Classification Appeal Decision
Under section 5112 of title 5, United States Code

Appellant: [Appellant]
Agency classification: Quality Assurance Specialist
GS-1910-12
Organization: Department of the Air Force
OPM decision: Quality Assurance Specialist
GS-1910-12
OPM decision number: C-1910-12-01

/s/
Kathy Day
Classification Appeals Officer
12/28/00
Date
As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

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Introduction

On August 25, 2000, the Atlanta Oversight Division, U.S. Office of Personnel Management (OPM), accepted an appeal for the position of Quality Assurance Specialist, GS-1910-12, [organizational and geographical location]. The appellant is requesting that his position be classified as Senior Quality Assurance Functional Advisor, GS-1910-13.

The appeal was accepted and processed under section 5112(b) of title 5, United States Code (U.S.C.). 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.

General issues

The appellant believes that his current position description does not adequately encompass the total scope of his acquisition reform duties. He also believes his work is “professional” rather than “expert technical,” as stated in his position description. He compares his position to other positions classified as Senior Quality Assurance Functional Advisor, GS-1910-13.

By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). 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.

OPM considers a position description adequate for classification purposes when it is considered so by one knowledgeable of the occupational field involved and of the application of pertinent classification standards, principles, and policies, and is supplemented by otherwise accurate, available, and current information on the organization, functions, programs, and procedures concerned. We find the current position description adequate. For purposes of this appeal, our decision will be based on the official position description of record supplemented by the information provided by the appellant, the acting supervisor, the program manager, and his agency.

Work classified to a professional series requires education and training in the principles, concepts, and theories of the occupation. Typically, these can be gained only through completion of a specified curriculum at a recognized college or university. This requirement is called a “positive education requirement” and is common to nearly all professional occupational series. Expert technical work, however, is based on extensive experience and on-the-job training rather than on formal academic education in the discipline itself. The GS-1910 series is not a professional series, i.e., it does not have a positive education requirement. It would not, therefore, be appropriate for the appellant’s position description to indicate a requirement for professional work. The expert specialist performs work closely allied to professional work and would be expected to work independently and possess a high degree of specialized knowledge and skill.
Position information

The appellant is assigned to position description number [#].

The appellant implements quality assurance contract administration services functions according to higher headquarters directives and the Federal Acquisition Reform. He plans and implements quality assurance and reliability programs in all areas of contract performance for complex weapons systems, including concept exploration and definition; demonstration and validation; engineering and manufacturing development, production, and deployment; operations and testing; and maintenance and technical/engineering support. The appellant serves as a member of the Integrated Product Team providing guidance, insight, quality technical assessment, verifications of compliance, risk identifications, cost saving identifications, continuous improvement identifications, analysis of nonconforming products, and recommendations for review or redirect of actions and resources.

He performs quality assurance/reliability statistical analysis; determines and implements sampling plans and procedures; and makes recommendations for determination of the adequacy and effectiveness of product quality levels, characteristics, control parameters, process controls, failure analysis, and adequacy of procedures to ensure compliance. The appellant reviews contracts; specifications; drawings; and quality assurance plans, processes and work instructions for adequacy and conformance. He also assists in the preparation of quality assurance requirements for contracts’ statements of work, specifications and amendments.

The appellant monitors the contractor’s quality assurance systems and operations and assures adequacy and effectiveness of the quality and reliability program. He performs special studies and surveys, witnesses testing and examinations of the product, accumulates data, performs reliability analyses, determines findings, and makes recommendations for corrective actions.

Approximately 90 percent of the appellant’s time is spent on quality assurance of the AGM-142 missile system which was originally an Israeli built weapon that has been transitioned to United States production. According to the program manager, translating everything from Hebrew into English, changing many vendors, and dealing with contractors from Korea, Australia, and Israel have made this program extremely difficult and intricate and created many quality issues. The appellant must be knowledgeable of the entire manufacturing process to identify technical issues and critical needs so that he can recommend changes to improve the quality assessment. The program manager relies on the appellant to investigate problems and provide recommendations. She stated that his recommendations are always accepted.

The appellant works under the general technical and administrative supervision of the Specialized Contracts Branch Chief. He receives work assignments in terms of program objectives, policies, requirements, constraints, time frames, and resources. He works independently and completed work is reviewed in terms of satisfactory compliance with overall policy, contract and program requirements.
Series and title determination

The agency determined that the appellant’s position is properly classified as Quality Assurance Specialist in the GS-1910 series. The appellant agrees with the series determination but believes his position should be titled Senior Quality Assurance Functional Advisor.

The GS-1910 series covers positions involved in planning, developing, or administering quality assurance programs supporting the development, acquisition, production, use, maintenance, storage, and supply of products required by Federal agencies. Such positions are primarily concerned with the systematic prevention of defects and nonconformances, the identification of unsatisfactory trends and conditions, and the correction of factors which may contribute to defective items.

