



United States  
**Office of  
Personnel Management**

Philadelphia Oversight Division  
William J. Green, Jr. Federal Building  
600 Arch Street  
Philadelphia, Pennsylvania 19106-1596

In Reply Refer To:

Your Reference:

**OPM Decision Number:** C-1670-13-01, 11/21/97

**PH:OD:96-20**

**PERSONAL**

[appellant's name]

U.S. Department of the Army

U.S. Army [engineering test center]

[directorate name]

[branch name]

[activity location]

Dear [appellant's name]:

This is our decision on the position classification appeal that you filed with our office and that we accepted under the authority contained in section 5112(b) of title 5, United States Code (U.S.C.).

This appellate decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government. It is the final administrative decision on the classification of your position, and is not subject to further appeal. It is subject to review only under the limited conditions and time limits specified in title 5 of the Code of Federal Regulations (CFR) 511.605 and 511.613 and the Introduction to the Position Classification Standards, Appendix 4. It must be implemented according to the provisions contained in 5 CFR 511.612.

Position Information:

Appellant: [appellant's name]

Current Classification: Supervisory Materiel Test Specialist, GS-301-13

Position Description No.: 97131

Requested Classification: Supervisory Material Test Specialist, GS-301-14

OPM Decision: Supervisory Equipment Specialist,  
(Parenthetical Optional), GS-1670-13

Organizational Information: U.S. Department of the Army  
[director name]  
[division name]  
[branch name]  
[activity location]

### Analysis and Decision

In considering your appeal, we carefully reviewed all of the information submitted by you or on your behalf; information obtained during telephone audits with you and your supervisor, [supervisor's name and organizational location], on September 23, 24 and 25, 1997, a telephone interview with [supervisor's name] on September 26, 1997, and telephone interviews with [second level supervisor's name and organizational location], on October 9 and 23, 1997; and, other pertinent position classification information provided by you, [first and second level supervisor's names], and your employing activity at our request.

It is our decision that your position is properly classified as Supervisory Equipment Specialist (Parenthetical Optional), GS-1670-13. Accordingly, your appeal is denied.

The basis of your appeal is that your position be upgraded because your agency had not applied the General Schedule Supervisory Guide (GSSG) correctly to your work. Your GSSG rationale addressed all six GSSG factors, and claimed proper application of the GSSG should result in the crediting of Factor Levels 1-3, 2-1, 3-3, 4A-2, 4B-2, 5-8, and 6-6. You disputed the crediting by your activity of Levels 3-2, 5-7, and 6-5 to your position.

Your initial appeal letter of June 11, 1996, and subsequent correspondence and telephone contacts with this office, stressed your belief that your position warranted upgrading for two primary reasons: (1) you exercise the supervisory and managerial functions found at Level 3-3; and, (2) the GS-13 grade level nonsupervisory work in your Test Operations function supported evaluation of your position at Levels 5-7 and 6-6. This rationale applies to both the position you officially occupied when you initially filed this appeal and your current position of record to which you were reassigned effective July 6, 1997.

The official reassignment to your current position occurred as part of an organizational realignment in which the former RAM [division name] was eliminated as a separate division in the [director name] and placed as a branch in the [division name]. Because you stated that you continue to perform the grade controlling functions of your previous position in your new position of record, we continued your appeal.

Integral to your appeal rationale are the results of an internal study by the former Directorate of Human Resources (DHR) (now Division of Human Resources) issued March 7, 1996. The study concluded your position, and the competitive service employees whom you supervise, no longer occupy Equipment Specialist, GS-1670 positions. The DHR found:

Basically, "Equipment Specialists" in [directorate name] perform RAM [reliability, availability, maintainability]/ILS [integrated logistics support] test and evaluation of defense weapons systems and materiel, including their maintenance and support equipment. Specifically the positions provide customers with information relative to the performance of systems. . . . The positions assemble in test teams and employ a specialized expertise in planning, executing, and reporting on RAM, MANPRINT [human factors, safety], and ILS test specifics. . . .

The Equipment Specialist occupational series in [directorate name] includes positions that involve . . . work that requires primarily an intensive, practical knowledge of equipment and its characteristics, properties, and uses in order to (1) collect, analyze, interpret, and provide specialized information about equipment together with related advice to those who design, test, produce, procure, supply, operate, repair, or dispose of equipment; (2) identify and recommend practical solutions to engineering design and manufacturing defects and recommend substitute testing or support equipment when the requested equipment is unavailable; or develop, install, inspect, or revise equipment maintenance programs and techniques. The paramount requirement for such work is technical knowledge of equipment and its inner workings. Although "Equipment Specialist" positions are required to have this knowledge, it is not the primary knowledge required in recruiting for this position. It is our position that the positions are unique in that there are work mixtures that require the incumbents in these positions to interact with other functional areas, i.e., ILS, MANPRINT, Safety, Technical writing, ADACS, and reporting systems and in actuality manage information relative to the performance of systems. Therefore, we feel the work should be excluded from the Equipment Specialist Standard.

