

U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA Programs

Dallas Oversight Division
1100 Commerce Street, Room 4C22
Dallas, TX 75242-9968

Job Grading Appeal Decision
Under sections 5103 and 5346 of title 5, United States Code

Appellant: [appellant's name]

Agency classification: Medical Equipment Repairer
WG-4805-11

Organization: [appellant's unit]
Department of Veterans Affairs
[city, state]

OPM decision: Medical Equipment Repairer
WG-4805-11

OPM decision number: C-4805-11-02

/s/ Bonnie J. Brandon

Bonnie J. Brandon
Classification Appeals Officer

August 3, 2001

Date

As provided in section S7-8 of the *Operating Manual: Federal Wage System*, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in section 532.705(f) of title 5, Code of Federal Regulations (address provided in the *Introduction to the Position Classification Standards*, appendix 4, section H).

Decision sent to:

[appellant's name and address]

Shared Service Center, HR Links
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3401 S. W. 21st Street, Building 9
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Introduction

On March 21, 2001, the Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) accepted an appeal from [the appellant]. He works as a Medical Equipment Repairer, WG-4805-11, in the [unit within a hospital], Department of Veterans Affairs, [city, state]. Believing his job should be classified as Electronics Technician, GS-856-10, the appellant filed an appeal with the Department of Veterans Affairs. The Department's decision of February 15, 2001, sustained the local servicing personnel office's assignment of the appellant's work to the Federal Wage System as WG-4805-11. In his appeal to OPM, the appellant states that his job should be placed in the General Schedule because he is performing work that was previously assigned to an employee in a GS-856-10 Electronics Technician position. We have accepted and decided the appeal under sections 5103 (pay category) and 5346 (Federal Wage System job grading appeals) of title 5, United States Code (U.S.C.).

To help decide this appeal, an Oversight representative held telephone conversations on June 28, 2001, with the appellant and on July 11, 2001, with his immediate supervisor. In reaching our decision, we have reviewed information gained from these conversations and all material of record furnished by the appellant and his agency, including the appellant's official job description [number].

General issues

The appellant makes various statements about his agency and its evaluation of his work. He identifies specific duties that he believes warrant placement of his job in the General Schedule because they were previously assigned to a GS-856-10 Electronics Technician position. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of the appellant's job. We cannot compare the appellant's duties to those in other jobs or positions as a basis for deciding his appeal. By law, we must make our decision solely by comparing the appellant's current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5346). Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

Job information

The [appellant's specific Veterans Healthcare System] includes [the hospital] where the appellant works and a campus in [a nearby city]. The [appellant's unit] provides service to both facilities. The appellant's supervisor is located at the [name] campus and is routinely on site at the hospital in [the city where the appellant works] one or two times a week.

The appellant's duties include maintaining, troubleshooting, and repairing a wide variety of the medical equipment such as electronically-controlled incubators, endoscope processors, steam and ethylene oxide sterilizers, microprocessor-controlled equipment, and surgical tables and lights. When not repairing medical equipment, the appellant is responsible for first-call maintenance of elevators, translogic and pneumatic tubes, dietetic equipment, dumbwaiters, floor buffers, trash chutes, and linen chutes. He is responsible for routine preventive maintenance procedures, electrical inspection of new equipment, and the modification of equipment at the

manufacturer's request. The work requires knowledge of electrical and electronic circuitry; steam; chemical sterilization; and mechanical vacuum pressure systems. Skill in using tools and test equipment and the ability to use schematics, drawings, and technical specifications to troubleshoot, isolate, and determine cause of the malfunction are also required.

Pay category determination

Section 5102(c)(7) of title 5, United States Code, exempts from coverage under the General Schedule those "employees in recognized trades or crafts, or other skilled mechanical crafts, or in unskilled, semiskilled, or skilled manual-labor occupations, and other employees including foremen and supervisors in positions having trade, craft, or laboring experience and knowledge as the paramount requirement." The *Introduction to the Position Classification Standards* defines paramount requirement as the essential, prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the position has been established. Whether particular types of positions are trades, crafts, or manual labor occupations within the meaning of title 5 depends primarily on the most important requirement for the performance of a primary duty or responsibility for which the position exists. If a position clearly requires trade, craft, or laboring experience and knowledge as a requirement for the performance of its primary duty, and this requirement is paramount, the position is under the Federal Wage System regardless of its organizational location or the nature of the activity in which it exists.

