

Position Classification Standard for Consumer Safety Series, GS-0696

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SERIES DEFINITION

This series includes professional positions concerned with enforcing the laws and regulations protecting consumers from foods, drugs, cosmetics, fabrics, toys, and household products and equipment that are impure, unwholesome, ineffective, improperly or deceptively labeled or packaged, or in some other way dangerous, or defective. These positions require knowledge of various scientific fields such as chemistry, biology, pharmacology, and food technology. Consumer safety officers identify substances and sources of adulteration, and contamination, and evaluate manufacturing practices, production processes, quality control systems, laboratory analyses, and clinical investigation programs.

The Consumer Safety Series, GS-0696, replaces the Food and Drug Officer Series, GS-0695, and the Food and Drug Inspection Series, GS-0696.

This standard for the Consumer Safety Series, GS-696, supersedes the standard for the Food and Drug Inspection Series, GS-0696, published in February 1964.

OCCUPATIONAL INFORMATION

Consumer safety officers are concerned with enforcing and obtaining voluntary compliance with laws and regulations protecting consumers from products that are impure, harmful, unwholesome, ineffective, improperly labeled, or in some other way dangerous, defective or deceptive. The products that come under their jurisdiction are numerous and varied. They include foods, drugs, therapeutic devices, cosmetics, toys and equipment used by children, flammable fabrics, and hazardous substances (a broad category that includes such things as household cleaning products, pottery foodware, and household appliances).

Regulations and programs relating to these products primarily concern:

1. Ingredients in food and drug products. -- Standards of identity are set for many common food products and tolerances are set for the use of certain chemical substances, food additives, preservatives, color additives, and artificial ingredients. Packaging and other materials coming in direct contact with foods and drugs are monitored for possible reactions with and adulteration of products.
2. Sanitation and contamination of products. -- This includes microorganisms; insect infestation; contamination by rodent, bird, insect, or other animal excreta; foreign materials; decay; and deterioration that render products unfit for human consumption.
3. Labeling and packaging. -- Labels must include specific information on the ingredients, weights, and directions for use. Packaging must be appropriate for the nature and quantity of the contents.

4. Safety. -- Products must meet certain standards for safety under normal or prescribed use. Labels must warn consumers about possible hazards.
5. Effectiveness of drug products. -- Firms that produce drugs and therapeutic devices must have sufficient scientific evidence to prove that their products are effective for the purpose intended.
6. Good manufacturing practices. -- This primarily relates to manufacturing processes, equipment, facilities, quality control systems, and work performance standards that are conducive to producing commodities that meet prescribed standards of identity, purity, quality, and strength.

The primary means of obtaining information about the products is by periodically inspecting establishments that manufacture, process, store, distribute, or sell them. If violations or poor manufacturing practices are encountered, depending on the seriousness of the problem and cooperativeness of the establishment management, a variety of actions may be taken, such as verbal requests for correction, warning letters, recalls, seizures, injunctions, or criminal prosecutions. In addition, consumer safety officers receive information about products that are violative or hazardous from consumers, manufacturers, distributors, retail outlets, physicians, hospitals, and advertisements in medical journals and other media.

Consumer safety officers come from a variety of academic backgrounds, generally with substantial course work in the biological or physical sciences. They may, but do not necessarily, work with commodities closely related to their academic backgrounds -- such as food technology majors with foods, pharmacy majors with drugs. However, employees generally develop a basic ability throughout the full range of commodities before they begin to specialize in a particular area.

Employees use their scientific backgrounds, supplemented by additional scientific training on the job:

- to identify foods, drugs, cosmetics, and related substances from their chemical makeup and physical properties;
- to evaluate the safety of ingredients and additives for human consumption;
- to evaluate conditions in food and drug production operations affecting the growth of microorganisms;
- to evaluate chemical formulations and processes, laboratory analytical methods, and scientific research or investigational programs; and
- to relate the scientific evaluations of laboratory analysts (e.g., chemists, microbiologists, and food technologists) and medical officers to the provisions of the laws, regulations, and programs of the agency.