The appellant’s position is appropriately classified in the GS-1910 series. Quality Assurance Specialist is the approved basic title for all nonsupervisory positions in this series. Where appropriate, a parenthetical specialization may be added. The agency may unofficially use organizational titles for internal administration, program management, or similar purposes.

Standard determination


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, 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.

The appellant disagrees with the agency determination of factors 1, 2, 4, 5, 6, 7, and 9. We have reviewed factors 3 and 8 and agree with the agency determination. Therefore, only those factors contested by the appellant will be discussed in this decision.

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 1-7. The appellant believes Level 1-8 is correct.

Level 1-7 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. The quality assurance specialist has broad knowledge of the practices, policies, and procedures of related activities such as contract administration, engineering, production, and procurement and skill in coordinating quality assurance plans and programs with these activities. For example, the specialist at this level might design, plan, and implement an effective and economical quality assurance program; have knowledge of methods, processes and materials associated with manufacturing an avionics system or subsystem; use a wide range of methods, principles, and practices to evaluate the contractor’s conformance to quality requirements and to assure that procedures adequately control the quality of the product. The specialist may also use various methods of statistical analysis, control, sampling and evaluation to determine compliance with the many associated aspects of quality control.

Level 1-8 requires mastery of quality assurance concepts, operating principles, and methodology applicable to a major agency program or mission area, e.g., the quality assurance program providing support to agency maintenance activities. This includes expert knowledge of organizational missions, objectives, and procedures; the relationship with other program areas, e.g., acquisition or logistics; and the regulatory framework in which the program operates. The specialist exercises a very high degree of skill in applying this knowledge to the analysis and resolution of very complex or sensitive problems related to quality assurance, and in applying new developments and methodologies to assigned program areas. The specialist utilizes technical expertise and broad experience in assigned program area in dealing with extremely broad and complex quality problems which are further complicated by such factors as the wide dispersion of organizations and activities involved, and the multiplicity of authorities, policies, and controls. The results of problem research/study are incorporated into program directives covering new and innovative conceptual approaches, technologies, and methods for enhancing the assessment of quality performance, and identifying areas for improvement.

The appellant meets and somewhat exceeds Level 1-7. However, he does not meet the full intent of Level 1-8. He has a comprehensive knowledge of the quality assurance program including the methods, processes and materials associated with manufacturing the AGM-142 missile system and subsystems. He also uses a wide range of methods, principles, and practices to evaluate the contractor’s conformance to quality requirements and to assure that procedures adequately control the quality of the product. Similar to Level 1-8, the appellant has expert knowledge of the mission, program and procedures related to quality assurance. He keeps abreast of new developments and requirements in the field, and his work with the AGM-142 is complex. However, Level 1-8 is looking not simply for a level of technical expertise to deal with the quality assurance of a particular complex weapons system but rather for a level of mastery to apply theoretical approaches and new developments to problems that are of an overall program or policy nature and more far-reaching than a single project or system.

The standard provides illustrations at Level 1-8 which help to clarify the intent of the factor level description. Typical of this level is an employee at the agency headquarters level who develops agency plans, policies, and procedures to be used by others in the field; who is responsible for studying unprecedented quality assurance problems and developing new techniques and procedures and changing agency policy; or who evaluates field performance, provides technical
advice to headquarters staff, and serves on interagency committees. Technical expertise alone is not sufficient to meet the intent of Level 1-8. There must also be significant program or policy responsibility. The appellant’s quality assurance responsibilities are primarily limited to the AGM-142 missile system with some support to several other quality assurance programs concerned with aircraft weapons systems. He provides comments to draft policy directives issued by higher management but is not responsible for making policy determinations. His duties do not encompass the broad program responsibilities necessary to fully meet and credit Level 1-8.

Level 1-7 is credited for 1250 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 2-4. The appellant believes Level 2-5 is correct.

At Level 2-4, the specialist plans and carries out assignments independently, determines the scope and level of quality assurance activities, establishes priorities, interprets and applies agency policies and procedures, and coordinates and consults with other activities as required. The specialist has considerable expertise and is responsible on his own for resolving problems involving deviations from established procedures, unfamiliar situations, or unusual requirements. The supervisor is kept informed of potentially controversial issues.

At Level 2-5, the supervisor provides only administrative guidance giving the employee wide latitude for identifying specific problems for investigation, projects to be initiated, and goals to be met. The specialist independently monitors and evaluates the effectiveness of the agency’s programs and develops new procedures or recommendations for policy change. Results of the work are normally accepted without significant change.

