

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



Atlanta Oversight Division
75 Spring Street SW., Suite 972
Atlanta, GA 30303

Classification Appeal Decision
Under Section 5112 of Title 5, United States Code

Appellant: [appellants]

Agency classification: Engineering Technician
GS-802-10

Organization: U.S. Army Garrison

OPM decision: Engineering Technician
GS-802-9

OPM decision number: C-0802-09-30

Kathy W. Day
Classification Appeals Officer

Date: 3/18/98

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).

Since this decision lowers the grade of the appealed position, it is to be effective no later than the beginning of the sixth paya period after the date of this decision, as permitted by 5 CFR 511.702. The servicing personnel office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

The personnel office must also determine if the appellant is entitled to grade and pay retention, or both, under 5 U.S.C. 5362 and 5363 and 5 CFR 536. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented.

Decision sent to:

[appellants]

Chief, Classification Branch
Field Advisory Services Division
Defense Civilian Personnel Management
Service
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[Civilian Personnel Officer]

Director of Civilian Personnel
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Chief, Position Management and
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Manpower and Reserve Affairs
U.S. Department of the Army
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Hoffman Building II
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Introduction

On September 22, 1997, the Atlanta Oversight Division, U.S. Office of Personnel Management (OPM) accepted a classification appeal for the position of Engineering Technician, GS-802-10, U.S. Army Garrison, [city/state]. The appellants believe that their position should be reclassified as Engineering Technician, GS-802-11.

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.

General issues

The appellants believe that their position description does not reflect the correct grade level because of new duties and responsibilities added to the position. However, the assumption of additional duties and responsibilities is not sufficient to support an increase in the grade of a properly classified position unless those additional duties are of significantly greater complexity and difficulty than those which supported the original classification of the position.

To help decide the appeal, an Atlanta Oversight Division representative conducted a telephone audit and an onsite audit of the appellants' position. The audits included interviews with two of the appellants representing the group and their immediate supervisor. In reaching our classification decision, we reviewed the audit findings and all information of record furnished by the appellants and their agency, including their official position description.

Position information

The appellants are assigned to [position number]. The appellants, supervisor and agency have certified the accuracy of the position description.

We found the position description does not meet the standards of adequacy on pages 19 and 20 in the Classifier's Handbook. OPM considers a position description to be adequate for classification purposes when it is:

- considered so by one knowledgeable of the occupational field involved and of the application of pertinent classification standards, principles, and policies; and
- supplemented by otherwise accurate, available, and current information on the organization, functions, programs, and procedures concerned.

The position description states that the appellants resolve a variety of complex problems requiring considerable judgment to make sound engineering compromises and decisions. This language is almost verbatim from the GS-11 grade criteria in the position classification standards for the Engineering Technician Series, GS-802. However, based on our evaluation of the appellants'

projects, we did not find that they are not required to apply this level of judgment. Thus, the language in the position description should be changed to ensure the responsibilities are accurately described. In addition, the position description does not fully describe the level of supervision given or the level of review of work. For example, the appellants' projects are assigned based on the difficulty of the work and the ability of the appellants. Although work is not subject to close review, the supervisor stated that it is reviewed more closely than indicated in the position description, e.g., through customer feedback inquiries and work reports. Therefore, the supervisory controls portion of the position description should be revised to reflect the true nature of the supervision received.

A brief summary of the appellants' work follows:

The appellants perform the full range of life-cycle project management duties and responsibilities for complete projects of a conventional nature. They coordinate work of private and Government organizations, analyze work requirements and use Job Order Contract (JOC) task orders, Indefinite Delivery/Indefinite Quantity (IDIQ) task orders, contract solicitation and credit card purchases to construct, replace, renovate and make repairs to real property. They develop a narrative description of the work including concept drawings and sketches based on the customer's requirements, conduct site visits to obtain additional information, and coordinate all planning aspects of projects with other departments. They prepare cost estimates and specifications, requests for contractor proposals, bid schedules and special provisions to complete solicitation packages. They conduct site visits and meetings to develop agreements between user and contractor representatives and negotiate quantities of line items with contractors for JOC task orders. They develop work schedules, monitor contractor's performance and develop required documentation for construction modifications. They also support Government inspectors by clarifying questions that develop pertaining to original intent and changes in scope.

The appellants work under the general supervision of the Division Chief. Work is assigned in terms of major objectives, background information and advice on specific unusual problems that are anticipated or on matters requiring coordination with other groups. The appellants discuss unusual, controversial or policy questions with the supervisor, but technical assistance is infrequently sought. The appellants independently plan and coordinate all aspects of the assignments using established engineering guidelines, standards and practices. Work is monitored through random customer inquiries and work reports. Completed work is reviewed for general adequacy, conformity to purpose of the assignment, and sound engineering judgment.

