

**U.S. Office of Personnel Management
Office of Merit Systems Oversight and
Effectiveness
Classification Appeal and FLSA Programs**

San Francisco Oversight Division
120 Howard Street, Room 760
San Francisco, CA 94105-0001

**Classification Appeal Decision
Under section 5112 of title 5, United States Code**

Appellant: [The appellant]

Agency classification: Safety and Occupational Health
Specialist
GS-018-11

Organization: [The appellant's organization]
U.S. Department of the Navy

OPM decision: Safety and Occupational Health
Specialist
GS-018-11

OPM decision number: C-0018-11-01

Carlos A. Torrico
Classification Appeals Officer

May 15, 2001
Date

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

Decision sent to:

Appellant:

[The appellant's address]

[The appellant's union]

Agency:

[The appellant's servicing personnel office]
U.S. Department of the Navy

[The appellant's regional personnel office]
U.S. Department of the Navy

Director, Plans, Programs and Diversity
Office of the Deputy Assistant Secretary
Of the Navy (CP/EEO)
U.S. Department of the Navy
800 North Quincy Street
Arlington, Virginia 22203-1998

Ms. Janice W. Cooper
Chief, Classification Appeals
Adjudication Section
U.S. Department of Defense
Civilian Personnel Management Service
1400 Key Boulevard, Suite B-200
Arlington, VA 22209-5144

Introduction

On August 1, 2000, the San Francisco Oversight Division of the U.S. Office of Personnel Management (OPM) received a classification appeal from [the appellant]. His position is currently classified as Safety and Occupational Health Specialist, GS-018-11. However, he believes his position should be classified as Safety and Occupational Health Manager, GS-018-12. The appellant works in the [appellant's organization], U.S. Department of the Navy. We have accepted and decided this appeal under the provisions of Section 5112 of title 5, United States Code (U.S.C.).

General issues

This appeal decision is based on a careful review of all information submitted by the appellant and his agency, as well as separate telephone interviews with the appellant and his supervisor by an OPM representative. Both the appellant and his supervisor have certified to the accuracy of the appellant's official position description (PD).

The appellant makes various statements about his agency and its evaluation of his position. In addition, he compares his position to others which he believes are similar but graded at a higher level. Therefore, he believes his job should be graded at a higher level. In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of the position. Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding his appeal, nor can we consider his personal qualifications or the quality or quantity of work performed. By law, we must make that decision solely by comparing his current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

Position information

The appellant serves as a Safety and Occupational Health Specialist at the [appellant's organization and installation]. His primary responsibility is enforcing the Navy's Safety and Occupational Health (NAVOSH), and environmental protection programs for his assigned geographical work area of [appellant's organizational command] and activities. He also has responsibility for monitoring and evaluating contractor compliance with applicable Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA), Department of Transportation (DOT), and Navy safety, health and environmental protection and fire prevention rules and regulations on Navy contracts. The scope of work encompasses all aspects of occupational safety and health, and environmental protection as well as fire protection associated with ship overhauls, repairs, and construction. He serves as point of contact in matters pertaining to occupational safety, health and environmental protection at assigned contractor work sites. He is responsible for conducting scheduled and unscheduled inspections and surveys of contractors' work aboard ships under construction, overhaul, or repair, to identify and evaluate risks to Naval personnel and equipment as required by current executive order, and to follow-up on deficiencies noted.

The appellant develops, performs, and evaluates educational activities, including safety orientation of new employees, and supervisory and management training in such subjects as fire protection, safety and health responsibilities, office safety, safe materials handling, hazardous waste, personal protective equipment, hearing and eye protection, hazards of chemicals, lifting techniques, etc. He participates in the development of innovative safety training and promotional activities, and monitors and coordinates inspections and investigations of complaints concerning occupational safety and health. He also administers the Employee Injury Compensation Program.

The appellant's PD, results of our interviews, and other material of record furnish much more information about his duties and responsibilities and how they are performed.

Series, title, and standard determination

The agency has classified the appellant's position in the Safety and Occupational Health Management Series, GS-018, and the appellant does not disagree. We concur with the agency's determination that the duties performed by the appellant and the knowledge required for the position are best covered by the position classification standard for the Safety and Occupational Health Management Series, GS-018, dated August 1981 (reissued in HRCD-7, July 1999).

