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**DIGEST OF SIGNIFICANT
CLASSIFICATION DECISIONS
AND OPINIONS**

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Preface

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

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

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

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

This issue of the *Digest* was edited by Mr. Robert Hendler (Philadelphia Oversight Division). Contributions were provided by Mr. Hendler, Mr. Fred Boland (Chicago Oversight Division), Ms. Bonnie Brandon (Dallas Oversight Division), Ms. Kathy Day (Atlanta Oversight Division), Ms. Linda Kazinetz (Washington Oversight Division), and Mr. Carlos Torrico (San Francisco Oversight Division). The Classification Programs Division staff provided technical review and assistance.

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Article No. 24-01

Standard: [General Investigating, GS-1810](#) (February 1972)
[Criminal Investigating, GS- 1811](#) (February 1972)
[Police, GS-083](#) (April 1988)

Factor: N/A

Issue: Series coverage

Identification of the Classification Issue

This issue arose as a result of OPM's adjudication of two group classification appeals. The appellants worked in security and law enforcement organizations at the local and regional level. They were not part of the agency's centrally managed criminal investigations organization. Their positions were classified to the General Investigating Series, GS-1810. The appellants claimed that they planned and conducted investigations relating to alleged or suspected violations of criminal law covered by the Criminal Investigating Series, GS-1811.

The appellants needed to know what constituted a crime, the kind of evidence required to prove that a crime was committed, the methods and patterns of criminal operations, and the decisions and precedents that control search and seizure, admissibility of evidence, and arrest authority. The appellants worked in cooperation with other Federal, State and local criminal investigation organizations. They employed criminal investigative techniques such as surveillance, covert photography, executed searches, and used information supplied by informants. They were directly authorized to conduct property investigations involving Government funds of up to \$2,500. They also investigated child pornography, computer theft, workers compensation and other cases. The appellants gathered and preserved evidence for forensic analysis and used photography for covert recording of criminal activity. They had the authority to carry weapons and make arrests.

Resolution

The Grade-Level Guides for Classifying Investigator Positions (GS-1810/1811 Guide) list specific knowledge, skills, and abilities that distinguish GS-1810 and GS-1811 positions. OPM found that the appellants spent all of their time investigating criminal or potentially criminal violations of Federal law. Given these facts, OPM found the positions were excluded from the GS-1810 series.

However, OPM also found that the mission and functions assigned to the appellants' organizations and, therefore their positions, did not support their claim that they performed criminal investigations within the meaning of the GS-1811 series. The agency's criminal investigations service was responsible for investigating actual, suspected, or alleged major criminal offenses. In contrast, activities and regional offices (local) were authorized to maintain limited investigative

capability for resolving minor offenses punishable by confinement of one year or less. An internal agency instruction stipulated that local investigators were permitted to investigate major crimes when the criminal investigations service declined jurisdiction. However, certain matters had to be referred to that service, including such cases as loss of ordnance, narcotics, dangerous drugs or controlled substances; incidents of aberrant sexual behavior involving force/coercion or when children were involved; and thefts of minor amounts of personal property when ordnance, contraband, or controlled substances were involved. The instruction stated that local off-base investigative activities were limited to minor offenses and to the immediate area surrounding the installation and off-base housing areas. However, this policy did not restrict such functions as preventing the escape or loss of identity of suspected offenders, preserving crime scenes, and ensuring the integrity of physical evidence.

The distinction between high level police work, discussed in the Grade Evaluation Guide for Police and Security Guard Positions (GS-083/085 Guide) as detective assignments, and lower level criminal investigating work can be difficult to make because the case work is often similar. OPM determined that the GS-1810/1811 Guide had to be read in conjunction with the information contained in the more recently issued GS-083/085 Guide. That Guide clarifies that the GS-1811 series covers positions primarily responsible for investigating alleged or suspected *major offenses or violations of specialized laws of the United States*. While agency policy typically required the criminal investigations service's involvement in violent crimes, this did not mean that the GS-1811 series alone covered all such crimes within its occupational definition. The GS-083/085 Guide defines major crimes found in the GS-1811 occupation as a capital crime, those involving prescribed monetary values, or others that may vary in different jurisdictions. Level 1-4 in the GS-083/085 Guide specifically includes investigating violent crimes and conducting long-term investigations, within the meaning of the GS-083 occupation. Therefore, OPM found that higher level detective work in the GS-083 series was very similar to the appellants' assignments.

