Oversight and Effectiveness
Preface

This is the twenty-seventh issue of the DIGEST OF SIGNIFICANT CLASSIFICATION DECISIONS AND OPINIONS (Digest). In it we present summaries of decisions and opinions that we believe have Governmentwide applicability. It is designed to aid classifiers and others with delegated classification authority in exercising their judgment. For this reason, we have included some articles that address basic principles of position classification and, when possible, provided links to actual decisions.

Digest articles summarize significant interpretations that clarify the underlying intent of the classification or job grading standards. However, these articles must be read in context with the standard as a whole, rather than in isolation. Because the Digest synopses may not reflect all relevant information bearing on a decision, good judgment in their application is necessary. Some Digest synopses draw from several cases and/or related issues. In those instances, the facts in cases linked to the article may not coincide completely. For these reasons, Digest items do not supersede or supplement classification standards and do not constitute “case law.”

Suggestions for improving future issues of the Digest may be made via e-mail to fedclass_appeals@opm.gov or fax at 202-606-2663, or by writing to the Director, Classification Appeals and FLSA Programs, U.S. Office of Personnel Management, 1900 E Street, NW, Washington, DC 20415-0001. The telephone number is 202-606-2990.

Digest issues are available on the U.S. Office of Personnel Management’s (OPM’s) website. The website address is http://www.opm.gov/classapp. The Digest can also be found on OPM’s CD-ROM with General Schedule Position Classification and Federal Wage System Job Grading Standards, which is issued by OPM’s Classification Programs Division.

This issue of the Digest was edited by Linda Kazinetz (Washington Oversight Division). Contributions were provided by Bonnie Brandon (Dallas Oversight Division), Tim Heath (Atlanta Oversight Division), Robert Hendler (Philadelphia Oversight Division), Douglas Schauer (Chicago Oversight Division) and Carlos Torrico (San Francisco Oversight Division). The Classification Programs Division staff provided technical review and assistance.

Melissa A. Drummond, Director
Classification Appeals and FLSA Programs
Article No. 27-01

Standard: Computer Clerk and Assistant, GS-335 (February 1980)  
Administrative Work in the Information Technology Group, GS-2200 (May 2001)

Factor: N/A

Issue: Distinguishing between computer assistance and information technology (IT) administrative work

Identification of the Classification Issue

The appellant’s position was previously classified as Supervisory Computer Specialist, GS-334-11. In response to an A-76 study on the feasibility of contracting out some of the installation’s automation work, all positions associated with Local Area Network (LAN) operations were reviewed. As a result, the agency reclassified the appellant’s position as Supervisory Computer Assistant, GS-335-10. The appellant believed the change in classification was made by the agency to avoid paying the special salary rate for Information Technology positions.

Resolution

The appellant was responsible for overseeing the monitoring, operation, and maintenance of the installation’s computer system. The system consisted of a remote processing station system, two LANs, microcomputers, and associated hardware and software that supported the installation's supply operations. The primary focus of the work was to administer the LANs and integrate with the networks or mainframes of other agencies or organizations. This included overseeing day-to-day operations and ensuring that processing activities met operational protocols; researching and recommending components for upgrading systems; planning and coordinating installation of hardware/software; determining system infrastructure components; ensuring compatibility of new or upgraded systems/components with existing infrastructure and equipment; implementing computer security measures and data integrity/recovery procedures; and providing technical assistance and training to users.

OPM found that the appellant’s work was properly classified to the GS-335 series. Although the work involved administering the operation of a computer system, the appellant was not involved in the planning, design, or development of systems, which is typical of Information Technology. The installation’s LAN was small and did not have the same level of complexity addressed in the Information Technology Management series, GS-2210. In addition, the scope of the position was limited in that responsibility for establishing servicewide systems, hardware, and software requirements and making
decisions on the need for system upgrades and/or software migrations was assigned to higher-level organizations in the agency. OPM sustained the agency’s series determination of the appealed position as Computer Assistant, GS-335.

Link to C-0335-10-01
Article No. 27-02

Standard: Mail and File, GS-305 (May 1977)

Factor: N/A

Issue: Series determination

Identification of the Classification Issue

The appellants’ position was classified as Processor, GS-1101-4. The appellants distributed incoming mail and used automated systems to find addresses for outgoing mail. The agency considered classifying the positions to the Mail and File series, GS-305, but selected the General Business and Industry series, GS-1101, with the rationale that the work required subject-matter knowledge of the organization’s programs. Their underlying reasons were to maintain organizational homogeneity in classification within the organization and to provide nominal qualifying experience for employees in the mail unit to allow them to compete for other positions at the field activity. The appellants believed that their position should be classified at a higher level.

