U.S. Office of Personnel Management Office of Merit Systems Oversight and Effectiveness Classification Appeals and FLSA Programs

> Washington Oversight Division 1900 E Street, NW., Room 7675 Washington, DC 20415-6000

Classification Appeal Decision Under section 5112 of title 5, United States Code		
Appellant:	[name]	
Agency classification:	Supervisory Engineering Draftsman GS-818-9	
Organization:	Drafting Review Branch Publishing Division [office] [directorate] [bureau] [Department] [city and State]	
OPM decision:	Supervisory Engineering Draftsman GS-818-9	
OPM decision number:	C-0818-09-01	

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Linda J. Kazinetz Classification Appeals Officer

November 12, 2002 _____ 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:

[appellant]

[servicing human resources officer]

[Department human resources officer]

Introduction

On July 16, 2002, 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 Supervisory Engineering Draftsman, GS-818-9, in the Drafting Review Branch of the Publishing Division, [office], [directorate], [bureau], in [city and State]. The appellant requested that her position be classified at the GS-10 level. This appeal was accepted and decided under the provisions of section 5112 of title 5, United States Code (U.S.C.).

A telephone audit was conducted by a Washington Oversight Division representative on October 23, 2002. 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], and other material submitted in the agency administrative report on September 17, 2002.

Position information

The appellant is the chief draftsperson for [bureau] and supervises a group of 10 engineering draftsmen. The purpose of her unit is to review [item] drawings submitted by applicants for compliance with quality criteria, and either informing the submitter of the corrections required or making the necessary corrections using automated equipment or free-hand drawing.

General issues

The appellant submitted with her appeal a copy of a position description reportedly occupied by her predecessor in the position. The position description was classified at the GS-10 level in March 1988.

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 description to others, even a previously-classified version, as a basis for deciding the appeal. The grade of the other position description may have been based on elements or circumstances that are not conveyed in the body of the document, or the position may have been misclassified. Regardless, we must evaluate an appealed position on its own merits by applying the appropriate OPM standards and guidelines.

Series determination

The appellant's position is properly assigned to the Engineering Drafting Series, GS-818, which covers work involved in portraying engineering and architectural ideas and information through drawings. Neither the appellant nor the agency disagrees.

Title determination

The authorized title for supervisory positions in this series is Supervisory Engineering Draftsman. Neither the appellant nor the agency disagrees.

Grade determination

The position was evaluated by application of the criteria contained in the General Schedule Supervisory Guide (GSSG), which is a cross-series guide used to determine the grade level of supervisory positions in the General Schedule. The GSSG has six evaluation factors, each with several factor level definitions and corresponding point values. Positions are evaluated by crediting the points designated for the highest level met under each factor, and converting the total to a grade by using the grade conversion table provided in the GSSG.

The appellant contests the agency's evaluation of factors 1, 3, 4, and 6. These factors are addressed below. We reviewed factors 2 and 5 and agree with the agency's assignment of Levels 2-1 and 5-4.

Factor 1, Program scope and effect

The agency credited Level 1-3 under *Scope* and Level 1-2 under *Effect*. The appellant contends that Level 1-3 should be credited under both elements, based on the sole argument that "the program segment directed does perform technical work as well as professional for attorneys, applicants, and outside agencies with a staff of 10 employees."

Scope

This element addresses the complexity and breadth of the program or program segment directed; or the work directed, products produced, or services delivered. The geographic and organizational coverage of the program (or program segment) *within the agency structure* is included under this element.

At Level 1-2, the program segment or work directed is administrative, technical, complex clerical, or comparable in nature. The services provided have limited geographic coverage and support most of the activities comprising a typical agency field office, an area office, a small to medium military installation, or comparable activities within agency program segments. Among the illustrations provided in the GSSG at this level are the following:

In a field office providing services to the general public, furnishes a portion of such services, often on a case basis, to a small population of clients. The size of the population serviced by the field office is the equivalent of all citizens or businesses in a portion of a small city. Depending on the nature of the service provided, however, the serviced population may be concentrated in one city or spread over a wider geographic area.

Directs operating program segment activities comparable to those above but found at higher organizational levels in the agency, for example, the section or branch level of a bureau.

