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[Main Menu](#) [Exit](#)

Preface

This is the twenty-third issue of the *DIGEST OF SIGNIFICANT CLASSIFICATION DECISIONS AND OPINIONS (Digest)*. In it we present summaries of several decisions and opinions that we believe have Governmentwide applicability. The new General Schedule Job Family Standards (JFS) and other multi-occupational guides have raised significant interpretive issues. We are providing clarifying guidance that will ensure consistency of interpretation with respect to those issues. Other articles cover a variety of General Schedule (GS) and Federal Wage System (FWS) interpretive issues.

The *Digest* is designed to aid classifiers and others with delegated classification authority in exercising their judgment. For this reason, we have included some articles which provide fundamental principles pertaining to position classification. *Digest* items, however, 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. Kathy Day (Atlanta Oversight Division), and Mr. Carlos Torrico (San Francisco Oversight Division). Technical review and assistance was provided by Ms. Bonnie Brandon (Dallas Oversight Division), Ms. Linda Kazinetz (Washington Oversight Division), and the staff of the Classification Programs Division.

Melissa A. Drummond, *Director*
Classification Appeals and FLSA Programs

Standard: [Job Family Standard for Clerical And Technical Accounting And Budget Work, GS-500C \(December 1997\)](#)

Factor: Factors 1, 2, 4, and 5

Issue: Evaluation of Voucher Examining Work

Identification of the Classification Issue

This issue arose in an OPM oversight division's adjudication of an appeal. The position was located in a medium-sized medical center that provided administrative support services to outlying clinics. The appellant's duties were "mixed" in that he performed elements of work covered by more than one occupational series. A major portion of the work involved Voucher Examiner, GS-540 work. The remainder of the work involved maintaining and administering two vendor programs and auditing a variety of related documents, including certified invoices, employee travel and education reimbursements, and multi-year construction progress payments. The agency classified the position at the GS-6 grade level using both the GS-500C Job Family Standard (JFS) and another position classification standard (PCS) covering the appellant's other work. The activity classified the position as Voucher Examiner, GS-540-6 and, in applying the JFS, credited the position with Levels 1-3, 2-2, 3-2, 4-3, 5-3, 6/7 2a, 8-1, and 9-1. The issue was whether the JFS had been applied properly.

Resolution

The GS-500C JFS is specifically designed to evaluate nonsupervisory clerical and technical work concerned with supporting accounting, budget, and other related financial management work in the Federal service. In applying the JFS, OPM agreed with the crediting of Levels 1-3, 3-2, 6/7-2a, 8-1, and 9-1, but lowered each of the remaining factors one level. Those factors pertinent to the GS-540 work are addressed.

A review of the position found that the voucher examining issues and problems, dealt with by the appellant, were more limited in scope and typically routine and recurring. The more difficult voucher examining work, such as multi-year construction contracts and contracts for medical services with other medical facilities, did not occupy a significant portion of the appellant's time. OPM found that the position did not meet Level 1-4 since it did not require an in-depth or broad knowledge of extensive and diverse accounting, budget or other financial regulations, operations, and procedures to resolve nonstandard transactions, provide advice, or perform other work that required authoritative procedural knowledge. The agency's crediting of Level 1-3 was sustained.

While the appellant worked under limited supervision, OPM determined that the nature of the work precluded the crediting of Level 2-3. As recognized in the JFS, Level 2-2 covers some employees who work more independently than others, receiving little day-to-day supervision. However, their work is limited or controlled by readily applicable instructions or procedures that specifically describe how the work is done and the kind of adaptations or exceptions that can be made. The voucher examining duties performed by the appellant met this situation. The types of vouchers typically examined by the appellant, such as certified invoices, employee travel and educational reimbursements, and patient funds, did not fully meet the level of judgment, decision making, or commitment required for Level 2-3.