Both guides recognize employees in the GS-083 and GS-1811 occupations frequently help one another. GS-1810/1811 Guide grade level distinctions are based on primary case agent responsibility. Helping in a case by executing warrants, conducting surveillance, and conducting interviews has no particular impact with respect to determining the grade level of an investigator's position. Similarly, OPM concluded the appellants' assignments in serving warrants, contacting local and State authorities to obtain and/or provide background information on suspects, and traveling across state lines to perform searches and conduct interviews and suspect surveillance failed to prove that the appellants were performing GS-1811 functions. OPM found that travel across state lines in the GS-1811 occupation typically meant investigating criminal enterprises that operate in multiple jurisdictions. It did not necessarily cover conducting interviews and/or searches in the commuting area around a Federal installation, or the similar off-post work examples provided by the appellants.

OPM concluded the appellants' cases were long-term investigations within the meaning of the GS-083/085 Guide in that they extended from several days to several weeks, were local in nature, and were resolved by applying investigative and related techniques typical of the GS-083 occupation.

Furthermore, agency policy limited the breadth, depth, and complexity of investigations that could be managed by the appellants. OPM found all the positions were covered by the GS-083 series.

“Back to the Basics”

The series determination decision in this case illustrates that standards are dynamic. Information in the newer GS-083/085 Guide updated and clarified the meaning of the previously issued GS-1810/1811 Guide.

Duties and responsibilities assigned to positions are controlled by the mission assigned to the organization in which those positions are found. The positions created to perform an assigned mission must be considered in relation to one another; i.e., each position reflects only a part of the organization's work as a whole. The existence of the agency-level criminal investigations service and its responsibility for conducting or controlling investigations of serious crimes so limited the breadth, depth, and complexity of the investigations conducted by the appellants as to exclude their positions from the GS-1811 series.

Link to [C-0083-08-01](#), [C-0083-09-01](#), [C-0083-09-02](#)

Article No. 24-02

Standard: [General Engineering, GS-801](#)
[Civil Engineering, GS-810](#) (June 1966)

Factor: N/A

Issue: Series coverage; selection of standards for grading

Identification of the Classification Issue

This issue arose as a result of OPM's adjudication of a classification appeal. The appellant stated that the position included work in all aspects of facility management, including civil, electrical, mechanical, fire protection engineering, architecture, and landscape architecture. The appellant claimed that she should be assigned to the GS-801 series because: (1) someone with only civil engineering knowledge could not address the diversity of problems handled by the position; (2) no single engineering discipline predominated; and (3) the work in all disciplines was at the same level of skill and ability. Because of the multifaceted nature of the work, the appellant also claimed the General Grade Evaluation Guide for Nonsupervisory Engineering Positions (Guide) should be used for grade level analysis.

Resolution

OPM concluded that Civil Engineering, GS-810 work constituted the primary and paramount work of the position because it was the highest level of work performed and occupied a substantial amount of the appellant's time. OPM found that the appellant's other assignments, e.g., environmental engineering and landscape architecture, were ancillary to the position's civil engineering functions and were evaluable at lower grade levels than the GS-810 work. Therefore, the position did not meet the GS-801 series definition of engineering work, which includes positions that are not specifically classifiable in any other engineering series or that involve professional work in several branches of engineering. The classification system fully envisions that engineers whose positions are classified to a specific engineering series may perform work in other engineering series. Therefore, OPM sustained allocation to the GS-810 series.

Both the agency and the appellant referred to the Guide for grading purposes. Because the GS-810 standard contains directly applicable criteria, OPM determined that the Guide could not be used as a grading tool. OPM also found that there were standards for related occupations, which covered the work that the appellant performed. Their specific, directly applicable criteria had to be applied for grade level analysis before the Guide could be used as a grading instrument.

Based on the underlying reason for the existence of the position, OPM found that Part II, Planning and Development, of the GS-810 standard provided the best criteria with which to analyze the grade level worth of the appellant's work. Instructions in the standard acknowledge

that some positions contain functions that are included in more than one of the functional divisions. However, according to the standard, if one such function is clearly paramount, such a position should be evaluated against the criteria covering that function.

“Back to the Basics”

The series determination decision in this case involves the application of mixed grade and mixed series principles. By establishing that Civil Engineering, GS-810, was both the dominant and highest graded professional work performed, the position was excluded from the GS-801 series. It illustrates how decisions are made on what constitutes the primary and paramount work of a position.

Determining that the Guide was not necessary or appropriate for grade level determination purposes is based on the classification principle that specific, directly applicable standards must be used when they are available. If directly applicable standards are not available, the criteria selected as the basis for comparison must be as similar as possible to the position to be evaluated to limit the potential for misapplication.

