U.S. Office of Personnel Management Division for Human Capital Leadership & Merit System Accountability Classification Appeals Program

San Francisco Field Services Group 120 Howard Street, Room 760 San Francisco, CA 94105-0001

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

Appellants:	[Appellants' names]	
Agency classification:	Quality Assurance Specialist (Shipbuilding), GS-1910-11	
Organization:	[Appellants' organization/location] U.S. Department of the Navy	
OPM decision:	Quality Assurance Specialist (Shipbuilding), GS-1910-11	
OPM decision number:	C-1910-11-01	

Carlos A. Torrico Classification Appeals Officer

June 13, 2003 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:

[Appellants' names, representative's name and address]

[Address of servicing human resources office] U.S. Department of the Navy

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Introduction

On January 28, 2003, the San Francisco Oversight Division, now the San Francisco Field Services Group, of the U.S. Office of Personnel Management (OPM) accepted a group classification appeal from [appellants' names]. The appellants are represented by [name and title of representative]. On February 10, 2003, the Division received the agency's administrative report concerning the appeal. The agency classified the position as a Quality Assurance Specialist (Shipbuilding), GS-1910-11. The appellants believe that their position should be classified at the GS-12 level. The position is located in the [name and location of appellants' organization] U.S. Department of the Navy. We have accepted and decided their appeal under section 5112 of title 5, Unites States Code (U.S.C.).

This decision is based on a thorough review of all information submitted by the appellants, their representative, and their agency. In addition, an OPM representative conducted telephone interviews with three of the appellants and three of their supervisors to gather more information about the position.

General issues

The appellants compare their position to GS-12 quality assurance specialist positions at a nearby agency shipyard that their facility is scheduled to merge with in June 2003. The appellants indicate that they perform the same duties as the GS-12's, as well as other duties, and thus their position should be graded at that level. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of the position. 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 appellants' position to others as a basis for deciding their appeal.

Like OPM, the appellants' agency must classify positions based on comparison to OPM standards and guidelines. However, the agency also has primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions. If the appellants consider their position so similar to others that they all warrant the same classification, they may pursue the matter by writing to their agency's personnel headquarters. In doing so, they should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same as theirs, the agency must correct their classification to be consistent with this appeal decision. Otherwise, the agency should explain to them the differences between their position and the others.

Position information

Both the appellants and their supervisors have certified to the accuracy of their official position description (PD) [number]. [Appellants' organization] is an enhanced intermediate maintenance activity located at [name of installation]. The Commanding Officer reports to the Commander, Submarine Squadron [naval unit designation]. The mission at [appellants' organization] is to maintain and repair every system aboard the [sub class] submarine except the missile. All

repairs must be completed in 18 days. The command also repairs and upkeeps other submarines, surface ships and service craft. Incremental overhaul and planned maintenance allow [sub class] class submarines to have only one shipyard overhaul midway through the life of the ship. By supporting [sub class] incremental overhauls, operational time and money are saved by reducing the number of overhauls in the 30-year life cycle of [sub class] submarines.

Eight [sub class] submarines are assigned to the [appellants' organization]. Each submarine undergoes four refits each year. For each refit, the appellants' branch is responsible for an average of about 100 controlled work processes (CWPs). The CWPs are concerned with systems and components critical to the safety of the submarine as identified through the Submarine Safety (SUBSAFE) program. The appellants work with complex systems and components such as periscopes, gas systems, steam systems, hydraulic systems for steering and diving control surfaces, environmental controls, torpedo tubes, sea-connected and seawater systems, non-seawater piping and mechanical SUBSAFE systems, and hull structure. The appellants' position covers several duties and responsibilities including CWP review, refit or project management, auditing, training, and material certification. The appellants may perform primarily in one function (e.g., refit management or auditing), but they are qualified to perform all duties and rotate among the various functions.