OPM found that the appellant's position did not meet Level 4-3, where the work involves performing various accounting, budget, or financial management support assignments that use different and unrelated processes, procedures, or methods, e.g., reviewing and reconciling various types of transactions involving multiple funds or a number of different control accounts, or numerous modifications to contracts. Although the appellant worked with a variety of vouchers, the number of vouchers demanding application of distinctly different and unrelated processes and procedures, e.g., long-term construction contracts, travel with permanent changes in station including sale and purchase of residence, were limited in number and frequency, precluding the crediting of Level 4-3.

OPM also found that the appellant's work did not meet Level 5-3, where the work affects the quality, quantity, and accuracy of the organizations's records, program operations, and service to clients, e.g., ensuring the integrity of the overall general ledger, its basic design and the adequacy of the overall operation of the accounting system and various operating programs. OPM found the processing of vouchers, while important to proper expenditure of funds, impacted the immediate functional area and did not reflect the scope and breadth of financial program impact reserved for Level 5-3.

Based on the factor levels properly assigned, OPM evaluated the appellant's voucher examining work at the GS-4 grade level. {See the next issue for the final classification of the position.}

“Back to the Basics”

With this appeal, OPM determined that Level 2-3 is not typical of positions in the GS-540 occupation. Although voucher examining work can be very detailed and require extensive documentation, development and reconstruction, the opportunity to deviate from established requirements and guidelines is severely restricted, e.g., charges are either allowable or they are not. In contrast, some positions in other covered occupations routinely exercise this level of judgment and discretion, e.g., accounting technicians that maintain ledgers and subsidiary accounts for a block of complex accounts and ensure that all account requirements are met, from allotments, commitments, and obligations, through reconciliations.

Standard: [Procurement Clerical and Technician Series, GS-1106 \(September 1992\)](#)

Factor: Factors 1, 2, 3, 4, and 5

Issue: Evaluation of Credit Card Coordinator Duties

Identification of the Classification Issue

This issue arose in an OPM oversight division's adjudication of the classification appeal discussed in the previous case. As the alternate program coordinator for the International Merchant Procurement and Accounting Card (IMPAC) program, the appellant worked under the general supervision of the Financial Manager. As the liaison between the medical center, headquarters, and the contractor, the appellant: (1) served as a primary point of contact to answer questions on the operation of the program; (2) troubleshoot program failures and provided direction and solutions for problem areas; (3) was responsible for issuance and destruction of credit cards; and (4) conducted initial formal training and follow-up training of cardholders and approving officials. As the facility IMPAC Billing Officer, the appellant also performed program audits to ensure compliance with applicable policy and procedures. The appellant claimed that the IMPAC program and prime vendor duties should be classified either to the Supply Systems Analysis, GS-2003 or to the Miscellaneous Administration and Program Series, GS-301.

Resolution

OPM found that the position was not classifiable to the Supply Program Management Series, GS-2003, since the appellant's work was not analytical in nature, but concerned primarily with technician work in support of a procurement program. The GS-2003 is used for positions involved in the management, direction, or administration of a supply program or responsible for analyzing, developing, evaluating, or promoting improvements in the policies, procedures, or techniques of a supply program. Similarly, the appellant's work was not classifiable to the Miscellaneous Administration and Program Series, GS-301 since the work did not involve two-grade interval general administrative work required for inclusion in this series.

Instead, the oversight division found the appellant's IMPAC program duties to be covered by the Procurement Clerical and Technician Series, GS-1106. This work requires a practical knowledge of procurement procedures, operations, regulations, and programs to serve as an important link between the contractor and various agency or activity personnel and to provide

support to other procurement support staff. OPM found that the appellant's IMPAC and blanket purchase duties were procurement support functions within the meaning of the GS-1106 PCS. The factors and levels, which differ from those in the previous issue or otherwise have an impact on the final classification of the position, are addressed.

OPM found the appellant's applying knowledge of: (1) the IMPAC credit card program, agency, and Federal Acquisition Regulations (FAR); (2) the purchase card database and processing procedures to support bank card transactions; and (3) supply and finance regulations involved the application of a body of standardized procurement regulations and procedures related to one or more procurement functions typical of Level 1-3. As required at this level, the appellant used this knowledge to generate a variety of recurring and special reports, train cardholders, and respond to recurring questions from card users, installation personnel, and vendors. The appellant's knowledge was more specific to the credit card and prime vendor programs rather than to an in-depth or broad body of procurement phases or functions. The problems and issues with which she dealt did not require applying a depth or range of procurement program knowledge on analytically demanding issues found at Level 1-4.

