

U.S. Office of Personnel Management  
Division for Human Capital Leadership and Merit System Accountability  
Classification Appeals and FLSA Programs

Center for Merit System Compliance  
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:** Engineering Technician  
GS-802-09

**Organization:** [squadron]  
Maintenance Engineering  
Department of the Air Force  
[base]  
[city and State]

**OPM decision:** GS-1601-9  
(title to be determined by the agency)

**OPM decision number:** C-1601-09-01

/s/ Linda J. Kazinetz

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Linda J. Kazinetz  
Classification Appeals Officer

September 26, 2003

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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).

Since this decision involves a change in the classification of the appealed position, it is to be effective no earlier than the date of the certificate and not later than the beginning of the fourth pay period following the date of the certificate. The servicing personnel office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

**Decision sent to:**

[appellant]

[servicing personnel officer]

Director of Civilian Personnel  
HQ USAF/DPCC  
1040 Air Force Pentagon  
Washington, DC 20330-1040

Chief, Civilian Policy  
HQ USAF/DPFC  
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## **Introduction**

On April 16, 2003, the Center for Merit System Compliance (formerly the Merit System Compliance Group) of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], who is employed as an Engineering Technician, GS-802-9, in Maintenance Engineering of the [squadron], Department of the Air Force, at [base] in [city and State]. [Appellant] requested that his position be classified at the GS-11 level. 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 an appeals representative on September 4, 2003, and a subsequent telephone interview with the appellant's supervisor, [name]. This appeal was decided by considering the audit findings and all information of record furnished by the appellant and his agency, including his official position description [number], and other material submitted in connection with the agency administrative report and received as of June 27, 2003.

## **General issues**

The appellant claims that a position counterpart to his at another local installation is classified at the GS-10 level. We did not consider this in adjudicating his appeal because, by law, we must classify positions solely by comparing their 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. Other positions that appear superficially similar to a given position may involve work that is more complex or broader in scope, may include additional duties that form the basis for the grade, or may be classified incorrectly.

## **Position information**

The appellant manages the base's protective coating maintenance contract (paint program) and the base sign program. The paint program is accomplished under a five-year contract. The appellant developed the statement of work and schedules, participated in the contractor evaluation and selection process, and monitors all work (both scheduled and unscheduled) performed under the contract as the contracting officer's representative. He receives work requests for painting services from other base components, inspects and measures the areas to be painted, and develops cost estimates. He communicates work orders to the contractor and instructs them on timeframes, manpower and material requirements, and potential problems. He tracks all open jobs, inspects completed work, and keeps monthly totals of the amount of money paid under the contract by line item. He prepares requests for contract modifications for special, high-dollar painting projects. He performs other associated duties, such as participating in monthly preventive maintenance inspections, attending construction planning meetings, and reviewing construction contracts to ensure that the painting specifications are appropriate.

The appellant receives work requests for all base signs (informational, traffic, and reserved parking), determines if digging permits are required, orders the signs using a government credit card, and tracks delivery. On a weekly basis, he sends a list of sign installation jobs to base maintenance requesting a work crew, instructs them on placement, and checks their work in

progress. He maintains updated diagrams of all base parking spaces and their designations. He has revised the base operating instructions for both signage and reserved parking. He has participated on various steering groups and planning committees involving such issues as traffic management, carpools, and smoking areas to ensure follow-through with appropriate signage. The appellant also makes other credit card purchases for his group as required, although other employees share this duty. This is not a major duty for grade determination purposes.

The appellant stated that the wording in his position description “is directly from OPM verbiage for a GS-802-11.” However, we adjudicate an appeal by evaluating the *position*, i.e., the duties and responsibilities actually assigned by management and performed by the employee, not the *position description*. In the appellant’s case, our decision was based on our review of his work, including representative work samples. We found that his position description, although it contains the basic functions of his position, overstates those functions, their complexity, and the associated knowledge requirements. For example, the position description states that the organizational goal or objective of the position is to “execute programs to design, construct, operate, maintain, and repair facilities for the 11th wing,” and the duty statements make repeated references to contract oversight of construction projects. The appellant does not have these responsibilities, as his position is limited to the paint and signage programs, neither of which can be characterized as construction operations of the type implied by the position description. The wording copied from the GS-11 grade level criteria in the GS-802 position classification standard, with its description of complex engineering problems, is not applicable to the appellant’s position.

Both the appellant and his supervisor argued that the appellant has supervisory responsibilities that were not credited in the agency evaluation of his position. His supervisor stated that the appellant supervises a crew of between two and four persons, two days per week, on sign installation; a summer employee, 40 hours per week, assisting with the sign program; and eight painting contractors on a daily basis.

