

**OFFICE OF PERSONNEL MANAGEMENT  
ATLANTA OVERSIGHT DIVISION  
ATLANTA, GEORGIA**

CLASSIFICATION APPEAL DECISION

Under section 5112(b) of title 5, United States Code

Appellant: [Appellant]

Position: Safety and Occupational Health Manager  
GS-0018-12

Organization: [Organization]  
Corps of Engineers  
Department of the Army

Decision: Safety and Occupational Health Manager  
GS-0018-12  
(Appeal denied)

**OPM decision number:** C-0018-12-01

Kathy W. Day  
Classification Appeals Officer

Date: 11/4/96

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## **Background**

On July 29, 1996, the Atlanta Oversight Division, Office of Personnel Management, accepted an appeal for the position of Safety and Occupational Health Manager, GS-018-12, [organization], Corps of Engineers, Department of the Army. The appellant is requesting that his position be changed to GS-13.

The appeal has been accepted and processed under section 5112(b) of title 5, United States Code. This is the final administrative decision on the classification of the position subject to discretionary review only under the limited conditions and time outlined in part 511, subpart F, of title 5, Code of Federal Regulations.

## **Sources of Information**

This appeal decision is based on information from the following sources:

1. The appellant's letter received July 29, 1996, appealing the classification of his position.
2. The agency's letter of August 13, 1996, providing position and organizational information.
3. A telephone interview with the appellant on October 23, 1996.
4. A telephone interview with the appellant's immediate supervisor on October 29, 1996.

## **Position Information**

The appellant, supervisor, and agency have certified to the accuracy of the position description.

The appellant plans, manages, and directs [a program] for the Corps of Engineers. He plans, implements, and evaluates a comprehensive safety and occupational health program encompassing construction of buildings, water control structures, and other facilities; identification and clean-up operations of hazardous and toxic waste (HTW) sites; operation and maintenance of locks and dams, as well as public recreation facilities and activities including swimming, boating, skin diving, camping, and fishing; and response to natural disasters such as hurricanes and tornadoes. This includes the development and application of methods and techniques to control or eliminate unsafe acts or conditions; determining the requirements for training and conducting a safety education program; investigating accidents; and advising design engineers during the development of plans and specifications. The appellant exercises supervisory authority over a subordinate staff of seven employees.

The District Engineer provides administrative direction and determines the resources to be allocated. The appellant is responsible for independently planning and executing the district safety program including setting goals and objectives and administering activities. Completed work is accepted as technically sound and reviewed only in terms of effectiveness in accomplishing District objectives. Controversial safety issues are discussed with his immediate supervisor.

### **Standards Referenced**

Safety and Occupational Health Management Series, GS-018, August 1981.  
General Schedule Supervisory Guide, April 1993.

### **Series and Title Determination**

The appellant does not contest the occupational series or title of his position.

The agency determined that the appellant's position was properly placed in the Safety and Occupational Health Management Series, GS-018, which covers positions which involve the management, administration, or operation of a safety and occupational health program or performance of administrative work concerned with safety and occupational health activities and includes the development, implementation, and evaluation of related program functions. The primary objective of this work is the elimination or minimization of human injury and property and productivity losses caused by harmful contact through the design of effective management policies, programs, or practices. We agree with the agency determination.

The GS-018 standard mandates the use of the title *Safety and Occupational Health Manager* for positions, such as the appellant's, which are responsible for planning, organizing, directing, operating, and evaluating a safety and occupational health program.

The appellant's position is properly titled and coded as Safety and Occupational Health Manager, GS-018.

### **Grade Determination**

The appellant performs both program management and supervisory work evaluated by the GS-018 standard and the General Schedule Supervisory Guide (GSSG) respectively. The appellant's position is evaluated as follows:

## **Safety and Occupational Health Management Series, GS-018**

The GS-018 standard is used to evaluate the appellant's program planning and management responsibilities and is written in the Factor Evaluation System (FES) format. Under the FES, positions are evaluated on the basis of their duties, responsibilities, and the qualifications required as evaluated in terms of nine factors common to nonsupervisory General Schedule positions.

A point value is assigned to each factor based on a comparison of the position's duties with the factor-level descriptions in the standard. The factor point values mark the lower end of the ranges for the indicated factor level. For a position factor to warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the position fails in any significant aspect to meet a particular factor level description in the standard, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect which meets a higher level. The total points assigned are converted to a grade by use of the grade conversion table in the standard.