The DHR considered the Logistics Management Series, GS-346, but concluded that series also was not appropriate. DHR found:

Since the incumbents in these positions interact with so many other program areas in the accomplishment of their RAM/ILS program responsibilities we kept in mind that the main purpose of the work was to manage, direct, and coordinate information. Also, due to the multiple specialties, DHR-P

concludes that these positions were more properly suited to be grouped and classified by application of the Miscellaneous Administration and Program Series, GS-301. Positions are classified in the GS-301 series when they involve primarily knowledge of types, uses, and costs of engineering and logistics data used in the management of a weapons system or equipment program in order to participate in decisions regarding the identification, selection, acquisition, and control of such data. As the major function is to manage and direct RAM/ILS/MANPRINT functions for [activity name] we concluded that the GS-301 standard is more appropriate in evaluating subject positions.

The subsequent establishing and filling of two subordinate Materiel Test Specialist, GS-301-13 positions in your organization are integral to your appeal rationale as discussed previously.

Your appeal rationale has raised several procedural issues warranting clarification. All positions subject to the Classification Law contained in title 5, U.S.C., must be classified in conformance with published position classification standards (PCS's) of the U.S. Office of Personnel Management (OPM) or, if there are no directly applicable PCS's, consistently with PCS's for related kinds of work. Therefore, other methods or factors of evaluation, such as comparison to or reliance on the classification of other positions, that may or may not be classified correctly, e.g., the reclassification of your position and your subordinate positions to the GS-301 series, are not authorized for use in determining the classification of a position. The classification appeal process is a de novo review that includes a determination as to the duties and responsibilities assigned to your position and performed by you, and may direct corrections to a position description (PD) of record or other appropriate corrective action if, while adjudicating the appeal, OPM determines there is an inaccuracy material to the proper classification of the position. Thus, any previous action taken by your agency, or its failure to take action, are not germane to our de novo review.

Our factfinding revealed that your official PD contains the major duties and responsibilities that you perform and is hereby incorporated by reference into this decision. The PD adequate for classification purposes when supplemented with mission and function statements and other information contained in the appeal record. The record shows you supervise two Materiel Test Specialist, GS-301-13's, four Materiel Test Specialist, GS-301-12's, one Supply Technician, GS-2005-7, and oversee the work of contractor and military employees. Current workload information shows 8 RAM evaluators, 19 RAM Data Collector Collectors, one Noncommissioned Officer-in-Charge (NCOIC), and 39 military data collectors. Contact employees perform work for you full time, while the military perform that work for approximately 75 percent of the time.

Both you and your supervisor stressed the distinction between the GS-12 and GS-13 level work in your unit is Task Leader/Team Leader responsibility. For example, team leaders

manage major testing operations being conducted at multiple test sites, and assisting in the scheduling and other quasi-supervisory functions. Your base level workload analysis credits both GS-301-13 positions as performing GS-13 “Team Leader” duties 100 percent of the time and each of the four GS-301-12 positions performing GS-13 level work 25 percent of the time. Information you provided describes one of the eight RAM evaluators functioning as a GS-13 Task Leader 35 percent of the time, one of the 19 RAM data collectors functioning as a GS-13 Task Leader 85 percent of the time, and the NCOIC functioning as a GS-13 Task Leader 50 percent of the time.

The record shows that your organization performs a part of the overall testing program vested in the [directorate name]. Directorate testing responsibilities are subdivided among the three divisions and their components actively engaged in testing operations, ranging from test planning, analysis, and assessment, through actual field and ground tests. RAM testing is one of those testing components. We will address the grade level aspects of your appeal rationale in the Grade Level Determination section of this decision.

#### Series and Title Determination

Your agency has determined that your position is classified properly to the Miscellaneous Administration and Program Series, GS-301 with which you have not disagreed. We do not concur.

The rationale used by your activity to move your position and your subordinate positions out of the Equipment Specialist Series, GS-1670, described above, is inappropriate for two primary reasons. First, the GS-1670 PCS clearly recognizes that many positions in the occupation are intensely involved in equipment and material test functions. As discussed, beginning on page 6 of the GS-1670 PCS, some equipment specialists participate in design, development, and testing of new or modified equipment in the preproduction stage to achieve such results as mechanical reliability; reduction in technical skills required to maintain equipment; use of standard parts, tools, and test equipment; use of interchangeable parts and components; accessibility of parts and components for adjustment and repair; reduction in frequency of repair; speed in fault isolation; reduction of repair time; and simplicity and safety of operation. These functions typically entail the review of layouts, engineering and production drawings, specifications, and test reports. The GS-1670 PCS recognizes that these testing functions are performed from the preproduction stage through the production, usage, and disposal stages.

The involvement of GS-1670 positions in the testing process, including testing data analysis, is discussed further on page 2 of the GS-1670 PCS in describing the distinction between Engineering Group, GS-800 technician occupations and GS-1670 occupational coverage. Specifically included in the GS-1670 series are positions that apply a knowledge of equipment, such as its purpose, functions, and limitations; how it is designed, manufactured, operated, and

maintained; or its internal workings and materials to advise on or make decisions that related to the equipment's use, performance, safety, operation, maintainability, or disposal. Safety, maintainability, and related equipment and material support ends are the very purpose of the reason for the existence of the [branch name] and the test operations that you oversee. The professional engineering and psychological test planning, development, analysis, and related functions are vested in the Branch RAM Engineer and MANPRINT Groups. In contrast, the logistical support function provided by your subordinates, in addition to test planning, data capture, data reduction, data analysis, and related functions, are based on the application of a practical knowledge of equipment as defined in the GS-1670 PCS.