Standards determination

Engineering Technician Series, GS-802, June 1969.

Series determination

The agency found that the appellants' position is best covered by the Engineering Technician Series, GS-802. The appellants do not disagree.

The GS-802 series includes technical positions that require primarily application of a practical knowledge of (a) the methods and techniques of engineering or architecture; and (b) the construction, application, properties, operation, and limitations of engineering systems, processes, structures, machinery, devices, and materials. The positions do not require professional knowledges and abilities for full performance, and therefore, do not require training equivalent in type and scope to that represented by the completion of a professional curriculum leading to a bachelor's degree in engineering or architecture. We find the position is properly placed in the GS-802 series.

Title determination

The appellants are assigned to construction, renovation, replacement or repair of conventional projects that include architectural and civil structures, mechanical and electrical systems, components and equipment. Engineering Technician positions that involve work covering two or more subject-matter specializations, none of which are paramount, are properly titled Engineering Technician.

Grade determination

The GS-802 standard uses two classification factors: *Nature of assignment* and *Level of responsibility*. The agency evaluated both factors at GS-10. The appellants believe the GS-11 level is correct. Our evaluation follows:

Nature of Assignment

At GS-9, engineering technicians typically perform a variety of work relating to the area of specialization that requires the application of a considerable number of different basic but established methods, procedures, and techniques. Assignments usually involve independent responsibility for planning and conduct of a block of work which is a complete conventional project of relatively limited scope, or a portion of a larger and more diverse project. Assignments require study, analysis, and consideration of several possible courses of action, techniques, general layouts, or designs, and selection of the most appropriate. They generally require consideration of numerous precedents and some adaptation of previous plans or techniques. Often changes or deviations must be made during progress of an assignment to incorporate additional factors requested after commencement of the project or to adjust to findings and conclusions which could not be predicted accurately in the original plans. Assignments typically require coordination of several parts, each requiring independent analysis and solution. When phases or details are performed by other groups or personnel outside the organizational unit, the technician reviews, analyzes, and integrates their work. In addition, assignments at this level require a good understanding of the effect that recommendations make or other results of the assignment may have on an item, system, or process and its end-use application.

At GS-11, engineering technicians perform work of broad scope and complexity that requires application of (1) demonstrated ability to interpret, select, adapt, and apply many guidelines, precedents, and engineering principles and practices which relate to the area of specialization; and (2) some knowledge of related scientific and engineering fields. They plan and accomplish complete

projects or studies of conventional nature requiring the independent adaptation of a general fund of background data and information and interpretation and use of precedents. They are typically confronted with a variety of complex problems in which considerable judgment is needed to make sound engineering compromises and decisions. Other related interests must often be considered, entailing frequent coordinative action with personnel in the field concerned. There is a continuing requirement for contact work. Initiative, resourcefulness, and sound judgment are needed in planning and coordinating phases of assignments and in selecting which of several sound alternatives is to be used in arriving at acceptable engineering compromises. Ingenuity and creative thinking are required in devising new ways of accomplishing less complex systems and facilities requiring design adaptation.

Illustrative of the GS-11 level is preparing design and specifications for various utility systems such as heating, plumbing, air conditioning, ventilating, pumping, gas supply, and pneumatic control systems. The assignments characteristically involve utility systems for office buildings, technical laboratories, experimental buildings, pumping stations, and flood control facilities, where the complexity or nonconventional nature of the buildings and facilities entails design problems requiring considerable adaptation of precedents or design of features for which precedents are not directly applicable. The technician performs technical review of contractor-prepared designs and specifications for such systems.

The appellants furnished several examples of their most typical projects that they believe illustrate assignments of “broad scope and complexity” and situations where “complex problems” required them to use considerable judgment to make “sound engineering compromises and decisions.” The following represent those that are reflective of the range of work projects assigned:

Projects numbers FF-00004-7P, FF-00030-7P, FF-9-7P, FF-10-7P, FF-31-7P, FF-7-7P, FF-8-7P, FF-80-7P, and FF-29-7P all involved the construction of 7,500 square foot motor pool facilities. These facilities required one half of the facility to be designed for administrative office space, parts, and equipment storage with features such as central heating and cooling systems, tile floors, suspended ceiling systems, fluorescent lighting, telephone lines, male and female latrines, shower facilities, and ceiling ventilation systems. The other half was designed to handle vehicle repairs and included four bay automotive work areas with air line supplies, retractable lamp cords, vehicle exhaust systems, suspended electrical heating units, wall mounted exhaust fans, vehicle lifts, and sufficient lighting. The motor pool facilities also required the installation of a pad mounted transformer with underground primary feed and new water and sewer systems.