Link to [C-0810-11-05](#)

Article No. 24-03

Standard: Paralegal Specialist, GS-950 (August 1986)
Legal Clerical and Assistance, GS- 986 (January 1992)

Factor: N/A

Issue: Series coverage; procedural versus analytical work

Identification of the Classification Issue

This issue arose in OPM's adjudication of an appeal. At issue was the classification of support work in a small legal office. This office had a high volume of cases in which several Government attorneys worked in a complex and specialized area of law. The appellant directed two legal clerks in their work and assisted the office in its case management, court filings, and examination of documents. To handle its numerous cases, the office also employed outside attorneys whom the appellant instructed regarding the intricacies of office procedures and special filing and reporting requirements. The appellant believed these duties exceeded normal Paralegal Specialist, GS-950-11, assignments.

Resolution

The appellant's work focused chiefly on administrative procedures important to the specialized processing requirements of the office's cases. The appellant's own statements concerning the documents reviewed and tasks performed bore this out as did an agency memorandum responding to the appellant's claims. The work examples provided in response to the oversight division's request further confirmed that the appellant's work largely demanded expertise in the procedural, rather than the analytical, aspects of the office's cases.

The appellant advised legal clerks on problems they encountered processing cases, explained filing requirements to attorneys, and reviewed cases for proper format, completeness, procedural accuracy, timeliness, evenness of workload distribution, and similar issues. The work demanded knowledge of proper procedures, but offered few opportunities for the subjective evaluations or convoluted factual analyses that engage higher graded paralegal specialists. The appellant's procedural expertise contrasted with the technical expertise associated with researching and advising on perplexing, subjective matters that require specialized knowledge of the law.

The Legal Clerical and Assistance Series, GS-986, standard covers legal procedural work requiring an understanding of the processes, procedures, and practices underlying legal activities; knowledge of the form, content, and use of legal instruments and documents; and familiarity with the steps involved in processing legal actions. The Paralegal Specialist, GS-950, standard specifically excludes positions like the appellant's that apply established instructions, rules,

regulations, precedents, and procedures to track cases, schedule court appearances, and compose routine legal forms. OPM concluded that the position was covered by the GS-986 series.

Link to [C-0986-00-01](#)

Article No. 24-04

Standard: [Job Family Standard for Professional Physical Science Work, GS-1300](#) (October 1997)

Factor: N/A

Issues: Series determination, grade level

Identification of the Classification Issue

This issue arose as a result of OPM's adjudication of a classification appeal. The appellant's hydrologist position required application of the Job Family Standard (JFS) for Professional Physical Science Work, GS-1300. The appellant's position was classified by the agency as Hydrologist, GS-1315-12. He believed his position should be classified as Environmental Scientist, GS-1301-13.

Resolution

The appellant's supervisor estimated that about 40 percent of the appellant's work was in hydrology, about 40 percent in geology, and about 20 percent in chemistry. The appellant believed his position required work in other physical sciences to the extent that his work as a hydrologist could not be considered predominant. OPM found that the primary and paramount field was hydrology because expertise in other fields was not required beyond what was necessary to accomplish the hydrological functions. Further, hydrogeology is a recognized subfield within the hydrology occupation. Hydrogeology covers work whose primary concern is with water but deals with the occurrence and movement of water in the crust of the earth and requires knowledge of geology to obtain appropriate water samples and predict the interactions between water and its geological environment. OPM found the position to be properly classified as Hydrologist, GS-1315.

The appellant directed and oversaw contractors at a Superfund site covering approximately 35 square miles. When problems occurred, the appellant made the necessary modifications in a procedure or, in cooperation with the environmental engineers, the equipment needed to remove contaminants from the water. The appellant gave speeches for the public affairs group to obtain public stakeholder acceptance for the selected procedure. Assignments were performed with considerable latitude. The work did not receive technical review and was generally accepted without change.

Although the appellant performed some aspects of the work illustrated at the GS-13 grade level, the position did not fully meet the intent of the GS-13 grade level criteria. As at the GS-12 grade level, the appellant extensively modified standard procedures or combinations of standard procedures to perform his work. This fell short of GS-13 grade level work involving wide-

ranging program issues for which technical problem definitions, methods, and/or data are highly incomplete, controversial, or uncertain. While the appellant performed some contractor oversight and program representation functions, he did not serve as an advisor or consultant for headquarters or field offices, develop new or revised guidelines for departmentwide use, or make public presentations involving long-range and controversial program issues typical of the GS-13 grade level. These functions were vested in other positions in the organization. Consequently, OPM determined that the appellant's work was properly evaluated at the GS-12 grade level.

