

**U.S. Office of Personnel Management
Pay Category and Job Grading Appeal Decision
Under sections 5103 and 5346 of title 5, United States Code**

Appellant: [appellant's name]

Agency classification: Medical Equipment Repairer
WG-4805-11

Organization: Biomedical Engineering
Facilities Management Service
Veterans Affairs Medical Center
Veterans Health Administration
Department of Veterans Affairs
[city and state]

OPM decision: Medical Equipment Repairer
WG-4805-11

OPM decision number: C-4805-11-03

/s/ Judith A. Davis for

Robert D. Hendler
Classification and Pay Claim
Program Manager
Merit System Audit and Compliance
1/26/12

Date

As provided in section S7-8 of the *Operating Manual: Federal Wage System*, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in section 532.705(f) of title 5, Code of Federal Regulations (CFR). Addresses are provided in the *Introduction to the Position Classification Standards*, appendix 4, section H.

As discussed in this decision, the appellant's official job description (JD) is not adequate for grading purposes. The servicing human resources office must submit a compliance report containing the corrected JD and a Standard Form 50 showing the personnel action taken. The report must be submitted within 45 days of the date of this decision to the U.S. Office of Personnel Management (OPM) office that accepted the appeal.

Decision sent to:

For Addressee Only

[appellant's name and address]

[servicing HR office name and address]

Deonne.Pitts@va.gov Classification Team Leader
Veterans Health Administration

Ms. Ann Marie Hannon
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Introduction

On September 28, 2011, OPM's Dallas Oversight office accepted a pay category appeal from [appellant's name] after receiving the agency's complete administrative report on September 26, 2011. The appellant's job is currently graded as Medical Equipment Repairer, WG-4805-11. He believes the job should be classified in the General Schedule (GS) system as Biomedical Equipment Support Specialist, GS-1601-12. The appellant is employed in Biomedical Engineering, Facilities Management Service, Veterans Affairs Medical Center, Veterans Health Administration, Department of Veterans Affairs (VA), in [city, state]. We accepted and decided this appeal under sections 5103 and 5346 of title 5, United States Code (U.S.C.).

We conducted telephone audits with the appellant on December 2 and 5, 2011, and on January 13, 2012. We also interviewed his first- and second-level supervisors on December 5, 2011. In reaching our decision, we reviewed all of the information gained from these conversations and all material of record provided by the appellant and his agency, including the appellant's official JD, number [number].

Background and general issues

The appellant's position was previously classified as Biomedical Equipment Support Specialist, GS-1601-11. He appealed to VA headquarters for reclassification of his position to Lead Biomedical Equipment Support Specialist, GS-1601-12. The agency determined the appellant's work is properly graded as Medical Equipment Repairer, WG-4805-11. The appellant was assigned to the WG-4805-11 job effective September 11, 2011. After receiving the agency's decision, the appellant filed an appeal with OPM through his human resources office. He requests that his job be classified as Biomedical Equipment Support Specialist, GS-1601-12.

The appellant indicates jobs similar to his within VA and other agencies are classified in the GS. Further, the appellant requests OPM to validate the information in VA's Human Resources Management Letter Number 05-08-07, dated April 15, 2008, and entitled Guidance for Classifying Positions Formerly Classified as Biomedical Engineering Technician, GS-802. In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of this job. By law, we must make that decision solely by comparing the appellant's current duties and responsibilities to appropriate OPM standards and guidelines. We have considered the appellant's statements only insofar as they are relevant to making that comparison. Since comparison to OPM standards is the exclusive method for grading jobs, we cannot compare the appellant's job to the grading of other jobs, which may or may not be properly graded, or to VA's internal guidance as the basis for deciding this appeal.

Like OPM, the appellant's agency must classify positions based on comparison to OPM's standards and guidelines. Consequently, the appellant's agency has primary responsibility for ensuring its positions are graded consistently with OPM appeal decisions. If the appellant believes his job is graded inconsistently with others, he may pursue this matter by writing to the VA's headquarters human resources office. He should specify the precise organizational location, series, title, grade, and responsibilities of the jobs in question. The agency should

explain to the appellant the differences between his job and the others, or grade those jobs in accordance with this appeal decision.