The functions of the [branch name] and your Test Operations component are not covered by the GS-301 series exclusion on page 1 of the GS-1670 PCS. The data identification, selection, acquisition and control functions in this exclusion pertain to data use for which an intensive practical knowledge of equipment is neither necessary nor required. In contrast, the data collection, reduction, and analysis functions at the core of your test operations mission are to evaluate actual equipment support requirements integral to the GS-1670 series, and require the technical knowledges covered by that series. At higher grade levels in the GS-1670 series, positions are expected to interact with a wide range of other functional areas and occupations, e.g., engineering and scientific disciplines, supply management, logistics management, and technical data management. This especially is true for positions engaged in preproduction equipment support.

Second, the position classification process does not permit exclusion from the proper series because, as stated in the March 27, 1992, [activity name] comments on the then draft GS-1670 PCS:

The series guidance does not meet the needs of management. . . . We do not believe the grading criteria is adequate for grading positions situated in a Research, Development, Test, and Evaluation environment. Without exception, every factor level and the related illustrative examples deal with Equipment Specialist positions at a maintenance depot or a major agency supply point. . . .

Much of our difficulty centers around the limited number of factor levels presented in the standard and the use of such terms as "agency" or "world wide."

In addition, the standard contains no grading criteria which would result in a grade level of GS-13 when properly applied.

By law, positions must be placed in the proper occupational series whether or not the grade level criteria in the published PCS produces the grade level desired by the activity.

Based on the appeal record, we find that your position is allocated properly as Supervisory Equipment Specialist, GS-1670. Your activity may assign a parenthetical title according to the guidance contained in the GS-1670 PCS.

#### Grade Level Determination

Since your position involves the accomplishment of the work of the organization through the direction of other people, it is properly graded by application of the GSSG. The GSSG is used to grade supervisory work and related managerial responsibilities that require accomplishment of work through the combined technical and administrative direction of others; constitute a major duty occupying at least 25 percent of the position's time; and meet at least the lowest level of Factor 3 in the GSSG based on supervising Federal civilian employees, Federal military or uniformed service employees, volunteers, or other noncontractor personnel. Work performed by contractors is considered in applying the grading criteria within each factor provided the position first meets the coverage requirements described above based on supervision of noncontractor personnel.

GSSG instructions stipulate that supervisory duties are to be evaluated by comparing them with each factor. Points are credited to a position for the highest factor level that is met according to the instructions specific to each factor level. For a position factor to warrant a given point value, it must be **fully** equivalent to the overall intent of the selected factor level description. If the position fails in any significant aspect to meet a particular factor level description in the Guide, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level. If one level of the factor is exceeded, but the next higher level is not met, credit is to be given for the lower level involved. The total points are accumulated under all factors and converted to a grade level based on application of the Point-to-Grade Conversion Table.

Your GSSG rationale addressed all six GSSG factors, and claimed proper application of the GSSG should result in the crediting of Factor Levels 1-3, 2-1, 3-3, 4A-2, 4B-2, 5-7, and 6-6. You disputed the crediting by your activity of Levels 3-2, 5-6, and 6-5 to your position. You did not disagree with your agency's crediting of Levels 1-3, 2-1, and Subfactors 4A-2 and 4B-2. Based on our review of the record, we find that your position is credited properly at Level 2-1, 4A-2, and 5-4, and have so credited your position. Our analysis addresses the remaining factors, and considers fully the shared matrix management responsibilities that you exercise over military personnel who officially report through the military chain of command.

### Factor 1 - Program Scope and Effect

This factor assesses the general complexity, breadth, and impact of the program areas and work directed, including its organizational and geographic coverage. It also assesses the impact of the work both within and outside the immediate organization. In applying this factor, we must consider all program areas, projects, and work assignments the supervisor technically and administratively directs, including those accomplished through subordinate General Schedule employees, Federal Wage System employees, military personnel, contractors, volunteers, and others. To assign a factor level, the criteria dealing with both scope and effect must be met.

#### Scope

This element addresses the general complexity and breadth of the program (or program segment) directed; and the work directed, the products produced, or the services delivered. The geographic and organizational coverage of the program (or program segment) within the agency structure is included under Scope.

Level 1-3 includes providing complex administrative, technical, or professional services having coverage that encompasses a major metropolitan area, State, or a small region of several States; or, when most of the area's taxpayers or businesses are covered, coverage comparable to a small city. Illustrative of such work is providing services directly to the general public by furnishing a significant portion of the agency's line program to a moderate sized population of clients. The size of the serviced population is **the equivalent** of a group of citizens and/or businesses in several rural counties, a small city, or a portion of a larger metropolitan area. Depending on the total population serviced by the agency and the complexity and intensity of the service itself, however, the serviced population may be concentrated in one specific geographic area, or involve a significant portion of a multistate population, or be composed of a comparable group.

The rationale initially presented by your activity is an analysis of a proposed PD to which you were never officially assigned, when the Branch was a separate division. This rationale evaluated your position at Level 1-3 because your position directed a work function responsible for analysis, test planning, and evaluation for the reliability and maintainability evaluation of weapons systems. Your assigned personnel are responsible for planning, conducting, and reporting on the RAM/ILS during the test and evaluation of electronic and missile weapons systems including their maintenance and support equipment. A later rationale, provided as part of your current PD of record, concluded that "the ILS evaluation of defense weapons systems and material in order test which is work properly characterized as technical in nature which supports the Army's missile weapons system." At our request, you provided extensive work examples and other program documentation on the actual mission and functions of the Branch and its test operations.