The appellant meets Level 2-4. He is considered a technical expert in the AGM-142 system and independently determines what quality assurance activities are necessary to ensure conformance with the contract. He resolves problems, deviates from standard procedures when necessary, and handles unusual requirements associated with the AGM-142 missile system. This falls short of Level 2-5. This level not only reflects administrative supervision only, with full technical authority delegated to the employee, but also is typically accompanied by responsibility for a significant program or function. Although the appellant has significant technical responsibility, his program responsibilities are limited to the AGM-142 system primarily and the program manager retains ultimate responsibility and authority for administration of the quality assurance program. Level 2-4 involves a high degree of independence and responsibility, and thus fully recognizes the technical responsibility vested in the subject position. Neither the absence of immediate supervision in the day-to-day operations nor the fact that the appellant’s technical decisions are normally accepted serves to support a level above 2-4.

Level 2-4 is credited for 450 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. The agency credited Level 4-4. The appellant believes Level 4-5 is correct.

At Level 4-4, the quality assurance specialist performs varied duties involving the complete range of quality assurance principles, techniques, and methodology to plan and accomplish projects for complex products. The specialist develops the overall plans and approaches based on technical requirements; monitors the application and effectiveness of controls and methods; and adjusts quality assurance activities as indicated by quality data trends or conditions. Decisions at this level require ensuring that critical quality requirements are identified and provided for in terms of appropriate specifications, procedures, or methods of quality verification; tailoring the approach to the product/project requirements; making major modifications in approach as a result of changing technical requirements or manufacturing techniques; and coordinating the resolution of nonconformances.

At Level 4-5, assignments typically include a broad range of duties involving substantial breadth and depth of analysis and consideration of numerous interrelationships and variables to develop new approaches or to resolve persistent, widespread, or critical quality problems. At this level, specialists frequently serve in a program leader capacity and are more commonly found in organizational levels having management responsibility for major quality assurance programs of the agency, i.e., the Department of the Air Force.

The appellant meets Level 4-4. He is responsible for the overall quality assurance for the AGM-142 missile system which is very complex and requires him to develop and/or modify quality assurance activities to ensure that critical quality requirements are identified and met by the contractor. He has to review and analyze numerous system specifications and technical criteria. The appellant advises engineers, quality control personnel and other program officials on changing technical and manufacturing requirements and nonconformance issues. The appellant’s work is comparable to the third illustration in the standard under Level 4-4. The illustration describes the specialist who is responsible for planning, developing, and implementing integrated quality assurance programs supporting highly sophisticated and complex avionics systems and equipment. The work involves determining the quality assurance requirements; developing unique quality requirements, e.g., sampling techniques or mandatory inspection points, for inclusion in contractual documents; modifying quality assurance activities to meet program changes or requirements; evaluating the performance of the contractors; identifying and assisting in the resolution of actual and potential problems; and advising engineers and program officials.

The appellant does not have the broad overall program responsibilities intended to credit Level 4-5. Although the appellant’s responsibilities for the AGM-142 program are complex and complicated because the missile was originally produced in Israel and still has components produced overseas, his program responsibility is more limited than that described at Level 4-5. The appellant’s assignments are confined primarily to the AGM-142 missile system with only minimal support to other aircraft weapons systems quality assurance programs. The program
managers have ultimate responsibility and authority for their programs. The appellant's responsibilities do not equate to the “major agency program” responsibilities described at Level 4-5. A major agency quality assurance program would, for example, be the maintenance quality programs conducted throughout the agency across the country. The full intent of Level 4-5 is not met and cannot, therefore, be credited.

Level 4-4 is credited for 225 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 5-4. The appellant believes Level 5-5 is correct.

At Level 5-4, the purpose of the work is to plan, develop, and implement quality assurance projects of considerable breadth and complexity. Assignments may involve responsibility for planning and implementing program plans for ensuring that quality requirements for major products are achieved throughout the item’s life cycle. Other assignments may involve serving as a technical specialist concerned with quality implications of highly specialized products, manufacturing processes or techniques. The results of the work affect a range of agency activities being carried out at a number of locations. For example, the services provided by technical specialists for a product or commodity normally have application to other agency programs and activities. Typical of this level is the specialist who plans, develops, and implements quality assurance programs supporting the design, development, and acquisition of major weapons systems. The programs are characterized by high dollar value, state-of-the-art technology, compressed schedules, concurrent development and production, and frequent changes in requirements. The results of the work directly influence quality requirements imposed on contractors and ultimately cost factors, delivery schedules, and confidence in product quality and reliability in operational use. The resolution of actual or potential quality problems impacts the activities of major contractors and the work of other agencies.