OPM credited the position with Level 2-3 because the appellant planned and carried out her duties with a high degree of independence. She independently resolved most problems and deviations that occurred with cardholders, vendors, and the contractor. As the alternate program coordinator, she updated and provided training to cardholders and approving officials, served as the main resource in answering their questions, and exercised continuing responsibility for program audit and oversight. These functions provided the opportunity for the exercise of discretion not present in the appellant's voucher examining work

OPM found that the appellant used various guidelines such as FAR, agency directives and handbooks, medical center memoranda, and credit card program manuals and instructions. The appellant also utilized judgment and initiative in identifying appropriate procedures with the introduction of the new credit card and in responding to questions and resolving problems. The position, however, failed to meet Level 3-3, where work involves routinely responding to contractor protests or equivalent problems, extracting relevant information, or reconstructing incomplete files. Available guidelines were applicable to most of the appellant's work. Although the appellant was responsible for understanding and advising card users on changes in program policies and procedures, these issues did not occur with the frequency and did not entail the interpretive demands intended at Level 3-3. While the appellant disseminated changes in program procedures, including those in local program training, her duties did not reflect the interpretation and adaptation of guidelines envisioned at Level 3-3, e.g., devising more efficient methods for procedural processing.

OPM did find that the position met Level 4-3. At this level, the employee identifies the nature of the problem, determines the need for and obtains additional information through oral contacts or written regulations, and considers how previous actions differ from or are similar to the issue at hand before deciding on an approach. The employee also makes recommendations or takes action based on a case-by-case review of the issues or problems involved in each assignment or situation.

The appellant's work as alternate program coordinator for the IMPAC credit card program involved transactions interrelated with other systems such as supply and accounting. The work in implementing the new and revised credit card programs required obtaining additional information through contacts with agency personnel, vendors, and contractors and by reviewing regulations and manuals. In addition, the appellant developed training programs for card users and approving officials and designed local guides and instructions on implementing new or revised program procedures developed by others. OPM concluded these functions reflected the variety and intricacy of tasks as well as the difficulty and originality involved in work warranting the crediting of Level 4-3.

OPM found that these same duties met Level 5-3 and its dual purpose of applying conventional practices to a variety of problems and developing recommendations, solutions, or reports that directly affect customer or vendor relations or operations. Again, as IMPAC Coordinator, the appellant treated a variety of problems in procurement transactions including the investigation and resolution of disputed procurement, credit, and billing errors and the review of purchases to ensure that proper appropriations and cost elements were being charged. This, in turn, resulted in revamping the training for card users, developing local guides for approving officials and cardholders, and monitoring card usage.

By applying the GS-1106 PCS, the total of 1,135 points fell within the GS-6 grade level point range of 1,105 to 1,350 points on the Grade Conversion Table in the GS-1106 PCS. Because the GS-1106 work controlled the classification of the position, OPM reclassified the position as Procurement Technician, GS-1106-6.

Standard: [Housing Management Series, GS-1173 \(September 1981\)](#)

Factor: Factors 2, 3, and 5

Issue: Evaluating Program Responsibility, Technical Authority, and Program Impact

Identification of the Classification Issue

These issues arose in an OPM oversight division's adjudication of a classification appeal. The appellant was a military base housing manager responsible for a housing management program. His responsibilities included on-base military housing for families; quarters for unaccompanied personnel; mobile home lots; and associated utilities, streets, roads, and grounds. The appellant claimed that his position was a close match to Benchmark 12-1 of the GS-1173 PCS.