In assessing Scope, care must be exercised to assure the full workload of an organization is identified and evaluated properly. As discussed previously, the test operations you supervise are a component of the overall [activity name] test and evaluation mission. For example, the [office name] is responsible for “Lead coordination of [activity name]’s involvement in space testing”; the [division name] serves “as the focal point for Army and BMDO [Army Ballistic Missile Defense Organization] missile system test and assessment programs”; and, the [division name] focuses on “planning, execution and assessment of systems, subsystems, and components under test to climatic, shock, vibration, other environments, propulsion tests, and other simulations of real world and space environments.”

The point here is that the [branch name] performs a defined segment of the overall [activity name] test and evaluation mission. Responsibility for testing plan development is shared. RAM testing development is accomplished by the RAM Engineer Group, and human factors, system safety and health hazards in the MANPRINT Group. Testing plans performed for other [activity name] components are developed by those organizations, as is testing expertise in highly technical areas. For example, the [division name] provides expertise for data collection systems. If a project requires a systems performance test, the [branch name] assumes primary responsibility. In addition, the [division name] functions as the primary project manager for [activity name] testing. ILS is the only area of full testing development responsibility tasked to your component. The primary and paramount function that your component performs is the actual test operations. Only the component of the program segment that you supervise may be considered in assigning a level for this factor.

We find the [branch name] program RAM Engineer, MANPRINT, ADP Group and Test Operations functions, when viewed in their totality, meet the intent of Level 1-3. That is, the work is comparable to providing complex technical, administrative, or professional services directly affecting a large or complex multimission military installation. We reach this conclusion based on the customer base impacted external to [activity name], recognizing that [activity name] currently falls short of the large multimission military installation as defined on pages 4 and 5 of the GSSG. In evaluating your position, we find the population serviced consists of Army and other agency customers to whom the Branch provides line testing program support. [activity name] itself consists of approximately 2,137 civilian employees, 400 military employees, and 919 contractors. Even when augmented with approximately 465 tenants, this falls short of the definition of a large activity on page 4 of the GSSG. The combination of [activity name] and its tenants also falls short of the definition of a multimission organization on page 5 of the GSSG.

The GSSG requires that a program segment directed at Level 1-3 must meet the full intent of that level. The illustrations in the GSSG make it clear that engineering and equivalent technical functions at Level 1-3 are of significant breadth and complexity; i.e., directing design, oversight, **and** related services for the construction of complex facilities at multiple sites that

are essential for the field operations of one or more agencies throughout several states. RAM MANPRINT test operations are equivalent to one aspect of that program segment; not the full scope of the engineering, oversight, maintenance, and repair function illustrated in that example and intended at Level 1-3. The GSSG recognizes in the last illustration at Level 1-2 that although a function, in its entirety, may warrant evaluation at one level, a component of that program or program segment will not: "Directs operating program segment activities comparable to those above but found at higher organizational levels in the agency, for example, the section or branch level of a bureau."

Furthermore, the program segment component you supervise provides a limited amount of complex administrative or technical services within the meaning of the GSSG. Information you and your supervisor supplied identified the eight staff years of RAM evaluator work at the GS-12/11 level and the 19 years of RAM data collector work at the GS-11/9 level. The data you provided at our request shows that the 39 military data collectors without any grade level equivalents provided. In a June 19, 1997 memorandum, your activity characterized the 8 RAM evaluators as performing GS-9 through GS-12 work and the 19 RAM data collectors as performing GS-7 through GS-9 work. The memorandum described 26 (not 39) military consisting of 13 private first class/specialist (E-3/E-4), 7 sergeants (E-5), 3 staff sergeants (E-6), and 3 sergeants first class (E-7). Your activity provided Military Occupational Specialties (MOS) information on the military employees, characterizing some E-4/E-5 work at the WG-5 level; some E-4 work at the GS-4/5 level; other E-5 work at the GS-5/6 level; E-6 work at the WG-8 level; and, E-7 work at the WG-10 level. An equivalency was not provided for several MOS's. Based on the MOS descriptive information on the record, we conclude the remaining military weapons system crew members, would not exceed the GS-5/6 operator work. This conclusion is based on comparing the relative complexity of the work assignment, skills and knowledge, and level of responsibility to related work performed in GS occupations. It is established OPM guidance that work below the GS-9 level is not complex work within the meaning of the GSSG. Therefore, because the RAM MANPRINT Test Operations function does not meet Level 1-3 fully, it must be evaluated at Level 1-2.

#### Effect

This element addresses the impact of the work, the products, and/or the programs described under Scope on the mission and programs of the customer(s), the activity, other activities in or out of government, the agency, other agencies, the general public, or others.

At Level 1-3, the activities, functions, or services accomplished directly and significantly impact a wide range of agency activities, the work of other agencies, or the operations of outside interests, e.g., a segment of a regulated industry, or the general public. At the field activity level, involving a large, complex multimission organization or very large serviced populations,

the work directly involves or substantially impacts the provision of essential support operations to numerous, varied, and complex technical, professional, and administrative functions.

The rationale initially presented by your activity is an analysis of a proposed PD to which you were never officially assigned, when the Branch was a separate division, did not address this element directly. A later rationale, provided as part of your current PD of record, concluded that:

Work accomplished affects and substantially impacts the provision of essential support operations to numerous, varied and complex technical and professional functions to include many different test programs involving air defense, land combat, and troop support systems which are essential elements of major Army defense programs.