Consumer safety officers engage in the types of functions discussed below:

Inspection and Investigation

Some employees primarily inspect establishments that manufacture, process, store, distribute, or sell regulated products. These inspections may be required by law; they may be part of an enforcement program; or they may be in response to specific complaints, suspected violations, or need for information regarding a broad industry or commodity-wide problem.

Employees performing inspection work evaluate raw materials, manufacturing methods and processes, laboratory analyses, packaging and distribution methods, labeling, storage conditions, and quality control techniques in terms of their effects on safety, purity, and effectiveness of the products and the accuracy and adequacy of labels, instructions, and warning statements. In conducting investigations of consumer illnesses, injuries, or deaths, employees are concerned primarily with collecting evidence necessary to determine whether the illness, injury, or death may be attributed to violations of laws enforced by the agency. They may present in court evidence obtained during an inspection or investigation.

Compliance

Employees performing compliance work are primarily concerned with evaluating inspection, investigation, and laboratory analytical reports of violations to determine the appropriate legal or corrective actions. They hold hearings to give alleged violators an opportunity to be heard in an informal atmosphere. They prepare documentation, witnesses, and supporting evidence for legal action. Where actions are contested, they work closely with the Office of the General Counsel and U.S. Attorneys in supporting the Federal Government's position.

They try to persuade industry officials to comply with the laws and regulations voluntarily whenever possible. They apply a substantial knowledge of the laws, regulations, policies, and priorities of the agency to evaluate violations and to advise industry, consumers, and personnel within the agency on matters of interpretation and intent.

Other Functions

The following are illustrative of the numerous other functions in which employees may engage. They:

- coordinate programs with State and local governments, and advise them on programs that are primarily State and local responsibilities.
- develop, coordinate, and participate in programs intended to improve voluntary compliance, such as industry education seminars and workshops.
- evaluate the impact of court decisions and scientific reports on agency programs and policies.

They advise management on, the need for new or modified regulations and legislation.

- coordinate and advise on requests to market or test new drugs, making certain that application forms include adequate information for evaluation by scientific and medical personnel and that their recommendations are consistent with the laws, regulations and policies of the agency.
- in conjunction with laboratory analysts, develop standards for foods and tolerances for food and color additives.
- develop regulations, enforcement programs, guidelines, and policies.

EXCLUSIONS

The following types of positions are excluded from this series:

1. Positions engaged primarily in inspecting meat, poultry, fish, and related products in order to determine compliance with standards of wholesomeness and purity are included in the [Food Inspection Series, GS-1863](#).
2. Positions engaged in inspectional and investigative work enforcing the food, drug, cosmetic, hazardous substance, product safety, and related laws and regulation, where the primary requirements are practical knowledge of pertinent programs, regulations, commodities, and manufacturing, processing, storage, and distribution methods, rather than professional scientific training, are included in the [Consumer Safety Inspection Series, GS-1862](#).
3. Positions for which the primary requirement is professional training in a specific discipline (e.g., chemistry, engineering, veterinary medicine) are included in the appropriate professional series.
4. Positions engaged in enforcing the food, drug, cosmetic, and related laws and regulations that require professional legal training are included in the [General Attorney Series, GS-0905](#).
5. Positions that are primarily concerned with eliminating or controlling physical conditions, operating practices, and other factors that may result in injury to persons or damage to property, as part of occupational safety programs, regulations, and standards, are included in the [Safety and Occupational Health Management Series, GS-0018](#), or [Safety Engineering Series, GS-0803](#).

TITLES

- *Consumer Safety Officer* is the authorized title for nonsupervisory positions.
- *Supervisory Consumer Safety Officer* is the authorized title for positions requiring supervisory qualifications.

CLASSIFICATION CRITERIA

Two broad criteria provide the basis for classifying consumer safety officer positions: Nature of assignment and Level of responsibility. Qualification requirements are not described separately, but have been reflected as appropriate under the two broad criteria. None of the elements

discussed below should be considered alone as grade determining. In combination, however, they give a picture of the overall difficulty and responsibility of assignments.

Nature of assignment

This factor deals with (1) the complexity of assignments; (2) the purpose and urgency of inspections and investigations; and (3) the attitude of the establishment management and their history of violations. These elements are important in determining the level of knowledge, skill, and ability required to complete assignments.