The appellants' PD reflects that the primary function of the position is to coordinate, monitor, and implement the Submarine Safety (SUBSAFE) program at the [organization] by monitoring and maintaining the quality and reliability of repairs and alterations in accordance with applicable guidelines (e.g., the Naval Sea Systems Command 0024-062-0010 Submarine Safety Requirements Manual and the CINCLANTFLT/CINCPACFLINST 4790.3 Joint Fleet Maintenance Manual). They are responsible for ensuring that work performed by [organization] on controlled systems or components (e.g., SUBSAFE/Hull Integrity, Level I (LI), Ocean Engineering Scope of Certification (SOC)/Deep Submergence System (DSS), and other controlled work in support of [sub class] submarine refits, the [sub class] Periodic Equipment Replacement program (TRIPER), Advanced Equipment Repair Program (AERP), Periscope Regional Repair Center (PRRC), and other assigned ship/submarine repairs comply with technical requirements and established standards of quality. The appellants also conduct audits and training, complete upgrade/certification of material for use in SUBSAFE and Level I applications, and review Objective Quality Evidence (OQE) in conjunction with IMFB work on controlled systems and components to assure technical accuracy and verify that satisfactory OQE exists for re-certification of the system or component, including shop and shipboard testing.

[Organization] planners develop controlled work procedures (CWPs) where all maintenance and repair standards, procedures and processes, diagrams, drawings, tests, etc., for the system or component are pulled together into a package. The appellants review the CWPs to ensure the technical accuracy of the packages before releasing the CWP packages to the shops. The appellants investigate and coordinate departures from specifications with activity engineers and higher organizational levels, e.g., Commander Submarine Force, United States Pacific Fleet (COMSUBPAC) and Naval Sea Systems Command (NAVSEA), and document the departures. The appellants also review the CWP package for completeness and accuracy when it is completed.

Sixty days before a submarine arrives for a refit, an appellant is assigned to serve as the refit manager. The refit manager provides refit quality management, establishes milestones to ensure refit quality goals are met, provides technical guidance, monitors and reports on the status of all CWPs, assists in determining corrective actions for identified deficiencies, facilitates work communication and resolution among various personnel, and prepares the letter certifying the submarine is ready for sea for higher level final approval. The refit manager will also provide quality management training to submarine crews.

The appellants serve as project manager for the quality management of the [sub class] Periodic Equipment Replacement Program (TRIPER), Periscope Regional Repair Center, and Advanced Equipment Repair Program. They ensure the quality of the work done on the systems and components when they are refurbished or repaired.

Periodically the appellants plan and conduct audits and trend analyses. The appellants conduct in-process surveillances of operations, processes, and documentation to ensure the shop and shipboard work is performed as required. They plan and carryout horizontal audits of an area (e.g., calibration, material control) within the [organization], issue reports, and work with the shops for improvements. They conduct vertical audits of completed CWPs. They also conduct special audits, e.g., investigating and determining the cause for the high repair rate for a valve and working with involved parties to develop a solution. The appellants conduct trend analyses of the data base where repair shop discrepancies are recorded. Their analyses identify areas of concern, e.g., failure to document calibrated instruments, failure to follow updated epoxy repair procedures. The appellants work with process improvement teams to develop solutions to the identified problems. The appellants coordinate COMSUBPAC, NAVSEA Fleet Maintenance Assessment audits at [organization] and work with organizations to ensure appropriate corrective action and response to the audit. They may volunteer to participate in NAVSEA audits of other activities.

The appellants provide formal classroom training and one-on-one training to craftsmen, quality assurance inspectors and other personnel involved with SUBSAFE/Re-entry Control, Level I, SOC/DSS, and other controlled work. They certify material for SUBSAFE and Level I use, including material supplied from outside activities such as Naval Inventory Control Point (NAVICP) and vendors in accordance with quality assurance procedures.

The appellants report to Supervisory Quality Assurance Specialists, GS-1910-12, who serve as Branch Supervisors in the [Division]. The primary function of the supervisory positions is to plan and coordinate the [organization] Quality Assurance program as a shift supervisors to support [sub class] submarine refits, [sub class] Periodic Equipment Replacement program (TRIPER) refurbishment, and other assigned ship/submarine repairs, by monitoring and maintaining the quality and reliability of repairs and alterations in accordance with CINCLANTFLT/CINCPACFLTINST 4790.3 Joint Fleet Maintenance Manual (JFMM) and other approved standards and requirements. The supervisors provide technical and administrative supervision to the appellants.

