OPM decision number: C-0808-11-01, 4/7/97

PH:OD:96-11

PERSONAL
[appellant's representative]
[representative's organizational position]
[representaives address]

Dear [representaive's name]:

This is our decision on the classification appeal you filed with our office, which we accepted under the authority contained in section 5112(b) of title 5, United States Code (USC).

This appellate decision constitutes a classification certificate which is mandatory and binding on administrative, certifying, payroll, disbursing, and accounting officials of the Government. It is the final administrative decision on the classification of this position, and is not subject to further appeal. It is subject to review only under the limited conditions and time limits specified in 5 Code of Federal Regulations (CFR) 511.603 and 511.613 and the Introduction to the Position Classification Standards, Appendix 4. It must be implemented in accordance with the requirements contained in 5 CFR 511.612.

Position Information:

Appellant:	[appellant's name]
Current Classification:	Architect, GS-808-12
Position Description No.:	05586E
Requested Classification:	Architect, GS-808-13
OPM Classification:	Architect, GS-808-11
Organizational Information:	[agency] [agency component] [work location]

Analysis and Decision

In considering the appeal, we carefully reviewed all the information submitted by you and the appellant on her behalf; information obtained from [appellant] during a desk audit of her position on January 28, 1997, an interview with her supervisor, [supervisor's name] conducted on January 28 and 30, 1997, and an interview with a co-worker, [co-worker's name], conducted on January 30, 1997; and, other pertinent classification information submitted by the employing agency at our request.

It is our decision that the proper classification of the position is Architect, GS-808-11. Accordingly, the appeal is denied and the position downgraded for the reasons discussed below.

In your initial appeal letter of April 12, 1996, you stated the appellant's position should be evaluated at Levels 1-8, 2-5, 3-5, 4-6, 6-4, and 7-4. You also stated "the Personnel specialist completing the desk audit did not consider all of the information provided by the employee, nor did the rater meet with the employee during the period of the Audit to ensure all of the information was considered." In your discussion of Factor 1, you stated "The rater did not consider numerous projects completed by the employee . . . [and] did not mention new approaches and modifications made by the employee." You reiterated these observations in your comments on the analysis of other factors.

These statements have raised several procedural issues that warrant clarification. All positions subject to the Classification Law contained in title 5, USC, must be classified in conformance with published position classification standards (PCS's) of the Office of Personnel Management (OPM) or, if there are no directly applicable PCS's, consistently with published PCS's for related kinds of work. Hence, other methods or factors of evaluation, such as your dissatisfaction with the fact-finding process used by the agency in its review of the appellant's position, are not authorized for use in determining the classification of a position. The classification appeals process is a de novo review which includes a determination as to the actual duties and responsibilities assigned by management and performed by the employee. This includes establishing the difficulty and complexity of work performed by the incumbent over a representative work cycle typical of the occupation. Thus, the classification review and conclusions drawn by the employing agency previously have no bearing on our adjudication of the appeal.

The appellant refused to certify the accuracy of her PD of record. On July 23, 1997, she informed her servicing personnel office that her PD was not accurate and provided language that she believed "should be added to make my position description more accurate." Our fact-finding revealed that while the position description (PD) of record covers the work assigned by management and performed by the appellant it, as well as the appellant's suggested changes

to the PD, overstate the difficulty and complexity of work assigned by manage-ment and performed by the appellant. For example, the PD of record implies that the appellant works on highly complex design and construction projects:

> Applies extensive background knowledge of the broad field of architecture as well as expert knowledge of his/her specialty of architectural engineering to resolve very complex technical problems, develop plans and approaches and settle differences of opinion with other engineers in the Government and with industrial contractors. . . .
>
> Keeps abreast of new developments in the state of the art by researching technical journals and maintaining close contact with engineers and other technical personnel within the government and private industry. Also, anticipates the impact that technical changes will have on our operations. . . .
>
> Incumbent must resolve technical problems independently, even in those areas where guidelines are lacking.

The proposed PD provided by the appellant amplifies this impression:

> Serves in an advisory capacity to key officials in the Headquarters Office, Regional, District, Host Site and other field offices in technical matters related to his/her architectural expertise. Provides engineering data and information for use throughout the Service for work applicable in all [agency] Offices. . . .
>
> Innovative and original thinking is required in anticipating the need for and developing new or revised design improvement projects applying the latest design technology. Important design features must be conceived where information on requirements is vague. Must exercise resourcefulness in promoting acceptance of ideas by private Architects, Engineers, and Government Officials. . . .
>
> Incumbent is highly flexible and is expected to exercise initiative and ingenuity in determining which guideline is the most suitable to achieve techniques and results desired. Incumbent must resolve technical problems independently, even in those areas where guidelines are lacking.

Our fact-finding revealed, however, that the appellant's regular and recurring work occupying a preponderant amount of her work time entails architectural design and related work substantially more circumscribed than described in either the PD of record or the appellant's

proposed PD. For example, the most complex project during the last two to three-year period involved:

1. [city] (West Virginia) Federal Courthouse - [agency] is leasing most of the 3-story Federal building attached to the courthouse. It is a GSA controlled project. The local [agency] Coordinator is a mechanical engineer. The appellant replaced [co-worker's name] as the architectural representative, commenting on the contract architect's drawings at established design phases. The primary architectural issue dealt with by the appellant pertains to the aesthetics of the roof line. A parapet over mechanical systems on the roof will not be built in order to save money because it cannot be seen. The appellant also is reviewing details for Americans with Disabilities Act (ADA) requirements, e.g., ADA access doorways and ramps, and fire and safety issues. [appellant] met with Group Managers in order to discuss work group placement requirements, assuring that conference space, computer training room, storage security, public access security, file weight floor load, and similar work support needs are met. The primary [agency] tradeoffs have involved decreasing the window area in order to save on utility costs.