At Level 1-3, the work directed is technical, administrative, protective, investigative, or professional in nature. Coverage of the work typically encompasses a major metropolitan area, a State, or a small region of several States; or, when most of an area's taxpayers or businesses are covered, coverage comparable to a small city. Among the illustrations provided in the guide at this level is the following:

In providing services directly to the general public, furnishes a significant portion of the agency's line program to a moderate-sized population of clients. The size of the population serviced is the equivalent of a group of citizens and/or businesses in several rural counties, a small city, or a portion of a larger metropolitan area. The serviced population may be concentrated in one specific geographic area or involve a significant portion of a multistate population.

The scope of the appellant's position does not exceed Level 1-2. Scope is determined by both the *complexity* and *breadth* of the work or program directed. *Complexity* refers to the nature of the work itself; i.e., whether it is clerical, administrative, technical, or professional. In this case, the work directed by the appellant is technical, not professional. Professional work is work that requires knowledge in a field of science or learning acquired through education or training equivalent to a bachelor's or higher degree, with major study in the specialized field. Technical work may be associated with a professional field, but instead requires extensive practical knowledge gained through education and/or specific training less than that represented by college education. Engineering drafting does not require a four-year college degree and is regarded as a technical occupation. Technical work is included at both Levels 1-2 and 1-3. Therefore, the distinction between these two levels as they pertain to the appellant's position must be based on the *breadth* of the work directed.

Breadth refers to the geographic and organizational coverage of the work. At Level 1-2, the work has limited geographic coverage (such as a field office providing services to a small population of clients equivalent to a portion of a small city), whereas at Level 1-3, the coverage extends to a larger serviced population (such as a field office providing services to a moderatesized population of clients equivalent to a small city). The appellant's position cannot be directly compared to these criteria because [bureau] has no regional or field structure and all the work is organizationally centralized. However, the criteria for breadth do not relate solely to serviced population numbers, but also include consideration of the nature of the services provided within the context of the agency's mission. Hence, although both Levels 1-2 and 1-3 include work involving the provision of services to the general public, at Level 1-3 the work represents "a significant portion of the agency's line program." The work supervised by the appellant is an adjunct to the primary line work of the agency, which is the substantive examination of [item] applications for scientific or engineering merit. Thus, the agencywide scope of her work is less significant in regard to this factor than the limited nature of the services provided within the agency's overall program operations. In another sense, the work can be considered comparable to "the operating program segment activities...found at higher organizational levels in the

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agency, for example, the section or branch level of a bureau." In either case, the work is aligned with Level 1-2 in terms of both its complexity and breadth.

Effect

This element addresses the impact of the work on the mission and programs of the customers, the activity, the agency, other agencies, the general public, or others.

At Level 1-2, the services support and significantly affect installation level, area office level, or field office level operations; or provide services to a moderate, local, or limited population of clients or users comparable to a major portion of a small city or rural county.

At Level 1-3, the services directly and significantly impact a wide range of agency activities, the work of other agencies, the operations of outside interests, or the general public.

The Level 1-2 criteria address two different scenarios; i.e., positions involved in the provision of support services internal to an organization (where effect is on installation level, area office level, or field office level operations), and positions involved in the delivery of externally-oriented, line functions within a designated geographic area (where effect is on a moderate, local, or limited population of clients or users). The appellant's position is consistent with the latter work situation, as it affects the quality of the [item] documentation submitted by applicants.

The effect of the appellant's work does not meet Level 1-3. Her work does not *significantly* affect outside interests or the general public (i.e., [item] applicants). Her unit ensures that [item] drawings meet graphics standards (for example, in terms of format, level of detail, proportion, views, and legibility) before they are published, but this work does not determine whether a [item] is awarded or denied.

Level 1-2 is credited.

350 points

Factor 3, Supervisory and managerial authority exercised

This factor covers the delegated supervisory and managerial authorities that are exercised on a recurring basis.

The agency credited Level 3-2 under this factor. The appellant believes that Level 3-3 should be credited because "long term goals were established in January 2002" and because, although there are no subordinate supervisors, "office staffing needs are met by assuring [that] eight of the technical centers at the [bureau] are staffed by a draftsperson." She also believes that her position should be credited with responsibilities 3, 5, 7, 9, 10, 11, 14, and 15.

Level 3-3a involves exercising delegated managerial authority to set a series of annual, multiyear, or similar types of long-range work plans and schedules for in-service or contracted work; assuring implementation (by lower and subordinate units) of the goals and objectives for the program segment; determining goals and objectives that need additional emphasis; determining the best approach for resolving budget shortages; and planning for long-range

staffing needs, including such matters as whether to contract out work. These positions are closely involved with high level program officials (or comparable agency level staff personnel) in the development of overall goals and objectives for the program segment.