The results of our interviews, the appellants' PD, information obtained on Navy web sites, and other information of record provide additional details about the appellants' duties and responsibilities and the manner in which they are carried out.

Series, title, and standard determination

The agency has assigned the position to the Quality Assurance Series, GS-1910, titling it Quality Assurance Specialist (Shipbuilding), and the appellants do not disagree. We concur with the agency's title and series determination. The standard for the Quality Assurance Series, GS-1910, provides directly applicable evaluation criteria that we have applied to their position as discussed below.

Grade determination

The standard for the Quality Assurance Series, GS-1910, is written in the Factor Evaluation System (FES) format which employs nine factors. Under the FES, each factor-level description in a standard describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor-level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. Our evaluation with respect to the nine FES factors follows.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts which the employee must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts) and the nature and extent of the skills needed to apply these knowledges.

- At Level 1-7, the specialist is required to have a comprehensive and thorough knowledge of the full range of principles, concepts, and methodology related to one or more quality assurance functional programs (e.g., maintenance and manufacturing), and considerable skill in applying this knowledge to the planning and accomplishment of a variety of difficult and complex work assignments. Specialists at this level may also apply a broad knowledge of a range of complex products including their quality characteristics and manufacturing methods, and of the practices and procedures of related functional and administrative activities.
- At Level 1-8, the specialist is required to have a 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). Technical expertise and broad experience is used in dealing with extremely broad and complex quality problems. 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 knowledge required of the appellants' position is comparable to Level 1-7. The appellants' position requires a comprehensive and thorough knowledge of the full range of quality assurance principles, concepts, and methodology as they apply to complex SUBSAFE systems and components in one or more functional specializations (hull/mechanical/electrical) when analyzing controlled work packages or conducting in process surveillance of work processes, refit or project management, auditing, training, and material certification. These reviews involve SUBSAFE/Hull Integrity Re-entry Controls, repair procedures, manufacturing methods and techniques, special processes, and test and performance requirements.

The appellants' position does not meet Level 1-8 since it is not responsible for a major *agency* (e.g., Department of the Navy) program or mission area. For example, at Level 1-8 the specialist serves as a staff specialist with responsibility for exercising final authority for quality assurance matters in a major commodity or program area throughout a Defense contracting agency. The responsibility for major program or mission areas lies at higher levels within the Department of the Navy, e.g., Naval Sea System Command.

This factor is evaluated at Level 1-7 and 1250 points are credited.

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 provides assignments in terms of overall objectives and any limitations on the scope of the work. The specialist consults with and advises the supervisor on such aspects as priorities, staffing, or funding requirements, and project milestones. The specialist plans and carries out assignments independently. Work assignments are assessed from the standpoint of overall effectiveness of quality assurance efforts through periodic status reporting, briefings, or reviews. Completed work products are controlled for timely completion, but are generally accepted as technically sound.
- At Level 2-5, the employee receives only administrative supervision; the employee is responsible for large scale projects related to overall program administration or quality compliance issues in a technical program area, frequently as the agency's technical expert. The results of the work are considered technically correct and normally accepted without significant change.

The supervisory controls over the appellants' position meet Level 2-4 but fall short of Level 2-5. The overall structured approach to submarine repairs to ensure timely, efficient, consistent, and effective submarine repair work carried out at different shipyards and maintenance facilities, results in many priorities being determined by organizations other than the appellants', e.g., the CINCLANTFLT/CINCPACFLT JFMM sets out the audit schedule and [organization] planners generate the TRIPER Status Report which sets equipment repair priorities. However, within the overall parameters, the supervisor makes assignments and provides the appellants with program objectives, refit time constraints, or other priorities comparable to Level 2-4. Also like Level 2-

4, the appellants are allowed wide latitude to plan and carry out assignments. For instance, they independently research and investigate quality management problems, contacting employees and officials at higher organizational levels and in other commands to seek corrective actions. Comparable to Level 2-4, the supervisors review the appellants completed work products in terms of overall effectiveness of quality assurance efforts and timeliness, e.g., they review completed audit reports and CWP packages for overall technical accuracy and completeness and the appellants update the supervisors on the status of a refit.