Under FES, positions which significantly exceed the highest factor level or fail to meet the lowest factor level described in a classification standard must be evaluated by reference to the Primary Standard, contained in Appendix 3 of the Introduction to the Position Classification Standards. The Primary Standard is the "standard for standards" in the FES.

### Factor 1 - Knowledge Required by the Position:

This factor measures the nature and extent of information or facts that a worker must understand to do acceptable work, such as the steps, procedures, practices, rules, policies, theories, principles, and concepts; and the nature and extent of the skills needed to apply this knowledge. The agency evaluated this factor at Level 1-7 while the appellant believes that Level 1-8 is appropriate.

At Level 1-7, the work requires knowledge of a wide range of safety and occupational health concepts, principles, practices, laws, and regulations applicable to the performance of complex administrative responsibilities which require the planning, organizing, directing, operating, and evaluation of a safety and occupational health program; **or** comprehensive knowledge of regulations, standards, procedures, methods, and techniques applicable to a broad range of safety and occupational health duties in one or more specific areas of safety and occupational health. In addition, the following knowledge is also required:

- Knowledge of standards, procedures, methods, and techniques applicable to construction projects including construction equipment, materials, and utility systems.

- Sound technical knowledge sufficient to analyze safety design features and specifications and develop new methods and procedures to identify or control hazardous construction processes and equipment usage.
- Knowledge of psychological and physiological factors sufficient to evaluate the relationship of an individual to the working environment and to motivate individuals to perform in a safe manner.
- Knowledge and skill sufficient to:
  - manage a safety and occupational health program with diverse but recognized hazards, achieving compliance with regulatory provisions and effectively communicating multiple safety and occupational health practices and procedures to staff and line personnel; and
  - modify or significantly depart from standard techniques in devising specialized operating practices concerned with accomplishing project safety and occupational health objectives.

Level 1-7 is met. The appellant's supervisor states that the appellant spends approximately 50 percent of his program management time on work related to dangerous and high risk projects such as the construction of [dams], dredging projects, and maintenance and operation of locks and dams. This work requires the appellant to stay abreast of new safety technology and to modify standard or accepted techniques in devising specialized safety practices and to develop new methods, approaches, and procedures to deal with complex, frequently changing safety conditions found at high risk construction sites. In addition, he is responsible for a variety of recreational facilities and activities including swimming, boating, skin diving, fishing, and camping; horizontal construction sites; clean-up at sites of natural disasters; and clean-up at HTW sites. He must have knowledge of a wide range of safety and occupational health concepts, laws, regulations, and practices that are applicable to these varied assignments. The appellant's geographical area of responsibility is limited to [his district]. Although the district also covers [areas outside the continental United States], there has not been any work conducted in those areas within the last two years nor is there an expectation that work will occur in those areas anytime in the near future.

To better understand the intent of Level 1-7, reference is made to the Primary Standard. The Primary Standard provides a basic description of the knowledge required at a particular level in order for that level to be credited. At Level 1-7, the position requires knowledge of a wide range of concepts, principles, and practices of a professional or administrative occupation, such as would be gained through extended graduate study or experience, and skill in applying this knowledge to difficult and complex work assignments; OR a comprehensive, intensive, practical knowledge of a technical field, and skill in applying this knowledge to the development of new methods, approaches, or procedures. The appellant's

duties require extensive experience in the safety and occupational health field, as well as knowledge of a wide range of safety and occupational health concepts, principles, and practices and skill to apply that knowledge to difficult and complex work assignments, e.g., the [dam], construction of concrete water tanks, and dredging projects. He must also be able to develop new methods, approaches, and procedures to the safety operations associated with such high risk projects, as well as be able to analyze and modify safety standards for the numerous other activities that are conducted in the [district]. The appellant's duties clearly meet the intent of Level 1-7.

At Level 1-8, in addition to the knowledges and skills described at Level 1-7, the work also requires:

- Expert knowledge of safety and occupational health concepts, principles, laws, regulations, and precedent decisions which provide the capability to recommend substantive program changes or alternative new courses of managerial action requiring the extension and modification of existing safety and occupational health management techniques critical to the resolution of safety and occupational health management problems; **or**
- Knowledge sufficient to serve as a technical authority and make significant, far-reaching decisions or recommendations in the development, interpretation, or application of the principal agency safety and occupational health policies or critical criteria.

