

OFFICE OF PERSONNEL MANAGEMENT
MERIT SYSTEMS OVERSIGHT AND EFFECTIVENESS
DALLAS OVERSIGHT DIVISION
CLASSIFICATION APPEAL DECISION

Under section 5103 and 5346 of title 5, United States Code

Appellant: [the appellant]

Position: Welder Training Leader, WL-3703-8
Position Number: 5107117

Organization: [section]
[activity name] Job Corps Civilian Conservation Center
Forest Service
U.S. Department of Agriculture
[location]

Decision: Welder Training Leader, WL-3703-10
(Pay Determination Denied, Position Upgraded)

OPM Decision Number: C-3703-10-01

Approved:

/s/ Judith L. Frenzel for
Bonnie J. Brandon
Classification Appeals Officer

9/10/96
Date

Copy of decision sent to:

[CCS]

INTRODUCTION

The appealed position is assigned to [The Department of Agriculture]. The duty station [small installation]. The appellant's position was initially classified and filled as a Training Instructor (Welding), GS-1712-9. In 1984 the appellant's position was reclassified as a Welder Training Leader, WL-3703-8. The appellant contends that his position should be returned to the General Schedule and classified as a Training Instructor or classified in the Federal Wage System as a wage supervisor.

This appeal is filed with the Office of Personnel Management under the provisions of sections 5103 and 5346 of title 5, United States Code. This is the final administrative decision of the Government, subject to discretionary review only under the conditions specified in title 5 of the Code of Federal Regulations, sections 532.705.

POSITION INFORMATION

[The installation] is concerned with the development of student job skills through classroom and shop instruction and on-the-job training in vocations having predetermined employment opportunities. The appellant serves as the lead position in the welding program, providing technical supervision to the two welding instructors and overseeing the welding program at the Center. Students in the welding program are taught basic welding by a Welder Training Leader, WL-3703-8. The students then move into the advanced welding training program where they are taught by a contract welding instructor and the appellant.

The position description of record is adequate for classification purposes. However, there is one discrepancy. As stated in the position description, the appellant "shares overall responsibility with other welding instructor for the training of assigned crews of students on projects. . . ." The appellant's supervisor, the Work Program Officer, confirmed that the appellant has sole responsibility for planning and overseeing the welding phase of work projects and for training students in the welding program. This discrepancy is not a grade controlling factor for classification purposes.

PAY CATEGORY DETERMINATION

The appellant requests that his position be classified as a Training Instructor, GS-1712-9, or as a wage supervisor in the Federal Wage System. According to the guidance provided in the Introduction to the Position Classification Standards, if trade, craft, or manual-labor knowledge and experience is of *paramount* importance in performing the primary duty of a position, the position is properly classified under a prevailing rate system. If not, the position is subject to the General Schedule.

The Position Classification Standard (PCS) for Training Instruction, GS-1712, is appropriately used to evaluate a position when the paramount requirement of the work is a combination of practical knowledge of the methods and techniques of instruction

and practical knowledge of the subject-matter being taught. Positions in this series do not have *either* a paramount requirement of professional knowledge and training in the field of education, *or* mastery of a trade, craft, or laboring occupation.

As noted in the PCS for Training Instruction, teacher positions in Job Corps centers should be classified according to the *paramount* knowledge and skills required of the teachers. The appropriate series may be one of the professional education series, the GS-1712 series, a wage grade series, or a specific subject-matter series. The requirements of positions vary depending on the educational strategy or emphasis of the vocational training program and the nature of the courses being taught.

The paramount qualification requirement of the appellant's position has been established by agency management officials as the knowledge of a trade, craft, or laboring occupation, i.e., welding. Thus, the appellant's position cannot be placed in the GS-1712 series.

Management's intent is documented in the official position description of record and in the classification decision dated 9/8/95 from the Director, Job Corps National Field Office. As described in the appellant's position description, the knowledge and skills required of the appellant's position include the following:

- mastery of the operation and maintenance of various types of industrial-type welding equipment, and
- practical knowledge and experience in instruction to assure the training aspects of the Job Corps program are met.

In a grade evaluation dated 8/22/95, the position classification specialist stated that it was "absolutely a management intent decision" and that the purpose of the appellant's position was to instruct students in the fundamentals of the welding trade. The expectations of management were specifically defined in a 5/1/96 memorandum to the appellant that was signed by the Center Director and the Work Program Officer. The following items are quoted from this memorandum.

I do require you to continue to instruct students in the skill of welding so that they can pass a certification test to the standards of the American Welding Society. We still have professional requirements of the Welding Program, and I will continue to expect you to assist student teachers assigned to welding as part of their requirement for college teacher certification. I expect you to continue with the Welder Certification Program, because this is a part of our Center approved and supported program.

The requirements of the appellant's position as stated above require both the knowledge of the trade of welding and the knowledge associated with education and vocational training. Consider the following:

- According to two educational professionals at Western Montana College, only a state certified teacher may work with college student teachers. The Center could not support the Western Montana College in its Industrial Arts student-teaching program without the teaching credentials of the appellant.
- A high level of skill and knowledge in welding is required to be qualified by the American Welding Society as a Certified Welding Inspector. The Center could not maintain its Welder Certification Program if someone at the Center did not have this certification. [Location] is the only Job Corps Center in the United States having the capability of certifying its welding graduates, and at this time the appellant is the only employee at the Center with this certification capability.

For the appellant's position, management officials have set the educational strategy and emphasis on the occupational knowledge and skills of welding. This is evidenced by the importance placed on the welding program to provide students the necessary skills to pass a certification test. The knowledge and skills needed to meet student training needs include advanced welding techniques such as various gas welding torch processes and the use of various metals and alloys.