The supervisory controls over the appellants' position do not meet Level 2-5 where the specialist receives administrative supervision only. The appellants' position reports to Supervisory Quality Assurance Specialists, GS-1910-12, who provide technical and administrative supervision to subordinate positions. As discussed in the above paragraph, the supervisors review the appellants' completed work for overall effectiveness. The appellants' level of responsibility does not reach Level 2-5 since the appellants' position does not serve as the Department of the Navy's technical expert in a technical program area. The appellants' work reviewing the quality of controlled work packages and other work in support of [sub class] submarine refits is subject to time constraints and supervisory checks that are comparable to Level 2-4. The review of the appellants' work is not as broad as described at Level 2-5 where the work product, such as proposals for major policy or program changes, are reviewed in terms of agency mission and goals and fulfillment of program objectives.

This factor is evaluated at Level 2-4 and 450 points are credited.

Factor 3, Guidelines

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

- At Level 3-3, there are a number of specific guidelines, but the specialist must adapt and extend the guidelines to situations encountered in planning and accomplishing work. The specialist exercises judgment in interpreting agency guides, regulations, or precedent cases and in adapting this guidance to individual situations and problems arising in the work.
- At Level 3-4, the principal guidelines regularly used in the work include agency quality assurance policy statements and program directives, Government procurement regulations, and general administrative instructions. Guidelines are presented in general terms and frequently outline the major areas of program planning along with suggested approaches. For example, the guides may delineate major areas of concern (such as, quality assurance surveys and audits, control of quality costs, technical reviews) and assign broadly-stated responsibilities for these activities during the development of quality assurance program plans. The specialist uses initiative, extensive experience, and a broad knowledge of quality assurance principles and practices to develop new methods (e.g., the detailed approach and methodology of quality assurance program plans) and recommend policy changes. Through review of study reports, industry specifications/standards, and textbooks, the specialist keeps abreast of new developments having potential application to assigned programs.

Like specialists at Level 3-3, the appellants adapt and extend a number of specific guidelines such as component technical manuals, agency technical manuals, agency instructions, etc., and recommend changes to technical guidelines such as quality assurance manuals, drawings, JFMM, and specifications and standards when deficiencies or errors are noted. The appellants coordinate and write departures from specifications as necessary. The appellants coordinate and write local instructions covering processes and procedures, e.g., a detailed local instruction covering all aspects of the material certification process or a local instruction consolidating several different procedures and processes concerning cleanliness into one document for easier reference by shop personnel. Unlike Level 3-4, the appellants' position is not responsible for regularly applying general guidelines to develop quality assurance program plans. The appellants' position is not required to regularly apply general guidelines on program planning and state-of-the-art developments to develop new methods and policy changes for a program of the scope described at Level 3-4.

This factor is evaluated at Level 3-3 and 275 points are credited.

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.

- Quality assurance specialists at Level 4-4 perform varied duties aimed at insuring the acceptability of *products*. Level 4-4 involves application of a complete range of quality assurance principles, techniques, and methodology to plan and accomplish projects for products having complex characteristics. Decisions are based on multiple considerations, e.g., interpretation of numerous specifications and technical data, consideration of a wide range of manufacturing processes and techniques, evaluation of feedback data from using activities, and analysis of test results and processing problems. Broad functions concerned with planning and completing the work include developing the overall plans and approaches based on technical requirements; monitoring the application and effectiveness of controls and methods; and adjusting quality assurance activities as indicated by quality data trends or conditions.
- At Level 4-5, specialists frequently serve in a program/project leader capacity to accomplish particularly complex, sensitive, or long-term special studies concerning *major agency quality assurance programs*, e.g., major studies concerning maintenance quality programs being carried out at diverse locations of the country. Decisions concerning what needs to be done are complicated because of such factors as the wide dispersion of organizations and activities involved; difficulties in determining scope of the problem in these activities; multiple authorities, policies, and regulations governing the activities; relationship to and interdependence of activities, e.g., maintenance/supply/ logistics function; and impact of quality costs on programmed resources. The work involves developing innovative solutions along with implementing instructions for effecting changes involving new methodology, policies, or procedures. Assignments

having these characteristics are more commonly found at organizational levels having management responsibility for major quality assurance programs of agencies.