At Level 5-5, the purpose of the work to provide agency staff level advice and guidance in quality assurance for a major commodity program, e.g., procurement of nuclear equipment and systems; an important functional area, e.g., quality assurance policy and functions pertaining to foreign military sales; or similar assignments. The work typically involves serving as the agency’s expert technical consultant and advisor in the assigned areas; directing indepth studies and investigations to analyze and resolve critical problems; evaluating new developments in technology or regulatory matters for application in assigned areas; providing agency staff guidance and direction to field personnel and organizations; and developing specialized policy and procedural guidelines for assigned areas.

The appellant meets Level 5-4. He plans, develops, and implements the quality assurance program supporting the design, development, and acquisition of the AGM-142 missile system. The program involves high dollar value, state-of-the-art technology, and frequent changes in requirements. The results of the work directly influence quality requirements imposed on
contractors and ultimately cost factors, delivery schedules, and confidence in product quality and reliability. The appellant provides expert technical advice on the AGM-142, analyzes critical problems, and keeps abreast of new technology and regulations that can be applied to his assignments. Although on the surface some of his duties appear to meet Level 5-5, the scope, i.e., the purpose, breadth, and depth of the assignment, is more aligned with Level 5-4 in terms of the organizational setting and the nature of the quality assurance program he conducts. The appellant is not responsible for providing agency staff guidance to field personnel and lower level organizations nor does he have the authority to develop policy as described at Level 5-5. In addition, although he works with representatives from foreign governments involved with the production of the AGM-142 and he states he is involved in foreign military sales, the appellant is not responsible for providing policy and guidance for the foreign military sales program. He works within already established policies and guidelines.

Level 5-4 is credited for 225 points.

Factor 6 - Personal Contacts:

This factor measures face-to-face contacts and telephone dialogue with persons not in the supervisory chain. The agency credited Level 6-3. The appellant believes Level 6-4 is correct.

In addition to contacts with personnel in production, engineering, higher level quality assurance and program officials, the specialist at Level 6-3 has contact with employees and officials of other Federal agencies and/or private industry. The specialist may have to identify and locate the appropriate person and explain their respective roles.

At Level 6-4, the specialist has regular contact with high level program and quality assurance officials in other Federal agencies, top executives in large private industrial firms, or representatives of foreign governments. The individuals vary according to the nature of the problem.

Level 6-3 is met. The appellant’s contacts are with employees and quality assurance officials within his agency, other agencies, and private industry, including the representatives from the Israeli company that produced the AGM-142 and the Israeli government. Unlike Level 6-4, these representatives are not top agency officials or top executives, but rather the quality assurance program managers and officials or the appellant’s counterparts. The Israeli individuals are the representatives designated to work with the appellant on quality assurance or production issues, not leading representatives of the Israeli government.

Level 6-3 is credited for 60 points.

Factor 7 - Purpose of Contacts:

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 this factor must be the contacts which are the basis for the level selected for Factor 6. The agency credited Level 7-3. The appellant believes Level 7-4 is correct.

At Level 7-3, contacts require considerable skill to influence individuals to correct deficiencies which would otherwise result in unacceptable products. The specialist must exercise a high degree of technical skill and judgment in explaining the requirements. He must also use considerable tact and persuasion to motivate reluctant individuals.

At Level 7-4, the purpose of the contacts is to negotiate or settle significant issues or problems which require escalation because established channels and procedures have failed to resolve the problem. The issue many concern significant quality deficiencies or persistent noncompliance on the part of a contractor where formal efforts to effect corrective action have been unsuccessful. The specialist assumes the lead in effecting a compromise or developing acceptable alternatives.

Level 7-3 is met. The appellant routinely uses skill and judgment to persuade individuals to correct deficiencies or change procedures, etc. The program manager indicated that frequently the individuals do not want to cooperate. Although the appellant has had a few occasions to travel to Israel to conduct face-to-face meetings to resolve problems, most of his regular and recurring contacts are through e-mail and by phone through established channels. Therefore, Level 7-4 cannot be credited.

Level 7-3 is credited for 120 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. The appellant believes Level 9-3 is correct.

At Level 9-2, the duties involve regular and recurring visits to manufacturing, storage and test areas. The visits may require the use of protective clothing and gear and the observance of appropriate safety precautions.

At Level 9-3, the specialist is exposed on a regular and recurring basis to potentially dangerous situations. The work requires strict adherence to safety precautions to avoid hazards. Typical of this level is the surveillance of operations concerned with the receipt, storage, inspection, maintenance, renovation, issue, etc., of ammunition items.

Level 9-3 is met. The appellant makes regular and recurring visits to the facility that manufactures the AGM-142 missile system. This involves observing the assembly of live munitions, rocket motors, and warheads.

Level 9-3 is credited for 50 points.
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A total of 2850 points falls within the range for GS-12, 2755 to 3150 points, according to the grade conversion table in the standard.

**Decision**

The appellant’s position is properly classified as Quality Assurance Specialist, GS-1910-12.