The appellant's position is correctly titled as Safety and Occupational Health Specialist, which is the authorized title for all nonsupervisory positions in the GS-018 series at the GS-12 grade level or below that are assigned a number of program elements such as inspection, evaluation, training, or providing administrative and technical services to management representatives and employees.

The title requested by the appellant, Safety and Occupational Health Manager, is not appropriate. That title is reserved for those positions responsible for planning, directing, operating, and evaluating a safety and occupational health program for an entire agency or subordinate level, such as a bureau, command, regional or district office or installation. Other responsibilities associated with the manager position include appraising the degree of program compliance with applicable laws, rules and regulations, assessing achievements, and recommending new procedures.

Unlike the appellant's position, inherent in program management is the advising of top management on appropriate measures and alternative courses of action which will achieve mission goals with a minimum risk of injury to personnel and damage to property. This involves formal issuance of directives, regulations, and manuals concerning safety and occupational health program operations. In the appellant's case, neither the scope of his assignments nor the type of authority he exercises in carrying them out are indicative of program management.

The overall responsibility of the appellant's position is enforcing the Navy's Safety and Occupational Health (NAVOSH) and environmental protection programs, as well as fire protection for a segment of [the appellant's organizational command] and its tenant activities. This includes monitoring and evaluating contractor compliance with applicable Navy regulatory and procedural directives from higher headquarters, safety and occupational health standards, environmental protection standards, national consensus standards, fire protection guides, and a myriad of other established guides, publications, procedures, contract clauses, textbooks, and

occupational practices. In doing this, he plans and prioritizes his specific work assignments, and independently carries out project or request orders for an assigned geographic work area. He is not assigned the responsibilities for planning, organizing, directing, budgeting, coordinating, evaluating, administering, and executing the Navy's Safety, Occupational Health, and environmental protection programs for the entire [appellant's organizational command] and its activities. Those responsibilities are assigned to the Safety and Occupational Health Manager's position. The appellant provides input on such items as the annual work plan for [the command], and assists in updating local instructions. He provides input to his immediate supervisor or the Deputy of [the command], who in turn forwards it to the Safety and Occupational Health Manager for review. The manager ensures that the appellant's input adheres to the Navy's safety and environmental protection programs for [the command].

The agency has established a Safety and Occupational Health Manager position at the installation. The incumbent of that position is responsible for carrying out the "program management" duties for [the command], and also has the collateral duty of Deputy for Safety and Occupational Health and Environmental Protection (OSH-E). The Safety and Occupational Health Manager is not the appellant's supervisor. Both positions are under the supervisory control of the installation's Attorney-Advisor who supervises the Office of Counsel and [the appellant's organization]. The Deputy of [the command], is the Attorney-Advisor's immediate supervisor.

The appellant's position is properly titled Safety and Occupational Health Specialist, and is evaluated by application of the grading criteria in the position classification standard for the Safety and Occupational Health Management Series, GS-018, dated August 1981 (reissued in HRCD-7, July 1999).

Grade determination

The GS-018 standard uses the Factor Evaluation System (FES), which employs nine factors. Under the FES, each factor level description in a standard or guide describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. Our evaluation with respect to the nine factors follows:

Factor 1, Knowledge required by the position, Level 1-7, 1250 points

This factor measures the nature and extent of information or facts that a Safety and Occupational Health Specialist must understand to do acceptable work, and the nature and extent of the skills necessary to apply this knowledge. To be used as a basis for selecting a level under this factor, knowledge must be required and applied.

At Level 1-7 (pages 12-14), the work requires knowledge of a wide range of safety and occupational health concepts, principles, and practices, laws, and regulations applicable to the performance of complex administrative responsibilities which requires 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 (e.g., identifying, evaluating, and controlling a wide variety of industrial hazards related to the full range of work operations). 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.
- 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.