The appellants' position matches Level 4-4. Comparable to Level 4-4, where the focus is on complex *products*, the appellants' position is responsible for applying the full range of quality assurance principles, techniques, and procedures to assigned complex controlled systems or components (e.g., SUBSAFE/Hull Integrity, Level I (LI), Ocean Engineering Scope of Certification (SOC)/Deep Submergence System (DSS)), and other controlled work in support of [sub class] submarine refits, the [sub class] Periodic Equipment Replacement program (TRIPER), Advanced Equipment Repair Program (AERP), Periscope Regional Repair Center (PRRC), and other assigned ship/submarine repairs. Similar to the second illustration under Level 4-4, the appellants' decisions concerning what needs to be done involve: analysis of a wide range of materials, detailed processes and fabrication techniques; documentation of stringent submarine certification requirements; identification of causes; formulating recommendations for corrective action; and initiating follow up checks to verify compliance with requirements.

The appellants' position does not meet Level 4-5 as it is not regularly assigned particularly sensitive, complex, or long-term special studies related to the Department of the Navy's broad quality assurance programs or equivalent work.

This factor is evaluated at Level 4-4 and 225 points are credited.

Factor 5, Scope and effect

Scope and effect covers the relationship between the nature of the work, i.e., the purpose, breadth, and depth of the assignment, and the effect of the work products or services provided both within and outside the organization.

- At Level 5-3, the work involves performance of a variety of assignments directed toward ensuring acceptability of products, or acceptable levels of quality in the operations involved. The results of the work affect the acceptability of the products involved in terms of conformance to technical requirements, meeting user's needs in a timely fashion, and performing as intended. For some positions the results of the work impact effectiveness of operations in achieving and maintaining desired quality levels consistent with economy and efficiency.
- At Level 5-4, the purpose of the work is to plan, develop, and implement quality assurance projects of considerable breadth and complexity. Some assignments may involve planning and implementing program plans for ensuring that quality requirements for major products are achieved throughout the item's life cycle; serving as a technical specialist in a broad product or commodity area, or be concerned with quality implications of highly specialized products, manufacturing processes, and techniques for a range of agency activities. The results of the work affect a range of agency activities being carried out at a number of locations.

The purpose and impact of the appellants' work is aimed at ensuring acceptability of products and acceptable levels of quality in operations as described at Level 5-3. Comparable to Level 5-3, the purpose of the appellants' work is to ensure conformance with technical specifications in the areas of SUBSAFE/Re-entry Control, Level I, SOC/DSS, other controlled work packages, and non-controlled work processes in the hull/mechanical/electrical areas. The results of the appellants' work meets Level 5-3 as their work directly influences quality requirements imposed on shop production processes, post-fabrication/repair/overhaul testing and inspection, controlled material handling and certification, and final shipboard testing and operational use of systems and components.

We do not find that the appellants' work meets Level 5-4 where the purpose of the work involves, for example, developing and implementing a quality assurance program plan for the life cycle of tracked/wheeled vehicle systems or serving as the regional technical authority in the electronic and electrical commodity area. The record shows that their work does not involve planning and implementing program plans, or that their efforts affect a range of agency activities at a number of locations.

This factor is evaluated at Level 5-3 and 150 points are credited.

Factor 6, Personal contacts

This factor includes face-to-face contacts and telephone and radio contacts with persons not in the supervisory chain. Levels described under this factor are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place.