2. [agency and location] Service Center Interconnecting Driveway - The appellant prepared the specifications and drawings for moving a small guard shack in order to better control public access; paving the new driveway resulting from these changes; repaving the parking area in phases; adding an additional parking area; building a new stairway between the North and South buildings; installing a new ADA ramp to connect the buildings; and redoing Door #5 accessible from the new driveway to meet ADA and security needs. The elevation of the site needed to be changed in order to preclude puddling and to allow and ease the slope for handicapped access. Tradeoffs included losing spaces for cars in front while adding spaces in back, and breaking the project into phases for budgetary purposes. A retention basin for water runoff was installed behind the new lot since the land was not otherwise useable and the approach was less costly than installing piping or drains. The guard shack, a prefabricated Partaking selected from a commercial catalogue, had a shelf and storage drawer added for badges. It was placed on a concrete pad and was wired electrically so that the guards could control building door access by means of a panic device.

3. [location] Service Center Cafeteria - The purpose of the project was to replace a failing floor and add new cafeteria equipment, primarily to upgrade services and move the dessert area to the front of the room. The appellant searched for commercially available materials that would not exceed cost restrictions and would meet performance requirements. The project entailed working with the contract cafeteria operator, GSA, which purchased the kitchen equipment, and electrical and mechanical engineers regarding equipment power and piping support. Operating within drain line and soffit

lighting constraints, the appellant worked toward improving work flow, and schedule the work in order to minimize the time needed to shut down the permanent cafeteria and operate a temporary cafeteria.

4. 18th Floor Training Center - The appellant's part in the project primarily involved space layout. Trying to use existing walls, she developed a floor plan to accommodate seven classrooms, one dedicated to computer training. The administrative offices were placed near the door in support of buzzer and card security access. Floor flow was built around the placement of classrooms on the building perimeter and core floor areas for training preparation functions. The plan required working around a video teleconference area. A canteen/lounge area was planned for meeting with customers, and moving walls were added to some rooms in order to enhance their use, e.g., unfolding doors to create breakout rooms or folding them to create a larger classroom. Tradeoffs included cost determinations, e.g., tearing out or reusing ceiling tiles, and assuring that sound insulation and other room performance needs were met.

5. [location] Service Center Doors #1 and #25 (both planned; only one was built) - The Door #1 project was to replace a door with an ADA accessible door. The door was fitted with panic hardware allowing the guards to override the door controls for security purposes. The appellant developed drawings, specifications and estimates, and found hardware that would support the higher impact door selected. Door #25 was to provide weatherproof access outside the cafeteria using panic hardware for the gate. The appellant also designed a 3,300+ square foot concrete pad (basket weave stamped colored concrete) in order to extend seasonal cafeteria seating space. In order to achieve the European look desired by the Center Director, the appellant used filigree brick walls and columns for privacy, people control, as well as decorative purposes. Upkeep was minimized by being able to hose the pad off through the wall openings. Benches were placed along the perimeter to expand seating, and tables were procured from the schedule that met toxic chemical requirements. The appellant designed a ramp, new gates, a lock, and a curb cut for ADA access.

Other projects discussed included: (1) Door #10, which included a proposed child care walkway (not constructed); (2) functioning as the contracting officer's technical representative (COTR) for 14th floor rehabilitation at the [name] Federal Building for [agency] internal audit (this required slab to slab security, and the inclusion of a conference/training space); and, (3) space planning issues emanating from the work on the [name] Federal Building [location], impacted by asbestos abatement, ceiling water damage, and work interruption concerns.

We will address other work examples in our detailed grade level analysis of the appellant's position. We find these projects, however, do not represent the use of complex technical innovations, or reflect the exercise of expert architectural knowledge and skill which are claims

at the core of your appeal rationale. Rather, we find these projects are relatively limited in scope, and are performed by application of established occupational methods, techniques and practices.

Series and Title Determination

The agency has classified the position in the Architect Series, GS-808. You have not disagreed with that determination. We find that the work the appellant performs meets the series coverage of the published GS-808 PCS, i.e., knowledge of architectural principles, theories, concepts, methods, and techniques; a creative and artistic sense; and an understanding and skill to use pertinent aspects of the construction industry, engineering and the physical sciences related to the design and construction of new or the improvement of existing buildings. Based on the titling practices established for positions in this series, the position is allocated properly as Architect, GS-808.

Grade Level Determination

The Architect Series, GS-808 position classification standard (PCS) contains grade level criteria in the Factor Evaluation System (FES) format. This format describes the criteria for nine factors, each factor being described at various levels, and benchmark descriptions, which are descriptions of actual positions with the factor level criteria applied. In crediting levels (and assigning corresponding points) to a given factor level, the position must meet the overall intent of the selected factor level description. In other words, each factor level description represents the minimum or "threshold" for that factor. If a position fails in any significant aspect to meet the criteria in a particular factor level description, we must assign a lower level, unless an equally important aspect that meets a higher level balances the deficiency. The total points assigned are converted to a grade by use of the Grade Conversion Table in the PCS.