As discussed previously in this decision, the [branch name] provides test support services, in its entirety, that meet Level 1-3 fully. You supervise a portion of the services directed primarily at a client group within the U.S. Department of the Army and, occasionally, to other Federal agencies. However, as discussed previously, the test operations component of the Branch cannot be construed as providing the full impact and effect of services contemplated at Level 1-3, e.g., the impact of the full range of design, oversight, **and** related services for the construction of complex facilities for general public as discussed previously in this decision. Based on the foregoing, we find you provide administrative and technical services that fall short of Level 1-3 and, therefore, must be evaluated at Level 1-2.

Therefore, because your position meets Level 1-2 for both Scope and Effect, your position is evaluated at Level 1-2 (350 points) for Factor 1.

### Factor 3 - Supervisory and Managerial Authority Exercised

This factor covers the delegated supervisory and managerial authorities that are exercised on a recurring basis. To be credited with a level under this factor, a position must meet the authorities and responsibilities to the extent described for the specific level. Levels under this factor apply equally to the direction of specialized program management organizations, line functions, staff functions, and operating and support activities. Where authority is duplicated or not significantly differentiated among several organizational levels, a factor level may apply to positions at more than one organizational level.

Your activity's analysis of your current PD of record concluded that your position met Level 3-2, but did not address Levels 3-3a or 3-3b. Your rationale references an earlier activity analysis of a proposed PD to which you were never officially assigned, when the Branch was a separate division:

The incumbent has full program responsibility for [directorate name] RAM/ILS functions. Incumbent is responsible for directing the systems analysis, test planning, and evaluation for the reliability, maintainability evaluation of weapons systems and materiel under test. The Test Operations supervisor serves as a technical advisor to the Division chief on matters related to maintenance evaluations, maintenance support packages, publications evaluations, and ILS.

The incumbent carries out all supervisory responsibilities listed in 3-2c and is responsible for exercising significant responsibilities in dealing with officials of higher rank; assuring equity in the assessment of subordinates of the adequacy of contractor and military completed work involving a substantial dollar level of annual resources; making decisions on work problems presented by subordinate teams; making selections for subordinate positions; hearing and resolving group grievances and employee complaints; approving within-grade increases, overtime, and travel; determining whether contractor work meets standards of adequacy for authorization of payment; recommending awards and changes in position classification; and finding and implementing ways to eliminate or reduce significant bottlenecks and barriers to production.

You provided documentation in support of your claim that you continue to exercise the authorities described above by your activity.

To meet Level 3-3 (775 points), a position must meet paragraph a or b below:

- a. Exercise delegated managerial authority to set a series of annual, multi-year, or similar types of long-range work plans and schedules for in-service or contracted work. Assure implementation (by lower and subordinate organizational units or others) of the goals and objectives for the program segment(s) or function(s) they oversee. Determine goals and objectives that need additional emphasis; determine the best approach or solution for resolving budget shortages; and plan for long range staffing needs, including such matters as whether to contract out work. These positions are closely involved with high level program officials (or comparable agency level staff personnel) in the development of overall goals and objectives for assigned staff function(s), program(s), or program segment(s). For example, they direct development of data; provision of expertise and insights; securing of legal opinions; preparation of position papers or legislative proposals; and execution of comparable activities which support development of goals and objectives related to high levels of program management and development or formulation.

Our factfinding revealed that substantial program authority is retained at the Directorate level. The record shows that while you participate in program planning within the Branch, you are not delegated managerial authority to set a series of annual, multi year, or similar types of long-range work plans and schedules. Although you manage revolving fund monies in your organization, budget authority for appropriated funds and major decisions, including signatory authority on program direction, are retained at the Directorate. Based on a February 27, 1997, SF-52 provided by your activity at our request, we find the Directorate retains the authority to establish and fill positions. While the record shows the Branch Chief relies upon your expertise in managing test operations, the record shows the scope of program management responsibilities implicit at Level 3-3a are not vested in first level supervisory operating components at [activity name] based on the authorities retained at the Branch, Division and Directorate levels. Therefore, while you provide important input on the need to fill vacant positions, your position is not delegated authority to determine how to resolve budget shortfalls or plan for staffing needs inherent at Level 3-3a. You do not routinely advise high-level program officials or comparable agency-level (i.e., Army Headquarters) in the development of basic Directorate or major program segment goals and objectives as discussed under Factor 1. Any recommendations that you may have on such matters must flow through the participative input process to the Directorate in which such authority and responsibility are vested. Accordingly, your position does not meet Level 3-3a.

- b. Exercise all or nearly all of the delegated supervisory authorities and responsibilities described at Level 3-2c of this factor and, in addition, at least 8 of the following *responsibilities*.
  1. Using any of the following to direct, coordinate, or oversee work: supervisors, leaders, team chiefs, group coordinators, committee chairs, or comparable personnel; and/or providing similar oversight of contractors;
  2. Exercising significant responsibilities in dealing with officials of other units or organizations, or in advising management officials of higher rank;
  3. Assuring reasonable equity (among units, groups, teams, projects, etc.) of performance standards and rating techniques developed by subordinates or assuring comparable equity in the assessment by subordinates of the adequacy of contractor capabilities or of contractor completed work;
  4. Direction of a program or major program segment with significant resources (e.g., one at a multimillion dollar level of annual resources);