Level 1-8 is not met. In order to understand the intent of Level 1-8, the Primary Standard is again referenced. At Level 1-8, the position requires (in addition to the requirements described at Level 1-7) mastery of a professional or administrative field to apply experimental theories and new developments to problems not susceptible to treatment by accepted methods and to make decisions or recommendations significantly changing, interpreting, or developing important public policies or programs. Level 1-8 is looking not simply for a level of technical expertise to develop new safety methods to deal with a particular piece of equipment or complex construction operation but rather for a level of mastery to apply theoretical approaches and new developments to problems that are of a program or policy nature and more far-reaching than a single project or situation. Paragraph one in Level 1-8 in the GS-018 standard describes this requirement for both technical expertise, i.e., *expert knowledge*, and significant program or policy responsibility, i.e., *recommend substantive program changes or alternative new courses of managerial action*. Likewise, paragraph two in Level 1-8 in the GS-018 standard also describes a requirement for both technical expertise, i.e., *serve as a technical authority*, and significant program or policy responsibility, i.e., *make significant, far-reaching decisions or recommendations...of principal agency safety and occupational health policies*. The difference between Level 1-7 and Level 1-8 lies in the breadth of the program responsibilities.

Benchmark #13-1 is referenced in the appellant's supporting documentation as being equivalent to his position. Benchmark #13-1 is credited with Level 1-8 for Factor 1. While the types of activities described in this benchmark are similar to the appellant's, the geographic area of responsibility is different. The benchmark describes program responsibility that is *widely dispersed...over a large geographic area*. The appellant's area of responsibility is limited and is not considered a large geographic area.

Although the appellant has technical knowledge to modify, improve, and/or develop safety operations in complex, high risk situations, such as the Portuguese Dam and numerous dredging projects, that technical knowledge alone is not sufficient to meet the full intent of Level 1-8. His duties do not encompass the broad program or policy responsibilities described in Level 1-8. Level 1-8 is not fully met and there are no aspects of the appellant's position which meet a higher level to balance that deficiency; therefore, Level 1-8 cannot be credited.

This factor is evaluated at Level 1-7, for 1250 points.

#### Factor 2 - Supervisory Controls:

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility for carrying out assignments, and how completed work is reviewed. The agency evaluated this factor at Level 2-4, and the appellant does not contest this determination.

At Level 2-4, the supervisor sets the overall safety and occupational health objectives and management resources available to achieve the expected results. Program or specialized requirements and time constraints typically are developed in consultation with the supervisor. At this level, the employee typically has responsibility for independently planning and carrying out a safety and occupational health program or a significant assignment and resolving most conflicts and hazardous situations. The work is coordinated with principal organizational representatives, and initiative must be taken to interpret safety and occupational health policy, standards, and regulations in terms of established objectives. The course of action to be taken or methods and techniques to be applied may also be determined by the employee. The supervisor is kept informed of progress, potentially controversial safety and occupational health matters, or far-reaching implications. Completed work such as reports of program accomplishments are reviewed only from an overall standpoint in terms of compatibility with other activities, or effectiveness in meeting safety and occupational health objectives.

Level 2-4 is met. The appellant independently plans and carries out the District safety program, setting the objectives and determining how the resources will be used to meet the objectives. He brings controversial matters to the attention of his supervisor. The supervisor reviews the appellant's work only for effectiveness in meeting objectives.

At Level 2-5, the supervisor provides administrative direction with assignments in terms of broadly defined safety and occupational health mission or functional goals. The safety and occupational health manager independently plans, designs, and carries out programs within the framework of applicable laws. Typically at this level, the manager provides technical leadership, and work results are considered as authoritative and are normally accepted without significant change. If the work is reviewed, the review usually is focused on such matters as fulfillment of program objectives, effect of advice, or the contribution to the advancement of safety and occupational health management. Recommendations for changes in program direction or the initiation of new safety and occupational health management projects are usually evaluated for such considerations as availability of funds and other resources, relationship to broad program goals or national priorities.

Level 2-5 is not met. The appellant functions within the parameters of agency regulations and standards which are more definitive than the statutory framework cited at Level 2-5, and his work does not entail the broad program goals or national priorities described at Level 2-5.