The appellant stated that he was the installation's technical expert on housing matters policies, methods and processes and independently carried out the program responsibilities with a minimum of supervision. He, therefore, believed that the supervisory controls of the position should be evaluated at Level 2-5. The appellant claimed that procedures he developed locally were implemented in the departmental operating guidance and, therefore, met the broad management planning and program development criteria discussed at Level 3-4. The appellant also believed that because the program serviced a nearby activity, Level 5-4 should be credited.

Resolution

OPM found that the appellant's level of responsibility did not fully meet the intent of Level 2-5. Level 2-5 discusses national priorities, broad program goals and missions, and the effect of advice and influence on the overall program. At this level, an employee is considered technically authoritative and independently plans and carries out a program with only administrative supervision. Such level of responsibility, however, cannot be viewed in isolation but must be considered within the context of the significance of the program or function and how much control is really left to the employee's discretion.

In this case, although the appellant worked independently and was considered the technical expert on housing matters for the installation, his assignments consisted of more than broadly defined mission statements. The appellant conducted his program within the policies, objectives, and procedures clearly established by the military Department for administering their housing program. Overall departmental facilities policy was established by a separate engineering command, which had responsibility for approving any policy changes and providing advice.

OPM also found that the supervisor's position was credited with exercising technical control over the appellant's position, and was ultimately held responsible for administration of the housing program (see Digest No.7, page 5). The appellant's organizational context fell substantially short of Benchmark 12-1 in that responsibility for major housing initiatives and other long range program changes were retained by the Department's engineering command. OPM found that Level 2-4 fully recognized the level of expertise, independence, policy interpretation, and program responsibilities typical of the appellant's position.

Regarding guidelines, OPM found that the appellant worked within a number of published regulations including Department policy and program guides and engineering command level requirements. He stated that many issues that came up affected every housing manager and he and other managers shared their solutions to particular problems. He also stated that he shared local procedures, which he developed to address specific situations, with the command level which were adopted into published operating procedures.

OPM found that the presence of an intervening command level organization that furnished some interpretation of broad policy directives prevented the appellant from being in the position of independently interpreting and developing new policy. The purpose of the command program was, in part, to establish consistent approaches to deal with the broad planning issues and housing trends found at Level 3-4. In a related appeal case, another oversight division found that the engineering command's guidance on Public-Private Venture Program initiatives precluded that activity-level housing manager position from being credited with making the *significant* interpretations and adaptations of guidelines intended at Level 3-4. While the guidelines did not address many of the day-to-day problems that occurred, they did permit a sufficient degree of flexibility for adaptation and interpretation to resolve problems typically encountered by many housing managers at the installation level. The degree of guidance the appellant was provided was more appropriately credited at Level 3-3 which adequately recognized the appellant's contribution to policy changes and procedural guidance through his comments on draft proposals and his recommendations for adopting certain procedures for handling situations common to all housing managers.

OPM also found that the primary purpose of the work was the administration, control, and management of housing related operations and activities involving facilities located at the primary installation and the second serviced smaller activity. The appellant served as the installation's technical expert on matters involving the local housing program for the two serviced activities that provided housing for members of other service branches, including active duty National Guard and Reserves. As a result, the appellant had contact with civilian housing personnel or military supervisors of other service branches to resolve problems involving differing housing policies or infractions of Department housing rules by the members of the other

services. These contacts included discussing policies implemented by the appellant's activity that were of interest to housing officials of another installation. However, these contacts were for the purpose of exchanging information regarding the solution to a specific local problem, not for the purpose of providing advisory services to another agency regarding the management of their housing program, as is required at Level 5-4. The appellant also periodically participated in various groups involved in the analysis of existing Department policies and instructions and provided recommendations and comments regarding changes or modifications in policy. However, the focus of the appellant's work was the implementation of the housing program at the local level and not the development of housing management programs and policies at the agency level for use by other housing specialists. Level 5-3 was credited to the position.

The grade of the appellant's position was sustained.