Resolution

During its review, OPM found that the appellants spent a considerable amount of their time searching for correct addresses for outgoing mail. These efforts were often intensive and required understanding and using a proprietary computer system and sometimes tasking other offices, including bureau field offices, in the identified geographic area. The work required knowledge of the missions, functions, and operations of bureau offices and personnel. However, OPM concluded that the mission of the appellant’s unit, as specified in its mission statement, was to process mail. Regardless of the tools utilized to accomplish this goal, processing mail was the reason for the existence of the organization. Although the position required knowledge of the organization’s structure and functions, OPM found that the primary purpose of the work was expressly included in the coverage of the GS-305 series. OPM changed the series of the appellants’ position from GS-1101 to GS-305.

“Back to the Basics”

The Classifier’s Handbook states that a position should be classified to the occupation that best represents the main purpose for the existence of the position, usually reflected as the paramount knowledge or experience required to do the work. This is often manifested in the mission of the organization in which the position is located. When a position is clearly identifiable with one occupational series, it should be classified to that series. Although the normal line of progression for the
position in either the immediate or broader organization may be considered, series selection should not be used to artificially provide qualifying experience for essentially dissimilar work.

Link to C-0305-04-01
Identification of the Classification Issue

The appellant’s position was classified to the General Facilities and Equipment Series, GS-1601. The appellant managed and coordinated aircraft maintenance and repair functions carried out by subordinate organizations to support an Air Force Wing. He believed his position should be classified in the Logistics Management Series, GS-346, because Air Force instructions and policy directives include aircraft maintenance and aviation logistics organizationally as part of the Logistics Group. He stated that the GS-1601 series does not cover aircraft maintenance and repair operations and that the Air Force’s automated personnel staffing system does not have specialized aircraft maintenance skill codes for positions in the GS-1601 series. He also claimed that, because the Wing did not include a Logistics Group, he was in effect carrying out the duties of a Logistics Group Commander, a position which was last occupied by an Air Force colonel. He, therefore, believed that he had been given the authority and responsibility, but not the commensurate grade, of a military officer.

Resolution

The primary purpose of the appellant’s organization was to provide aircraft maintenance support to the Wing by ensuring that an adequate number of aircraft were available to meet daily pilot training requirements of about 300 flying missions per day. The appellant planned, prioritized, supervised, directed, controlled, and coordinated all maintenance activities related to several weapons systems and diverse aerospace ground equipment. He directed the operation and administration of the maintenance organization through eight subordinate flights that were responsible for flight line maintenance, shop support, and evaluation of contract support associated with aircraft and support equipment maintenance.

OPM found that the GS-346 work assigned to the appellant’s position was secondary to the maintenance function that he supervised. Both the GS-346 and the GS-1601 series address functions related to maintenance, resource and fiscal management, and manpower management. However, the overriding characteristic of logistics management work is the coordination of individual functional areas into a unified program that meets total support requirements. The appellant did not provide logistics support to other programs by orchestrating separate and distinct operations. In addition, his position
required more technical knowledge of the equipment and its functions, operation, and maintenance than is typical of GS-346 positions, and also called for an in-depth knowledge of the maintenance organization. Since his primary duties were clearly maintenance-based, and the requisite skills and knowledges fit the GS-1601 series, his position was correctly placed in that series. OPM sustained the agency’s series determination of the position.

“Back to the Basics”

Although organizational location can provide an indication of the appropriate series for a position, the primary work and the paramount qualifications are the usual determinants for series assignment. An agency’s skill code structure has no bearing on determining the appropriate series for a position.

Military assignments are governed by the “rank-in-the-person” concept, in contrast to the Federal position classification system, which regards the inherent grade value of the work being performed as separate from the qualifications or experience of the employee performing it. Comparison to military rank cannot be considered when classifying civilian positions, nor can a pay grade be added exclusively to equate the “status” of a civilian position to a counterpart military position.

Link to C-1601-14-01
Article No. 27-04


Factor: N/A

Issue: Position title

Identification of the Classification Issue

The appellant’s position was classified to the Safety and Occupational Health Management Series, GS-018, and was titled Safety and Occupational Health Manager. The appellant requested an upgrade, but OPM found no evidence to support it. During our review, however, we determined that the agency had incorrectly titled the position.

Resolution

The appellant served as a regional occupational safety and health officer. Her responsibilities involved developing and administering the total safety and occupational health program, including those elements unique to the installation and other serviced commands and activities. She exercised full supervisory responsibilities for professional, technical, and administrative employees.