The appellant believes the 4805 Medical Equipment Repairing job grading standard (JGS) is outdated and impacts the ability to classify his job accurately. However, the content of JGSs is not appealable (see 5 CFR 532.701). All occupations change over time, some more rapidly and profoundly than others, but the fundamental duty and responsibility patterns and qualifications required in an occupation normally remain stable. Therefore, careful application of the appropriate standard to the job the appellant performs will yield the correct grade of his job.

Job information

Both the appellant and his supervisor (a Supervisory General Engineer, GS-801-12, position) certified to the accuracy of the appellant's official JD. According to the appellant's JD and information provided during the telephone conversations, the appellant performs the following major duties:

- Performs or oversees installations, repairs, preventive maintenance, and calibrations of medical equipment and systems to manufacturers' specifications.
- Troubleshoots and plans or performs system restorations on complex medical digital-based systems; recognizes hazardous conditions and procedures with medical instrumentation systems and initiates appropriate preventive or corrective action, including determining whether a system should be removed from service, restored, or allowed to remain in clinical use.
- Designs and applies test setups to evaluate equipment and system performance to ensure validity and efficiency of operations.
- Acts as the Contracting Officer's Technical Representative for assigned contracts; schedules, monitors, and reviews contracted services; coordinates with contractors to provide preventive maintenance, system restorations of biomedical and computer equipment, or parts for assigned equipment; documents that completed work meets accreditation standards and other requirements.
- Serves as technical advisor and consultant to medical staff and others in the evaluation and purchase of new equipment or modification of systems to meet special needs; evaluates new equipment from various manufacturers for possible purchase; accepts or rejects newly purchased or returned equipment and systems.
- Advises and trains equipment users when equipment is new or operational problems are involved; finds resolutions to issues associated with the complex relationship among the electrical, electronic, mechanical, physical, and chemical components of equipment and systems.
- Determines frequency of inspections; ensures milestone dates for safety checks and maintenance of equipment are met and records are up to date and accurate; ensures systems are in compliance with applicable codes and standards; ensures safety reliability and diagnostic or therapeutic efficacy of all devices used in the direct and indirect delivery of patient care.
- Provides recommendations and drafts of internal standard operating procedures; develops maintenance troubleshooting instructions and specifications; determines test equipment

requirements; projects stock inventory; tracks expenditures and submits an annual budget for the shop.

To perform these duties, the appellant must have a good working knowledge of all systems; a practical knowledge in networking, electronics, electricity, and medical instrumentation; and knowledge of medical equipment design/diagnostic tools, principles, and component life cycles. The work also requires the ability to read, interpret, and apply a variety of technical data such as schematic drawings, wiring diagrams, tables, charts, mathematical expressions and formulas, and other service documentation included in the manufacturer's literature to effect system restorations.

The VA uses automated systems and databases to report problems; keep track of the status of work orders, requests for parts, etc.; and prepare reports. The knowledge and skill needed to use these systems and databases are important and facilitate the appellant's work, but they are not primary requirements for performing the major duties of the job.

As the Biomedical Engineering's representative, the appellant participates on several committees, such as the Commodity Standardization Committee, that relate to the mission of his organization. Within this context, the appellant aids his supervisor and the work of the organization by providing input and advice on matters such as using a standard term for each piece of equipment.

The appellant's JD, which we incorporate by reference into this decision, and other material of record furnish much more information about his duties and responsibilities and how they are performed. Although the JD of record describes the major duties and responsibilities assigned by management and performed by the appellant, it is not adequate for grading purposes. As discussed later in the decision, the appellant's job is properly covered under the Federal Wage System (FWS). Under the FWS job grading method, the grade of a job is decided by comparison of the whole job with grade definitions in an appropriate JGS, considering job facts as indicated by the four factors of skill and knowledge, responsibility, physical effort, and working conditions involved in the work.

The appellant's JD is written in Factor Evaluation System (FES) format. The FES classification method is often used to assign grades to nonsupervisory positions under the GS. This method includes nine factors common to most nonsupervisory positions in GS occupations. After careful consideration, we find the appellant's JD does not adequately describe his work in terms of the four factors used in the FWS job grading method, impeding the proper application of the appropriate JGS. Therefore, the JD must be revised so as to establish a clear link between the appellant's work and the four-factor method used to grade his job. Regardless, an OPM decision classifies a real operating job and not simply the JD. We have decided this appeal based on an assessment of the actual work assigned to and performed by the appellant.