- (1) The complexity of assignments is a significant factor at each grade level. Warehouses, distributors, and retail outlets are ordinarily among the simplest to inspect. Production establishments are more difficult, requiring a more in-depth knowledge of commodities and additional knowledge of manufacturing and processing techniques. The complexity of assignments depends on:
 - the inherent complexity of products -- their ingredients and chemical and physical characteristics, their stability and susceptibility to contamination, and the importance of purity and uniformity;
 - the volume and diversity of products--the variety of ingredients and the variety and sophistication of equipment and processes; and
 - the sophistication and complexity of quality assurance systems -- laboratory analyses of raw materials and products, laboratory and clinical testing, scheduling of operations, cleaning and maintaining equipment and facilities, cross-checking steps in process, and handling and storing of ingredients, products, labels, containers, etc:
- (2) The purpose and urgency of assignments range from routinely scheduled inspections to special investigations; from limited inspection for specific information about a phase of an operation to complete inspections of total operations; and from poor manufacturing practices or technical violations that present no immediate hazards to serious health hazards that must be identified and removed immediately.
- (3) The attitude of the establishment management and their history of violations are bases for judging the likelihood of encountering violations, whether they might be serious or intentional violations, and the probable difficulty of obtaining accurate and adequate information.

Level of responsibility

This factor deals with (1) the degree of supervision received; (2) the adequacy and specificity of instructions and guidelines; and (3) the nature and significance of personal contacts, recommendations, and decisions.

Lower grade employees receive close supervision, with detailed instruction, guidance on planning and organizing their assignments, and specific, well-established guidelines and reference materials. Assignments are primarily for fact finding with little responsibility for

evaluation and drawing conclusions. As employees advance, they are given more leeway in planning their assignments. Guidelines and instructions are frequently broad requiring selection from among alternatives and considerable adaptation. Reports require more evaluation in that they summarize total situations, giving details of the significant points only.

Higher grade employees work with problem areas and new programs. They develop their own approaches to new or unique situations. Guidelines may be totally inadequate for dealing with the problems encountered. Reports are frequently in terms of recommendations based on substantial analysis and evaluation of situations.

Employees characteristically come in contact with establishment managers, consumers, counterpart State and local officials, marshals, attorneys, and court officials. At any level, employees may present testimony in court. The purpose and fact of contacts and testimonies are significant in distinguishing between grade levels. At lower grades, contacts generally relate to routine inspectional activities and the exchange or acquisition of factual information. At higher grades, they relate to such things as planning and coordinating programs and activities, presenting or explaining the agency position in terms of policies and priorities, gaining cooperation of industry, State, and local officials, and preparing testimony on major issues.

NOTES ON GRADE-LEVEL CRITERIA

This standard provides grade-level criteria for non-supervisory positions in grades GS-5 through GS-13.

Nonsupervisory positions above those levels described in the grade-level criteria are too few in number and too individualized to develop specific grade-level guidance. However, positions that have duties and responsibilities that clearly exceed the grade levels described in this standard should be classified to the appropriate higher grade by extending the criteria of this standard and applying sound classification principles.

Consumer safety officers may engage in a number of other functions not specifically covered in the grade-level criteria of this standard. Such positions should be classified by comparison with the criteria of this standard and application of sound classification judgment.

Positions that require supervisory qualifications should be evaluated by reference to the [General Schedule Supervisory Guide](#).

CONSUMER SAFETY OFFICER, GS-0696-05

Nature of assignment

Consumer Safety Officers GS-5 receive training in regulatory requirements for commodities, pertinent manufacturing practices, and inspectional and investigative techniques to supplement their professional scientific education. They learn the agency's programs and policies, and

pertinent laws and regulations. They attend formal training sessions, study manuals and guidelines, and accompany experienced employees on inspections and investigations.

As they gain experience, GS-05 employees begin to participate in assignments, collecting background information on establishments, taking notes on conditions they observe during inspections, and preparing segments of the final report. After observing or participating in a particular type of inspection or investigation, GS-05 employees may then take the lead in the same type assignments. At this stage, supervisors or experienced employees accompany GS-05 employees primarily for guidance and evaluation.