The position classification process recognizes that positions may perform different kinds and levels of work which, when evaluated in terms of duties, responsibilities, and qualifications required, are at different grade levels. As provided for in the Introduction to the Position Classification Standards, page 23:

> The proper grade of such positions is determined by evaluation of the regularly assigned work which is paramount in the position.
>
> In most instances, the highest level work assigned to and performed by the employee for the majority of the time is grade-determining. When the highest level of work is a smaller portion of the job, it may be grade controlling only if:

- The work is officially assigned to the position on a regular and recurring basis;

- It is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time); and

- The higher level knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

Work that is temporary or short-term, carried out only in the absence of another employee, performed under closer than normal supervision, or assigned solely for the purpose of training an employee for higher level work cannot be considered paramount for grade level purposes.

Our analysis of the position must be guided by these established position classification principles.

Factor 1 - Knowledge Required by the Position

This factor measures the nature and extent of information or facts which the architect must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, principles, theories, and concepts) and the nature and extent of skills necessary to apply these knowledges. The knowledges and skills of an architect relate to the programming and preliminary planning for and/or the actual design and/or construction or improvement of buildings and related structures. To be used as a basis for selecting a level under this factor, a knowledge must be required and applied.

Your rationale for this factor listed 11 projects without descriptive details or time frames. Our on-site fact-finding, discussed above, concentrated on duties performed by the appellant a substantial amount of her work time during the past two years; i.e., a period of time we find reflects a reasonable current work cycle within the meaning of the GS-808 PCS. This fulfills the stipulation in 5 CFR 511.609 that OPM will decide the appeal on the basis of the actual; i.e., current duties assigned by management and performed by the employee.

At Level 1-7, work requires professional knowledge applicable to a wide range of architectural duties and the skill sufficient to: (1) modify standard practices and adapt techniques to solve a variety of architectural problems; (2) adapt precedents or make significant departures from previous approaches to similar projects to accommodate the specialized requirements for some projects; and (3) apply the standard practices of engineering disciplines as they relate to a specific assignment; or equivalent knowledge and skill.

The appellant's more complex projects meet Level 1-7 in that the work requires: (1) developing design criteria for projects complicated by cost limitations, as discussed in the above projects tradeoffs; (2) designing areas to meet multiple functions, e.g., the interconnecting driveway and related structures project; (3) the need to balance the relative weight of all architectural features, e.g., the drainage, slope, and functional demands of the interconnecting driveway project, with cost limitation; and, (4) checking drawings and specifications prepared by contract architects for all types of structure, e.g., the [location] project to assure accuracy, completeness, and agreement between architectural and engineering elements, tentative sketches, and the specifications, and checking and reviewing projects planned by contract architects for similar purposes. We find that the appellant's position meets the intent of Level 1-7 as illustrated in Benchmark #11-02. Although she is typically not engaged in the most complex projects described in that illustration; i.e., "the return of a 5-story building to its appearance at a particular period in time," other than for the recent period of funding limitations, she typically manages several projects at various stages of completion that entail adapting techniques and established precedents to solve a variety of architectural problems, e.g., constructing a porch at the [location] Service Center to serve as a side lobby extension in order to deal with the need for a guard post and interior space for visitors.

In contrast, Level 1-8 entails mastery of one or more architectural functions to the extent that the architect is capable of applying new developments and experienced judgment to: (1) extend or modify architectural methods and techniques; (2) resolve problems which are singular in kind or without equal; and (3) develop new approaches for use by other design or construction specialists in solving a variety of architectural problems. Typically, the architect is a recognized expert in the function(s) involved and the exploitation of basic scientific knowledge. As a recognized expert, the architect is sought out for advice and consultation by colleagues who are, themselves, professionally mature. The architect typically speaks and deals responsibly on technical matters outside the employing organization as well as within and might, for example, have an important committee assignment in a professional organization or, performs work requiring the exercise of equivalent knowledge and skill.

Illustrative of work at Level 1-8 are the exercise of knowledge and skills necessary to: (1) perform the full scope of architectural work for building multi-building groups, e.g., institutions, large housing projects, and multipurpose buildings, involving rare and unique problems; (2) performing similar work in the design of multi million dollar medical complexes with a wide variety of highly specialized structures involving both new construction and renovation of existing buildings; (3) serving as the technical authority within an agency for a multi-state area for projects involving the full range of buildings and related structures; (4) developing design criteria and standards for a **major nationwide** architectural program entailing the design of buildings or groups of buildings; (5) developing and revising **agency** architectural standards and specifications as well as parts of agency technical handbooks used by architectural and engineering specialists nationwide; (6) providing staff advisory services

within the centralized architectural office of an agency with responsibility for reviewing and coordinating **all** design and construction work and proposing additional work in light of agency needs; and, (7) coordinating and reviewing broad agency programs at the agency headquarters and field offices for varied buildings and related structures under diverse working conditions at numerous locations.

Duties and responsibilities assigned to a position flow from the mission assigned to the organization in which they are located. The positions that are created to perform assigned mission must be considered in relation to one another; i.e., each position reflects a portion of the work assigned to the organization. Therefore, the duties and responsibilities assigned to the appellant and performed by her may not be considered in a vacuum. While the appellant's organization has been reconstituted as a field component of [agency] nationwide architectural and engineering organization, our fact-finding revealed the appellant and her immediate organization do not have nationwide responsibility for any [agency]-wide architectural or engineering function. [agency] architectural and engineering policy and program guidance is still issued from the Real Estate Planning and Management Division at [agency] Headquarters. Documents provided by the agency at our request indicate the Headquarters engineering and architect staff is responsible for "corporate projects." In contrast, the [location] A/E Center, in which the appellant works, is responsible for providing services to [geographic area of responsibility].