5. Making decisions on work problems presented by subordinate supervisors, team leaders, or similar personnel, or by contractors;
6. Evaluating subordinate supervisors or leaders and serving as the reviewing official on evaluations of nonsupervisory employees rated by subordinate supervisors;
7. Making or approving selections for subordinate nonsupervisory positions;
8. Recommending selections for subordinate supervisory positions and for work leader, group leader, or project director positions responsible for coordinating the work of others, and similar positions;
9. Hearing and resolving group grievances or serious employee complaints;
10. Reviewing and approving serious disciplinary actions (e.g., suspensions) involving nonsupervisory subordinates;
11. Making decisions on non-routine, costly, or controversial training needs and training requests related to employees of the unit;
12. Determining whether contractor performed work meets standards of adequacy necessary for authorization of payment;
13. Approving expenses comparable to within-grade increases, extensive overtime, and employee travel;
14. Recommending awards or bonuses for nonsupervisory personnel and changes in position classification, subject to approval by higher level officials, supervisors, or others;
15. Finding and implementing ways to eliminate or reduce significant bottlenecks and barriers to production, promote team building, or improve business practices.

The record shows that you exercise nearly all the supervisory responsibilities described at Level 3-2c, which are incorporated by reference into this decision. We find that *responsibility 1* is credited properly to your position since you manage test operations by using the equivalent of leaders and team chiefs. The volume of work managed in your component requires the use of

subordinates in a work leader or equivalent capacity to meet minimum requirements. You coordinate extensively with other units within [activity name] due to the matrix management structure of the activity, which meets the intent of *responsibility 2*. As the first level supervisor in the unit, none of your subordinates develop performance standards and rating techniques within the meaning of *responsibility 3*. You do have responsibilities concerning contractor oversight, but they are limited to those typical of *responsibility 12*. That responsibility may not be double credited in both *responsibilities 3* and *12*. That is, your responsibilities are primarily task oriented. The appeal record shows that the type of programmatic contractor capability and performance assessment envisioned in *responsibility 3* is not vested at the first level supervisory echelon.

Based on our factfinding, *responsibility 4* is not creditable in that you do not direct a major program segment that involves an expenditure at a multimillion dollar level of annual resources. The figures provided by you and your supervisor show your funding minimally exceeds \$2 million, which is not multimillion within the meaning of the GSSG. You make decisions on work problems presented by your work/task leaders, and contractor personnel used in that capacity, which meets the intent of *responsibility 5*. Because you have no subordinates who function as full rating officials, your position may not be credited with *responsibility 6*. The record indicates that you have selection authority warranting the crediting of *responsibility 7*. We note, however, that final approval authority is retained at the Directorate.

*Responsibility 8* may not be credited to your position in that you have no subordinate supervisory positions to fill. *Responsibility 9* is predicated on the **regular** exercise of authority that exceeds *responsibility 6* under Level 3-2c. The record does not show that you routinely deal with such issues and, as the first formal step in the grievance process, the intent of this responsibility is not met in your position. The record indicates that the approval authority for serious disciplinary actions is retained at the Directorate, which precludes the crediting of *responsibility 10*.

Our factfinding revealed that while you make decisions on training funded by project funds that primarily consists of technical training. Nonroutine, costly, or controversial training within the meaning of the GSSG, e.g., long term management or executive leadership training programs and sabbaticals, are controlled at and above the Division level because they primarily involve the expenditure of "institutional" (non-project) funds. Because *responsibility 11* is not met completely, it may not be credited to your position. Our factfinding revealed that you are authorized to approve within grade increases, approve employee travel, and approve overtime from project funds, resulting in the crediting of *responsibility 13*.

Documentation provided at our request shows that you exercise the signatory authority creditable for *responsibility 14* in generating award recommendations. You also are authorized to recommend changes in position classification. There are, however, only three civilian

employee positions, i.e., GS-301-13, GS-301-12, and GS-2005-7. The crediting of this *responsibility* is predicated on an organization varied and complex enough to require regular attention to changes in position classification, and a reasonable chance of adoption. Given the position classification request, review, and approval process on the samples of action provided by both you and your activity at our request, we find these conditions are not met. Because *responsibility* 14 is not fully met, it may not be credited to your position. Given your ongoing responsibility for the effective and efficient management of testing operations, and program reliance on effective team building and management, *responsibility* 15 is an ongoing major function of your position, and is fully creditable to your position.

In summary, we find responsibilities 1, 2, 5, 7, 12, 13, and 15 are creditable to your position. This fails to meet the eight element requirements for crediting your position at Level 3-3b. Accordingly, your position is credited properly at Level 3-2c (450 points).

#### Factor 5 - Difficulty of Typical Work Directed

This factor measures the difficulty and complexity of the basic work most typical of the organization(s) directed, as well as other line, staff, or contracted work for which the supervisor has technical or oversight responsibility, either directly or through subordinate supervisors, team leaders, or others.

For first level supervisors, the level selected is the highest grade which:

- best characterizes the nature of the basic (mission oriented) nonsupervisory work performed or overseen by the organization directed; and
- constitutes 25% or more of the workload (not positions or employees) of the organization.

This means that 25 percent or more of the nonsupervisory duty hours of subordinates and others (based on estimates derived from position descriptions, supervisors, staffing studies, or contract documents) is expended on work at or above the base level credited, or, where extensive contract work is overseen, that 25 percent or more of the dollars spent on human services is for work at or above that level. It includes the workload of General Schedule subordinates, Federal Wage System employees, assigned military, volunteers, student trainees or non-Federal workers, such as contractor employees, State and local workers, or similar personnel.