GS-5 consumer safety officers may independently perform many duties that are, typically performed by inspectors without scientific training, such as collecting samples, checking effectiveness of recalls, and following up routine consumer complaints. Generally such duties when performed by professional employees are considered part of their preparation for higher level professional work.

Level of responsibility

GS-05 consumer safety officers receive close supervision. They perform most assignments in the company of experienced employees or with specific instructions at the start of assignments, allowing little opportunity for decision making. Reports are detailed and are closely reviewed for accuracy, completeness, and adherence to policies, procedures, and material covered in training sessions.

Contacts at GS-05 are primarily with other consumer safety officers, inspectors, and laboratory personnel. Contacts outside of the agency are limited to individual consumers and managers of retail stores, warehouses, or plants to obtain samples and factual information.

CONSUMER SAFETY OFFICER, GS-0696-07

Nature of assignment

Consumer Safety Officers GS-07 may receive formal training; however, primary emphasis is placed upon gaining experience in conducting inspections and investigations. They receive progressively more varied and complex assignments to broaden their exposure to a wide range of commodities and manufacturing processes. Generally they are accompanied by supervisors or experienced employees on their initial exposure to a commodity or manufacturing process. As assignments recur, they independently plan and conduct inspections and investigations, and prepare reports.

GS-07 consumer safety officers independently inspect warehouses, distributors, and retail outlets. They also inspect small manufacturers where equipment is simple and commonly used, as in a bakery or candy factory. The emphasis of inspections is on sanitation, labeling and packaging where applicable laws and regulations are well-defined by precedents and inspection

manuals. Assignments are screened to avoid establishments with past violative records, where uncooperative managers or violations are likely.

Some assignments may be similar to those performed by inspectors without scientific training. However, they are primarily for development. They give GS-07 employees experience in conducting complete inspections independently, including planning inspections, dealing with establishment managers, reviewing receipt and distribution records, and preparing reports.

In addition, GS-07 employees are frequently responsible for inspecting limited phases of more complex manufacturing operations. Typical assignments include:

1. Investigating the operation and control system for packaging and labeling processes, to ensure that contaminations and mixups are avoided.
2. Inspecting laboratory facilities of small plants to determine whether appropriate assays are performed on raw materials and ingredients.
3. Reviewing records of cooking times and temperatures and bacterial counts of cooked products in food canneries.
4. Inspecting the use of food or color additives to ensure that they are within authorized tolerances.

Level of responsibility

For assignments involving new or unfamiliar commodities or processes, GS-07 employees receive detailed instructions similar to GS-05 employees. As assignments recur, however, they receive instructions in terms of objectives, and reference materials to be used. They select appropriate guidelines which give specific, clear-cut directions. Experienced employees are available for guidance in planning assignments. GS-07 employees prepare detailed reports that are closely reviewed for accuracy, completeness, and conformance with policy. Supervisors frequently accompany them on assignments.

Contacts are primarily with establishment managers and employees to obtain specified information on the establishment's activities and to discuss the outcome of inspections. By comparison, at GS-05 contacts are primarily to obtain samples or factual data.

CONSUMER SAFETY OFFICER, GS-0696-09

Nature of assignment

Consumer Safety Officers GS-09 apply a sound working knowledge of a variety of commodities, manufacturing practices, and inspectional and investigative techniques to independently plan and carry out routine inspections and investigations. They are required to utilize a good knowledge of raw materials, manufacturing practices, quality control techniques, and agency regulations and programs to carry out their assignments. They inspect manufacturing establishments that use standard, though varied and somewhat complex, equipment and processes. Examples of the types of establishments they independently inspect include:

- small manufacturers of noncomplex prescription drugs in the simplest dosage forms,
- drug firms that primarily repack and distribute, but produce a few, nonprescription drugs such as tablets, capsules, and liquids, and
- manufacturers of food products such as breakfast cereals, dessert mixes, cookies, lentils, etc.

By comparison, GS-07 employees inspect less varied establishments with one or a few products and processes and are concerned primarily with sanitation, labeling, and similar issues.