Integral to the appellant's appeal rationale is her work on major projects, e.g., the [location] project and the overhaul and repair of the [name] Federal Building in [location]. While the [agency] is the major tenant in both buildings, overall responsibility for building design and construction work rests with another agency, i.e., the General Services Administration. While the appellant represents the [agency] interest in those projects, the fundamental design, construction, repair, and maintenance of those buildings is a mission neither assigned to nor performed by the appellant or her agency. Assuring that building design meets [agency] operational needs is not equivalent to the exercise of knowledge and skill described at Level 1-8 in the GS-808 PCS. The position classification process also does not permit the crediting of multiple positions with full responsibility for the same project; i.e., multiple architects cannot be credited with overall design and construction responsibility for a major building or other project. In addition, we note that the appellant is not the primary [agency] representative on either project. She was assigned to the [location] project after the basic design concepts were already formulated, and another [location] staff member is assigned overall responsibility for the [name] project. Accordingly, Level 1-7 (1,250 points) is assigned for this factor.

Factor 2 - Supervisory Controls

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the architect's responsibility, and the review of completed work. Controls are

exercised by the supervisor in the way assignments are made, instructions are given to the architect, priorities and deadlines are set, and objectives and boundaries are defined. The architect's responsibility depends on the extent to which the architect is expected to develop the schedule and sequencing of various aspects of the work, to modify or recommend modification of instructions, and to participate in establishing priorities and defining objectives. The review of completed work depends upon the nature and extent of the review, e.g., close and detailed review of each phase of the assignment; detailed review of the finished assignment; spot check of finished work for accuracy; or review only for adherence to policy.

At Level 2-4, the supervisor sets the overall objectives and resources available. The architect and supervisor, in consultation, develop the deadlines, projects and work to be done. The architect having developed expertise in the work involved, is responsible for planning and carrying out the assignment; resolving most conflicts which arise; coordinating the work with others as necessary; and interpreting policy on own initiative in terms of established objectives. In some assignments, the architect also determines the approach to be taken and the methodology to be used. The architect keeps the supervisor informed of progress, potentially controversial matters, or far-reaching implications. Completed work is reviewed only from an overall standpoint in terms of feasibility, compatibility with other work, or effectiveness in meeting requirements or expected results.

In contrast, at Level 2-5 the supervisor provides administrative direction with assignments in terms of broadly defined missions or functions. The architect has responsibility for planning, designing, and carrying out programs, projects, studies, or other work independently. Results of the work are considered as technically authoritative and are normally accepted without significant change. If the work should be reviewed, the review concerns such matters as fulfillment of program objectives, effect of advice and influence on the overall program, or the contribution to the advancement of technology. Recommendations for new projects and alteration of objectives usually are evaluated for such con-siderations as usability of funds and other resources, broad program goals, or national priorities.

You stated the appellant's supervisor:

> . . .is not an architect, and does not set objectives or establish resources. There is no system in place in which other architects review, or provide assistance, or approval, or technical support to the incumbent. The incumbent serves as the COTR [contracting officer's technical representative] on her projects. Incumbent's signature is considered to be technically authoritative. . . . This should be rated at level 2-5.

Technical supervision is not restricted to supervisors who possess the same qualifications as the staff supervised. For example, the Financial Managers, GS-505, usually called

comptrollers, oversee complex financial management programs of major Federal activities. Their staff typically consists of professional accountants, budget analysts, and other highly analytical positions. Financial Managers, however, do not need to be qualified accountants but, because they are held technically accountable for the full financial program, and are authorized to accept or reject the work performed by their staff, they therefore, exercise technical supervision over their accounting staff. The same is true for natural resource program managers who typically oversee the work of a number of professional biological science, engineering, and related technical support positions. The appeal record, including the appellant's performance plan and the supervisor's PD of record, reflect that the appellant receives a definable degree of technical supervision within the meaning of the position classification process. This includes the supervisor's use of [co-worker's name] assistance in a technical review and control capacity over all A/E Center architectural projects. While this role may not be either clear to the appellant, or desired on her part, the use of [co-worker's name] in that capacity is within management's discretion.

Your rationale appears to equate COTR work as evidence of working only under administrative supervision. The COTR role entails accepting or rejecting work in accordance with defined contract requirements, and is performed in a variety of positions classified to various grade levels in the Federal government. Program technical **and** administrative control is vested in the technical contract approving official's position; it is not creditable to the position functioning as that position's agent in the field. Implicit in Level 2-5 is a degree of program management authority that is not delegated to the appellant's position. [appellant's name] does not, for example, operate only within the parameters of broadly defined missions in independently planning, designing, and carrying out major program activities. The intent of this level is that the employee normally would be responsible both for initial conception of work to be undertaken within a broad program area and for the funds and resources expended in accomplishing the work. As discussed above, that function is vested in [supervisor' name] position.