OPM found that the title of the appellant’s position was incorrect. The title Safety and Occupational Health Manager is appropriate for positions responsible for planning, organizing, directing, operating, and evaluating a safety and occupational health program for an entire agency or subordinate level. The title Supervisory Safety and Occupational Health Specialist is the correct title for positions which meet the criteria of the General Schedule Supervisory Guide (GSSG) for evaluation as a supervisor. Although the appellant had regional program responsibility, she also had full supervisory responsibilities for a staff. Because the grade level of her position was determined by reference to the GSSG, OPM found that the title prescribed in the standard for supervisory positions, Supervisory Safety and Occupational Health Specialist, was the appropriate title.

“Back to the Basics”

Official position titles are assigned in accordance with titling instructions prescribed in the governing position classification standard. These titles are used to properly identify positions for various administrative and recordkeeping purposes (e.g., the maintenance of governmentwide statistics on categories of positions.) However, this does not preclude agencies from constructing organizational titles that they believe are more descriptive or appropriate for local circumstances. These organizational
titles can be used both internally and for official program business in lieu of the official position title. The distinction between official position titles and organizational titles should be explained to employees who perceive that the official position title implies a lesser stature than the organizational title.

Link to C-0018-12-03
Article No. 27-05

Standard: Forestry, GS-460 (January 1980)

Factor: Factor 5, Scope and Effect

Issue: Fully meeting the criteria of Level 5-4

Identification of the Classification Issue

This article is included based on an agency's request to highlight our analysis of Scope and Effect in the Forestry standard. The appellant’s position was classified as Forester, GS-460-11. The appellant worked in the Supervisor’s office of a national forest and served as the contracting officer for all forest timber sales. He was responsible for pre-award, award, administration, termination, and contract dispute resolution functions. He believed his position met Level 5-4 of the GS-460 standard.

Resolution

OPM found that, although the appellant furnished advisory services to top forest management, his position did not meet the other aspects of Level 5-4. At that level, the scope of the work extends to a number of locations within a broad geographic area, or affects the continued existence of a resource unique to a geographic area. OPM concluded that the term “broad geographic area” applies to a second-level unit or responsibility for at least a state. The appellant’s position was located in a first-level unit as that term is defined in the GS-460 standard; i.e., he was directly responsible for program execution and had personal dealings with timber purchasers and their representatives. The fact that he worked in the Supervisor’s office and directed the work of employees engaged in timber sales at the district level within the forest was not equivalent to working in a second-level or comparable unit. OPM pointed out that first- and second-level forest units are not analogous to supervisory levels, but rather are distinguished by the nature of the work performed. In regard to the remaining Level 5-4 criteria, the appellant applied established methods to resolve contracting problems rather than developing new or vastly improved techniques. The direct impact of his work was on the forest’s timber sales program rather than on the Forest Service’s programs or activities. Because Level 5-4 was not fully met, OPM awarded Level 5-3.

Link to C-0460-11-01
Article No. 27-06

Standard: General Schedule Leader Grade Evaluation Guide (June 1998)

Factor: N/A

Issue: Coverage of the General Schedule Leader Grade Evaluation Guide (GSLGEG)

Identification of the Classification Issue

The appellant’s position was classified as Lead Engineering Technician, GS-802-12. His position description was rewritten in connection with an installation reorganization using an automated PD program. With the automated PD, his engineering duties were classifiable at the GS-11 level, so lead duties were added to support the GS-12 level. The appellant claimed that his leader duties occupied 40 percent of his work time and that, by application of the GSLGEG, his position should be graded at the GS-13 level.

Resolution

The appellant led two GS-12 engineering technicians and one local national technician whose position was equivalent to the GS-11 level. However, OPM found that the appellant’s position did not meet GSLGEG coverage requirements. To be classified by application of Part II of the Guide, positions must spend at least 25 percent of their time leading a team of other GS employees in accomplishing two-grade interval work (or one-grade interval at GS-9 or above), and must exercise certain minimum authorities and responsibilities. OPM found that the level of independence exercised by the subordinate team members, especially the GS-12’s, precluded the position from meeting the 25 percent criterion. Both positions operated with considerable independence and the incumbents were considered to be the technical authorities in their respective fields. OPM concluded that the appellant spent no more than 20 percent of his time leading work, mainly over only the GS-11 equivalent position, and did not perform, as a minimum, all of the first seven authorities and responsibilities described in Part II. In addition, since the appellant’s non-lead duties graded out at the GS-11 level, it was doubtful that he possessed the extent of technical knowledge needed to monitor GS-12 level work. Therefore, the position could not be evaluated using the GSLGEG and OPM found the position to be correctly classified at the GS-11 level.