Most of the appellants were assigned to construct motor pool facilities. These are conventional projects using established design features that do not present problems requiring considerable adaptation of engineering principles, techniques and methods. The type of problems encountered in these projects involved resolving a design feasibility or deficiency problem. For example, in one of these projects, the appellant discovered that the electrical engineer designed an overhead electrical service that was not feasible for the area. He discussed the problem with the engineer and the engineer redesigned an underground electrical service. The appellant also found doors and hinges

that did not meet security requirements, an underground fuel tank that was left off of a civil design and no weather sills at overhead doors, and he had the deficiencies corrected. The problems encountered by the appellants associated with motor pool facilities did not involve making compromises in engineering designs or plans or require the appellants to develop alternative designs because precedents were not applicable.

Project G3-00013-7P involved the award of a construction project for a 4,000 square foot classroom facility in a battle simulation compound. The classroom facility did not involve complex design requirements. The problems encountered in this project involved the negotiations over the contractor's non-priced items in the proposal. The contractor refused to negotiate one non-priced item and the appellant had the non-priced item removed from the contract. The appellant solicited quotes from other contractors and the non-priced item was awarded to another contractor resulting in a cost saving to the government. The appellants' authority to negotiate costs are carried out in accordance with established negotiation techniques and the level of warrant authority delegated to them. Using standard construction contract methods and techniques and basic negotiation skills to meet contract specifications for conventional design facilities, as well as awarding the non-priced item to another contractor does not illustrate the use of creativity and judgment to develop alternative solutions to resolve complex problems that are characteristic of the GS-11 level..

The LASO project involved the construction of a 4300 square foot brick type permanent facility for an automation support organization. The design of the facility was contracted out under the IDIQ method. The fire alarm system required features that were non-priced items in the unit price book. The appellant worked closely with the design engineers to develop specifications for the system, and the problems encountered were resolved in coordination with design engineers and teams. While the development of specifications involved some adaptation of established standards, the appellant did not conduct the work independently. Additionally, problems encountered in this project involved the resolution of design deficiencies. Similar to the motor pool facilities, the resolution of the design deficiencies did not present problems requiring compromises of engineering principles, methods or techniques. The appellant used practical knowledge of construction management techniques to perform site surveys for the layout, and established engineering guidelines, codes, measurements, and other requirements to ensure designs were developed in accordance with design standards and specifications.

Other samples included: (1) Project number FW-00115-6P, the conversion of 90 x 23 feet of warehouse space into an administrative office space; (2) Projects TG-60034-6P and TG-80001-8P, structural renovation and changes in electrical, heating, air conditioning and plumbing utilities and systems in three story brick buildings; (3) Projects HB-00044-6P and HB-00045-6P, renovating and remodeling bathrooms that included new plumbing lines (water and sewer), fixtures, vanities, lighting, wall coverings, ceilings and floor coverings; (4) Project number IC-00044-6P, remodeling of an existing latrine and re-working the entire water and sewer piping system; (5) Project WD-00002-7, the replacement of a roof; (6) Project WQ-00008-7P, replacing an oil and water separator and grit chamber; and, (7) Project WN-00002-7P, replacing exterior lighting. While the appellants are assigned a diverse variety of projects, the projects are conventional in nature and do not contain

complex features where alternatives must be used because standard design features are not applicable. The work involves conventional projects that have specific problems that are addressed using precedents and established engineering principles, methods and techniques.

During our onsite audit, the appellants stated that the installation is a high security area and there is a reluctance to release blueprints for construction projects. Many projects do not have designs and the materials required to develop specifications are non-standard. Some specifications require them to go back to the manufacturer to determine if a certain material can be used. There are special considerations such as ammunition storage systems that require special grounding field systems used to prevent lighting from causing explosions; lead based paint removal and special vinyl coated fences or safety glass in school facilities; anti-corrosive systems for sewer plant generators; lightning rods for field protection and explosive-proof fixtures in gas stations and paint shops. However, although certain situations may require such special considerations, normally the necessary products/systems are available in the market place, have been used by engineers in similar situations and would not be considered unprecedented in nature.