Link to [C-1315-12-01](#)

Article No. 24-05

Standard: Medical Records Technician, GS-675 (November 1991)

Factor: Factor 1, Knowledge required by the position

Issue: Significance of quality assurance and special studies

Identification of the Classification Issue

This issue arose in OPM's adjudication of appeals from Medical Records Technicians, GS-675, at a facility servicing a medium sized population. The appellants worked in a health service that provided immediate care to about 70 patients daily. Medical staff at the service referred patients to local hospitals for specialized treatment or surgery. Patients with serious or chronic medical problems were housed in and serviced by other specialized facilities. The appellants believed their prominent roles on the health service's quality assurance team, their participation in cost saving studies, and their record keeping advice to doctors and nurses exemplified Level 1-5 knowledge.

Resolution

Specialized studies, quality assurance reviews, and medical registry maintenance can involve higher graded work when the underlying tasks go beyond extracting information from various sources and require higher skill in classifying medical conditions and in applying complicated analytical techniques. More knowledgeable technicians, for example, assist professionals in retrieving data for research, diagnostic, and teaching purposes. They apply complicated case-mix algorithms, link multiple sources of information from databases and records, or run statistical analyses requiring special training. They exercise greater knowledge and skill by helping researchers conduct large-scale studies to identify the kinds of patients likely to develop a disease, the effectiveness of existing treatments, the types and rates of complications, and the costs of medical care associated with the disease.

The appellants did not assist clinical researchers in such studies. They did not use complicated techniques to analyze the health service's records. Rather, they summarized cost data to identify and control medical expenses for a small patient population. Their quality assurance studies were essentially a repetition of each other's original work. That is, they analyzed records to identify and resolve common inconsistencies or discrepancies in medical documentation. The studies required application of the same knowledge as when the work was first performed. The appellants did not maintain special registries, such as those under the National Cancer Institute's Surveillance, Epidemiology, and End Results Program. Therefore, they had no opportunity to apply the higher knowledge and skill associated with registry maintenance.

The appellants' coding of the general health care for a small population, even when coupled with their coding of specialized treatments given at local hospitals, lacked the subtleties involved in

cancer registry coding or the dilemmas presented in coding experimental treatments at teaching and research facilities. Such facilities see many critically ill patients and use novel diagnostic and treatment methods. Medical Records Technicians at these facilities maintain comprehensive medical records and code many diagnoses and treatments. The greater number of specialties and health care providers at these facilities, as well as the new diagnostic and therapeutic services they offer, further complicate the analysis and coding of records. The health service where the appellants worked lacked such complicating features. Therefore, Level 1-4 was credited.

Link to [C-0675-06-02](#)

Article No. 24-06

Standard: Purchasing, GS-1105 (March 1993)

Factor: Factor 2, Supervisory controls

Issue: Distinguishing Level 2-3 from 2-4

Identification of the Classification Issue

This issue arose in OPM's adjudication of a classification appeal. The appellant was a Purchasing Agent responsible for administering contracts and purchasing activities related to obtaining services, supplies, and minor construction and repair work from commercial and government required sources. She was authorized to procure goods and services using Simplified Acquisition Procedures for open market purchases. Other items and services were acquired through Federal Supply Schedule contracts, fixed-price, or negotiated contracts between the government and commercial concerns. The agency credited Level 2-4 claiming the appellant worked very independently, was responsible for resolving disagreements between contractors and purchasers, and had the authority to terminate the contracts she oversaw.

Resolution

Level 2-4 is credited when the employee purchases various goods and services with different requirements, coordinates the work with others, and regularly resolves conflicts in administering purchase orders, such as protests, claims, and terminations for convenience or default. Typically, there is no higher level procurement expertise immediately available. Generally, it is not feasible to obtain higher level guidance since many of the problems require immediate attention and intensive on-the-spot negotiation.

OPM determined that, although the appellant functioned with very little supervision, her regular and recurring work assignments involved small purchases of standard, commercial goods and services. These assignments did not typically require the conflict resolution, coordination, or intensive negotiations needed to credit Level 2-4. When contractors and clients disagreed over goods or services, the appellant clarified procedural issues and matters by interpreting the conditions or requirements in effect at the time the contract was signed. While she had authority to terminate a contract if the contractor did not meet the terms of the contract, termination was seldom necessary with the small purchase contracts she managed. Higher level procurement expertise also was immediately available. At the appellant's installation, negotiations and terminations of the type described at Level 2-4 involved large, formal contracts that were handled by higher graded procurement personnel. OPM determined that Level 2-4 was not fully met and credited Level 2-3.