Standard: [Administrative Analysis Grade-Evaluation Guide \(August 1990\)](#)

Factor: Factor 2, Supervisory Controls

Issues: (1) Appropriateness of Level 2-5 and
(2) Meaning of “Agency” Under Level 2-5

Identification of the Classification Issue

This issue arose in an OPM oversight division’s adjudication of a classification appeal. The appellant’s position was classified as a Support Services Specialist, GS-342-11 and was located in a regional office of a Federal department. Because the position did not meet the criteria for grade evaluation using the PCS for the Support Services Administration Series, GS-342 (dated November 1978), it was evaluated by application of the Administrative Analysis Grade-Evaluation Guide (AAGEG). The AAGEG was selected because it provided appropriate grading criteria covering the position’s staff analytical work and the general administrative subject matter work. Because the position’s subject matter knowledge was covered by the AAGEG, OPM determined additional cross-series comparison to another appropriate subject matter PCS was not necessary. Under Factor 2, Supervisory Controls, the appellant’s agency assigned Level 2-4. However, the appellant believed that his supervisory controls met Level 2-5 because he dealt with contractors and clients directly, had complete responsibility to plan and perform all his work, and because his work was usually not reviewed by his supervisor in progress or upon completion.

Resolution

OPM determined that the position exceeded Level 2-4 in some aspects because the appellant functioned quite independently in carrying out assignments and received little supervisory review of his work products. However, the scope of those assignments and responsibilities was more limited than that envisioned at Level 2-5. The appellant’s assignments affected administrative and management services primarily within a four state region, and were normally monitored in terms of effectiveness in satisfying client requirements and for compliance with accepted agency policy and budgetary constraints. Unlike Level 2-5, the appellant’s work did not regularly influence broad agency policy objectives and program goals. The word “agency” was sometimes used by the appellant’s Department to refer to one of its components. However, in OPM PCS’s, the word “agency” refers to an Executive department or comparable independent establishment as defined in Title 5, United States Code, Section 105. The appellant’s position was, therefore, credited with Level 2-4.

“Back to the Basics”

The factor level relationships table in the AAGEG illustrate which FES factor levels are typically assigned at various levels for administrative analysis positions. Typically, Level 2-4 is the highest level assigned for positions which have been credited with Level 1-7, as was the appealed position. The table also shows that covered positions evaluated at Level 1-8 typically are credited at Level 2-4. This recognizes that the staff analytical functions evaluated by the AAGEG typically are subject to review by line management officials whose programs and employees would be affected by implementation of the staff work.

Additional factor level guidance is found in *The Classifier's Handbook*, which includes a factor relationship table for all administrative occupations covering line as well as staff program functions. Here, Level 2-5 typically is not assigned until Level 1-8 has been credited. When reviewing the grade level criteria in the AAGEG and the relationship tables in *The Classifier's Handbook* as a whole, there is a direct correlation between the scope and importance of the subject studied and/or the significance of the programs or functions managed and the factor levels assigned. While this typical pattern does not preclude assignment of Level 2-5 to a specific position where Levels 1-7 or 1-8 have been assigned for administrative staff work, it would be unusual for a position to vary from the pattern.

Standard: [General Attorney Series, GS-905 \(April 1998\)](#)

Factor: N/A

Issue: Use of Grading Criteria for Cross-Series Comparison

Identification of the Classification Issue

This issue arose in an OPM oversight division's adjudication of Hearing Officer, GS-930 appeals. In each case, the appellants objected to their agency's application of more specific criteria found in other position classification standards (PCS's). They preferred the more general criteria in the General Attorney Series, GS-905 PCS which their agencies had initially applied. They likened their work to a judge in a court of law and felt the GS-905 criteria most appropriate.

Resolution

When an occupation, like the GS-930 series has no grading criteria of its own, grade level determinations are made by comparison to a PCS for a closely related kind of work. Normally, this involves finding a like category, e.g., professional, administrative, or technical PCS with grading criteria in the same occupational group or a related group. Crossing occupational groups is generally preferable to crossing categories in such searches, because the former involves adjusting for differing subject-matter fields while the latter requires adjusting for different perspectives. For example, Legal Clerical and Assistance, GS-986 work should be evaluated by applying the Grade Level Guide for Clerical and Assistance Work and/or other appropriate single-grade interval PCS's in other occupational groups. Evaluating GS-986 work with the Paralegal Specialist, GS-950 PCS would not be appropriate because it is structured to evaluate two-grade interval legal analytical work not requiring graduation from a recognized law school.