The GSSG defines "managerial" as the authority vested in some positions which direct the work of an organizational unit, are held accountable for the success of specific line or staff functions, monitor and evaluate the progress of the organization toward meeting goals, and make adjustments in objectives, work plans, schedules, and commitment of resources. As described in 5 U.S.C. 5104, such positions may serve as head or assistant head of a major organization within a bureau, or direct a specialized program of marked difficulty, responsibility, and national significance. Thus, Level 3-3a is not intended to credit first-level operating positions that are responsible solely for planning and executing their own localized program segments, but rather for positions at higher levels in the organizational hierarchy that direct broad programs carried out at subordinate levels. The appellant's position is supervisory, not managerial, as that term is defined in the GSSG. Thus, Level 3-3a is not applicable to her position.

To meet Level 3-3b, a position must exercise all or nearly all of the delegated authorities and responsibilities described at Level 3-2c and, in addition, at least 8 of the 15 responsibilities listed at Level 3-3b. We found that the position fully meets Level 3-2c, which describes such typical supervisory duties as planning and assigning work, evaluating performance, interviewing job applicants, and effecting discipline. Our analysis of the responsibilities listed at Level 3-3b follows:

Responsibilities 1, 3, 5, 6, 8, and 12 involve duties inherent to second-level supervision or contractor oversight, e.g., assuring consistency in subordinates' completion of employee performance ratings or contractor work assessment, making decisions on work problems presented by subordinate supervisors or contractors, evaluating subordinate supervisors, recommending selections for subordinate supervisory positions, and determining whether contractor work is acceptable. The appellant is a first-line supervisor over 10 employees with no subordinate supervisors. She reported that a contractor drafting firm was hired for two months approximately five years ago to assist with a backlog of work. Since this was a one-time need rather than an ongoing or recurring requirement of the position, it cannot be considered in this evaluation. Therefore, none of these responsibilities can be credited.

Responsibility 2 is not credited. It involves exercising significant responsibilities in dealing with officials of other units or organizations, or in advising management officials of higher rank. The appellant advises [item] applicants of graphics standards, but does not have significant interrelationships with other organizations within the agency or a significant advisory role to higher level management.

Responsibility 4 is not credited. It involves directing a program or major program segment with significant resources (e.g., one at a multimillion dollar level of annual resources). The appellant does not control her unit's operating budget, nor does that budget approach this level of resources.

Responsibility 7 is credited. It involves making or approving selections for nonsupervisory positions. The appellant makes selections for the positions on her staff.

Responsibilities 9 and 10 are not credited. They involve significant authority to hear and *resolve* group grievances or serious employee complaints, and to review and *approve* serious disciplinary actions (e.g., suspensions). The appellant reported that in her seven years in this position, none of these situations has ever arisen. Further, as a first-line supervisor, the appellant would not be authorized to make the final decisions on actions of this nature. This authority would reside at higher management levels.

Responsibility 11 is not credited. It involves making decisions on nonroutine, costly, or controversial training requests for employees of the unit. This type of training is not normally required in the appellant's unit. The appellant's staff has recently completed training in AutoCAD and GTX software. Although the appellant ensures that each employee has received the requisite training, the decision to both adopt this technology and to train the current staff in its use was made at higher management levels.

Responsibility 13 is not credited. It involves approving expenses comparable to within-grades, extensive overtime, and employee travel. The appellant has approval authority for within-grade increases, but there is no requirement in her unit for either extensive overtime or travel.

Responsibility 14 is credited. It involves recommending awards for nonsupervisory personnel and changes in position classification subject to higher-level approval. The appellant does this.

Responsibility 15 is not credited. It involves finding and implementing ways to eliminate or reduce significant bottlenecks and barriers to production, promote team building, or improve business practices (e.g., a large production or processing unit). This would apply to large organizations whose missions would be susceptible to the application of such methodological or structural improvements. The work supervised by the appellant does not lend itself to these types of management applications.

Since the position can be credited with only two of the listed responsibilities, it does not meet Level 3-3b.

Level 3-2 is credited.

450 points

Factor 4, Personal contacts

This is a two-part factor which assesses the nature and purpose of the personal contacts related to supervisory and managerial responsibilities. The nature of the contacts, credited under subfactor 4A, and the purpose of those contacts, credited under subfactor 4B, must be based on the same contacts.

Subfactor 4A, Nature of contacts

This subfactor covers the organizational relationships, authority or influence level, setting, and difficulty of preparation associated with the personal contacts.