Pay category determination

Section 5102 of 5 U.S.C. requires a pay category determination be made as the first step in the position classification process. Section 5102(c)(7) exempts from coverage under the GS those

employees in recognized trades or crafts, or other skilled mechanical crafts, or in unskilled, semiskilled, or skilled manual-labor occupations, and other employees including foremen and supervisors in positions having trade, craft, or laboring experience and knowledge as the paramount requirement. The *Introduction to the Position Classification Standards* defines paramount requirement as the essential, prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the position has been established. Whether particular types of positions are trades, crafts, or manual-labor occupations within the meaning of title 5 depends primarily on the most important requirement for the performance of a primary duty or responsibility for which the position exists. If a position clearly requires trade, craft, or laboring experience and knowledge to perform its primary duty, the position is under the FWS regardless of its organizational location or the nature of the activity in which it exists. Paramount requirement does not rely on percentages of work time.

The appellant's JD and other information provided by the appellant, his supervisors, and the medical center clearly show the appellant's primary duties are trade related. These duties are directly linked to the three critical elements in the appellant's performance plan: electrical safety and preventive maintenance, repairs, and shop needs. Because the paramount requirement of the appellant's personally performed work involves maintaining, repairing, and troubleshooting medical equipment, the primary requirement of his job is trades knowledge and experience in that work. While the nature of FWS work has changed somewhat as repair tools and equipment have become computerized, the basic purpose of troubleshooting, testing, calibrating, and repairing remains the same. The primary determinant of pay category is the knowledge and experience required to perform the work, not the types of tools used.

The appellant believes the duties relating to modifying and developing equipment would exclude the job from the 4805 occupational series and, by inference, the FWS. Distinction between FWS and GS work is blurred somewhat by the innovative ability of many experienced trade workers as exhibited in the development of shortcut procedures; the recognition and recommendation of correction of errors in documentation; or recommendations of methods, design changes, etc., to remedy a deficiency. It is significant to note while the trade worker's performance tends toward that of GS-type work, such performance is in response to a random condition or need. It is often valuable to and recognized by the activity, but it is not an ongoing need of the activity; i.e., it is not required by management, and its absence is not cause for negative action by the supervisor against the employee. For GS positions, the design, development, planning, and acquisition work is paramount while installation, maintenance, and other hands-on work is secondary and usually involves an oversight role rather than actual performance of that work. In contrast, the primary requirement for the appellant's job is the hands-on work relating to installation, maintenance, repair, calibration, and testing of medical equipment.

It is not unusual for engineering organizations which develop and design systems, or which develop maintenance, test, repair, calibration and other procedures, to ask for trades input. Mechanics and other trade employees are the primary users of these published blueprints, schematics, maintenance manuals, and test procedures and can provide valuable input on the impact of the effectiveness of these engineering products within the shop environment. Such input is valuable to and recognized by engineering organizations, but it does not constitute the primary work of the appellant's job or the reason for its existence. As the paramount

requirement for the appellant's primary duties is trades knowledge, the work is exempt from the GS and is assigned to the FWS.

Occupational code, title, and standard determination

The appellant's job best fits in the 4805 Medical Equipment Repairer occupation which covers jobs involving the installation, maintenance, overhaul, repair, and testing of various medical and dental equipment used in patient diagnosis and treatment and in research laboratories. The 4805 JGS prescribes the title *Medical Equipment Repairer* for jobs at grade 10 and above. As explained in the next section of this decision, the appellant's job is graded at the 11 level. Therefore, the appropriate title for the appealed job is *Medical Equipment Repairer*.

The 4805 JGS defines work at only the grade 11 level. It indicates that the level of skill and knowledge and other work requirements described may warrant grading above or below the 11 level. The JGS uses four factors for determining grade level: skill and knowledge, responsibility, physical effort, and working conditions. The factors provide a framework within which the occupation is structured as well as specifically applicable criteria for evaluating the level of work. Our assessment of each factor follows.