The *Classifier's Handbook* states that because of differences in the nature and qualifications required to do various kinds of work, only PCS's that are compatible with the work being evaluated should be used. Therefore, professional positions should be evaluated against PCS's for professional work that is comparable in scope and difficulty and as nearly equal in subject matter and function.

This is further complicated by the need for additional discernment in applying professional criteria to nonprofessional positions. This is illustrated in the Engineering Group, GS-800, VIII which

cautions the use of professional engineering standards in the evaluation of technician positions in grades GS-9 and above:

Careful consideration needs to be given to any significant differences in required scope and intensity of the theoretical and practical knowledge and insight. There are some situations where the qualifications required for the work of professional classes described in the standards are so different from the qualifications required for the work of a nonprofessional position with somewhat similar duties and responsibilities that the differences have a marked impact on the grade level of the work performed.

Unlike GS-905 work, Hearings and Appeals Series, GS-930 work lacks full professional requirements. It does not require a degree, professional legal education, or admission to the bar. The differences in duties, responsibilities, qualification requirements, and screening processes between the two occupations make the GS-905 PCS a difficult comparison. Without suitable adjustments for these significant differences, erroneous grading of the work is likely.

OPM found the Paralegal Specialist series, GS-950 PCS a better match because it (1) addresses administrative work, rather than professional work, (2) belongs to the same occupational family, and (3) shares similar characteristics in terms of the required analytical, research, writing, and judgment skills. It accurately portrays the complexities of nonprofessional analytical legal-like work related to hearings and appeals at the lower- to mid-grade levels.

OPM recognized at the higher grade levels, however, other considerations apply that the GS-950 PCS does not adequately address. The PCS does not, for example, define Level 1-8 since it is rarely encountered in Paralegal work. Consequently, OPM looked to another PCS to evaluate the more complex elements of the appellants' work. It found the Social Insurance Specialist Series, GS-105 PCS most appropriate and fully adequate to the task since it covers administrative work involving analytical knowledge and skills related to those that the appellants exercise. Like the appellants, GS-105 employees determine benefit eligibility, analyze incomplete and conflicting data, and employ lay knowledge of professional fields to weigh the testimony of experts. Though the lower grade levels of this PCS were not as closely related to the appellants' work as the GS-950 PCS, the higher levels contained germane criteria appropriate to extend the factor levels not directly described in the GS-950 PCS. Between the two PCS's, applied separately and in full, an accurate assessment of the GS-930 duties was possible.

Standard: General Biological Science Series, GS-401
[\(Handbook of Occupational Groups and Families, January 1999\)](#)

Factor: N/A

Issue: Selection of Appropriate Professional Series

Identification of the Classification Issue

This issue arose in an OPM oversight division's adjudication of a classification appeal. The appellant's duties were "mixed" in that he performed elements of work covered by more than one occupational series. The appellant's primary duties at a military installation included developing and implementing all program activities related to the management and preservation of a forest and oversight and management of the cultural and historical resources located within its boundaries. The agency placed the position in the General Biological Science Series, GS-401, claiming that the appellant performed work in more than one professional series with none being predominant.

Resolution

As stated in The Handbook of Occupational Groups and Families, positions in the General Biological Science Series, GS-401 involve professional work in biology, agriculture, or related natural resource management when there is no other more appropriate series. Positions included in the GS-401 series involve (1) a combination of several professional fields with none predominant or (2) a specialized professional field not readily identified with other existing series. The oversight division found that the appellant's position did not meet either of these criteria.

The appellant performed work in only one professional field--forestry--which was readily identified with the Forestry Series, GS-460. Like work in that series, his duties for managing the forest resources required primarily professional knowledge and competence in forestry science in order to conserve, utilize and protect the natural resources of the forest, including the inventory, management, planning, and evaluation of each resource. The military installation did not include a variety of non-forest habitats warranting application of the depth and breadth of work in other established professional fields required for coverage by the GS-401 series, e.g., Wildlife Biology, GS-486 and Rangeland Management, GS-454.