At Level 1-8 (pages 14-15), 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 1-7 is met. The nature of the appellant's work requires a comprehensive knowledge of established safety and occupational health regulations, standards, and procedures applicable to a wide range of safety and occupational health duties. He is knowledgeable of a number of requirements, methods, techniques, and practices that enable him to enforce the existing safety program for employees and contract workers at [the appellant's organizational command]. He provides safety guidance and makes recommendations to eliminate known industrial hazards, and those related to construction projects. He is sufficiently knowledgeable of psychological factors to evaluate the relationships of individuals to their working environment, and motivate them to perform in a safe manner. The appellant refers to agency, national and local safety standards and requirements to fulfill safety goals and objectives and to develop local adaptations to established standards to meet requirements.

The two illustrations provided at Level 1-7 (pages 13-14) show the type of assignments envisioned at that level. The appellant's assignments are most like the second illustration, i.e., knowledge of safety and occupational health principles, practices, standards and abatement measures related to diverse industrial settings sufficient to apply a wide range of methods and techniques in the inspection of private and Government-owned plants, factories, foundries, and shipyards and to determine compliance with applicable regulatory provisions.

The appellant's assignments and responsibilities do not meet the full intent of Level 1-8. While the appellant's scope of responsibility involves the abatement or elimination of significant potential hazards, those hazards and methods of dealing with them are largely known. He is

responsible for a wide range of safety and occupational duties for a segment of [the command] employees and activities. There is no evidence in the appeal record that the appellant is required to recommend substantive program or operational changes, or significantly extend or modify established techniques. He stated that his guides can be general in some situations, so he determines what safety procedures should be required in those circumstances. However, he is not developing alternative new courses of managerial action but rather selecting from among accepted techniques and safety practices for dealing with various hazardous situations. He consults with Fire Chiefs and Inspectors, State of [name of State] OSHA Officials, EPA Officials, Commanding Officers of ships and civilian and military employees and contractor employees on the installation whenever he has safety, health or environmental issues or questions that cannot be resolved through normal avenues. Also, there is no evidence that he functions as a technical authority on the development, interpretation, or application of agency safety and occupational health policies or criteria. The appellant provides technical assistance and clarification in occupational safety, health and environmental matters to the Command's Attorney concerning issues or situations he encounters in his geographic work area. However, his role is to interpret and apply established guidance and methods to local operations, and to evaluate them by identifying safety hazards and assessing the effectiveness of abatement measures.

The appellant is not considered the local expert at [the command]. His supervisor and the Deputy of [the command] indicated that the Safety and Occupational Health Manager is the local expert. The Safety and Occupational Health Manager also carries the title "Deputy for OSH at [the command]." Whenever there are questions or issues concerning the NAVOSH and environmental protection programs at [the command], the Safety and Occupational Health Manager is called upon to address or resolve program issues. The appellant provides input for the portion of [the command] that is considered his work area.

This factor is evaluated at Level 1-7 and 1250 points are credited.

Factor 2, Supervisory controls, Level 2-4, 450 points

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

At Level 2-3 (page 17), the safety and occupational health manager or supervisor makes assignments by defining objectives, priorities and deadlines, and provides assistance for unusual situations where previous precedents are unclear. Completed work is reviewed for technical soundness of solutions achieved, appropriateness and conformity to policy and safety and occupational health program requirements. Specific methods or techniques used in achieving solutions are usually not reviewed in detail. The agency assigned this level to the appellant's position.

At Level 2-4 (pages 17-18), 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 Level 2-4 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.

At Level 2-5 (page 18), 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.

The appellant's position fully exceeds Level 2-3 and meets Level 2-4. Our interviews disclosed that the appellant receives work assignments in three ways: directly from his supervisor, directly from the Safety and Occupational Health Manager, and directly from the Project Officers. Significant portions of his work assignments come directly from the Project Officers. The work is coordinated directly with them, and he takes the initiative in interpreting 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 are determined by the appellant. The appellant's PD, as well as information gathered during fact-finding sessions, indicates that the appellant plans his work assignments, determines priorities, and independently carries out his assignments. He performs recurring assignments such as scheduled and unscheduled inspections of ships, responds to inquiries and complaints from Project Officers, managers, supervisors, and contractor employees over a wide range of safety and occupational health topics, and prepares informational instructions/notices. He has the authority to halt operations of unsafe working conditions during ship overhauls, repairs, and construction at work sites where safety measures are not being followed, or where serious injuries or major property damage appear imminent. He can direct the supervisors or contract employees to take immediate protective and corrective measures. The appellant does not, however, determine program direction in the sense of guiding the actions of other agency safety and occupational health specialists, nor does he initiate major new projects of such magnitude that they would have to be considered from the perspectives of funding availability and national priorities. Work results are normally accepted as technically sound but may be reviewed for attainment of program objectives, policy implications and compliance with agency regulations.