The supervisor also furnished a list of current projects assigned to the appellants. They include renovating buildings, providing utility hook-ups, construction of pre-fab and metal buildings, installing fan coils units in latrines, renovating restrooms, miscellaneous repairs, replacing oil/water separators, blackening ceilings and upgrading lights in basement, installing carpet, replacing a roof, replacing a storm drain, installing power service, PVC waterline, concrete slab and safety lights, expanding a building, door installation, installing a physical entry detection system and vent system, and repairing and upgrading roads. None of the projects referenced involved the complexity, unprecedented or nonconventional nature of the buildings and systems characteristic of the GS-11 level. While the appellants were able to show at least two projects that involved special features and mentioned projects that involved special requirements, designs and specifications, such projects do not represent a substantial portion, i.e., 25 percent or more, of their work. In addition, in our interview with the supervisor, he stated that he assigns work based on the engineering feasibility, the ability of the appellants and complexity of the work requested by the customer. Projects that involve complex features, such as those described at the GS-11 level, are assigned to professional engineering project managers within the division. The appellants' assignments do not routinely exceed those described at the GS-9 level.

GS-10 level assignments are not specifically described in the standard. The appellants' assignments do not in any way regularly exceed those described at the GS-9 level. Therefore, their assignments cannot properly be classified at the GS-10 level.

GS-9 is assigned for Nature of Assignment.

Level of Responsibility

At GS-9, the supervisor outlines requirements, provides information on any related work being performed, and furnishes general instructions as to the scope of objectives, time limitations, priorities,

and similar aspects. The supervisor is available for consultation and advice where significant deviations from standard engineering practices must be made, and he gives more detailed instructions when distinctly new criteria or new techniques are involved. The supervisor observes the work for progress and for coordination with work performed by other employees or other sections and for adherence to completion and cost schedules. Standard methods employed are seldom reviewed but review is made for adequacy and for conformance with established policies, precedents and sound engineering concepts and usage. Personal work contacts typically are more frequent and demanding than at lower levels and are primarily to resolve mutual problems and coordinate the work with that of personnel in related activities. Some contacts are made with using agencies for whom work is done and with contractors and architect-engineer firms. The contacts are made, e.g., to clear up doubtful points, to advise as to discrepancies found in meeting contract terms, to consider recommendations for acceptable substitutes, and to promote adherence to agency standards and concepts of good engineering. Contacts outside the agency are usually arranged under supervisory guidance.

At GS-11, technicians have considerable freedom in planning work and carrying out assignments. The supervisor makes assignments in terms of the major objectives, providing background information and advice on specific unusual problems which are anticipated or on matters requiring coordination with other groups. Unusual or controversial problems or policy questions arising in the course of a project may be discussed with the supervisor but technical supervisory assistance is infrequently sought or required. The supervisor is usually informally advised regarding progress but there is little review during progress of typical assignments. Completed work in the form of recommendations, plans, designs, reports, or correspondence is reviewed for general adequacy, conformity to purpose of the assignment, and sound engineering judgment. Contacts with contractors and other personnel regarding complex engineering and administrative problems are carried out without close supervision. However, the technicians generally discuss with the supervisor the approach to be taken.

In our interview with the supervisor, he stated that the organization is under reorganization and position descriptions were being written for permanent positions to more accurately reflect how work is performed and the level of supervision given to the appellants. However, for purposes of this evaluation, we cannot consider proposed organizational changes or positions that are not in existence. Thus, we find that the appellants work directly under the supervisor. The supervisor determines the feasibility and scope of work to be completed and assigns it to the appellants. The appellants work with considerable freedom in the accomplishment of their assignments and may consult with engineers or the supervisor on complex or unusual problems. The supervisor reviews completed work, such as cost estimates or projects without designs for adequacy of the technical application of engineering principles, and conducts customer surveys to determine whether work objectives were met satisfactorily. The GS-11 level of responsibility assumes that the employee is performing assignments equivalent to the GS-11 level and would, therefore, have responsibility for adapting a general font of knowledge and interpreting precedents to handle complex assignments requiring the exercise of considerable judgment. In comparison, the appellants apply conventional engineering practices and a knowledge of the codes, specifications, and regulations to their projects. They exercise some

judgment in determining the applicability of the specifications, codes, and engineering principles to the specific project, but consults with the supervisor on difficult problems or situations. This level of responsibility does not meet the intent of the GS-11 level.

The GS-10 level is not specifically described in the standard. To be appropriately classified at the GS-10 level, the technician's Level of Responsibility would have to regularly and clearly exceed the level described at grade GS-9. The appellants' position does not regularly require them to perform at a level that exceeds the GS-9 level.

GS-9 is assigned for Level of Responsibility.

Since both factors are evaluated at the GS-9 level, the appropriate grade of the position is GS-9.

Decision

The position is properly classified as Engineering Technician, GS-802-9.