GS-9 consumer safety officers also participate in large, intensive inspections and investigations of major firms as junior members of a team and are responsible for limited phases of total projects. Examples of phases that might be assigned to GS-09 team members include:

- Reviewing control system for receiving department of a major drug firm.
- Reviewing data and records on ingredients, or raw materials to ensure that total amounts received are accounted for in the manufacturing processes and in the total volume of products manufactured.
- Reviewing the handling and treatment after cooking of products susceptible to bacteriological contamination, and collecting samples at critical points.

GS-09 consumer safety officers are assigned to investigations that may result in legal actions. Generally violations that they independently investigate deal with clear-cut or economic issues such as:

- contamination by insects, rodents, foreign objects, etc.,
- inaccurate or inadequate labeling, listing of ingredients, weights, fill of container, warning statements, etc.,
- injuries resulting from the use of household products or flammable fabrics,
- dangerous toys or sports equipment, and industrial chemicals.

They collect essential information, documentation, samples, photographs, etc., of violative conditions and prepare reports. By comparison, GS-07 employees rarely operate independently on assignments likely to result in legal actions.

Level of responsibility

Supervisory guidance varies depending upon the familiarity and experience of GS-09 employees in the area of assignment. They receive little or no instruction on assignments involving familiar firms, processes, and commodities. Where these factors are new, GS-09 employees receive closer guidance and are frequently accompanied by experienced employees on their initial assignments in the area. In any case, GS-09 employees are expected to recognize and report unanticipated or unusual problems. More experienced employees are available for guidance.

GS-09 consumer safety officers usually prepare detailed reports. Reports of routine assignments where minor problems were resolved in the closeout are reviewed primarily for overall adequacy. Where violations or unresolved problems are involved or assignments are new, reports are closely reviewed for accuracy and completeness, Supervisors must have sufficient information to make recommendations where legal actions are warranted. By comparison,

GS-07 employees receive instructions with each inspectional assignment and all their reports are closely reviewed for accuracy and completeness.

For most assignments, precedents are directly applicable and programs and procedures require only minor adaptation to fit the case at hand.

Contacts are primarily with establishment managers to obtain information on the firm's activities, to discuss the outcome of inspections, and to obtain voluntary correction of minor violations. By comparison, GS-07 employees inspect establishments with a history of compliance.

CONSUMER SAFETY OFFICER, GS-0696-11

Nature of assignment

Consumer Safety Officers GS-11 exercise sound judgment and professional competence to plan and carry out inspections and investigations encompassing the full range of commodities and manufacturing processes in their districts. Assignments are frequently complicated by a variety of diverse products, ingredients, and additives, highly specialized and sophisticated processes and equipment, products that are unstable or susceptible to microbiological contamination, complex quality control systems, or uncooperative establishment managements. Examples of the types of establishments inspected include:

- firms that utilize complex manufacturing equipment and techniques to process canned, dried, and frozen vegetable or fruit products, or soups;
- producers of convenience foods -- frozen dinners, baked goods, etc.;
- drug firms that manufacture prescription drugs in several dosage forms, including injectable.

By comparison, GS-09 employees independently inspect a more limited range of commodities and processes, or they participate in limited phases of inspections or investigations under the leadership of higher level employees.

GS-11 employees investigate a wide range of violations, including serious injuries and illnesses. They utilize a thorough knowledge of agency laws, regulations, policies, and precedents to collect necessary documentation and evidence of violative conditions. They decide whether to collect costly and time-consuming evidence and determine whether they have sufficient documentation. They recognize serious public health hazards where timeliness and departure from the usual procedures are essential. By comparison, GS-09 employees primarily investigate technical and economic violations. GS-11 employees plan and participate in joint inspections with State and local public health or food and drug inspectors. They participate in training these inspectors in the methods and techniques of inspection and investigation. They may evaluate State and local inspection programs, such as shellfish, milk sanitation, or catering establishment.