The appellant's duty site is geographically situated away from his immediate supervisor and the Safety and Occupational Health Manager. His work assignments encompass the geographic area of [the installation], while the Safety and Occupational Health Manager's geographic area encompasses [the command]. Since the appellant receives assignments directly from Project Officers, he is geographically separated from his immediate supervisor and the Safety and Occupational Health Manager. He infrequently communicates with his immediate supervisor or the Safety and Occupational Health Manager until assistance is needed with unusual situations where previous precedents are unclear. Consequently, the appellant plans and carries out his

daily work assignments independently. The appellant also calls his supervisor or the Safety and Occupational Health Manager to keep them abreast of work situations occurring at his duty site.

The appellant's supervisory controls do not meet Level 2-5 because his position is not that of a safety and occupational health manager who independently plans, designs, and carries out the entire safety and occupational health program for the installation.

This factor is evaluated at Level 2-4 and 450 points are assigned.

Factor 3, Guidelines, Level 3-3, 275 points

This factor covers the nature of guidelines and the judgment needed to apply them.

At Level 3-3 (page 20), the specialist has available for application public laws, Executive Orders, State and municipal codes, OSHA standards, agency manuals, procurement contract clauses, safety council reports, national safety association publications, and manufacturing association criteria. The work assignments typically require independent interpretation, evaluation, selection and application of guidelines to specific situations including modifications and adaptations when necessary. In addition, judgment frequently must be exercised in applying standard hazard control or elimination practices to different situations.

At Level 3-4 (page 20), 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 also are 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.

The appellant's guidelines meet Level 3-3 but fall short of Level 3-4. His guidelines include OSHA Standards, EPA and DOT Standards, U.S. Public Health Service guidelines, Department of Defense, Department of the Navy, and [the command] instructions, directives, manuals, and policies, various Federal, State, and local codes, standard textbooks and professional journals, past inspection summaries, fire prevention/protection guides, and national consensus standards. Like Level 3-3, he independently interprets and applies these guidelines to specific situations, and sometimes must modify and adapt them as necessary. Judgment is needed in applying standard hazard control practices to differing situations.

The appellant's position does not meet Level 3-4. His guidelines are more definitive and specific than those described at Level 3-4. Because he is not faced with highly unusual or complex work problems, his guidelines are sufficient to resolve most problems encountered. While he occasionally modifies and adapts guidelines, unlike Level 3-4 available precedents are available and applicable to his work.

This factor is assigned Level 3-3 and 275 points are credited.

Factor 4, Complexity, Level 4-4, 225 points

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.

At Level 4-4 (pages 21-22), the assignments cover a wide range of work operations and environmental conditions involving a substantial number and diversity of hazards; or a wide variety of independent and continuing assignments in a specialized area of safety and occupational health that have exacting technical requirements. The safety and occupational health manager or specialist evaluates a variety of complex, interrelated physical conditions, operating practices, hazardous human-machine interaction, and serious mishaps. Assignments require analysis of unconventional safety and occupational health problems or circumstances, inconclusive facts or data, and are characterized by the uncertainty of accepted control or abatement methods that are available for selection and use. The nature of the hazards is such that generally no single approach is adequate to control or eliminate a given problem; rather, the adaptation of proven safety and occupational health techniques is necessary. The work typically requires interpretation of a variety of occupational circumstances to adapt known control or protective measures to eliminate or minimize hazardous situations.