“Back to the Basics”

In determining the applicability of the GSLGEG, the first test is whether the position meets the basic coverage requirements. The duties and grade levels of subordinate positions, and their working and
reporting relationships within the organization, should be examined to confirm that each criterion is fully met.

Link to C-0802-11-06
Article No. 27-07

Standard: General Schedule Leader Grade Evaluation Guide (June 1998)

Factor: N/A

Issue: Coverage of the General Schedule Leader Grade Evaluation Guide (GSLGEG)

Identification of the Classification Issue

The appellant was a team leader over personnel management specialists on program evaluation reviews. He believed that his position should be evaluated by application of the GSLGEG.

Resolution

The appellant was responsible for designing the evaluation methodology to accomplish the objectives of the review, providing technical guidance to team members, and assessing team performance to provide input to the first-line supervisor. He made team assignments, stayed abreast of the status and progress of work being performed, set deadlines and work requirements, provided specific instructions for completing work, reviewed and edited written work products, and represented the team in obtaining needed supplies and resources.

OPM found that the appellant’s position should not be classified using the GSLGEG. The GSLGEG is applicable to positions that have responsibility for a permanently assigned group of employees over whom both technical and administrative leadership responsibilities are performed on a continuing basis. The GSLGEG specifically excludes positions that have functional “project” responsibility but do not lead other workers on a continuing basis.

While the appellant spent a considerable amount of time performing in a leadership role vis-à-vis other employees, his work in this role was clearly project-driven. The appellant did not have continuing responsibility for leading a permanently assigned group of employees. Rather, he led ad hoc teams that were formed to conduct specific reviews. He was assigned and designated as team leader for some reviews, and served as team member on others. Decisions as to the constitution of the teams were made by the first-line supervisor when the teams were formed, based on such factors as availability of staff, past experience, and complexity of the assignment. Thus, while the appellant performed some duties similar to those of a team leader, those duties did not meet the criteria for classification under the GSLGEG. OPM classified the position using the appropriate standard for the appellant’s technical work.
Link to [C-0201-13-03](#)
Article No. 27-08

Standards:  
- Medical Equipment Repairer, 4805 (June 1974)
- Electronics Technician, GS-856 (December 1965)

Factor:  
N/A

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

Identification of the Classification Issue

The appellant’s position was classified as Medical Equipment Repairer, 4805. He believed it should be classified as Electronics Technician, GS-856.

Resolution

The appellant was responsible for maintaining, repairing, and troubleshooting medical equipment, and modifying such equipment as requested by the manufacturer. The 4805 job grading standard specifically covers installing, modifying, troubleshooting, maintaining, testing, calibrating, and repairing medical, laboratory, and dental equipment (electronic, electrical, and mechanical). It excludes technicians who perform such work incidental to the development and evaluation of medical equipment. Development and evaluation are engineering functions. Even though installation, maintenance, repair, and testing are mentioned in the GS-856 standard, it is the design, development, and evaluation work that is considered paramount and that controls the pay category. For example, regular and significant technical evaluations, development of specialized circuits or components, and complex modifications to standard electronic designs are hallmarks of electronics technician work. While electronics technicians may combine their knowledge of electronic theory and the ability to use their hands and tools to carry out their assignments, the knowledge of electronic theory is the paramount requirement of the work and the manual dexterity and skill are secondary.

The appellant’s regular and recurring work assignments and the limited degree to which he performed modification work did not require the knowledge and abilities of an electronics technician. Rather, his duties involved the repair and maintenance of medical equipment used in patient diagnosis and treatment. OPM concluded that the paramount requirement of the appellant’s job was the performance of work that required the application of knowledge and experience typical of the Federal Wage System, and sustained the agency’s classification to the 4805 occupation.
“Back to the Basics”

The *Introduction to the Position Classification Standards (Introduction)* says that a position is exempt from the General Schedule if its primary duty involves the performance of physical work which requires knowledge or experience of a trade, craft, or manual labor nature. The *Introduction* further states that a position is subject to the General Schedule, even if it requires physical work, if its primary duty requires knowledge or experience of an administrative, clerical, scientific, artistic, or technical nature not related to trade, craft, or manual-labor work.

The nature of Federal Wage System work has changed somewhat as repair tools and equipment have become computerized, to the point that some FWS employees may do very limited “manual” labor in the traditional sense of that term. However, 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.

Link to [C-4805-11-02](#)