

Office of Merit Systems Oversight and Effectiveness Digest of Significant Classification Decisions and Opinions September 1984 No. 05-04

Standards: <u>Electronics Technician, GS-0856</u>

Electronic Integrated Systems Mechanic, WG-2610

Factor: Guidance on distinguishing between Wage and Classification Act positions

Issue: Pay System Determination

Identification of the Classification Issue

Appellants appealed to an Office of Personnel Management Region to have position changed from Electronic Technician, GS-0856, to Wage Grade. The Region held that the work performed was very similar to that described in the job grading standard for Electronic Integrated Systems Mechanic, WG-2610. Therefore, they excluded the positions from application of the guidelines for borderline positions, stating that the positions were not sufficiently mixed and borderline to justify application of the Office of Personnel Management guidelines for such positions. The agency thereupon requested the Classification Appeals Office to overturn the Region's decision on the basis that the guidelines for borderline positions should have been applied.

Resolution

The Classification Appeals Office concluded that it was not the Office of Personnel Management's intent to categorically exclude consideration of the guidance contained in the GS-0856 Series. That guidance is provided to assist in the pay category determination of "a large body of positions" as stated under the section of the GS-0856 Series titled Distinguishing Between Prevailing Wage and Classification Act Positions.

If a position were determined to be clearly under a specific pay category, it can be expected that application of the guidance would surely result in confirmation of that determination. Indeed, paragraphs 1 and 2 of the guidance specifically describe characteristic positions in each pay category, thereby proving that the guidance can be applied generally. If it were meant to apply to

only a limited number of cases precisely at the borderline, there would be no need for paragraphs 1 and 2, which characterize positions clearly in each category.

The Electronics Technician Series states that "many of the positions contain mixed functions, some of which are trade or craft in nature, and others which are properly under the Classification Act. There is no sharp line of distinction among such positions but rather a spectrum which ranges from positions which are clearly Wage Board [now Wage Grade] to positions which are clearly under the Classification Act. A large body of positions falls between these extremes with varying combinations of characteristics of both." In short, positions which are clearly in one pay category or the other are described as to the *extremes*, while a large body fall somewhere between. Therefore, the application of the guidance provided is not narrowly restrictive, but is rather generally useful in reaching a decision.

Under the section titled Coverage of the Series in the Electronics Technician Series, one of the bases for its identification as a separate series is "the special problems resulting from the marked overlap of positions in this occupation under the Classification Act and similar trades positions." Again, the Office of Personnel Management has emphasized the recognition of the mixed General Schedule and Wage Grade nature of most positions in this occupation. Furthermore, under the section titled Distinguishing Between Prevailing Wage and Classification Act Positions, the Office of Personnel Management recognizes that even "many electronics technician positions which are unequivocally under the Classification Act (e.g., whose primary purpose is to perform subprofessional engineering work in designing, developing, and evaluating new units of electronic equipment) have, as a secondary requirement, well-developed craft-type skills in the use of hand and power tools and in wiring, construction, and assembly of components. In some positions, these trade skills are fully comparable to those of the shop mechanic. Moreover, one of the sources of recruitment to fill such technician positions is from among Wage Grade mechanics. Yet the paramount requirement is to perform subprofessional work on electronic equipment, such as design, experimental development, and evaluation." This bears reiteration. Even many "unequivocally" General Schedule Technician positions require mechanical skills, sometimes the equal of the shop mechanic. From all of the foregoing references, it is clear that mixed General Schedule and Wage Grade duties are not uncommon.

In this particular case, maintenance of equipment could not reasonably be used to exclude consideration of the positions under the General Schedule. The GS-0856 standard specifically includes maintenance as one of the functional operations performed by electronic technicians. The standard states that "career patterns and management intent should be carefully considered." The guidance states, "Although the performance of preventive and corrective equipment maintenance per SE is normally a Wage Grade function, in some positions such maintenance is an integral part of the testing, analysis, alignment and performance evaluation of complex electronic systems." In borderline cases it permits consideration of "whether the environment, career ladder, etc., are shop oriented" in reaching a determination. This point is reinforced in the Introduction to Electronic Equipment Installation and Maintenance Family, 2600, which states that "the nature of the organization (R&D [research and development], maintenance depot, etc.) may give some

indication of the predominant character of the work. . ." The positions under consideration in this case were part of a maintenance engineering program which included testing, fault analysis, alignment and performance evaluation requiring a practical knowledge of electronic theories and principles. The Electronic Integrated Systems Mechanic, WG-2610, standard specifically excludes such positions from its coverage and refers to the GS-0856 standard for further guidance.

In view of the foregoing, the Classification Appeals Office concluded that it was proper to apply the Office of Personnel Management's guidance for resolution of positions which are at neither "extreme." This requires consideration of management requirements and intent for consistency, equity, and economy, as well as career patterns; job environment; required application of knowledge of and participation in operating programs, and time spent on trades and crafts functions as against Classification Act types of work. In this regard, it was observed that the positions in question did not work in a traditional equipment shop atmosphere, but rather, were under the technical leadership of professional maintenance engineers. Due to the rapidity of equipment changes, they had to possess the electronic technician's ability to "transfer a knowledge of electronics theory from equipment to equipment."

Any questions as to the proper pay category, in accordance with Office of Personnel Management's guidance, cannot and should not ignore management's requirements and intent. An ostensible similarity with a particular standard should not be permitted to automatically exclude application of the guidelines for borderline positions. The use of the guidelines in all but the most obvious of cases can only serve to enhance the accuracy of judgment.