This factor is evaluated at Level 2-4, for 450 points.

#### Factor 3 - Guidelines:

This factor covers the nature of guidelines used, and the judgment needed to apply them. The agency evaluated this factor at Level 3-4, and the appellant does not contest that determination.

At Level 3-4, the available guidelines tend to lack specificity for many applications such as departmental or agency policies, recent developmental results, and findings and approaches of nationally recognized safety and occupational health organizations. These guidelines are also often insufficient to resolve highly complex or unusual work problems such as determining the potential hazard of detonating various experimental explosive devices in a research and development environment. The safety and occupational health manager or specialist must modify and extend accepted principles and practices in the development of solutions to problems where available precedents are not directly applicable. Experienced judgment and initiative are required to evaluate new trends for policy development or for further inquiry and study leading to new methods for eliminating or controlling serious hazards to life and property.

Level 3-4 is met. The appellant's guidelines include Occupational Safety and Health Administration (OSHA) standards; Environmental Protection Agency and Department of Transportation standards; U.S. Public Health Service guidelines; Department of Defense, Department of the Army, and Corps of Engineers instructions, directives, manuals, and policies; various Federal, State, and local codes; standard textbooks and professional journals; and past inspection summaries. The appellant must adapt these guidelines to the



specific work situations he encounters, and devise approaches and measures which meet the intent of the guides. In many cases, the available guidelines are not directly applicable to the work situations and require judgment on the part of the appellant in their adaptation and application.

At Level 3-5, work is performed chiefly under basic legislation, agency policies, and mission statements requiring extensive interpretation and ingenuity for adaptation. As a technical authority, the safety and occupational health manager develops new approaches and concepts where precedent does not exist, as well as nationwide standards, procedures, and instructions to guide operating safety and occupational health personnel.

Level 3-5 is not met. The appellant's guidelines are more definitive than those depicted at this level, and he is not responsible for developing nationwide standards to guide other safety and occupational health personnel.

This factor is evaluated at Level 3-4, for 450 points.

#### Factor 4 - Complexity:

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work. The agency evaluated this factor at Level 4-5, and the appellant does not contest that determination.

At Level 4-5, the work includes broad and diverse assignments requiring innovative analysis of high safety risk activities. The safety and occupational health manager or specialist weighs, considers, and evaluates: (1) high safety risks in a field with constantly changing hazards; or (2) serious conflicts between operational requirements involving hazardous materials and the application of safety and occupational health standards that require protective measures affecting the timeliness of mission accomplishment; or (3) diverse hazardous work processes and environmental conditions for a broad field characterized by a wide variety of problems such as extreme fluctuation in workforce employees assigned high safety risk jobs, large number of visitors engaged in hazardous activities, or widespread geographic dispersion of operations. In many instances, elimination or control of unsound but often traditional work practices and dangerous physical conditions threatening individual safety and property requires the development of new accident prevention techniques for modification of accepted specialized safety procedures.

Level 4-5 is met. The appellant's work does include high safety risk activities such as civil works design and construction; maintenance and operation of navigation locks and dams; and the clean-up of HTW sites. Some of these activities require the modification of accepted specialized safety procedures and the development of some new accident prevention techniques. In addition, the appellant must sometimes deal with conflicts

between operational requirements involving hazardous situations and the application of safety and occupational health standards that affect the timely completion of projects, e.g., the work on [a project] which required urgent tunneling work that had to be completed in a timely manner while implementing modified safety procedures.

At Level 4-6, safety and occupational health managers originate extensive program and developmental efforts where prevailing safety and occupational health issues are largely undefined and involve problems of far-reaching implication or potential catastrophes. The appropriate course of action is contingent on a comprehensive, penetrating analysis often requiring a variety of complex research tools with limited or few precedents to aid in the problem-solving process. Progress is difficult to achieve, often requiring experimental application of prototype control approaches before either a solution is achieved or alternative efforts are initiated supported by additional resources from within or outside the agency. The work often results in new concepts influencing the resolution of previously unresolved, extremely complicated safety and occupational health issues, e.g., hazards encountered by a flight crew launched into outer space.

Level 4-6 is not met. The appellant's work does not involve largely undefined issues and elements or require him to establish concepts or theories to resolve unyielding problems as described at this level.

This factor is evaluated at Level 4-5, for 325 points.

