

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 441
Dallas, TX 75242

Pay Category Appeal Decision
Under section 5103 of title 5, United States Code

Appellant: [appellant's name]

Agency classification: Sheet Metal Mechanical (Aircraft)
Work Inspector
WG-3806-10

Organization: [appellant's Branch, Division]
Aircraft Management Directorate
[appellant's higher organizational level]
Department of the Air Force
[location]

OPM decision: properly assigned to the
Federal Wage System

OPM decision number: C-3806-00-01

/s/ Bonnie J. Brandon

Bonnie Brandon
Classification Appeals Officer

February 28, 2002

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[appellant's name and address]

[appellant's Civilian Personnel Division]

Director, Civilian Personnel Operations
HQ AFPC/DPC
Department of the Air Force
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Chief, Civilian Policy
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Introduction

On December 27, 2001, the Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a pay category appeal from [the appellant]. The appellant's work is currently assigned to the Federal Wage System as Sheet Metal Mechanical (Aircraft) Work Inspector, WG-3806-10. He believes the work should be classified in the General Schedule system, in the GS-1910 Quality Assurance Series. The appellant works in the [appellant's Branch, Division], Aircraft Management Directorate, [higher organizational level], Department of the Air Force, [location]. He first appealed to the Department of Defense's Civilian Personnel Management Service (CPMS), which sustained the pay plan, occupational code, and grade of the position. We have accepted and decided this appeal under section 5103 of title 5, United States Code.

Job information

The primary purpose of the appellant's position is to inspect work, products, and processes produced and performed during depot-level maintenance actions on KC-135 aircraft. The maintenance work is performed on a number of major aircraft systems such as airframe, landing gear, pumps, hydraulic, utility, fuel, pneumatic, flight control, electronics, sheet metal, avionics, and egress. The appellant inspects maintenance work and processes associated with the range of aircraft systems.

The appellant performs different categories of inspections. In one kind of inspection, the task evaluation, he observes a mechanic performing a job and determines if the job is performed in accordance with appropriate directives, technical orders, and other technical data. He evaluates the worker's performance as either "passing" or "failing." During another kind of inspection, the quality verification inspection, the appellant evaluates a maintenance procedure, process, or product to determine if it is being accomplished in accordance with standards, codes, technical orders, work specifications, drawings, and work control documents. The appellant rates the process as meeting acceptable standards or not. If he finds an unsatisfactory condition or error, he determines the cause of the incident, reports it, and then follows up on the corrective action taken on it. The appellant also performs a variety of core and other inspections. These involve the appellant inspecting various maintenance operation areas such as housekeeping, safety, bench stock, foreign object damage, quality records, hazardous material management, tool control and accountability, maintenance stamps, and material review. In performing his work, the appellant uses the Quality Assurance Plan, checklists, directives, technical orders, work control documents, certification books, and other technical manuals and data.

The appellant reports to a supervisory quality assurance specialist (GS-1910-11) in [his Branch]. The Branch comprises Wage Grade inspectors and General Schedule quality assurance specialists who are responsible for carrying out the requirements of the Aircraft Directorate Quality Assurance Plan. Branch employees conduct quality assurance assessments and other inspections. The Branch is part of [a Division], which is the focal point on quality and safety matters.

The appellant's job has changed since he appealed his classification to CPMS and OPM. In January 2002, management restructured the work the appellant and others were doing in the

inspection area. Prior to January, the appellant and other inspectors in the Branch did inspections in skill areas for which they had expertise. For example, the appellant was skilled and knowledgeable in the sheet metal area and was responsible for conducting inspections of sheet metal work and products. Other inspectors were responsible for inspecting electrical or structural work and products. Some inspectors were trained in all areas and were therefore doing inspections of the work and products associated with a number of aircraft systems, subsystems, and assemblies. (This is similar to the work now being performed by the appellant.) In early January 2002, management provided the appellant and other inspectors training in all of the skill areas (e.g., electrical, structural, sheet metal) to enable them to conduct the range of inspections performed by the Branch. Management is currently in the process of reassigning these employees, including the appellant, to job descriptions that accurately reflect the new duties and responsibilities. According to information provided by the appellant's human resources office, the work is tentatively being assigned to the WG-8852 Aircraft Mechanic occupation with the title of Aircraft Work Inspector. Although the appellant has not been officially assigned to the new job description, our decision for pay category determination applies to the work he was performing when he filed his appeal with us and the work he has been performing since January 2002.