Level of responsibility

Consumer Safety Officers GS-11 operate with a high degree of independence on all but the most difficult cases. Normally they receive assignments with little instruction other than the purpose and priority of the assignment and are expected to work without assistance. Where they encounter unusual technical problems, they typically consult higher level officers or laboratory analysts (chemists or microbiologists). By comparison, GS-09 employees receive instructions and closer guidance at the outset of assignments dealing with firms, commodities, or manufacturing processes that are new to them.

GS-11 consumer safety officers independently decide whether products and conditions in establishments are in compliance. They decide whether to accept the establishment managers' plans for correcting minor problems. In inspection reports, they summarize nonviolative conditions and voluntary corrective actions without preparing detailed reports. Violative conditions require more documentation and supporting evidence which the supervisors review before recommending legal actions. By comparison, GS-09 employees prepare detailed reports of each assignment.

For most assignments, programs and procedures require substantial interpretation, but can be adapted to the case at hand.

Contacts are with establishment managers and industry officials who are sometimes hostile or uncooperative, and require considerable tact and firmness to obtain needed information regarding the firms' activities and to get the firm to voluntarily correct violations.

CONSUMER SAFETY OFFICER, GS-0696-12*Nature of assignment*

Two types of GS-12 inspectional and investigative assignments are described below:

(1) Some Consumer Safety Officers GS-12 utilize an indepth knowledge of an industry or class of commodities, including an excellent knowledge of raw materials, products, manufacturing practices, and related problems of the industry. They are required to keep abreast of the latest technological changes, and conditions of firms in their districts, and related firms and activities in other districts. Assignments frequently involve new problems that are lacking in well-defined guidelines and precedents. They plan, coordinate, and conduct inspections and investigations with numerous complications, where timeliness, skill, and tact are critical. Assignments are typically characterized by:

- the latest and most sophisticated technology in a specialized area (e.g., food processing, drug manufacturing, product safety);
- products highly susceptible to variations or contamination that cannot be tolerated in the final product (e.g., parenterals, antibiotics, insulin, digitalis, other lifesaving drugs);

- clinical research and testing programs (generally associated with new or investigational drugs) requiring a thorough knowledge of scientific investigational and analytical methods;
- outbreaks of illness resulting from products regulated by the agency. For example, investigates outbreaks of food poisoning. Identifies contaminated product. Investigates all possible avenues of contamination (e.g., methods, equipment, and facilities used in preparation, storage, and shipment, general sanitation, industrial chemicals or possible adulterants used nearby, and individuals who handled the product).

By comparison, GS-11 employees primarily apply knowledge of the conventional methods and techniques of the industry, rather than the indepth knowledge of new technology and skill in solving unusual problems that GS-12 employees utilize.

GS-12 employees plan and serve as team leaders of intensive inspections and investigations of major manufacturers. They coordinate the work of the team which may include other consumer safety officers, inspectors, and scientific personnel (typically chemists or microbiologists) and insure that the final report and recommendations represent a unified view. GS-12 employees coordinate their districts' participation in nationwide investigations of major crises affecting the health and safety of the general population and involving major industries.

(2) Other GS-12 employees are the sole or senior consumer safety officers located at a resident post. They conduct the full range of typical assignments, described at GS-11, within the geographic area covered by the post and they:

- Maintain liaison, plan, and coordinate activities with State and local public health officials, representatives of other Federal agencies, marshals, U.S. Attorneys, and court officials.
- Evaluate the urgency and seriousness of reports of consumer injuries and deaths, complaints of violative products. Respond to queries from industry and consumers requiring scientific and technical advice. Use judgment and a good knowledge of agency policies and priorities to set priorities for handling many unscheduled matters that come directly to their offices.
- As agency representatives, inform the general public about agency programs, violative products, legal actions, etc.

Level of responsibility

GS-12 consumer safety officers plan and conduct inspectional and investigative assignments after receiving instructions regarding objectives and priorities. Since many GS-12 inspectional assignments deal with new or unusual commodities and manufacturing practices, inspectional programs and guidelines in the assigned area are frequently outdated, too broad, or in some other way inadequate. The lack of adequate guidelines requires GS-12 employees to develop new inspectional approaches and methodologies appropriate to the assignment at hand. By comparison, GS-11 employees adapt existing precedents and programs to the requirements of their assignments.