In contrast, we find the appellant occupies a traditional staff role where she is assigned specific work to carry out, and that his work receives a definable degree of technical review reflective of Level 2-4. The supervisor's position is held technically accountable for all Center functions. This clearly exceeds the type of administrative supervision normally expected at Level 2-5. In addition, the results of the appellant's work cannot be said to be authoritative in that her position is not assigned the authority upon which this normally would be predicated. She does not, for example, make actual decisions on program matters but, rather, in keeping with her staff role, she makes recommendations that are subject to review by her supervisor. The record reflects that Mr. Bove is involved fully in his program management role on decisions concerning the approach to take in responding to management project requests, making project work time and resource determinations, and in the acceptability of work tracked through the

monthly project status system reporting process for the appellant's position and all other positions in the office.

In short, Level 2-5 merely does not represent a high degree of technical independence, but also a corresponding management role that is well beyond the authority vested in the appellant's position. It derives not only from the technical latitude afforded, but also from the position's role in the organization and the authority to define the basic content and operation of the program beyond the technical aspects of discrete assignments. Neither the absence of immediate supervision for day-to-day operations nor the fact that technical recommendations normally are accepted serve to support a level above Level 2-4. Accordingly, this factor is evaluated properly at Level 2-4 (450 points).

Factor 3 - Guidelines

This factor covers the nature and judgment needed to apply guidelines. Since individual assignments vary in the specificity, applicability, and availability of guidelines, the constraints and judgmental demands placed upon architects also vary. In the architectural field there are many guides and standard specifications. They serve as checklists and do not relieve the architect of the responsibility for making a judgment that the standards as written are applicable in the particular circumstances at hand. The existence of specific instructions, procedures, and policies may limit the opportunity of the architect to make or recommend decisions or actions; however, in the absence of procedures or under broadly stated objectives, the architect may use considerable judgment in researching literature and developing new methods. For this factor guidelines refer to standard guides, precedents, methods, and techniques including: (1) agency manuals of instructions and operations; (2) standard textbooks and publications common to the profession; (3) manufacturers' catalogs and handbooks; (4) standard designs developed and prescribed by the central architectural staff of the agency; (5) standard, master, or guide specifications developed and prescribed by the central architectural staff of the agency; (6) files of previous projects undertaken by the agency including tentative, alternate and actual sketches, preliminary studies for specific design problems, bid prices, cost and production schedules, and material costs; (7) basic design and construction practices and methods as taught in architectural courses or generally accepted by architects and other specialists as a result of experience; (8) technical data appearing in publications, building codes of State and local governments and recognized architectural and engineering societies and organizations including regulatory and enforcement agencies; material catalogs; and price indices; and (9) governing policies and procedures of the agency.

Your rationale for this factor was based on the fact:

> The rater did not mention problems and technical skills needed to complete the project at the [location] Training Center, or Door #5 at the [location] Service Center. (Asbestos).
>
> Nor did the rater give proper consideration to the project completed at the [agency] Satellite Network office, in which an alternative method to more traditional "ground mounting methods" had to be employed.
>
> This should be rated at level 3-5.

Your rationale appears to confuse the coverage of Factors 1 and 3. The technical skills necessary to perform the work of the appellant's position were evaluated fully under Factor 1. During the audit, the appellant indicated that Level 3-5 should be credited to her position because she: (1) routinely needed to select the most efficient and effective way to procure construction, alteration, and repair services to meet customer needs; (2) routinely looked beyond the minimum requirements for the ADA, abiding by city as well as Federal code requirements; (3) developed alternative proposals for projects, e.g., developing three alternative proposals for the child care walkway; (4) assured that the interior designer for the [location] project understood [agency] user space and floor plan needs; and, (5) developed an innovative approach to mounting a satellite dish for the [location] Service Center on a pole attached to a prefabricated building rather than placing it on the roof or ground mounting it.

At Level 3-3, guidelines include standard instructions, technical literature, agency policies and regulations, manufacturers' catalogs and handbooks, precedents, and practices in the area of assignment or specialization. The architect independently selects, interprets, and applies the guides, modifying, adapting, and making compromises to meet the requirements of the assignment. The architect also must exercise judgment in applying standard architectural practices to new work situation and in relating new work situations to precedent ones. The GS-808 PCS defines designing to code requirements as working within established guidelines, methods, and techniques. We find the work performed by the appellant meets Level 3-3. As at that level, she routinely makes compromises to meet the requirements of her assignments. She routinely develops alternate approaches to projects, explaining the relative advantages and cost implications of each approach. The interconnecting driveway project evidences the adapting of established methods and techniques, e.g., changing elevations in order to preclude puddling, using a water basin rather than piping and drainage construction for cost effectiveness, placing barriers on the concrete and guard shack pad to reduce vulnerability. Her searching of literature and subsequent selection and use of commercially available porcelain pavers for the kitchen upgrade, selection of automatic door hardware, e.g., using a lock normally found in prisons to meet panic operation requirements, selection of colored stamped concrete basket weave pavers for the cafeteria extension in order to meet the aesthetics of a

European look in combination with easy maintenance and cleaning, all reflect the selecting and adapting of established occupational guidelines and practices to new work situations. Mounting the satellite dish on a pole attached to a prefabricated building reflects the adaption of a technique typical in a military environment in which large antenna frequently are mounted on the side of a building rather than on a roof top or the ground. Asbestos abatement technology is well established, and asbestos removal must be performed under specific and exacting control conditions that do not provide for or permit substantial deviation from established practices.