#### Factor 5 - Scope and Effect:

This factor covers the relationship between the nature of the work, as measured by the purpose, breadth, and depth of the assignment, and the effect of the work products or services both within and outside the organization. The agency evaluated this factor at Level 5-4, and the appellant does not contest that determination.

At Level 5-4, the purpose of the work is to assess the effectiveness of specific programs, projects, or functions. The safety and occupational health manager or specialist plans alternative courses of specialized action to resolve hazardous conditions and unsafe working practices. The work often involves the development of safety and occupational health criteria and procedures for major agency activities. Work products impact on (1) a wide range of agency safety and occupational health programs; or (2) safety and occupational health programs of large, private sector establishments.

Level 5-4 is met. The appellant is responsible for planning and conducting a safety and occupational health program for the District. He is responsible for developing and/or applying methods, techniques, and abatements to control or eliminate unsafe acts or conditions for a broad range of activities such as construction of buildings and water control structures; HTW clean-up operations; operation and maintenance of locks and dams; and

public recreation facilities. His work impacts District employees, contract employees, and visitors.

At Level 5-5, the purpose of the work is to resolve critical safety and occupational health problems often involving serious hazards of unpredictable consequences to humans and property. The work requires the development of new guides, approaches, and methods often under difficult circumstances such as when confronted by conflicting viewpoints and resource constraints. At this level, the safety and occupational health manager or specialist often serves as a consultant providing expert advice and guidance covering a broad range of safety and occupational health activities to officials, principal program managers and other safety and occupational health managers or specialists. The work efforts affect the activities of safety and occupational health managers and specialists both within and outside the agency.

Level 5-5 is not met. The appellant does not resolve critical safety and occupational health problems involving hazards of unpredictable consequences or develop the guides, methods, and approaches described at this level. His work does not affect the work of other experts both within and outside the agency.

This factor is credited at Level 5-4, for 225 points.

#### Personal Contacts:

This factor measures face-to-face contacts and telephone dialogue with persons not in the supervisory chain. The agency evaluated this factor at Level 6-3, and the appellant does not contest that determination.

At Level 6-3, personal contacts of a non-routine nature are with a variety of individuals such as managers, administrative law and Federal judges and professionals from other agencies or outside organizations. Contacts also include individuals such as managerial representatives of privately-owned businesses, contractors and consultants, university professors, State and local government officials, representatives of professional societies and national safety associations, safety engineers, and safety and occupational health specialists from private establishments.

Level 6-3 is met. The appellant has a number of personal contacts with individuals from outside his activity to discuss safety and occupational health issues. These contacts include representatives from OSHA, management levels in contracting firms, State and local officials, and representatives from private industry, higher headquarters, and the general public.

At Level 6-4, personal contacts are with high ranking officials from outside the agency such as key public and corporate executives; elected representatives; and top scientific personnel

of other departments and agencies, State, county, and municipal governments, private industry, national safety and health organizations, public groups, and national research organizations. Safety and occupational health managers or specialists may participate as technical experts on committees and seminars of national and international stature.

Level 6-4 is not met. There is no evidence in the appeal record that the appellant's regular contacts include individuals such as those described at this level or that he is recognized as a technical expert on a national and international level.

This factor is evaluated at Level 6-3, for 60 points.

#### Factor 7 - Purpose of Contacts:

The purpose of personal contacts ranges from factual exchanges of information to situations involving significant or controversial issues and differing viewpoints, goals, and objectives. The personal contacts which serve as the basis for the level selected for this factor must be the contacts which are the basis for the level selected for Factor 6. The agency evaluated this factor at Level 7-3, and the appellant does not contest that determination.

At Level 7-3, the purpose of the contacts is to influence, motivate, and encourage unwilling, skeptical, and often uncooperative individuals to adopt or comply with safety and occupational health standards, practices, procedures, or contractual agreements. This level also involves deposing, making affidavits, and testifying in a court of law where an opposing attorney may challenge the competence of a safety and occupational health manager or specialist including his/her work methods or findings.

Level 7-3 is met. The appellant's personal contacts often involve the use of persuasive techniques to "sell" safety considerations to managers, employees, and contractors in circumstances where following safe working practices represents a change in work habits and may impose additional costs.

