

U.S. Office of Personnel Management
Division for Human Capital Leadership & Merit System Accountability
Classification Appeals Program

Philadelphia Field Services Group
600 Arch Street, room 3400
Philadelphia, PA 19106-1596

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

Appellant: [appellant]

Agency classification: Electrical Engineering Technician
GS-802-11

Organization: Electrical and Ship Silencing Branch
Electrical/Electronics Engineering and
Planning Division
Engineering and Planning Department
[location] Naval Shipyard
Department of the Navy
[location]

OPM decision: Electrical Engineering Technician
GS-802-11

OPM decision number: C-0802-11-08

/s/ Robert D. Hendler
Robert D. Hendler
Classification and Pay Claims
Program Manager

November 1, 2005

Date

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

Decision sent to:

[appellant's address]

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[name]
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Introduction

On June 22, 2005, the Philadelphia Field Services Group, U.S. Office of Personnel Management (OPM), accepted a classification appeal for a position classified as Electrical Engineering Technician, GS-802-11, in the Electrical and Ship Silencing Branch, Electrical/Electronics Engineering and Planning Division, Engineering and Planning Department, [location] Naval Shipyard, Department of the Navy, [location]. The appellant requested that his position be reclassified to GS-802-12. We received a complete administrative report on August 2, 2005. The appeal has been accepted and processed under section 5112(b) of title 5, United States Code (U.S.C.).

In reaching our classification decision, we have carefully reviewed all information of record furnished by the appellant and the agency, including the official position description (PD) of record (PD number), which contains the major functions assigned to and performed by the appellant and we hereby incorporate it by reference into this decision. In addition, to help decide the appeal, an OPM representative conducted separate telephone interviews with the appellant and his supervisor.

General issues

The appellant compares his position to an Electrical Engineering Technician, GS-802-12 position at the [location] Naval Shipyard. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to another position, which may or may not have been properly classified, as a basis for deciding his appeal.

The appellant believes that his role as preventive maintenance (PM) coordinator and his associated duties and responsibilities support classification of his position at the GS-12 grade level. In support of his belief that he performs GS-12 grade level work, the appellant also states that he reports directly to a GS-13 Electrical Engineer Branch Head, that there are no intermediate level supervisory reviews of his work, and that having a GS-13 as an immediate supervisor is an indication of his independence in making decisions. The grade level of the appellant's immediate supervisor has no direct bearing on the classification of his assigned work. Rather, the proper classification of the appellant's position is solely based on a comparison of his currently assigned and personally performed duties and responsibilities to applicable OPM classification standards and guidelines.

The appellant believes that the GS-802 standard is outdated. However, the adequacy of grade level criteria in OPM standards is not appealable or reviewable (section 511.607 of title 5, Code of Federal Regulations). All OPM General Schedule standards are consistent with the grade level definitions of work established by law. These definitions are based on the difficulty and responsibility of the work at each grade level and the qualifications required to do the work.

The appellant makes various statements about his working conditions, his agency, and its evaluation of his position. In adjudicating this appeal, our only concern is to make our own

independent decision on the proper classification of his position in comparison to established OPM standards and guidelines. Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison. Because our decision sets aside all previous agency decisions, the appellant's concerns regarding his agency's classification review process are not germane to this decision.

Position information

The appellant is currently assigned to PD number (PD #). The appellant noted an apparent discrepancy between the number on his copy of the PD (PD #) and that shown on the Notification of Personnel Action form provided by the agency. The agency informed us that their PD numbering conventions were changed due to the introduction of the Defense Personnel Data System. Both numbers represent the same PD. Because of his unique role as designated PM Coordinator, the appellant is the only person assigned to PD number (PD #). Our comparison of the two PDs shows them to be identical. The appellant and the supervisor agree that the PD of record accurately reflects the duties performed.

The Electrical and Ships Silencing Branch provides technical direction on electrical/electronics systems for all non-nuclear work in connection with the overhaul, repair, conversion, construction, inactivation, and/or recycling of submarines. The appellant serves as the designated PM Coordinator for all submarine systems equipment; serves as a member of the "trouble desk" staff, as assigned, providing waterfront production technical support; and provides electrical engineering guidance and direction regarding ship interior communications systems, wire-ways and cable routing, ship's control systems (i.e. steering, diving, hovering systems including the Ballast control Panel and Ships control Panel), and electrical alarms and safety control systems. The organization chart provided by the agency shows the Branch is staffed as follows:

- 1 Supervisory Electrical Engineer, GS-850-13;
- 1 Supervisory Electrical Engineering Technician, GS-802-13;
- 10 Electrical Engineers, GS-850-12;
- 20 Electrical Engineering Technicians, GS-802-12;
- 5 Electrical Engineers, GS-850-11;
- 1 Mechanical Engineer, GS-830-11;
- 6 Electrical Engineering Technicians, GS-802-11
(including the appellant);
- 6 Electrical Engineers at or below the GS-9 level; and
- 2 Electrical Engineering Technicians at or below the GS-9 level