For classification purposes, supervisory work is defined as work which involves the combined technical *and* administrative direction of others, and which constitutes a major duty occupying at least 25 percent of the position’s time. Work performed by contractors may be considered in determining the grade of a supervisory position. However, the position must *first* meet the coverage requirements above based on supervision of *noncontractor* personnel. In other words, a position may be considered supervisory only if it involves full technical and administrative control over noncontractor personnel, occupying 25 percent or more of the time.

Although the appellant oversees the installation of signs by in-house maintenance crews, he does this in the capacity of customer rather than technical supervisor, as these employees perform a variety of maintenance services for components throughout the base. Further, he has no responsibility for administratively supervising these employees (i.e., scheduling and assigning their overall work, approving leave, evaluating performance, taking disciplinary actions, providing for training needs, and other related supervisory duties). Although the summer employee is assigned to the appellant to assist him with the sign program, the appellant is not designated as that employee’s administrative supervisor.

### **Series determination**

The appellant's position does not fit the occupational coverage of the Engineering Technician Series, GS-802. The GS-802 series includes technical positions that require primarily application of a practical knowledge of (a) the methods and techniques of engineering, and (b) the construction, application, properties, operation, and limitations of engineering systems, processes, structures, machinery, devices, and materials. Engineering technicians use this practical knowledge to perform "technical work in functions such as research, development, design, evaluation, construction, inspection, production, application, standardization, test, or operation of engineering facilities, structures, systems, processes, equipment, devices, or materials," where the work involves the solution of technical problems. In other words, this series requires practical engineering knowledge to perform limited aspects of engineering functions, such as conducting equipment tests, compiling and computing engineering data, preparing layout, assembly, and installation drawings, preparing construction project specifications, or designing equipment or systems. The appellant does not perform or provide contractor oversight for technical work related to construction that requires practical engineering knowledges. Rather, he oversees painting and sign installation, which requires practical knowledge of the trades associated with the work.

The position falls within the coverage of the Equipment, Facilities, and Services Occupational Group, GS-1600, which includes positions the duties of which are to advise on, manage, or provide instruction and information concerning the operation, maintenance, and use of equipment and facilities, or other work involving services provided predominantly by persons in trades, crafts, or manual labor operations. Positions in this group require technical or managerial knowledge and ability, plus a practical knowledge of trades, crafts, or manual labor operations. This occupational group encompasses several specialized series unrelated to the appellant's work, such as laundry operations, food services, printing services, and cemetery administration. It also includes the more general Facility Operations Services Series, GS-1640, but that series covers positions that require *broad* technical knowledge to operate and maintain a range of physical structures, utilities, roadways, and surrounding grounds. The appellant's position requires much more limited knowledges and skills related to his specific functional responsibilities. As such, his position is assigned to the Equipment, Facilities, and Services Series, GS-1601, which covers two-grade interval positions that supervise, lead, or perform work classified in the GS-1600 group which does not fit any of the established series within the group.

### **Title determination**

There are no titles specified for positions in the GS-1601 series. Therefore, the agency may construct a title that accurately represents the work performed.

### **Grade determination**

The position was evaluated by application of the criteria contained in the Job Family Position Classification Standard for Administrative Work in the Equipment, Facilities, and Services Group, GS-1600. 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.

The knowledge required by the appellant's position matches Level 1-6. At that level, work requires knowledge of equipment, facility, or service operations sufficient to design projects that have applicable precedents, or to plan approaches to assignments using well-established methods, techniques, processes, and precedents, such as:

- determining facility, grounds, or equipment overhaul, maintenance, restoration, or repair needs;
- preparing plans and specifications for alterations at a facility;
- preparing a statement of work and serving as the contractor representative to ensure compliance with the contract;
- scheduling the sequence of operations; and
- coordinating work forces and resources.

At this level, work involves overseeing and implementing a program involving limited technical issues; specific and well-defined objectives; relationships that are mostly factual in nature; and fairly well-understood mechanisms.

Correspondingly, within his assigned areas of responsibility, the appellant defines needs and prepares contract specifications/modifications, serves as the contractor representative, and schedules, coordinates, and oversees work in progress. Since his work is confined to the areas of painting services and sign installation, it involves limited technical issues and specific and well-defined objectives.

The position does not meet Level 1-7. At that level, work requires knowledge of a comprehensive range of principles, concepts, and practices concerning equipment, facility, or service operations with complicated service requirements that have no clear precedent or plan, such as:

- a facility containing a chiller system with an industrial size heater, a complete sewage disposal plant providing primary and secondary treatment, grounds containing a golf course, athletic fields and facilities, tennis courts, flower gardens, and lawns; or
- a national park comprised of historic buildings, staff housing, rental facilities, camp grounds, entertainment facilities, and museums.