The *Introduction* also 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.

Maintenance and repair work is typically regarded as trade or Federal Wage System work and usually performed in or from a shop, while evaluation and design work is typically regarded as technician or General Schedule work and usually performed in a laboratory or under the direction of an individual with professional training in the appropriate field of work. For example, the job grading standard for Medical Equipment Repairer, 4805, states, "Medical equipment repairers install, modify, troubleshoot, maintain, test, calibrate, adjust, overhaul, and repair a wide variety of medical, laboratory, and dental equipment (electronic, electrical, and mechanical)." The standard excludes such work, however, when it is performed by technicians incidental to the development and evaluation of medical equipment. Development and evaluation are engineering functions and, therefore, when nonprofessionals perform such work, it is often to support a professional engineer who actually directs the work.

The standard for Medical Equipment Repairer, 4805, is used to grade nonsupervisory work involved in the installation, maintenance, overhaul, repair, and testing of various medical and dental equipment used in patient diagnosis and treatment and in research laboratories. This work requires a knowledge and application of mechanical, electrical, and electronic principles and circuitry, the ability to determine malfunctions, and the skill to repair and maintain a variety of medical, laboratory, and dental equipment.

Characteristic of positions in the GS-856 Electronics Technician Series is the requirement for theoretical knowledge about the fields of electricity, electronics, physics, and, in some cases, engineering mechanics, that is less than full professional engineering knowledge but which nevertheless enables the technician to understand how and why a specific device or system embodying electronic principles operates. Electronics technician positions require the ability to follow schematic diagrams and block diagrams and in many cases to construct devices in accordance with more or less detailed instructions (dependent upon the requirements of the assignment). At the higher grade levels, electronics technicians modify or elaborate upon basic electronic designs in order to make them work in accordance with the engineering objectives which have been set. While many 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 assignment and the manual dexterity and skill is secondary. The GS-856 series is not intended to cover positions where employees are not required to understand and apply a practical knowledge of electronic theories and principles, even though they are dealing with electronic equipment.

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 controls the pay category. Regular and significant technical evaluations, development of specialized circuits or components, and complex modifications to standard medical equipment are hallmarks of electronics technician work. Such duties are noticeably absent from the appellant's job.

The majority of the appellant's duties include maintaining, repairing, and troubleshooting medical equipment. These duties are reflected in the appellant's performance plan which lists four elements for evaluation: repair, troubleshooting, installation, fabrication, and preventive maintenance; safety; ADP security; and customer service. Copies of work orders and other information provided by the appellant and his supervisor indicate that the appellant spends a large portion of his time repairing specialty patient beds, electric patient beds, incubators, and gas and steam sterilizers. He also maintains and repairs automatic and roll-up door sensors and environmental management equipment such as floor buffers and translogic and pneumatic tubes. The appellant modifies equipment as requested by the manufacturer. The appellant's regular and recurring work assignments and the limited degree to which he performs modification work clearly do not require the knowledge and ability necessary for an electronics technician position.

We conclude that the paramount requirement for the appellant's job is the performance of work which requires the application of knowledge and experience typical of the Federal Wage System. Therefore, the job is excluded from the General Schedule.

Occupation, title, and standard determination

The appellant's job best fits in the Medical Equipment Repairer, 4805, occupation which covers jobs that involve the installation, maintenance, overhaul, repair, and testing of various medical and dental equipment used in patient diagnosis and treatment and in research laboratories. The job grading standard for Medical Equipment Repairer prescribes the title *Medical Equipment Repairer* for jobs at grade 10 and above. As explained in the next section of this decision, the

appellant's job is graded at the 11 level. Therefore, the appropriate title for the appealed job is *Medical Equipment Repairer*.