Although OPM noted that the forestry duties were not grade controlling, professional knowledge in the forestry field constituted the paramount knowledge and qualifications for the

position and the principal reason for the position's existence. Moreover, the sources of recruitment and lines of progression for the position traditionally came from individuals possessing professional forestry knowledge and skill. Agency management indicated that when filling the position, the primary knowledge required was a professional knowledge and competence in forestry science.

The work managing the cultural and historical resources at the installation was judged to be non-professional. Such work is typically classified in the Park Ranger Series, GS-025. However, because the appellant did not perform the full scope of duties in the conservation, use and management of Federal park resources as described in the occupational information in the GS-025 PCS, the position did not warrant classification to that series. For the preceding reasons, OPM determined that it was inappropriate to classify the position in the GS-401 series and assigned it to the Forestry Series, GS-460.

Standard: [FWS JGS for Supervisors
\(December 1992\)](#)

Factor: N/A

Issue: Exclusion of Small Shop Chief Jobs From Coverage

Identification of the Classification Issue

This issue arose in the adjudication of job grading appeals by several OPM oversight divisions. The appellants occupied small shop chief (SSC) jobs in various trades, including Electronic Integrated Systems Mechanic, WG-2610, Aircraft Electrician, WG-2892, Sheet Metal Mechanic, WG-3806, and Aircraft Pneudraulic Systems Mechanic, WG-8268. Each appellant supervised two or three subordinates performing the journey-level work of the trade and performed work in the same trade that they supervised. The appellants claimed that they spent sufficient time supervising the work of their shop to warrant grading of their jobs by application of the Federal Wage System (FWS) Job Grading Standard (JGS) for Supervisors. The appellants put forth several rationales for coverage by the FWS JGS for Supervisors, including that they performed supervisory duties more than 50 percent of the time and that they worked with and along-side their subordinates performing the journey-level work of their organization. One appellant also claimed the 85 percent threshold was too stringent and, instead, referred to the 25 percent threshold used in the General Schedule system.

The appellants' claims were based on a job grading advisory issued by the OPM Classification Programs Division on the coverage of the FWS JGS for Supervisors and the related FWS JGS for Leader, which stated:

The central coverage criteria for both standards, i.e., the ongoing requirement that supervisors and leaders perform supervisory/leader duties on a substantially full-time and continuing basis is stringentsubstantially full-time means performing supervisory/leader duties to such an extent that, for all intents and purposes, it is considered to be comparable to full-time or 100 percent. Consequently, positions that perform supervisory/leader duties on less than a substantially full-time basis (i.e., less than 85 percent) do not meet the basic criteria for coverage and should not be evaluated under these standards. . . .

Working supervisors meet the “substantially full-time” requirement under the FWS supervisory job grading standard. . . . They perform the full-range of first-level supervisory duties in tandem with the journey-level work of the organization -- the supervisory responsibility continues to be exercised even when mingled with journey-level work assignments. Because the supervisory responsibility is continuous, and is performed on a substantially full-time basis, percentage of time is not a factor. . . .

Unlike working supervisors/leaders who routinely work with and alongside their journey-level counterparts, small shop chiefs function in a totally different manner. In addition to their program responsibility work, they perform nonsupervisory work independently from and unrelated to the journey-level work performed by the other individuals in their small shops. The similarities that occasionally exist between small shop chiefs and working supervisors/leaders are surface similarities at best.

Resolution

OPM found that the positions did not meet the threshold for job grading coverage by the FWS JGS for Supervisors. Discussions with the appellants and their immediate supervisors confirmed that the subordinates’ identical additional PD’s were current and accurate, reflecting the need for very little supervision. The journey level concept within the FWS presumes that occupants of such jobs are delegated significant work planning responsibilities. For example, Electronics Integrated Systems Mechanic, WG-2610-12 employees make decisions and judgments regarding troubleshooting techniques, modification and repair procedures; plan the sequence of work, and select the tools needed; determine the nature of repairs necessary to correct faults; and exercise primary responsibility for checking out the complete integrated systems. Aircraft Electrician, WG-2892-10 workers perform the same type of duties, but as they relate to the aircraft wiring system for which they are responsible.