In contrast, at Level 3-4 guidelines are often inadequate in dealing with the more complex or unusual problems. The architect is required to use resourcefulness, initiative, and judgment based on experience to deviate from or extend traditional architectural methods and practices in developing solutions to problems where precedents are not applicable. This level may include responsibility for the development of material to supplement and explain agency headquarters guidelines. As discussed previously, traditional architectural methods and techniques, established precedents, and established GSA and [agency] policies, regulations and practices pertain to the projects assigned to and performed by [appelant]. The appellant's work is performed preponderantly within the fabric of previously built structures, and does not require dealing with unusual local conditions (climatic or geographical). For example, the basic Beckley design decisions were made prior to the appellant's assignment to the project for which her concerns were primarily internal, e.g., space layout. The kitchen project did not alter the basic fabric of the building, nor did the 18th floor training center which tried to use existing walls. The limited structural issues in the COPS space modification project in the [location] Service Center south building, assistance provided on preventing water leak damage in the ACS computer room, and dealing with floor load issues for files in the Fallon building were all handled by adapting traditional architectural methods. While some work performed by the appellant several years ago, e.g., the [location] Service Center side lobby addition, which extended the basic building structure and had several demanding aesthetic requirements, required the extension of traditional methods and practices, this work is not indicative of work performed by the appellant a substantial amount of her work time during the past two years; i.e., a period of time we find reflects a reasonable current work cycle within the meaning of the GS-808 PCS. Because we find the appellant's position does not meet Level 3-4, the position does not approach or meet Level 3-5 as claimed in your appeal rationale. Accordingly, Level 3-3 (275 points) is assigned for this factor.

Factor 4 - Complexity

This factor covers the nature and variety of tasks, steps, processes, methods, or activities in the work performed and the degree to which the architect must vary the work, discern interrelationships and deviations, or develop new techniques, criteria, or information. The basic unit of measuring this factor is the "complex feature." A complex feature is an individual

architectural problem, broadly defined, which requires: (1) modification or adaptation of, or compromise with, standard guides, precedents, methods, or techniques; or (2) special considerations of planning, scheduling, and coordinating. In crediting a complex feature to a position, the following conditions must be met: (1) the duties and responsibilities of the position involve a specific, difficult problem requiring substantial analysis and evaluation of alternatives; (2) the architect in the position solves the problem although it may be subject to preliminary discussion of background and possible approaches, and the solution may be reviewed for technical adequacy as well as for conformance with policy by the supervisor or others; (3) the solution of the problem involves (a) substantial modification, adaptation of, or compromise with, standard guides, precedents, methods, and techniques, or (b) difficult or unusual planning, scheduling, negotiating, or coordination; and, (4) the architect applies a thorough knowledge of a variety of standard guides, precedents, methods, techniques, and practices in solving the problem.

Variations in the relative difficulty of work involving complex features are reflected below by the number of complex features and by their occurrence in combination. The interaction of complex features in combination is particularly significant in considering the relative intensity of all of the complex features in an assignment. A complex feature can be concerned with technical architectural work or socioeconomic, administrative, or other aspects of architectural work as illustrated in the following examples of complex features:

-- It is necessary to analyze and choose from among two or more standard methods from the standpoint of economy and architectural feasibility, when each approach contains advantages and disadvantages which do not readily or clearly outweigh those of the others. For example, cost considerations may dictate a compromise between a theoretically ideal method and a more economical but technically less satisfactory one. In like manner, there may be social, ecological, or other environmental considerations that make it necessary to analyze and weigh alternatives.

-- Standard material normally used by the agency in a given type of design is unavailable or not suitable because of unfavorable local conditions. It is necessary to engage in an extensive literature search to arrive at a satisfactory substitute.

-- In making modifications and alterations to existing buildings and structures it is necessary to: (a) modify the design for loads and stresses not anticipated when the building was designed originally; (b) keep changes and costs to a minimum while achieving objectives; and modify standards and specifications to meet limitations of existing buildings.

-- Special planning and scheduling are necessary to integrate completion dates for phases of Government work with phases to be performed by contractors, and, as necessary, to provide for continuing use of existing facilities.

-- When proposed work infringes on State or municipal structures or requires approval of such authorities, the architect coordinates with State or local civil authorities by personal contact and correspondence.

-- The architect presents special written analysis and justification to higher organizational entities regarding the economic, social, eco-logical, and other benefits the general public will derive from the proposed work in comparison with the estimated cost of such work.

Your rationale for this factor was based on the fact:

> The rater did not review projects mentioned in the Section labeled "Knowledge Required by the Position." A review of these projects would correctly reflect the complexity of the incumbent's work.
>
> This should be rated at 4-6.

At Level 4-4, assignments typically contain combinations, e.g., two to five, of the complex features. Work at this level typically involves the application of standard architectural practices to new situations and relating new work situations to precedent ones and, in addition, the modification or adaptation of and making compromises with standard guidelines. We find the projects discussed previously in this decision typically reflect a combination of features that meets, but does not exceed, those contemplated at Level 4-4. The appellant's projects routinely entail tradeoffs between cost and technically ideal methodology and phased scheduling in order to minimize ongoing work, e.g., the interconnecting driveway project required a tradeoff in the loss of parking spaces in front of the building in order to accommodate bus turning radius requirements, selecting a drainage solution that balanced cost and performance, and phased construction in order to limit parking lot disruption, and the kitchen project required selecting a flooring material that balanced cost with operational performance.