In determining the highest level of work that constitutes at least 25 percent of workload or duty time, trainee, developmental, or other work engineered to grades below normal full performance levels is credited at full performance levels. Excluded from consideration are:



- o the work of lower level positions that primarily support or facilitate the basic work of the unit;
- o any subordinate work that is graded based on criteria in this guide (i.e., supervisory duties) or the Work Leader Grade-Evaluation Guide;
- o work that is graded based on an extraordinary degree of independence from supervision, or personal research accomplishments, or adjust the grades of such work - for purposes of applying this guide - to those appropriate for performance under "normal" supervision;
- o work for which the supervisor or a subordinate does not have the responsibilities defined under Factor 3.

Your activity has evaluated this factor at Level 5-7 (930 points) using the base level of grade GS-12 level, concluding that work represented the basic work of the organization and constituted 25 percent or more of the workload. Your appeal rationale, however, is predicated on there being sufficient GS-13 team/task leader work in your organization to support a GS-13 base level.

The classification appeal process for supervisory positions accepts that subordinate positions are classified properly unless the appeal record contains contrary clear and convincing evidence. Your rationale is based on a workload analysis that all four GS-301-12 positions reporting to you perform GS-13 team/task leader work 25 percent of the time. In addition, you evaluated one GS-12 contractor as performing GS-13 task leader work 35 percent of the time, another contractor performing this work 85 percent of the time, and the NCOIC performing GS-13 task/team leader work 50 percent of the time.

To accept your rationale on your GS-12 civilian subordinates, we would be forced to conclude that all these positions are undergraded based on the following principle contained on the Introduction to the Position Classifications Standards:

Some positions involve performing different kinds and levels of work which, when separately evaluated in terms of duties, responsibilities, and qualifications required, are at different grade levels. . . .

In most instances, the highest level of work assigned to and performed by the employee for the majority of time [emphasis added] is grade-determining. When the highest level of work is a smaller portion of the job, it may be grade controlling only if:

- The work is officially assigned to the position on a regular and recurring basis;
- It is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time); and
- The higher level of knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

Our factfinding with you and your supervisor included a discussion of what task/team leader duties meant. They ranged from overseeing initial systems tests on complex weapons systems and/or major modifications accomplished at multiple field sites through managing military and contractor systems operation and data collection at those remote sites. Based on our discussions with both of you, we believe your rationale is based, in part, on a draft team leader guide for two grade interval positions that typically will result in classifying team leader positions one grade over the highest level of work led.

The draft team leader guide may not be cited for classification purposes because it has not been issued. However, your rationale regarding the concept of team leadership is integral to your appeal and requires a response. The draft team leader guide is intended to cover positions with ongoing team leader responsibility over a definable group of employees. It is not intended for use in a matrix management environment, such as your organization, in which team leader duties are situational and change from project to project. Team/task leader duties range in grade level worth. For example, team leader duties over the military weapons systems operators and mechanics, based on the grade level worth of that work, would not approach or meet the GS-13 level as you appear to propose. A significant portion of the leader functions you cite is over contractor work that does not exceed the GS-11 level in difficulty and complexity. Assuming the one grade level add on feature for team leadership did pertain, that leader work would not exceed the GS-12 level.

Critical in the application of the GSSG, however, is the specific exclusion, discussed above, of work leader duties; i.e., positions that share in the management of the organization. The record shows that the GS-13 level positions in your unit are evaluated at that level based on technical expertise and also test operations leadership duties. Based on the concept of what constitutes an expert; i.e., one of a limited number of people to whom others refer for assistance on unusually difficult and demanding issues, we would be forced to conclude that little of the testing work in your unit is based on established methods, principles, practices, and techniques. While complex methods development is likely for ground breaking prototype work, the range of testing functions in the Branch force us to conclude that work is not routinely performed by nor may it control the classification of all your two-grade interval civilian subordinates.

You also have evaluated the GS-13 positions as performing work at that grade level 100 percent of their work time. It is well established that positions rarely, if ever, perform the highest level of work 100 percent of the time. Position management studies typically find that grade controlling work is rarely performed more than 75 percent of the time. Based on GSSG principles, as discussed in the evaluation of work based on an extraordinary freedom from supervision, any GS-13 level “leader work” may be adjusted to and credited at the GS-12 level. The technical work that you personally perform is integral to your supervisory and program management duties and may not be double credited as base level technical work.

Your base level analysis also fails to assess the workload of your unit completely as required by the GSSG. We find the military positions perform support work within the meaning of the GSSG, and may be excluded from consideration for base level purposes. The two-grade interval data collector and evaluator work, however, is basic mission work that must be included. It is that work that warranted the crediting a number of Level 3-3b *responsibilities* to your position, and it must be evaluated under this factor to ensure internally consistent application of the GSSG to your position as a whole. We are aware that the grade level equivalency of RAM evaluator and data collector work varies, and that GS-12 level work likely exists that has not been documented fully in the record, we conclude there is sufficient GS-12 level work in your organization to minimally meet 25 percent or more of the workload.