OPM found that if the appellants were to exercise the breadth and depth of supervision necessary to occupy the amount of time claimed in their appeal rationales, the subordinate jobs could not sustain their grading at the journey-level. While the appellants might spend a significant amount of time on administrative functions to support their immediate supervisor, e.g., providing for shop facility and other support needs including property accountability, their technical supervision over journey-level work should be minimal. Furthermore, with only two or three civilian journey-level subordinates, limited turnover, and no disciplinary problems, very little time

would be spent on such activities as advising employees on performance issues, handling disciplinary problems, recruiting, and investigating complaints.

Responding to the cases in which the appellants claimed that they were working supervisors who worked side-by-side with their subordinates on two- or three-person team assignments, OPM stated that the FWS permits only one of those people to be credited with performing the journey level work of the assignment. For example, while two or three journey level carpenters may be sent out on a project, only one of them may be credited as exercising the work planning and control functions inherent in journey-level work. In each of these cases, the appellant's supervisor confirmed that most of the time the senior person on the team was responsible for writing up and signing off on the work orders. OPM determined that if the appellant was out on a team as the senior shop person, the appellant would be the final authority on all forms. Thus, when the appellant functioned as the team lead, OPM concluded that the supporting subordinate(s) could not be construed as performing the same kind and level of work as the appellant. As a result, the appellant was not functioning as a working supervisor within the meaning of the FWS JGS for Supervisors.

For the foregoing reasons, OPM was persuaded that the appellants' jobs clearly fell short of coverage by the FWS JGS for Supervisors.

“Back to the Basics”

Although not directly addressed in these decisions, OPM found the appellants' rationale evidenced some confusion as to the differences between FWS job grading principles and practices and General Schedule (GS) classification principles and practices. In the GS system, both nonsupervisory and supervisory positions are evaluated against the same grade level criteria defined in law. These grades are linked to a unified pay scale. As discussed in the *Introduction to the Position Classification Standards*, the highest level of work performed on a regular and recurring basis for 25 percent or more of the work time typically controls the grade level of a GS position.

In contrast, the FWS system uses key rank jobs to establish grading relationships for nonsupervisory jobs. The FWS JGS's for Supervisors and Leader are used as pay setting instruments to establish appropriate pay relationships between the level of work led or supervised based on the relative breadth and depth of responsibility and authority vested in the job.

Therefore, FWS supervisory jobs with limited work planning, direction, and related authority over the work controlled receive a lower pay differential than those with long-term work planning, direction, and administrative authorities. Because of the significant pay differentials provided by applying these JGS's, their thresholds for coverage are stringent.

The threshold for evaluation as a working supervisor is dependent upon both the work situation and the trade or craft involved. For example, the Motor Vehicle Operator, WG-5703 occupation, in which journey-level workers typically drive alone, does not lend itself to having supervisors work with and alongside their journey-level staff. Therefore, it would be atypical to have a working supervisor in a WG-5703 occupation. In contrast, some occupations and their typical work settings provide for working supervisor situations. For example, a Materials Handler Supervisor, WS-6907 may function as a working supervisor over a large warehouse, performing the same journey-level work as those performed by five or six subordinates. In smaller warehouse situations, however, limited work direction and control functions typically are vested in a senior Materials Handler job as discussed in the WG-6907 JGS.

Overall, when evaluating positions, OPM has observed that duties and responsibilities assigned to a job flow from the mission assigned to the organization in which those jobs are found. The positions created to perform that assigned mission must be considered in relation to one another; i.e., each job reflects only a part of the organization's work as a whole. Therefore, the duties and responsibilities assigned to a position and performed by the employee should not be considered in a vacuum.