Grade determination

The job grading standard for Medical Equipment Repairer, 4805, defines work at only the grade 11 level. It indicates that the level of skill and knowledge and other work requirements described may warrant grading above or below the 11 level. The standard uses four factors for determining grade level: skill and knowledge, responsibility, physical effort, and working conditions. Our assessment of each factor follows.

Skill and knowledge

The appellant's work requires the skill and knowledge to troubleshoot and repair to component level state-of-the-art gas and steam sterilizers, incubators, endoscope processors, surgical lights, electric patient beds, translogic and pneumatic tubes, and various other mechanical equipment. The work requires knowledge of the use of tools and test equipment, such as multimeters, to troubleshoot to component level in both discrete and integrated circuits. As an example of troubleshooting, the appellant said a problem with the sterilization system for endoscopes could be with the sterilizer itself or the microprocessor that controls the chemical sterilization. If the problem lies with the microprocessor, the appellant identifies the error message and then presses the proper pre-programmed key to restart the program. If it is an equipment problem, he must identify the malfunction and replace the defective part(s). He does not repair the microprocessor but calls in a contractor for that type of repair. Good hand and eye coordination is necessary for working with small components. The appellant must be skilled in reading and interpreting electronic, electric, and mechanical schematics, diagrams, and other technical literature.

The skill and knowledge required for the appellant's medical equipment repair duties are comparable to the grade 11 level. As described in the standard, medical equipment repairers at the grade 11 level apply a practical knowledge of the principles of electronic circuits and functions of electronic tubes and transistors to diagnose malfunctions and repair, and test electronic equipment. Repairers apply a practical knowledge of the principles and theories governing the maintenance and repair of electrical equipment in order to diagnose malfunctions and to repair and test such electrical equipment as sterilizers. Repairers at this grade level also have a knowledge of the relationships between electrical and electronic circuitry as well as the interrelationship of chemical, hydraulic, pneumatic, vacuum, or gas components of a piece of equipment or system. They have the ability to repair mechanical equipment such as sterilizers and other mechanical assemblies, and they select replacement parts. At this level, repairers must have good hand and eye coordination to work with small components. They use skill in the use of electronic test equipment multimeters and have the ability to use electrical test equipment such as test meters. Workers at this level have the ability to interpret and apply blue prints, schematic drawings, technical manuals, and other specifications.

This factor is credited at the grade 11 level.

Responsibility

The appellant works under the general supervision of the [unit's] supervisor. Because the supervisor spends most of his time at the campus in [a nearby city], the appellant completes nearly all of his assignments without supervision. As at the grade 11 level, the appellant receives work orally or through work orders, independently determines the nature of trouble and extent of repairs required, and completes repairs by following established trade practices and procedures using technical manuals and other specifications. If the appellant is unable to make repairs, he contacts the manufacturer for technical assistance, or he orders and replaces equipment or parts. He checks repairs made by contractors and signs off on their completed work. He assures new equipment is within prescribed limits for electrical safety and follows preventive maintenance procedures to assure equipment is in proper working order, similar to workers at the grade 11 level who assure that equipment is working within prescribed limits so that lives are not endangered. As at the grade 11 level, the appellant's supervisor spot checks work for compliance with trade practices, directives, and operating procedures.

This factor is credited at the grade 11 level.

Physical effort

As at the grade 11 level, the appellant's work assignments involve standing, stooping, bending, kneeling, and climbing. The appellant must also maintain intense concentration and awkward positions for long periods, often under adverse conditions. He must have excellent hand and eye coordination and must be able to lift more than 35 pounds.

This factor is credited at the grade 11 level.

Working conditions

Comparable to the grade 11 level, the appellant's environment ranges from work in a well-lighted shop to on-site repair in user locales within the hospital. The appellant works in proximity to lethal voltage, current, and gases. During repair of some equipment, he may be exposed to infectious diseases.

This factor is credited at the grade 11 level.

Decision

The job is properly exempt from the General Schedule and placed under the Federal Wage System as Medical Equipment Repairer, WG-4805-11.