The GSSG provides that in some cases a heavy supervisory or managerial workload related to work above the base level may be present. For these positions, the highest grade of supervisory work directed, which requires **at least 50 percent of the duty time of the supervisory position under evaluation**, may be used as the base level. Our review of your organization’s structure, and the freedom from technical supervision vested in the GS-301 positions as reflected in the PD’s of record, reflects a workload management structure that precludes our concluding that this alternative approach is warranted for your position. Accordingly, we find that GS-12 is the highest level of work directed that meets the requirements for this factor, which results in the crediting of Level 5-7 (930 points).

#### Factor 6 - Other Conditions

This factor measures the extent to which various conditions contribute to the difficulty/complexity of carrying out supervisory duties, authorities, and responsibilities. Conditions affecting work for which the supervisor is responsible (whether performed by Federal employees, assigned military, contractors, volunteers, or others) may be considered if they increase the difficulty of carrying out assigned supervisory or managerial duties and authorities.

To evaluate Factor 6, two steps are used. First, the highest level that a position meets fully is initially credited. Then, if the level selected is either 6-1, 6-2, or 6-3, the Special Situations listed after the factor level definitions are considered. If a position meets three or more of the

situations, then a single additional level is added to the level selected in the first step. If the level selected in the first step is either 6-4, 6-5, or 6-6, the Special Situations may not be considered in determining whether a higher factor level is creditable.

Your agency evaluated your position at Level 6-5 based on your supervising GS-12 work. As stated before, the GSSG must be applied in an internally consistent manner. In evaluating Factor 6, therefore, we must first locate the factor level description that recognizes the level of work led as credited in Factor 5. Tentatively selecting that factor level, we must assess whether the position performs the full range of coordination and work integration responsibilities found at that level. If both of those requirements are met, then that factor level may be credited to the position.

Your position fully meets Level 6-5a (975 points) since you: (1) directly supervise a subordinate work force with a GS-12 base level; and, (2) make major recommendations in a sufficient number of areas equivalent to those addressed under Level 6-5a in the GSSG. For example, you are relied upon to make major recommendations on the planning, scheduling, and conducting of tests with major resource implications, and the effective management and coordination of contractor and military resources in a matrix management environment. Level 6-6 may not be considered for your position in that you do not supervise a number of GS-13 level program segments or programs; GS-13 **position** workloads are creditable at Level 6-5b and not at Level 6-6 as you appeared to claim in your rationale. Your position does not meet Level 6-6b in that you do not have subordinate supervisors and the bulk of your contractor workload does not exceed the GS-11 level. Accordingly, this factor is evaluated at Level 6-5a (1,225 points).

### Summary

In summary, we have credited your position as follows:

<u>Factor</u>	<u>Level</u>	<u>Points</u>	
1	1-2	350	
2	2-1	100	
3	3-2	450	
4			
	A.	4A-2	50
	B.	4B-2	75
5	5-7	930	
6	6-5a	<u>1,225</u>	
		3,180 Total Points	

The total of 3,180 points falls within the GS-13 point range of 3,150-3,600 points in the GSSG Point-to-Grade Conversion Chart. We, therefore, find that your position is evaluated properly to the GS-13 grade level by application of the GSSG. Based on the above analysis, it is our decision that your position is classified properly as Supervisory Equipment Specialist (Parenthetical Optional), GS-1670-13.

Integral to your rationale is your claim regarding the failure of your activity to apply the GSSG in a timely fashion to your position and the impact of the recent reorganization that changed the RAM MANPRINT function from a division to a branch. As discussed with you during the appeal factfinding process, these matters are not germane to the classification appeal process. We believe that the discussion in Factors 1, 3, 5, and 6 may help you in resolving these issues.

This decision constitutes a classification certificate under the authority of section 5112(b) of title 5, U.S.C. This certificate is mandatory and binding on all administrative, certifying, payroll, disbursing and accounting officials of the Government. In accordance with 5 CFR 511.702, it must be implemented no later than the beginning of the sixth pay period following the date of this decision. The servicing personnel office must submit a compliance report containing copies of the action taken with respect to you, e.g., SF 50. The compliance report must be submitted to this office no later than 30 days following the effective date of the SF 50. You may contact your servicing personnel office for information about the implementation of this decision.

Under the provisions of title 5, U.S.C., OPM has the responsibility to determine whether positions are classified in conformance with and consistently with published PCS's. When misclassifications are found, we have no choice but to direct corrective action. Please be assured that this decision is not intended to reflect on your abilities, qualifications, or the quality of your performance. Rather, it reflects our evaluation of your position based on a comparison of your duties and responsibilities with the appropriate standards.

Sincerely,

/s/ 11/21/97

Robert D. Hendler  
Classification Appeals Officer

cc:

Director of Human Resources  
U.S. Department of the Army  
U.S. Army [engineering test center]  
[activity location]

Director of Civilian Personnel  
U.S. Department of the Army  
Room 23681, Pentagon  
Washington, DC 20310

Director, U.S. Army Civilian Personnel  
Evaluation Agency  
Crystal Mall 4, Suite 918  
1941 Jefferson Davis Highway  
Arlington, VA 22202

Chief, Civilian Personnel Policy  
Division, (DAPE-CPE)  
111 Army Pentagon (SAMR-CPE)  
Washington, DC 20310

Chief, Classification Branch  
Field Advisory Services Division  
Defense Civilian Personnel  
Management Service  
1400 Key Boulevard, Suite B-200  
Arlington, VA 22209

Director, Classification Appeals  
and FLSA Programs  
OMSO, U.S. OPM  
Washington, DC 20415