At this level, work involves overseeing and implementing a program involving the identification and resolution of difficult issues or problems, such as determining equipment, facility, or service deficiencies and appropriate resolutions; developing maintenance concepts, including forecasting usage rates, and establishing initial repair and replacement factors; analyzing facility and equipment requirements against customer needs; preparing budgets based on plans for maintenance, repair work, new construction, alteration projects, replacement of existing equipment, or increase in services; analyzing service capabilities against customer requests; and evaluating, developing, or changing services, procedures, and processes to increase program effectiveness.

The appellant's work does not involve attending to a *wide range* of equipment or facility maintenance needs, nor does it involve the identification and resolution of difficult technical problems. Maintenance painting is performed on a scheduled, cyclical basis. Unscheduled paint jobs are done upon customer request or as identified in maintenance inspections. The work involves considerable coordination and scheduling issues. However, the nature of the work is not such that it would involve more difficult *technical* issues, such as determining the *overall* maintenance requirements of new equipment or facilities and deciding whether to repair or replace equipment based on usage rates and cost factors.

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.

The level of responsibility under which the appellant works is comparable to Level 2-3. At that level, the supervisor outlines or discusses possible problem areas and defines objectives, plans, priorities, and deadlines, and provides guidance for unusual situations that do not have clear precedents. The employee independently plans and carries out the work in accordance with accepted policies and practices, and exercises judgment in resolving commonly encountered work problems and deviations. The supervisor reviews completed work for conformity with policy and effectiveness. The methods and procedures used seldom require detailed review.

This level basically describes the manner in which the appellant operates. The supervisor defines the appellant's ongoing responsibilities. The appellant carries out most of the work independently, but discusses with the supervisor high-priority work requests or substantial changes in the work plan. Work is reviewed largely from the standpoint of customer satisfaction regarding the quality and timeliness of the services provided.

The position does not meet Level 2-4. At that level, the supervisor outlines overall objectives and available resources, and discusses timeframes, scope of the assignment, and possible approaches with the employee. The employee determines the most appropriate practices and methods to apply; interprets regulations on his or her own initiative; applies new methods to resolve complex, intricate, controversial, or unprecedented issues and problems; resolves most of the conflicts that arise; and keeps the supervisor informed of progress and potentially

controversial matters. The supervisor reviews completed work for soundness of overall approach, effectiveness in meeting requirements or producing expected results, feasibility of recommendations, and adherence to requirements.

This level of responsibility is predicated on the performance of more complex assignments than those performed by the appellant. Because most of the appellant's work is covered by established precedent in terms of the actions to be taken, there is no requirement to discuss the approaches with the supervisor. Likewise, the scope of the individual painting or installation jobs is defined, either by past practice or by the customers. Although the appellant determines the most appropriate types of products to use based on such considerations as compatibility and maintainability, the work does not involve the resolution of complex or controversial issues or the interpretation of regulations. Because the appellant's work consists of a limited number of continuing functions, the supervisor reviews it more from the standpoint of the level of service provided (i.e., general effectiveness) rather than soundness of approach or feasibility of recommendations. The appellant does not perform the types of analytical, nonstandard assignments that would be susceptible to this level of supervisory review.

Level 2-3 is credited (275 points).

### *Factor 3, Guidelines*

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

The guidelines used by the appellant match Level 3-3. At that level, the employee uses a wide variety of agency policies, regulations, precedents, and work directions; however, they are not always directly applicable to issues and problems or have gaps in specificity. Precedents are available outlining the preferred approach to more general or day-to-day problems or issues. The employee uses judgment to interpret, modify, and apply available guidelines to specific problems or issues.

For the most part, the appellant's work is covered by past practices that may be modified to allow for the use of new products and techniques.

The position does not meet Level 3-4. At that level, the employee uses policies and precedents that are very general in nature. Policies specific to assignments are often scarce or of limited use. The employee uses judgment in deviating from established methods or researching trends and patterns to develop new methods and criteria or to propose new policies and practices.

The nature of the appellant's work is not such that it would be subject to *policies* as opposed to *practices*. The appellant works within the parameters of well-established maintenance programs, and the actions required of him are clearly defined. He reads trade literature to keep up with new products, but he does not *develop* new methods or, at the field installation level, propose new policies and practices.

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.

The complexity of the appellant's work is comparable to Level 4-3. At that level, work consists of different and unrelated processes and methods in completing assignments or projects. The employee analyzes and researches problems or issues and chooses a course of action from many alternatives. The employee identifies and discerns the interrelationships of conditions and elements to perform assignments such as scheduling maintenance based on weather, equipment or supplies needed, expense, and/or probable outcome.