The agency credited Level 4A-2 under this subfactor. The appellant believes that Level 4A-3 should be credited, based on her contacts with [item] applicants and attorneys and with staff of [item] firms.

The contacts described by the appellant are typical of Level 4A-2, which includes contacts with members of the business community or the general public and with supervisors and staff throughout the agency. At this level, the contacts may be informal, occur in conferences and meetings, or take place over the telephone. Her contacts do not meet Level 4A-3, which includes frequent contacts with, for example, high ranking managers at bureau and major organization levels of the agency or comparable personnel in other Federal agencies; key staff of public interest groups with significant political influence or media coverage; journalists representing influential city newspapers; congressional committee staff assistants; contracting officials and high level technical staff of large industrial firms; and/or State and local government managers doing business with the agency. At this level, the contacts take place in meetings and conferences and often require extensive preparation of briefing materials or up-to-date familiarity with complex subject matter.

The appellant has no contacts of this nature. Most of her contacts are with the agency's [item] examiners, [item] applicants and their attorneys, and drafting staff of [item] firms. She does not have contacts with *"high ranking* managers and technical staff" of the agency or of large industrial firms. Further, most of her contacts are relatively informal and consist of explaining graphics requirements and standards. She does not have the types of formal contacts described at Level 4A-3 that take place in meetings and conferences and require extensive preparation to provide briefings or discuss complex technical matters.

Level 4A-2 is credited.

50 points

Subfactor 4B, Purpose of contacts

This subfactor covers the purpose of the personal contacts credited under subfactor 4A, including the advisory, representational, negotiating, and commitment making responsibilities.

The agency credited Level 4B-1 under this subfactor. The appellant believes that Level 4B-2 should be credited.

The purpose of the appellant's contacts is consistent with Level 4B-1, where the purpose of the contacts is to discuss work efforts for providing or receiving services; to exchange factual information about work operations and personnel management matters; and to provide training, advice, and guidance to subordinates. This adequately covers the appellant's responsibility for explaining graphics requirements to clients, conveying information about the work of the unit, and dealing with subordinates.

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Level 4B-2 is not met, where the purpose is to ensure that information provided to outside parties is accurate and consistent; to plan and coordinate the work with that of others outside the organization; and/or to resolve differences of opinion among managers, supervisors, employees, contractors, or others. The nature of the work is not such that the appellant must ensure consistency of information provided to outside parties, for example, a situation where a supervisor would have to ensure that regulations are being interpreted and applied equitably. She does not plan and coordinate work with outside parties, nor does she resolve differences of opinion among others.

Level 4B-1 is credited.

30 points

Factor 6, Other conditions

This factor measures the extent to which various conditions contribute to the difficulty and complexity of carrying out supervisory duties, authorities, and responsibilities. The *difficulty* of work is measured primarily by the grade level of work credited under factor 5. *Complexity* is measured by the level of coordination required.

The bureau credited Level 6-2 under this factor, corresponding to the GS-7 base level assignment under factor 5. The appellant believes that her position meets three of the special situations described under this factor – physical dispersion, impact of specialized programs, and changing technology.

Physical dispersion

This situation is credited. The appellant directly supervises ten subordinates who are dutystationed throughout the agency's technical centers in seven different buildings.

Impact of specialized programs

This situation is not credited. It may be credited when the supervisor is responsible for a significant technical or administrative workload in grades above the level of work credited in factor 5. All of the employees supervised by the appellant are at the GS-7 level. She does not supervise any work above this level. Therefore, there is no basis for crediting this situation.

Changing technology

This situation is not credited. It may be credited when work processes and procedures vary constantly because of the impact of changing technology, creating a requirement for extensive training and guidance of the subordinate staff. The appellant's organization is in the process of transitioning to automated drafting technology, and her staff has received training in the associated software application. However, this one-time transition from manual to electronic drafting does not constitute *constantly* changing technology.

Level 6-2 is credited.

575 points

Summary

Factors	Level	Points
Program Scope and Effect	1-2	350
Organizational Setting	2-1	100
Supervisory/Managerial Authority	3-2	450
Personal Contacts		
Nature of Contacts	4A-2	50
Purpose of Contacts	4B-1	30
Difficulty of Work Directed	5-4	505
Other Conditions	6-2	575
Total		2,060

The total of 2,060 points falls within the GS-9 range (1855-2100) on the grade conversion table provided in the GSSG.

Decision

The appealed position is properly classified as Supervisory Engineering Draftsman, GS-818-9.