GS-12 employees resolve independently most inspectional or investigative problems they encounter. They refer to their supervisors, however, extremely critical or controversial policy matters or cases requiring expeditious handling. They also consult with laboratory analysts on problems regarding new or unusual formulations, laboratory analytical methods, or microbiological contamination.

Letters, reports, and recommendations that GS-12 employees prepare are generally assumed to be technically accurate. Supervisors review their completed work for adequacy of supporting data, soundness of judgment, and conformance with policy. Supervisors generally accept the recommendations of GS-12 employees regarding new inspectional approaches and methodologies, the extent and seriousness of violations, and the acceptability of voluntary corrective actions. In contrast to GS-11 employees who work within the framework of conventional methods and techniques and refer unusual problems to higher level officers for resolution, GS-12 employees develop unique and imaginative solutions which they present in the form of recommendations.

GS-12 consumer safety officers are frequently responsible for initiating and maintaining effective relations with State and local public health officials, representatives of other Federal agencies, industry officials, and consumer interest groups to explain and interpret established agency policies and priorities and to evaluate new manufacturing or inspection plans.

CONSUMER SAFETY OFFICER, GS-0696-13

Nature of assignment

Consumer Safety Officers GS-13 performing compliance work apply an extensive knowledge of the pertinent laws and regulations, precedent cases, procedures for taking legal actions, and the nature and extent of the evidence required to support legal actions. In addition, they utilize a thorough understanding of agency policies and priorities, and the provisions and intent of new programs and regulations that are not yet well-defined to make judgmental decisions regarding legal actions and give advisory opinions. By comparison, GS-12 employees perform compliance work in a developmental capacity and give advisory opinions on well-established programs and regulations.

GS-13 consumer safety officers in the district offices are the primary source of expertise within the geographic area covered by the district on the interpretations of the laws, regulations, and programs. They advise the managers, inspectors, and laboratory analysts on a wide range of regulatory questions. They review reports of inspections, investigations, and laboratory analyses for violations, determine the sufficiency of the evidence (requesting further investigation where necessary) and recommend appropriate legal actions. They independently act upon the full range of violations occurring within the district, including those that involve emergency situations, uncooperative industry officials, ambiguous or dubious evidence, and lack of precedents and guidelines. By comparison, GS-12 employees primarily deal with routine compliance issues and problems for which precedents and guidelines have been established.

In recommending legal actions, GS-13 employees consider the seriousness of violations, the hazards involved, the violator's history, precedent court decisions, and consumer interest, in addition to the legal and regulatory requirements.

The following are illustrations of typical GS-13 level assignments:

- preparing support for legal contests, the outcome of which will have a significant impact on major firms regulated by the agency;
- advising industry and agency management on the interpretation, intent, or impact of new programs, legislation, court decisions, and scientific findings; and
- developing legal cases that are complicated by (1) varied, inconsistent, or insufficient evidence and information; (2) extreme public interest; (3) financial powerful industries; or (4) new or previously unknown hazards.

Level of responsibility

GS-13 consumer safety officers in the district offices carry out their compliance assignments with a substantial degree of independence. They receive guidance regarding agency-wide policies, priorities, and positions on new or controversial issues. They consult project managers, scientists, and attorneys at the headquarters level on extremely complex or controversial legal or technical problems. By comparison, GS-12 consumer safety officers receive guidance on non-routine compliance problems or issues.

For many of the issues and questions that are directed to GS-13 employees, precedents and guidelines are inadequate. They rely upon their scientific backgrounds and understanding of broad legislation, policy statements, and program definitions to formulate recommendations and decisions. They recognize and convey to the agency headquarters serious problems and issues where policy decisions are needed.

Decisions and recommendations of GS-13 employees typically receive an administrative review within the district office. At the agency headquarters, decisions and recommendations of the district employees may be more closely reviewed for policy implications, impact on agency-wide activities, and priority for expenditure of resources.

GS-13 consumer safety officers have frequent contacts with U.S. Attorneys and court officials regarding legal actions. They hold hearings with industry officials. They also have contacts with recognized scientific and industry experts regarding precedent-setting legal actions or issues affecting major industry practices.