The appellant brings into his position more than a *practical* knowledge and experience in instruction. Obviously, the appellant has extensive teaching and educational knowledges and skills that he uses in his job. This is evident by the appellant's work as an educator. Such work includes the following: developing video tapes for instructional purposes; providing the students computer aided design (CAD) training; developing courses to provide welding training to students beyond the basic requirements of the Training Achievement Record established by the Department of Labor; and enhancing the students' training by taking their work to a technological college to be x-rayed to check welding quality.

Regardless of the education and teaching credentials of the appellant, the paramount knowledge requirement of his position is welding. As stated in the Introduction to the Position Classification Standards, if the manual-labor knowledge and experience is of *paramount* importance in performing the primary duty of the position, it is proper to classify the position under a prevailing rate system. A professional educator without an extensive knowledge of welding could not perform the primary purpose of this position, teaching students the skills of welding; therefore, the appellant's position is properly placed in the Federal Wage System.

GRADE DETERMINATION

We agree with the rationale provided by the agency that the position does not meet the criteria for a wage supervisor position, as defined in the Job Grading Standard for Federal Wage System Supervisors. The appellant does not, as a regular and recurring part of his job, and on a full-time and continuing basis, exercise technical and administrative supervision over subordinate workers in accomplishing trades and labor work. The appellant provides technical, but not administrative, supervision to one Welder Training Leader, WL-3703-8 and a contract welding instructor.

In the Federal Wage System, the appropriate standard to use for evaluating the appellant's position is the Job Grading Standard (JGS) for Leader. The Leader standard is used to grade the jobs of employees, who as a regular and recurring part of their jobs, and on a substantially full time basis, lead three or more workers to (a) accomplish trades and labor work or (b) train them in the work of a trades and labor occupation. Part II of the JGS for Leader is used to grade the jobs of training leaders. Training leaders require sufficient skill in and knowledge of the trade to carry out the training leader duties described in the standard and, as a second requirement, a practical knowledge of the methods and techniques of instruction. Under this standard, training leader jobs are graded on the basis of (a) the grade level of trades and labor work involved and (b) the type of training leader job involved.

Grade Level Involved

The grade level involved is either (a) the grade level of the nonsupervisory work for which the trainees qualify upon completion of the training course, or, if no target grade can be identified, (b) the highest nonsupervisory level of trade skill and knowledge required of the trainer. Since no target grade is identifiable for Job Corps students, the appellant's position is graded on the basis of the highest nonsupervisory level of trade skill and knowledge required of the appellant. Except for the minimum requirement of three trainees in a class, the number of students in the training class do not affect the grade of the training leader.

The JGS for Welder, WG-3703, is used to determine the highest nonsupervisory level of trade skill required of the appellant. In the agency's evaluation statement, the highest nonsupervisory level of trade skill of the appellant's position was evaluated at the WG-8 level. At this level, welding workers apply a variety of electric resistance welding methods and equipment, or one or more manual welding processes to carry out standard welding operations. The WG-8 welder must possess the knowledge to set up and operate various electric resistance welding machines, or use several manual welding processes, such as the gas welding process, arc welding process, etc., to weld parts made of commonly used metals. Welding workers at the WG-8 level perform welding operations on the basis of written or oral instructions and the supervisor is

available to advise on unusual problems. Welding at this level may be done in awkward and cramped positions, indoors or outdoors.

The appellant's position exceeds the requirements at the WG-8 level. The skill and knowledge and responsibility of the appellant's position meet the level in the standard described at the WG-10 level. At this level, the welder uses several different gas torch processes and various electric arc processes, including inert gas shielded ones, to weld all types of commonly used metals and alloys of various sizes, shapes, and thicknesses. The WG-10 welder is required to work with dissimilar metals such as copper to steel and must assure complete fusion of base and filler metals. Welding work at the WG-10 level is accomplished from all angles, including horizontal, vertical, and overhead. In short, the WG-10 welder applies knowledges of a wider range of manual welding processes and makes more difficult welds than does the WG-8 welder.

As described in the appellant's position description, students are taught to use manual and machine-operated torches from vertical, horizontal and overhead positions. Advanced welding techniques taught to the students include gas metal arc and gas tungsten arc welding for welding stainless steel and aluminum, both difficult to weld metals. Basic metallurgy is taught in conjunction with the use of advanced welding machinery. Welding projects completed by the Job Corps students under the guidance of the appellant include school stadiums and bleachers, bear-resistant garbage cans, tree pallets for fork lift use, and all-aluminum coolers for storing trees. The students are taught the skills of plastic welding, welding steel to copper, and pipe welding. The students are taught welding skills requiring complete fusion of base and filler metals in hard to reach places. To teach such skills to students, the appellant must possess the skill and knowledge of a welder described at the WG-10 level.

Type of Training Leader Job Involved

Two types of training leaders are described in the standard, Type A and Type B. The agency's classification evaluation placed the appellant's position in Type B, the more advanced of the two levels. Typically, a Type A Training Leader conducts training to update or expand the skills of full-performance workers. The Type B Training Leader conducts training sessions to cover all phases of a recognized trade or line of work that are designed to progressively improve the student's skills. We agree with the agency's evaluation that the appellant's position fits the Type B training situation.

Grade and Title Determination

The highest level of trade skill and knowledge required of the appellant's position is WG-10. The training situation is Type B. Using the conversion table in the standard, the appellant's position is graded at level 10.

The job title and occupational code of the craft in which the Training Leader is qualified to conduct training are used to complete the title of the Training Leader position.

DECISION

The appellant's position is classified as Welder Training Leader, WL-3703-10.