction of potential workplace hazards and thus affects the physical well-being of employees and visitors.

The position does not meet Level 5-4. At that level, the purpose of the work is to assess the effectiveness of specific programs, projects, or functions. The employee plans alternative courses of

specialized action to resolve hazardous conditions and unsafe working practices. The work often involves the development of safety and occupational health criteria and procedures for major agency activities. Work products impact: (1) a wide range of agency safety and occupational health programs; or (2) safety and occupational health programs of large, private sector establishments.

This level applies to those positions operating within the context of a broad safety and occupational health program, where the employee either develops criteria and procedures for, and reviews and evaluates the work of, other safety and occupational health specialists at subordinate agency levels, or analyzes safety measures instituted by large businesses for effectiveness. In contrast, the appellant personally carries out certain specific and narrowly-defined functions, such as inspecting office space and responding to employee complaints. There are no other safety and occupational health specialists in the agency for whom the appellant could develop guidance or procedures or whose work she could evaluate.

Level 5-3 is credited. 150 points

Factor 6, Personal Contacts

This factor includes face-to-face and telephone contacts with persons not in the supervisory chain. The relationship between Factors 6 and 7 presumes that the same contacts will be evaluated under both factors.

At Level 6-3, contacts are with a variety of individuals from other agencies or outside organizations, such as representatives of private businesses, contractors and consultants, State and local governmental officials, representatives of professional societies and national safety associations, and safety professionals from private establishments.

The appellant's personal contacts match Level 6-3, in that she has contacts with safety and occupational health staff in other Federal agencies, and occasionally with contractors.

The position does not meet Level 6-4. At that level, contacts are with high ranking officials from outside the agency such as key public and corporate executives, elected representatives, and top scientific personnel of other departments and agencies, governmental organizations, private industry, national safety and health organizations, public groups, and national research organizations. At this level, the employee may participate as a technical expert on committees and seminars of national and international stature.

The appellant has no contacts of this nature. Although she reported that she has had contacts with the OSHA Assistant Secretary and Region 3 Administrator, these contacts were made in connection with issuing invitations to awards ceremonies hosted by the Washington Federal Safety and Health Council, to which she is the [agency] representative. Thus, the contacts are infrequent and informal, and are not made within the context of performing her assigned duties.

Level 6-3 is credited. 60 points

Factor 7, Purpose of Contacts

This factor covers the purpose of personal contacts ranging from factual exchange of information to situations involving significant or controversial issues and differing viewpoints and objectives.

At Level 7-2, the purpose of the contacts is to resolve safety and occupational health problems by planning and coordinating activities in conjunction with supervisors to control or eliminate hazards. Through advisory and promotional efforts, the employee at this level motivates employees and public visitors to apply safe operating practices.

The purpose of the appellant's contacts is consistent with Level 7-2. Her contacts are to coordinate actions required in connection with safety and occupational health issues (e.g., coordinating emergency evacuation plans with other tenant agencies, obtaining needed services such as air quality testing or building maintenance), and to encourage employees to adopt recommended safety measures (e.g., seat belt usage and ergonomic equipment.)

The position does not meet Level 7-3. At that level, the purpose of the contacts is to influence, motivate, and encourage unwilling, skeptical, and often uncooperative individuals to adopt or comply with safety and occupational health standards, practices, or contractual agreements. For example, contacts are established to: (1) persuade and negotiate agreements involving agency managers or private sector executives where there are serious technical disagreements and complex employeemanagement relations; or (2) justify changes in operational programs to managers. This level also involves deposing, making affidavits, and testifying in a court of law where an opposing attorney may challenge the competence of the employee including his/her work methods or findings.

This level suggests those situations where management is unwilling to institute broad changes in operating practices required to mitigate hazardous working conditions, and the employee must negotiate agreements and explain and justify technical determinations. In the appellant's case, the nature of the work performed at the [building name] does not lend itself to the institution of these types of broad operational changes in response to safety concerns.

Level 7-2 is credited. 50 points

Factor 8, Physical Demands

This factor covers the requirements and physical demands placed on the employee by the work situation.

The position matches Level 8-1, which covers sedentary work with some walking, standing, bending, and carrying of light objects.

Level 8-2 is not met, where work involves regular and recurring physical exertion related to frequent inspections and surveys and occasional lifting and carrying of moderately heavy items, such as when inspecting ships or construction sites. As the appellant inspects mostly office space, the amount of physical exertion required is minimal.

Level 8-1 is credited. 5 points

Factor 9, Work Environment

This factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required.

The position matches Level 9-1, which describes a typical office environment with occasional exposure to conditions requiring special safety precautions and clothing.

Level 9-2 is not met, where work involves regular and recurrent exposure to such hazards as operating machinery, shielded radiation sources, irritant chemicals, acid fumes, high noise levels, adverse weather conditions, and high temperatures from steam lines. None of these conditions normally exist at the [building name].

Level 9-1 is credited. 5 points

Summary

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge Required	1-6	950
Supervisory Controls	2-4	450
Guidelines	3-3	275
Complexity	4-3	150
Scope and Effect	5-3	150
Personal Contacts	6-3	60
Purpose of Contacts	7-2	50
Physical Demands	8-1	5
Work Environment	9-1	5
Total		2095

The total of 2095 points falls within the GS-9 range (1855-2100) on the grade conversion table provided in the standard.

Decision

The appealed position is properly classified as Safety and Occupational Health Specialist, GS-018-9.