The appellant spends approximately 80 percent of his time performing PM duties which involves fabricating and installing protective covers intended to ensure that essential submarine components are not damaged during overhaul and/or repair work being done on other equipment in close proximity, or by environmental factors (such as dirt, dust or rust) during long periods when the equipment is not in use. The appellant develops detailed Task Group Instructions (TGIs), i.e. specific instructions for performing equipment repairs or other equipment procedures, to be followed by others in performing equipment cover-up, lay-up and start up

functions involving the installation and removal of covers. Drawings for most equipment covers have been previously developed and are available. Approximately 10 percent of the equipment on submarines scheduled for overhaul or repair is new, unique or for some other reason requires a new cover. The appellant designs the covers based on available dimensional equipment drawings or by taking detailed on-site measurements. He prepares accurate drawings of the covers using computer aided design - computer aided manufacturing (CAD-CAM) equipment, and detailed instructions for their fabrication. When not otherwise specified, the appellant determines if covers are to be hard or soft and what materials are to be used in their construction. The characteristics of the covers typically depend on the nature of the equipment itself, and its location in relation to other work planned for the ship. Covers may require intricate customized shapes and designs in order to fulfill their purpose. The appellant is responsible for maintaining the shipyard PM manual and other related guidance/documentation and for serving as PM coordinator for the shipyard.

He spends the remaining 20 percent his time on “trouble desk” or on engineering projects assigned by the supervisor. The projects are typically defined portions of larger electrical engineering projects or studies and are assigned in terms of the scope, purpose and timeframes for completion. The appellant independently accomplishes assignments selecting and adapting established guidance and coordinating with specialists in other fields as necessary. For example, the appellant may be assigned to inspect the high maintenance “bathtub area” of a submarine to visually check the electrical hangers and wire-ways, report on their condition, identify needed repairs, and/or improvements and coordinate with others to resolve problems. Problems or issues encountered requiring professional engineering input, deviations from established precedents or guidance, or those involving systems changes are referred to the senior engineer or technician assigned overall responsibility for the project or study.

Trouble desk work involves providing waterfront production technical support in response to specific deficiencies/problems received as Deficiency Reports (DRs) or Deficiency Logs (DLs) which surface during submarine overhaul and/or repair operations. He accesses the Automated Technical Drawing Index System and Ships Drawing Index to find the latest update/revision of the drawings for the needed repair on a particular submarine and responds by providing the correct technical drawings and/or written technical guidance. The appellant orders the necessary parts for the repair, and forwards the job order to the appropriate maintenance shop for action. When reported problems identify deficiencies in existing (TGIs), the appellant ensures that the TGI is updated. He also prepares technical documents such as DLs, DRs and TGIs as needed. The amount of trouble desk activity varies depending upon how far along a particular submarine is in the overhaul/repair cycle. Activity is heaviest at the beginning and end of the cycle. The immediate supervisor confirms that the appellant is not normally assigned to perform trouble desk duties on continuing basis, but rather that he is called on to work the trouble desk when there is a surge in this work. Matters referred to the trouble desk are numerous, varied and may involve electrical, mechanical or structural issues. The work is performed under the direction and guidance of a senior employee who serves as the trouble desk leader. While most problems are covered by existing guidance or precedent, at times unique issues are encountered requiring coordination with senior specialists for resolution and/or submitting the matter with a recommended solution to higher level engineering authorities for their approval.

Series, title, and standard determination

The agency classified the appellant's position in the Engineering Technician Series, GS-802, and titled it Electrical Engineering Technician. The appellant does not contest the agency's series or title determination of his position. After careful analysis of the record, we agree.

The GS-802 position classification standard (PCS) contains grade-level criteria up to the GS-11 level. The grade-level criteria at grades GS-9 and GS-11 are designed to provide consistency in the classification of positions of technicians and engineers who perform similar work. Engineering technician positions that clearly exceed the GS-11 grade level may be evaluated by extension of the criteria in the GS-802 standard in combination with grade-level criteria in appropriate standards for engineering positions. As discussed later in this decision, the appellant's position does not clearly exceed the GS-11 grade level by application of the grade level criteria in the GS-802 PCS. Therefore, application of other PCSs to evaluate the appellant's work is neither necessary nor appropriate.

Grade determination

The GS-802 PCS uses two factors to evaluate positions: *Nature of assignment* and *Level of responsibility*.

Nature of assignment

This factor includes the scope and difficulty of the project and the skills and knowledge required to complete the assignment.

At the GS-11 grade level, the highest level described in the PCS, technicians perform work of broad scope and complexity requiring the ability to interpret, select, adapt, and apply many guidelines, precedents, and engineering principles and practices related to the area of specialization. The work also requires that the technician possess and apply some knowledge of related scientific and engineering fields. At this level, technicians plan and accomplish complete projects or studies of a conventional nature requiring the independent adaptation of background data and information and interpretation and use of precedents. They are typically confronted with a variety of complex problems that call for considerable judgment in making sound engineering compromises and decisions. The work often requires constant coordination with personnel in other organizations having a role in accomplishing the projects.