In contrast, Level 4-5 assignments are of such breadth, diversity, and intensity that they involve many, varied complex features. The work requires architects to be especially versatile and innovative in adapting, modifying, or making compromises with standard guides and methods to originate new techniques or criteria. Individual assignments typically contain a combination of complex features which involve serious or difficult-to-resolve conflicts between architectural and management or client requirements. The appellant's current work assignment does not

include projects that regularly involve the origination of new techniques or criteria. As discussed previously in this decision, they are of limited scope and scale, e.g., the limited reconfiguration of parking access with driveway, guard shack, and barrier modification as opposed to the design and layout of complete parking facilities. The incumbent's typical interior projects, e.g., the modification of interior space for a training center, entail the modification and adaptation of standard guidelines typical of Level 4-4. Other examples include dealing with equipment requirements in the automated collec-tion area; raising the floor and putting in ramps in the Service Center North Building that could handle the carts used in the room and support cabling needs; and, selecting doors, mounting hardware, and operating hardware for external door projects that met ADA as well as security requirements. In contrast, the senior architect position in the office is assigned projects of the breadth, diversity, and intensity involving many and varied complex features typical of Level 4-5, e.g., the phased design of most interior space within the [name] Federal Building, requiring intensive coordination with extensive mechanical and electrical engineering changes to accommodate major reconfiguration of office space and support technologies. In contrast, the appellant has worked on limited portions of this project, e.g., assuring that floor design under the planned file storage area meets load bearing requirements. Because we find the appellant's position does not meet Level 4-5, the position does not approach or meet Level 4-6 as claimed in your appeal rationale. Accordingly, Level 4-4 (225 points) is assigned for this factor.

Factor 5 - Scope and Effect

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

Effect measures such things as whether the work output facilitates the work of others, provides timely services of a personal nature, or impacts on the adequacy of research conclusions. The concept of effect alone does not provide sufficient information to properly understand and evaluate the impact of the position. The scope of the work completes the picture, allowing consistent evaluations. Only the effect of performed properly work is to be considered.

The agency credited the appellant's position with Level 5-3 with which you did not disagree. We concur with this determination. At Level 5-3, the purpose of the work is to investigate and analyze any of a variety of problems or conditions and to provide or recommend ways of dealing with them. The architectural determinations affect the design, construction, or alteration of buildings and related structures, with regard to economy, efficiency, and safety. The appellant works on defined building and related structure projects, and her recommendations affect the design and construction of these structures with regard to cost, aesthetic appearance, as well as comfort and effective use.

The proposed PD provided by the appellant in response to the agency's request that she certify the accuracy of her PD of record, however, contains language that suggests a far broader scope and effect:

> The incumbent performs a wide variety of architectural engineering tasks . . . for the alteration of existing or the construction of new space **service wide**. He/she serves in a technical advisory capacity to key officials in **building** standards and specifications, analyses [sic] proposed projects and initiates engineering projects design to enhance building and organizational operations **service wide**.

While the [location] A/E Center is a field component of an [agency] headquarters component, it does not have service-wide program responsibility as discussed earlier in this decision. The appellant also has not been assigned any specific geographic area of responsibility for the states covered by the [location] A/E Center. The appeal file indicates that such scope and effect would be reserved for the supervisor's position based on that position's ongoing program responsibility for the assigned geographic area of responsibility.

Accordingly, Level 5-3 (150 points) is assigned for this factor.

Factor 6 - Personal Contacts

This factor includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. Personal contacts with the supervisor are covered under Factor 2, Supervisory Controls. 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, e.g., the degree to which the employee and those contacted recognize their relative roles and authorities. Above the lowest level, points should be credited under this factor only for contacts which are essential for successful performance of the work and which have a demonstrable impact on the difficulty and responsibility of the work performed. The relationship of Factors 6 and 7 presumes the same contacts will be evaluated for both factors.

Your rationale for this factor was based on the fact:

> A more comprehensive review in this area will show the depth and level of expertise the incumbent must possess to assess the needs of the customer and other parties involved.
>
> This should be rated at level 6-4.

The appellant's proposed PD does not address personal contacts as a separate factor. However, under "Duties" the PD states:

> Serves in an advisory capacity to key officials in the Headquarters Office, Regional, District, Service Center, Host site and other field offices on technical matters related to his/her architectural expertise. Provides engineering data and information for use throughout the Service for work applicable to all [agency] Offices.

The proposed PD recognizes that the appellant meets with members of A/E firms and the staff of other Government agencies.

At Level 6-3, personal contacts include a variety of officials, managers, professionals, or executives of other agencies and outside organizations. Typical of these contacts are contractor or manufacturer representatives; representatives of private architecture-engineer firms; other professional or para-professionals engaged in or concerned with the design of the cultural and social environment, e.g., urban, regional or community planners, interior designs, and engineers and other architects from other Federal agencies, State and local governments; officials and technical staff members of other Federal agencies, planning commissions, or State, county or local governments. We find the appellant's contacts impacting the substance of her work, meet Level 6-3. As at that level, she has recurring contacts with the staff of A/E firms who are performing contract design work, GSA staff, as well as internal [agency] managers and supervisors who are her primary customers. As at Level 6-3, the contacts are in a moderately structured setting in which the purpose and extent of each contact must be defined and the role and authority of each party are identified and developed, e.g., the appellant's COTR role with A/E design employees, agency representative role with GSA, and her technical advisory role to internal [agency] customers using her professional services.

In contrast, Level 6-4 personal contacts are with high ranking officials from outside the agency, including key officials and top architectural, engineering, and scientific personnel of other agencies, State and local governments, private industry, and public groups. The architect may also participate, as a technical expert, in committees and seminars of national or even international importance. These contacts are in a highly unstructured setting, in which the role and authority of each party may be very unclear, arrangements are difficult to make, and the ground rules may be different for each contact, e.g., with Members of Congress, State Governors, mayors of large cities, and presidents of large national or international firms. These types and settings of contacts are not representative of the appellant's position.