- In addition to contacts within the activity and at agency higher organizational levels serviced by the quality assurance organization described at Level 6-2, at Level 6-3 contacts are with employees and officials of other Federal agencies and/or private industry.
- At Level 6-4, contacts are with high level program and quality assurance officials in other Federal agencies, top executives of large private industrial firms, or representatives of foreign governments.

In researching and resolving technical quality management problems, the appellants have regular contact with employees and officials in various commands and components within the Department of the Navy as described at Level 6-2 (i.e., NAVSEA; Submarine Maintenance Engineering, Planning and Procurement Activity; NAVICP; Naval Surface Warfare Center, Carderock Division; COMSUBPAC; CINCPACFLT; etc). While they do not have contacts with officials of other Federal agencies, they do have contacts with private industry officials and vendors which is comparable to Level 6-3. The appellants do not meet Level 6-4 since they do not have high level contacts in other Federal agencies outside of the Department of the Navy, or with top industrial executives, or representatives of foreign governments.

This factor is evaluated at Level 6-3 and 60 points are credited.

Factor 7, Purpose of contacts

This factor covers the purpose of personal contacts which ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives. The personal contacts which serve as the basis for the level selected for this factor must be the same as the contacts which are the basis for the level selected under Factor 6.

- In addition to the purpose of contacts described at Level 7-2 where specialists advise responsible officials concerning problems affecting quality of the products or operations involved, at Level 7-3 contacts require considerable skill to influence and motivate individuals to correct deficiencies which would otherwise result in unacceptable products. Officials may have a meager understanding of the quality requirements involved, may dispute the nature of the requirements, or have a less than cooperative attitude.
- At Level 7-4, contacts are to negotiate or settle significant issues or problems which require escalation because established channels and procedures have failed to resolve the problem.

Comparable to Level 7-2, the purpose of the appellants' contacts is to research and coordinate resolutions to technical problems, advise responsible employees, supervisors, and division officers and managers of problems affecting the quality of the products or operations involved, and the need to effect corrective action. The purpose of the appellants' contacts also meets Level 7-3 as they use considerable tact and skill to correct deficiencies and resolve conflicts with those contacted, and retrieve certification information from vendors. Their contacts do not reach Level 7-4 as significant issues or problems are not escalated and are resolved within established channels.

The factor is evaluated at Level 7-3 and 120 points.

Factor 8, Physical demands

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

In addition to working at a desk in an office environment as described at Level 8-1, the appellants frequently walk, bend, climb, and stoop to examine material and components in production shops, storage areas, and during shipboard installation. That level of physical demand is comparable to Level 8-2 (the highest level described in the standard) which covers extended periods of walking, standing, or bending while observing manufacturing operations, witnessing tests or examining material and processes, e.g., at a maintenance facility.

This factor is evaluated at Level 8-2 and 20 points are credited.

Factor 9, Work environment

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

Part of the time the appellants work in a typical office setting with adequate heating, lighting, and ventilation as described at Level 9-1. However, comparable to Level 9-2, on a regular and recurring basis the appellants also use appropriate safety gear such as safety glasses, safety shoes, ear protection, and hard hats, to perform their work in production shops, storage facilities, laboratory test areas, and onboard submarines. Their work environment is not as dangerous as Level 9-3 where the work requires knowledge of special safety gear pertaining to work in a known toxic environment or investigating the failure of munitions items to detonate.

This factor is evaluated at Level 9-2 and 20 points are credited.

Summary of FES factors

	Factor	Level	Points
1.	Knowledge required by the position	1-7	1,250
2.	Supervisory controls	2-4	450
3.	Guidelines	3-3	275
4.	Complexity	4-4	225
5.	Scope and effect	5-3	150
6.	Personal contacts	6-3	60
7.	Purpose of contacts	7-3	120
8.	Physical demands	8-2	20
9.	Work environment	9-2	<u>20</u>
	Total:		2,570

The total of 2,570 points falls within the GS-11 range (2,355 - 2,750) on the grade conversion table in the standard. Therefore, the appellants' duties are graded at the GS-11 level.

Decision

The appellants' position is properly classified as Quality Assurance Specialist (Shipbuilding), GS-1910-11.