The PM and most complex trouble desk and project work performed by the appellant is comparable to the GS-11 grade level. The appellant is assigned continuing responsibility for preventive maintenance efforts including: maintaining and updating the shipyard PM manual, both hard copy and on the shipyard intranet; maintaining and updating reference files of drawings for all developed PM protective covers; responding to PM problems and issues as they arise; coordinating with engineering specialists in other fields, i.e. mechanical, structural, etc., as necessary for resolution of problems; providing and updating written guidance and instructions outlining proper procedures for the installation and removal of protective covers; coordinating

with others to identify PM requirements, resolve new or unique PM issues, fabricate appropriate covers and ensure proper installation; and for inspecting PM measures in place during ship overhaul and repairs to ensure that critical equipment is protected from damage occurring during submarine overhaul and/or repair operations. As at the GS-11 grade level, the work involves application of considerable judgment in selecting, applying and/or adapting established guidance and instructions to resolve PM engineering problems concerning electrical and mechanical equipment. The work requires consideration of equipment shut down, lay up and start up procedures. As at that grade level, PM projects are typically of a conventional nature requiring the appellant to select, interpret and apply available guidance and precedent. Development of new or unique PM covers and associated instructions regularly involves adaptation and modification of established guidance to address specific concerns relating to particular pieces of equipment. The appellant's PM work does not involve or require significant deviation from established standardized guidance, nor does it require the development of new or substantially modified engineering designs or concepts for submarine equipment or operating systems. The appellant's most complex trouble desk and project work requires the application of comparable knowledge and skill. Therefore, we find that the appellant's assignments meet, but do not exceed, the GS-11 grade level.

Level of responsibility

This factor considers the nature and purpose of person-to-person work relationships and supervision received in terms of intensity of review of work as well as guidance received during the course of the work cycle.

At the GS-11 grade level, the highest level described in the PCS, technicians have considerable freedom in planning work and carrying out assignments. The supervisor makes assignments in terms of the major objectives and provides 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 plans, designs, recommendations, reports, or correspondence is reviewed for general adequacy, conformity to purpose of the assignment, and sound engineering judgment. By comparison, technicians at lower grade levels receive advice and guidance on the application of nonstandard methods and techniques or in the solution of complex problems requiring significant deviations from established practice.

GS-11 technicians customarily make contacts in the course of their work with the same groups of individuals (e.g., using agencies, contractors, and architect-engineer firms) as do technicians at lower grade levels, and the purpose of the contacts is similar. Because of the increased scope of GS-11 grade level assignments, these contacts tend to become more extensive than at lower levels. 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.

Similar to the GS-11 grade level, the appellant works under general supervision. He has considerable freedom in planning and carrying his PM assignments and those provided on a project basis or performed as a member of a trouble desk. The supervisor reviews the appellant's PM work from an overall perspective concerning the accomplishment of assigned objectives and personally becomes involved with specific issues only on an exception basis when significant problems involving PM covers occur. Although the supervisor closely monitors such cases, and is available to provide assistance, the appellant is typically still responsible to work through the issues in consultation with senior specialists to ensure proper resolution of the problem. The supervisor would typically do a follow-up on-site ship check after the resolution of such a particularly high profile or complex situation. As at the GS-11 grade level, the appellant's completed work is reviewed in terms of adequacy and accuracy of PM procedures, compliance with policy and regulations, soundness of engineering decisions, and adherence with technical requirements/specifications. The results of his work efforts are normally considered technically correct and not significantly changed or modified by the supervisor.

The appellant's contacts are also similar to the GS-11 grade level. As at that level, his contacts are for the purpose of coordinating his work with that of others and resolving difficult, complex or unusual PM engineering and administrative problems. The appellant is considered the focal point for PM issues at the shipyard, particularly on protective equipment covers. The record shows that there are designated senior systems engineers for all major components and groupings of equipment on a submarine during overhaul and/or repair activities at the shipyard, and that they exercise primary responsibility for resolving any problems or issues relating to the equipment or operating systems themselves. The appellant is responsible for protective equipment covers and associated PM guidance which involves coordinating with and consulting the senior engineers and others responsible for maintaining or repairing ship equipment. This is particularly true when PM issues may impact equipment operations, for example when the type of PM cover designed must protect against environmental factors degrading equipment performance when the equipment is not in use for long periods of time. His regular contacts are with ship's crew personnel at all levels, personnel from other shipyard departments including metal and sail shop personnel, equipment manufacturers, suppliers and vendors, maintenance and repair personnel, senior engineering specialists, personnel at other naval shipyards, and occasionally with Submarine Maintenance Engineering Planning and Procurement Activity or planning yard engineering personnel. His contacts are usually made without coordination through his supervisor, although the supervisor is advised of high profile or potentially controversial issues. Therefore, we find that the appellant's Level of responsibility meets, but does not exceed, the GS-11 grade level.

Summary

By the application of the evaluation criteria in the standards for the Engineering Technician Series, GS-802, the appellant's position meets the GS-11 grade level. The position is properly evaluated at the GS-11 grade level.

Decision

The appellant's position is properly classified as Electrical Engineering Technician, GS-802-11.