Accordingly, Level 6-3 (60 points) is assigned for this factor.

Factor 7 - Purpose of Contacts

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

Your rationale for this factor was based on the fact:

> The rater did not give proper consideration to the degree of involvement the incumbent provides to internal and external clients and other parties.
>
> This should be rated at level 7-4.

At Level 7-3, the purpose of contacts is to influence or persuade other architects or subject matter specialists to adopt technical points and methods about which there are conflicts, to negotiate agreements with agencies and contractors where there are conflicting interests and opinions among organizations or among individuals who are also experts in the field, or to justify the feasibility and desirability of work proposals to top agency officials. The appellant's advice to [agency] managers on project tradeoffs, including convincing them to a band on strongly held esthetic desires and curtail project scope due to funds limitations and code requirements, COTR role with A/E firms, and advice to other technical staff working on different aspects of her assigned projects to assure that code, ADA, and user needs are met compares favorably with the extent of influence and persuasion found at Level 7-3.

In contrast, the purpose of contacts at Level 7-4 is to justify, defend, negotiate, or settle highly significant or controversial architectural matters. Architects often represent their agencies in professional conferences or on committees to plan extensive and long-range architectural programs and to develop standards and guides for broad activities. The scope of the appellant's projects do not provide the opportunity for the representational purposes typical of Level 7-4. Her position is neither assigned extensive and long-range program work nor is she delegated the authority and responsibility to represent the [agency] on such work as is required at Level 7-4.

Accordingly, Level 7-3 (120 points) is assigned for this factor.

Factor 8 - Physical Demands

This factor covers the requirements and physical demands placed on the architect by the work assignment. This includes physical characteristics and abilities (e.g., specific agility and dexterity requirements) and physical exertion involved in the work, e.g., climbing, lifting,

pushing, balancing, kneeling, crawling, or reaching. To some extent, the frequency or intensity of physical exertion is also considered, e.g., a job requiring intermittent standing.

The agency credited Level 8-1 with which you did not disagree. At Level 8-1, work is principally sedentary, although there may be some walking or bending involved in activities such as inspections of installed equipment or construction or field visits. We concur and have assigned Level 8-1 (5 points) for this factor.

Factor 9 - Work Environment

This factor considers the risks and discomforts in physical surroundings or job situations and the safety regulations required.

The agency credited Level 9-1 with which you did not disagree. At Level 9-1 work usually is performed in an office setting, although there may be occasional exposure to conditions in buildings or other structures under construction. We concur and have assigned Level 9-1 (5 points) for this factor.

Summary

In summary, we have credited the appellant's position as follows:

Factor	Level	Points	
1	1-7	1,250	
2	2-4	450	
3	3-3	275	
4	4-4	225	
5	5-3	150	
6	6-3	60	
7	7-3	120	
8	8-1	5	
9	9-1	5	
		2,540	Total Points

The total of 2,540 points falls within the GS-11 grade level point range of 2,355-2750 points on the Grade Conversion Table in the GS-808 PCS.

Based on the above analysis, it is our decision that the proper classification of the position is Architect, GS-808-11. This decision represents the current facts regarding the duties, responsibilities and qualification requirements of the position and is the basis for its classification.

This decision constitutes a classification certificate under the authority of section 5112(b) of title 5, USC. This certificate is mandatory and binding on all administrative, certifying, payroll, disbursing and accounting officials of the Government. In accordance with 5 CFR 511.702, it must be implemented no later than the beginning of the sixth pay period following the date of this decision. The servicing personnel office must submit a compliance report containing copies of the action taken with respect to the appellant, e.g., SF 50. The compliance report must be submitted to this office no later than 30 days following the effective date of the SF 50. The appellant may contact her servicing personnel office for information about the implementation of this decision.

By copy of this decision, we are also directing the servicing personnel office to correct the position description to reflect the actual duties and responsibilities assigned to the position as determined in this decision. Documentation of this must be submitted as part of the compliance report directed above.

Integral to this classification appeal is the appellant's claim that her position is classified inconsistently with those occupied by employees in the Philadelphia Center who perform work similar or related to the work she performs. The appeal record causes us to conclude that this claim warrants further action. While the employing agency has the primary responsibility for intra-agency consistency, including consistency with OPM decisions, the agency may not change the classification certification in an OPM decision nor may the agency classify a position on the basis of position-to-position comparison. We asked the agency personnel office to review the classification of those positions, and any identical, similar and related positions based on the rationale contained in this decision, and submit a report to this office explaining why the positions warrant a different application of the controlling PCS's or, if the positions are found to support the same or similar application, setting forth a plan to correct the classification of the other positions in order to achieve internal consistency. We also have asked the agency to inform the appellant of the results of the study.

Please be assured this decision is not intended to reflect on the appellant's ability, qualifications, or the quality of her performance. Rather, it reflects our evaluation of the position based on a comparison of the duties and responsibilities with the appropriate standards.

Please inform the appellant of our decision.

Sincerely,

signed 4/7/97

Robert D. Hendler
Classification Appeals Officer
Philadelphia Oversight Division

cc:
[name and address of appellant's servicing personnel office]

[name and address of regional personnel office]

[name and address of agency personnel office]

Director, Classification Appeals and
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