Skill and knowledge

The appellant's work requires the skill and knowledge to install, maintain, repair, and troubleshoot a variety of medical equipment within the main hospital and the outpatient clinics under the medical center's jurisdiction. The work requires knowledge of tools and test equipment to diagnose problems or malfunctions and a practical application of electronics, electricity, electromagnetics, chemistry, mathematics, general physics, pneumatics, and basic hospital and medical procedures. A familiarity with computers and networking requirements associated with various medical equipment is also needed to troubleshoot, repair, or arrange for repair or other appropriate resolution to fix the problem. As an example, the appellant uses this familiarity when loading medical diagnostic software onto a computer and ensuring that it interfaces with the medical center's network requirements. Examples of equipment for which the appellant provides services or arranges for service include infusion pumps, life support defibrillators, electroencephalographs, dialysis machines, X-ray units, electrocardiograph machines, diagnostic ultrasound machines, heat pumps for patients' use, telehealth and primary care carts, and wheelchairs. The work requires the ability to read, interpret, and apply technical data relating to schematic drawings, wiring diagrams, tables, charts, and mathematical expressions and formulas to maintain equipment and identify and resolve problems.

The skill and knowledge required for the appellant's job are comparable to the grade 11 level as described in the JGS. Medical equipment repairers at this level apply a practical knowledge of electronic circuits to diagnose malfunctions, repair, and test electronic equipment such as electrocardiographs, defibrillators, and electroencephalographs. Repairers at this level have the ability to maintain and repair mechanical equipment and select proper replacement parts and modification kits. As an example of modification, the appellant constructed a bracket to hold the camera on telehealth carts because the manufacturer's fastener did not securely hold the cameras. Workers at this level have the ability to interpret and apply blue prints, schematic drawings,

wiring diagrams, technical manuals, and other specifications and the ability to make mathematical computations and use algebraic formulas. Similarly, the appellant uses this ability to install certain medical equipment or devices, such as infusion pumps. Consistent with the grade 11 level, the appellant applies skill and knowledge of relationships between electrical and electronic circuitry to identify and resolve problems with various medical equipment and components and the computer and networking systems associated with operation of the medical equipment.

This factor is credited at the grade 11 level.

Responsibility

The appellant works under the general supervision of the Supervisory General Engineer. Similar to the grade 11 level, the appellant receives work requests through telephone calls, requisitions, electronic mail, or work orders and determines priorities for the work to be completed and either performs the work himself or assigns the work to one of the other two employees in the shop, based on their availability and expertise. The appellant ensures the work is completed in accordance with established trade practices and procedures and meets requirements imposed by Government agencies and other regulatory entities, such as The Joint Commission and National Fire Protection Association. If the appellant or other two employees are unable to make the repairs, the appellant contacts the manufacturer for technical assistance or arranges for a contractor to perform the work. The appellant is responsible for the quality and technical accuracy of work completed, including checking repairs made by contractors. He verifies the operational integrity and reliability of new equipment and ensures new and repaired equipment meets safety requirements, which is similar to workers at the grade 11 level who assure that equipment is working within prescribed limits so that lives are not endangered. The appellant independently completes day-to-day assignments and informs his supervisor of unusual problems or issues. The supervisor spot checks the appellant's work to ensure it meets requirements and achieves expected results. He also reviews reports prepared by the appellant and written procedures or policies the appellant may propose. This level of supervisory review is comparable to the grade 11 level where the supervisor spot checks work for compliance with trade practices, directives, and operating procedures.

This factor is credited at the grade 11 level.

Physical effort

Similar to the grade 11 level, the appellant's work assignments involve extended periods of walking, sitting, and standing and require the ability to work in awkward positions and cramped quarters. At times, the appellant may climb ladders or use scaffolding when performing work. Similar to workers at the grade 11 level who lift objects weighing more than 40 pounds, the appellant must be able to lift 50 pounds or more; for example, toolboxes that may weigh more than 50 pounds.

This factor is credited at the grade 11 level.

Working conditions

Comparable to the grade 11 level, the appellant usually performs work in areas that are well lighted and ventilated. When working in the medical center and outpatient clinics, the appellant may be exposed to noxious chemicals, contagious diseases, and risk of infection resulting from scrapes and scratches.

This factor is credited at the grade 11 level.

Decision

The appellant's job is properly graded as Medical Equipment Repairer, WG-4805-11.