Pay category determination

The appellant believes his work should be assigned to the General Schedule system rather than the Federal Wage System. Section 5102(c)(7) of title 5, United States Code, exempts from General Schedule coverage 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." More guidance is contained in section IV of the *Introduction to the Position Classification Standards*. In that section, "paramount requirement" is defined as the essential, prerequisite knowledge, skills, and abilities needed to perform the primary duties or responsibilities for which the position has been established.

The primary purpose of the appellant's job is to inspect work, products, and processes accomplished during aircraft maintenance. The work and products inspected are predominantly produced by Federal Wage System mechanics. To perform this work, the appellant must have knowledge of the operation, installation, and adjustment of a variety of major aircraft systems, subsystems, and assemblies (e.g., hydraulic systems, engines, electrical systems, avionics, flight control systems, and sheet metal products). This is considered trades knowledge. During the course of the appellant's work, he inspects some documents and processes that result from General Schedule employees' work, such as that done to plan and schedule aircraft maintenance work. The appellant inspects these processes and documents as part of the overall quality assessment of the maintenance work done on aircraft. The appellant also performs some general, core inspections covering issues such as tool control, housekeeping, safety, certification books, etc. Depending on the issue, this work is less dependent on his trades knowledge. However, since the paramount requirement for the appellant's primary duties is trades knowledge, the work is exempt from the General Schedule and assigned to the Federal Wage System.

Section IV of the *Introduction to the Position Classification Standards* also provides specific information about inspection work covered by the Federal Wage System and by the General Schedule. An inspection position is covered by the Federal Wage System when it primarily requires trades, crafts, or manual labor knowledge and experience and has as its primary purpose:

- accepting or rejecting the product of trades, crafts, or manual labor work on the basis of discrepancies discovered through the inspection process; or
- determining the condition of supplies, equipment, or material as serviceable, repairable, or condemned based on comparison with established requirements; or
- determining the need for repairs, modifications, replacements, or reconstruction needed for compliance with specifications, blueprints, or technical orders.

An inspection position is subject to the General Schedule when it primarily requires knowledge and experience in administrative, professional, technical, or managerial work and has as its primary purpose:

- advising on, performing, or directing work concerned with developing, installing, evaluating, modifying, or administering quality assurance programs, systems, or methods; or
- performing inspections requiring the application of established scientific or engineering principles, techniques, concepts, methods, and procedures; or
- performing inspection work for regulatory or law enforcement purposes.

The appellant's work is similar to the inspection work covered under the Federal Wage System and not the General Schedule. He uses his trades knowledge to observe and critique aircraft maintenance employees, tasks, procedures, processes, and products. He determines if work and processes are accomplished in accordance with applicable directives, technical orders, work control documents, and other guides. The appellant refers to checklists as he performs various inspections. When he finds an error or problem, he determines the cause and then reports the problem. After corrective action is taken by the appropriate personnel, he performs a follow-up inspection to ensure the problem is resolved. The appellant's primary work does not require administrative or technical knowledge, as found in the General Schedule.

The appellant believes his work fits within the GS-1910 Quality Assurance Series. This series includes positions the duties of which are to perform, administer, or advise on work concerned with assuring the quality of products acquired and used by the Federal government. The work involves (1) the development of plans and programs for achieving and maintaining product quality throughout the item's life cycle; (2) monitoring operations to prevent the production of defects and to verify adherence to quality plans and requirements; and (3) analysis and investigation of adverse quality trends or conditions and initiation of corrective action. The appellant's job is not responsible for the range of analytical work associated with this series. He participates in "monitoring operations...to verify adherence to quality plans and requirements" by performing inspections of work and products. However, this is only one aspect of work expected of GS-1910 positions. The appellant neither develops quality plans and programs nor analyzes and investigates quality trends and initiates systemic corrective actions, as found in the GS-1910 series.

Decision

The appealed job is covered by the Federal Wage System.