At Level 7-4, the purpose of contacts is to justify, defend, negotiate, or settle highly significant, controversial, and often very sensitive safety and occupational health issues. At this level, the safety and occupational health manager often represents the agency as a participant in professional conferences, hearings, national safety congresses, or committees to develop, change, or modify safety and occupational health standards and criteria which have a wide application and a major occupational impact. Typically, persons contacted have diverse viewpoints or opinions concerning a significant safety and occupational health policy, precedent, or objective that require extensive compromise efforts to achieve a mutually satisfactory conclusion.

Level 7-4 is not met. The appellant is rarely involved in personal contacts of the nature described at this level and typically does not represent his agency at national conferences or hearings.

This factor is evaluated at Level 7-3, for 120 points.

#### Factor 8 - Physical Demands:

This factor measures the requirements and physical demands placed on the employee in performing the work assignment, including the agility and dexterity required, and the extent of physical exertion. The agency evaluated this factor at Level 8-2, and the appellant does not contest that determination.

At Level 8-2, the work requires regular and recurring physical exertion related to frequent inspections and surveys requiring considerable standing, walking, climbing, bending, crouching, stretching, reaching, or similar movements. Occasionally, there may be a need to lift and carry moderately heavy objects. The work may also require some degree of agility and dexterity when, for example, it involves inspecting ships or construction sites. This is the highest level illustrated in the GS-018 standard.

Level 8-2 is met. The appellant's work involves recurring physical effort essentially as described at this level in the course of conducting safety inspections of work sites.

This factor is evaluated at Level 8-2, for 20 points.

#### Factor 9 - Work Environment:

This factor considers the risks and discomforts in the employee's physical surroundings, and the safety precautions required. The agency evaluated this factor at Level 9-2 and the appellant does not contest that determination.

At Level 9-2, the work involves regular and recurrent exposure to hazards, unpleasantness, and discomforts such as moving machine parts, shielded radiation sources, irritant chemicals, acid fumes, physical stress, high noise levels, adverse weather conditions, and high temperatures from steam lines. Protective equipment and clothing may be needed, including hard hat, metatarsal shoes, ear muffs or plugs, goggles, respirators and gloves.

Level 9-2 is met. The appellant's work regularly exposes him to a variety of hazardous situations including construction and equipment hazards, irritants from HTW sites, high noise levels, water hazards, etc. Protective clothing and equipment may be necessary.

This factor is evaluated at Level 9-2, for 20 points.

<b>SUMMARY</b>		
<b>FACTOR</b>	<b>LEVEL</b>	<b>POINTS</b>
1-Knowledge Required by the Position	1-7	1250
2-Supervisory Control	2-4	450
3-Guidelines	3-4	450
4-Complexity	4-5	325
5-Scope and Effect	5-4	225
6-Personal Contacts	6-3	60
7-Purpose of Contacts	7-3	120
8-Physical Demands	8-2	20
9-Work Environment	9-2	20
	<b>TOTAL</b>	2920

A total of 2920 points falls within the GS-12 range, 2755 to 3150 points, according to the Grade Conversion Table in the GS-018 standard.

### **General Schedule Supervisory Guide (GSSG)**

The GSSG covers GS/GM supervisory work and related managerial responsibilities that require accomplishment of work through combined technical and administrative direction of others; constitute a major duty occupying at least 25 percent of the position's time; and meet at least the lowest level of Factor 3 in the guide.

The appellant provides administrative but not technical supervision to one GS-690-12, Industrial Hygienist; one GS-610-10, Occupational Health Nurse; and one GS-610-9, Occupational Health Nurse. He provides both technical and administrative supervision to two GS-018-11, Safety and Occupational Health Specialists; however, they are credited with functioning independently under only general supervision. He also supervises one GS-303-5, Safety Assistant and one part-time student aid. His position description indicates that a total of 25 percent of the appellant's time is spent supervising all of his subordinates. Since only those positions receiving both technical and administrative supervision are included in the appellant's supervisory evaluation, the amount of time spent in supervisory duties is less than the 25 percent required for coverage under the GSSG.

### **Summary**

The appellant's supervisory duties are not covered by the GSSG, and his program management duties equate to the GS-12 level.

### **Decision**

This position is properly classified as Safety and Occupational Health Manager, GS-018-12. This decision constitutes a classification certificate issued under the authority of section 5112(b) of title 5, United States Code. This certificate is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government.