At level 4-5 (page 22), 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 4-4 is met. The appellant's work assignments cover a wide range of work operations and environmental conditions involving a substantial number and diversity of hazards in a specific geographic area where generally no single approach is adequate. He evaluates procedures for low, normal and high risk operations and activities, including protective equipment programs, accident investigation, diving and storage, hazardous materials handling and storage, ammunition handling and storage, electrical and electronics safety. The work is complicated by a variety of different, complex projects and performance capabilities, and the presence of large quantities of hazardous materials, all of which pose problems in the evaluation of the installation's compliance with occupational standards. He coordinates and performs investigations of mishaps and of hazardous condition reports involving personnel injuries or damage to machinery, tools, materials, or equipment. The appellant screens and evaluates reports

of safety hazards received from employees, contract employees, supervisors, and managers and disseminates applicable material within the Command and to contractors as appropriate. Analysis of potential hazards requires adapting established techniques and methods to adequately measure risks to employees. He participates in ship arrival/pre-overhaul conferences involving Ships Force and private contractors. During this process he briefs various individuals and officials on contractual safety protection/prevention requirements and other safety and health hazards associated with the contractor's planned work. When necessary, he recommends protective measures tailored to control a combination of complex hazardous elements with a minimum of interference with the overhauling processes.

Level 4-5 is not met. Unlike that level, his assignments are not so broad and diverse as to require innovative analysis of high safety risk activities. We found no indication that he deals with high safety risks with constantly changing hazards, or serious conflicts between operational requirements involving hazardous materials, or highly diverse work processes and environmental conditions. The appellant's work does not require him to develop new accident prevention techniques for modification of accepted specialized safety procedures. He must interpret a variety of occupational circumstances and adapt proven safety and occupational health techniques, when necessary, to control, minimize or eliminate hazardous situations.

This factor is evaluated at Level 4-4 and 225 points are assigned.

Factor 5, Scope and effect, Level 5-3, 150 points

This factor covers the relationship between the nature of the work; i.e., the purpose, breadth, and depth of the assignment, and the effect of the work products or services both within and outside the organization.

At Level 5-3 (page 23), the work involves the evaluation and analysis of safety and occupational health problems, conditions and administrative practices affecting work operations and environmental conditions. Work efforts affect the quality of surveys and inspections conducted, the adequacy of techniques applied to control or eliminate hazards and the physical safety and occupational health of employees and the general public.

At Level 5-4 (page 24), 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 5-3 is met. The appellant is responsible for assuring that the installation is in compliance with Navy's safety and certification requirements. He accomplishes this by enforcing the Navy's Safety and Occupational Health, and environmental protection programs as well as fire protection through work assignments for an assigned geographic area on [the installation]. His responsibilities include monitoring and evaluating contractor's compliance with applicable standards, rules and regulations to determine whether there are hazardous conditions detrimental

to the safety and occupational health of the employees and contract workers. The appellant is also working to eliminate or minimize hazards which could cause injuries to personnel and damage to property. He is responsible for applying methods, techniques, and abatements to control or eliminate unsafe acts or conditions for Command personnel working within Navy facilities and on private contractor's facilities who are performing Navy contracts.

His work affects daily operations of the Command as well as those of private contractors performing work on ship repair contracts under command cognizance. The appellant's work efforts, through surveys and inspections, affect the effectiveness of the installation's safety and occupational health, environmental protection programs and techniques, and the satisfactory control or abatement of hazardous conditions and operations. The work results are also directly related to the short and long term physical well being of visitors, employees and their dependents, and the safe, uninterrupted completion of navy ship repair, overhaul and construction contracts awarded private shipyards under [the command] cognizance.

The appellant's position does not reach Level 5-4. He neither assesses the effectiveness of specific programs, projects, or functions, nor does he plan alternative courses of specialized action to resolve hazardous conditions and unsafe working practices. The appellant is principally occupied with enforcing the Navy's safety and occupational health, and environmental protection program. The Safety and Occupational Health Manager has the responsibility of assessing the effectiveness of specific programs, and planning, executing and administering the safety and occupational health programs for all [the command]. The appellant's work assignments do not involve the development of safety and occupational health criteria and procedures for his installation. His assignments involve the application of developed criteria to the specifics of [the command]. There is no evidence that he is involved in developing safety and health criteria and procedures for major Department of the Navy activities.

This factor is evaluated at Level 5-3 and 150 points are credited.