“Back to the Basics”

This decision illustrates that it is not just the degree of independence that affects the evaluation of supervisory controls. It is also the degree to which the nature of the work allows the employee to make decisions and commitments and to exercise judgment. Having expertise and authority are not enough to credit Level 2-4 if the typical work does not present the full range of conditions requiring the level of judgment and initiative described. The availability of higher level procurement expertise, and the authority and responsibility assigned to those positions, precluded evaluating the appellant's position above Level 2-3.

Link to [C-1105-07-02](#)

Article No. 24-07

Standard: [Federal Wage System Key Level Definition for Production Facilitating Jobs](#)
(April 1993)

Factor: N/A

Issue: Differentiating positions in the Special Pay Plan for Production Facilitating Positions from positions in the General Schedule (GS)

Identification of the Classification Issue

This issue arose in a group of appeals from occupants of Engineering Technician, GS-802, positions. At one time, the appellants had occupied Planner and Estimator (P&E) jobs in the Special Pay Plan for Production Facilitating Positions. The appellants questioned the classification of their current jobs, claiming that they continued to perform work essentially the same as in their previous P&E jobs. In adjudicating the appeals, OPM had to determine the correct pay plan.

Resolution

Differentiating positions in the Special Pay Plan for Production Facilitating Positions from positions in the GS is one of the most difficult pay category determinations. The duties and responsibilities of such positions frequently overlap and in some cases are nearly identical. Jobs covered by the Production Facilitating Pay Plan include P&E's that perform duties virtually identical to the appellants' Engineering Technician, GS-802, positions.

The first requirement for placement in the special pay plan is that the journey-level knowledge of a trade or related group of trades is the paramount requirement for performance of the primary duty. Even if career progression has been from trades positions and the duties are similar to a Key Level Definition, the position is excluded from the special pay plan if journey-level knowledge of a trade or related group of trades is not the paramount knowledge of the positions, and the employee must utilize this knowledge and experience in performing the assigned duties. Knowledge of trades is considered paramount when the employee is required to have journey-level knowledge and experience in specified occupations. A primary consideration in making this determination is whether the career progression is exclusively from and normally to other trades positions. This exemplifies the fact that the paramount requirement of the position is trade or craft knowledge. Therefore, when an employee in a production planning position satisfactorily performs all assigned functions, but does not meet this requirement, the position is GS.

The second requirement is that duties must match a Key Level Definition. According to the Key Level Definition, a P&E participates in planning for construction, maintenance, repair, or manufacturing projects by determining facilities, equipment, material, and numbers and categories

of shop personnel required. From major work requests, engineering plans, and similar information, the P&E estimates costs and prepares job order specifications assigning work to shops or trade groups. This work requires intensive journey-level trades experience.

Assignments for one of the appealed Engineering Technician, GS-802, positions included preparing designs and specifications for various utility systems, e.g., heating, plumbing, and air conditioning; determining operations and methods involved and the time required to complete each phase; determining the types of equipment and material needed; and developing the cost estimates of labor, materials, and overhead. OPM determined that the paramount requirement for this position was not for journey-level trade or craft knowledge and experience, and the normal career progression was not exclusively from a trade or craft background. While trade experience was helpful, the paramount requirement was for general knowledge of shop operations and the ability to translate that knowledge into plans, work sequences, estimates of manpower, and material costs and type. The appellant relied on established engineering and estimating standards rather than intensive journey-level trades skills and knowledge to perform the work. Therefore, even though the duties appeared substantially the same as the Key Level Definition for P&E, the trade knowledge was not paramount. OPM found the position was correctly classified as GS.

Article No. 24-08

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

Factor: N/A

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

Identification of the Classification Issue

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

Resolution

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

In contrast, GS-1910 positions require broader knowledge of quality assurance principles and techniques, product characteristics, and associated manufacturing processes. These positions apply a variety of analytical and technical methods besides physical inspection. The focus of GS-

1910 work is to determine the effectiveness of quality procedures and controls and to identify inherent problems in the product or processes. The GS-1910 standard states that inspection "is but *one* of the techniques used by quality assurance specialists." OPM found that the purpose of the appellants' inspections was to provide the basis for accepting or rejecting the maintenance work itself, rather than for the broader objective of determining the effectiveness of the overall maintenance process, such as identifying the type or level of maintenance required for the aircraft or initiating corrective action to reduce maintenance deficiencies beyond the repair of the immediate aircraft.

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

“Back to the Basics”

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

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

Link to [C-8852-00-01](#)