



United States Office of Personnel Management

Office of Merit Systems Oversight and Effectiveness
Digest of Significant Classification Decisions and Opinions
June 2000
Article No. 24-08

Standard: Aircraft Mechanic, 8852 (January 1999)
Quality Assurance, GS-1910 (March 1983)

Factor: N/A

Issue: Distinguishing between Federal Wage System (FWS) and General Schedule (GS) positions

Identification of the Classification Issue

This issue arose in OPM's adjudication of a pay category appeal. The appellants inspected aircraft. They were responsible for observing and determining the quality of in-process and after-the-fact maintenance and for ensuring that aircraft mechanics followed prescribed maintenance procedures. This included observing maintenance and repair work carried out by aircraft mechanics in progress to ensure conformance to prescribed technical procedures; physically or visually inspecting parts and components for defects, serviceability, and proper installation; and periodically evaluating maintenance personnel on their knowledge of the aircraft systems and associated maintenance requirements and procedures. The appellants also performed such associated duties as determining the causes of equipment failures; resolving individual parts or equipment problems in consultation with engineering staff; documenting and reporting recurring equipment/system defects and operational problems; interpreting technical orders and instructions for applicability to the assigned equipment; and ensuring the expeditious completion of prescribed maintenance actions. The appellants claimed that these duties constituted Quality Assurance Series, GS-1910, program administration work. They stated that actual physical inspection of aircraft consumed a very minor portion of their time. Most of their time was spent on duties that they regarded as administrative in nature.

Resolution

Determining whether particular types of positions represent trades, crafts, or manual labor occupations excluded from coverage under the GS depends on the paramount knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the position has been established. In this case, OPM found that the appellants' jobs required primarily comprehensive, trade-based knowledge of the assigned aircraft systems in interpreting technical orders and evaluating the work of aircraft mechanics for compliance and adequacy by physically inspecting completed maintenance work. That is, the work required journey level Aircraft Mechanic, 8852, knowledge and skill.

In contrast, GS-1910 positions require broader knowledge of quality assurance principles and techniques, product characteristics, and associated manufacturing processes. These positions apply a variety of analytical and technical methods besides physical inspection. The focus of GS-1910 work is to determine the effectiveness of quality procedures and controls and to identify inherent problems in the product or processes. The GS-1910 standard states that inspection "is but *one* of the techniques used by quality assurance specialists." OPM found that the purpose of the appellants' inspections was to provide the basis for accepting or rejecting the maintenance work itself, rather than for the broader objective of determining the effectiveness of the overall maintenance process, such as identifying the type or level of maintenance required for the aircraft or initiating corrective action to reduce maintenance deficiencies beyond the repair of the immediate aircraft.

A position is subject to the GS if its primary duty requires knowledge or experience of an administrative nature not related to trade, craft, or manual labor work. OPM found that the duties characterized by the appellants as administrative were closely related and ancillary to the primary inspection function. They included duties that served the purposes of determining what work needed to be done, i.e., reviewing and tasking technical orders; ensuring that the work was being carried out properly and documenting deficiencies, i.e., completing personal evaluations based on observation of work in progress; resolving problems encountered in the course of the work, i.e., consulting with engineers on equipment problems; and reporting on results of the work, i.e., inputting data to an on-line database. These were not program administration duties, but rather duties that were directly tied to and furthered the accomplishment of the basic inspection function, with the primary purpose of ensuring proper maintenance of the assigned aircraft. Consequently, OPM sustained allocation to the FWS.

“Back to the Basics”

The GS includes many occupations that perform inspection work. For example, the Construction Control Series, GS-809, includes positions that inspect construction or monitor and control construction operations. The Agricultural Commodity Grading Series, GS-1980, often includes the inspection or the monitoring of conditions under which products are processed, stored, or transported insofar as these factors affect product quality. For these and other GS occupations, inspection typically is a tool used for a variety of broader program purposes.

The Explanatory Memorandum for the Quality Assurance Series, GS-1910, addresses the canceling of the Quality Inspection Series, GS-1960. It states that positions from the GS-1960 series would not automatically move into the GS-1910 series, because positions that had been appropriately classified to the GS-1960 series based on their being *primarily* involved in inspection work would fail to meet the GS-1910 series coverage definition. Therefore, had the appellants' jobs been covered by the GS, they would have been excluded from the GS-1910 series based on this explanatory material.

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