Factor 6, Personal contacts, Level 6-3, 60 points

Factor 6 covers the people and conditions or settings under which contacts are made. It includes face-to-face contacts and telephone dialogue with persons not in the supervisory chain.

At Level 6-3 (page 25), 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.

At Level 6-4 (pages 25-26), 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.

The appellant's personal contacts meet Level 6-3. Like that level he has contact with a variety of individuals both within and outside his agency. These include fellow workers, contract employees, department heads, and Project Officers to representatives of Naval Sea Systems Command (NAVSEA), Chief of Naval Operations (CNO), and Secretary of the Navy (SECNAV). Other contacts are with state and Federal occupational safety, health, and EPA officials, city and municipal fire department personnel, and contractor safety and health officials and senior management. The appellant also has contact with managers and supervisory personnel, industrial hygienists, medical and personnel specialists, occupational safety and health specialists from other Federal, state, local and private organizations, attorneys, and safety and health representatives from private shipyards.

Level 6-4 is not met. There is no evidence that he has regular contact with high ranking officials from outside his agency like those described at Level 6-4. In addition, we found no indication that he is called upon to participate as a technical expert on committees and seminars of national and international stature.

This factor is evaluated at Level 6-3 and 60 points are credited.

Factor 7, Purpose of contacts, Level 7-3, 120 points

Factor 7 covers the reasons for the contacts described in Factor 6.

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.

At Level 7-3 (pages 26-27), 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.

At Level 7-4 (page 27), 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 7-3 is met. The appellant's personal contacts are not only to obtain and exchange information, but also to influence and gain the support of sometimes unwilling and uncooperative project officers, contractors, managers, and supervisors, when discussing, defining, and promoting safety and occupational health program objectives, and safe and healthful work practices, procedures, and conditions. The appellant resolves problems and difficulties encountered in applying and complying with prescribed standards and regulations. He testifies as a witness at board hearings and examinations on matters relating to Navy safety and occupational health when it concerns his assigned geographic area.

Level 7-4 is not met. That level is reserved for safety and occupational health manager positions. The purpose of the appellant's contacts is not of the highly significant and controversial nature described at Level 7-4, and he does not represent the agency at national safety congresses, conferences, or committees, to develop or modify safety and health standards which have wide application.

This factor is evaluated at Level 7-3 and 120 points are credited.

Factor 8, Physical demands, Level 8-2, 20 points

This factor covers the requirements and physical demands placed on the Safety and Occupational Health Specialist by the work assignment.

At Level 8-2 (page 27), 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 for this factor described in the 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 on-site safety inspections of Navy ships undergoing repair, overhaul, and/or construction. This requires considerable walking, climbing ladders and scaffolds, bending, crouching, standing or similar movements. The appellant is subjected to hazardous areas and conditions which are associated with shipbuilding and ship repair work.

This factor is evaluated at Level 8-2 and 20 points are credited.

Factor 9, Work environment, Level 9-2, 20 points

This factor considers the risks and discomforts in the employee's physical surroundings, and the safety precautions required.

At Level 9-2 (page 28), 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, earmuffs or plugs, goggles, respirators and gloves. This is the highest level for this factor described in the standard.

Level 9-2 is met. The appellant's work regularly exposes him to a variety of hazardous situations including adverse weather, dirty environments, and operating machines. He may be exposed to hazardous materials including gases, chemicals, flammable liquids, high noise levels, ultraviolet and infrared radiation, dusts, mists, vapors, and fumes normally associated with ship repair, overhaul, and construction. The use of personal protective clothing and equipment is required during visits to work sites aboard ships.

This factor is evaluated at Level 9-2 and 20 points are credited.

Summary

In summary, we have evaluated the appellant's position as follows:

Factor	Level	Points
1. Knowledge required by the position	1-7	1250
2. Supervisory controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and effect	5-3	150
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
Total Points:		2570

The appellant's position totals 2570 points which falls in the GS-11 range (2355-2750). Therefore, in accordance with the grade conversion table on page 7 of the standard, his position is properly graded at GS-11.

Decision

The appellant's position is properly classified as Safety and Occupational Health Specialist, GS-018-11.