The appellant administers two distinct programs, painting and sign installation, which involve different processes and methods for contracted and in-house work. The appellant resolves problems that arise, such as inspecting areas to be painted to determine if structural or repair work is needed beforehand. He researches issues, such as finding the most economical or environmentally-safe products for use. He coordinates the concurrent accomplishment of multiple jobs and arranges for rescheduling based on weather, client needs, or unanticipated circumstances.

The position does not meet Level 4-4. At that level, work consists of a variety of duties requiring many different and unrelated processes and methods involving equipment, facilities, or services. The employee assesses unusual conditions, varies approaches to assignments, and decides how to perform assignments based on incomplete or conflicting data. The employee must interpret considerable data, plan work, or modify methods and techniques used to perform such assignments as scheduling repair or replacement due to aging, change in usage, unanticipated damage, or modernization.

The appellant's work does not require *many different* processes and methods relating to the facilities serviced (i.e., than if he were responsible for the provision of a wide range of maintenance services). His work does not involve unusual conditions, since the types of problems that are encountered tend to be recurring. It does not require the interpretation of considerable data in determining what work needs to be done, since the work is either performed as part of a cyclical maintenance schedule, in response to a work request, or as a result of directly observable conditions. He does not have to consider as many different factors in planning and scheduling work, and there is infrequent occasion to modify methods and techniques.

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.

The scope and effect of the appellant's work match Level 5-3. At that level, work involves analyzing and solving a variety of conventional problems or issues involving one or more types of equipment, facilities, or services. The work affects the design or operation of services, systems, programs, or equipment.

The appellant administers, coordinates, and resolves issues related to the base paint program and sign installation. His work affects the provision of these services to the base.

The position does not meet Level 5-4. At that level, work involves analyzing long-range needs, unusual problems, or unusual questions; and administering entire programs and operations, or phases of large and complex programs and operations. The work affects a wide range of agency concerns or the operation of other agencies.

The appellant does not *analyze* long-range needs or resolve unusual problems. He develops multi-year painting schedules, but these involve issues of coordination (i.e., ensuring that all facilities are included in the cycle) rather than analysis of needs. Problems routinely arise in the course of the work, such as scheduling conflicts, weather delays, and less frequently, the need to remove lead-based paint. However, these would not be characterized as *unusual* problems, since there is a limited universe of problems that can potentially arise within these functional areas. The work has no effect beyond the base.

Level 5-3 is credited (150 points).

*Factor 6, Personal contacts*  
and  
*Factor 7, Purpose of 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.

The appellant's personal contacts match Level 3 (the highest level described under this factor), where contacts are with persons from outside the employing agency in a moderately unstructured setting, such as contractors, vendors, or representatives of professional associations. This level may also include contacts with agency officials who are several managerial levels removed from the employee on an ad-hoc basis. The appellant has regular contacts with contractors and vendors and high level civilian and military personnel at the base.

The purpose of the appellant's contacts is consistent with Level B. At that level, the purpose of contacts is to plan, coordinate, or advise on work efforts, or to resolve issues or operating problems by persuading people who are working toward mutual goals and have basically cooperative attitudes. At this level, contacts typically involve identifying options for resolving problems. Level C is not met, where contacts are to influence and persuade others to accept and implement findings and recommendations, where resistance is encountered because of organizational conflict, competing objectives, or resource problems. The appellant's contacts are

to coordinate work projects and resolve problems encountered, but are not generally adversarial in nature.

Level 3B is credited (110 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 8-2, where work involves some physical exertion, such as long periods of standing or recurring bending, stooping, crouching, or reaching. The appellant physically inspects paint jobs, which may involve climbing, bending, and other frequent exertion. Level 8-3 is not met, where work involves considerable and strenuous physical exertion, including frequently climbing ladders, lifting heavy objects, crawling in limited space, *and* defending against physical attack.

Level 8-2 is credited (20 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, where work is performed in a typical office environment with occasional visits to facilities such as production operations and utility plants. Level 9-2 is not met, where work involves *regular and recurring* exposure to production areas. [Base] is not an industrial-type installation; most of its facilities are office, residential, or service-oriented.

Level 9-1 is credited (5 points).

*Summary*

<u>Factors</u>	<u>Level</u>	<u>Points</u>
Knowledge required	1-6	950
Supervisory controls	2-3	275
Guidelines	3-3	275
Complexity	4-3	150
Scope and effect	5-3	150
Personal contacts/Purpose of contacts	3B	110
Physical demands	8-2	20
Work environment	9-1	<u>5</u>
Total		1935

The total of 1935 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 GS-1601-9, with the title at agency discretion.